



UNION4 PLANNING

Client: Palmarium Properties Ltd

Site address: Land at 78 Reading Road and to
the rear of 80 Reading Road
Eversley
RG40 4RA

Proposed change of use to provide light
industrial (Use Class E(g)) and internal and
external storage and distribution (Use Class B8)
on the site with associated parking

PLANNING STATEMENT

August 2025



UNION4
PLANNING

Document Control

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Author(s): David Butcher

Checked By: Andy Stallan

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18 Farnham Road, Guildford, GU1 4XA
01483 340346
planning@union4.co.uk
www.union4.co.uk

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Union4 Planning on behalf of the Applicant, 'Palmarium Properties Ltd' in relation the proposed development on Land at 78 Reading Road and to the rear of 80 Reading Road Eversley, RG40 4RA.
- 1.2 The proposed development is to in part regularise existing and historic activities on this previously developed land site.
- 1.3 This proposal will ensure that existing businesses can remain in Wokingham Borough and also ensue a variety of premises are available for economic development in a sustainable location.
- 1.4 The application is for:

"Proposed change of use to provide light industrial (Use Class E(g)) and internal and external storage and distribution (Use Class B8) on the site with associated parking."
- 1.5 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning Statement provides an assessment of the proposals against the Development Plan and other material considerations, including the National Planning Policy Framework ('NPPF').
- 1.6 This is a re-submission of a previously approved scheme on the site, which was allowed to lapse during the COVID pandemic. The parameters of the scheme remain the same.
- 1.7 This is a minor application and is formed by the following documents:
 - This Planning Statement,
 - Application drawings by Richard Bayley MCIOB,
 - Transport Statement by Paul Basham Associates,
 - Noise Report by Clarke Saunders Acoustics,
 - Drainage Report by Union 4, and
 - CIL Additional Information Form.
- 1.8 The Planning Statement comprises the following sections:
 - Section 2 – Background: provides a detailed description of the Site and its surroundings and sets out other useful background information to the application including relevant planning history.
 - Section 3 – Proposals: provides a detailed description and explanation of the proposed development.
 - Section 4 – Policy Context: sets out the planning policy framework against which the planning application should be assessed.

- Section 5 – Planning Assessment: provides a detailed justification for the development against applicable planning policies and taking account of all other material considerations.
- Section 6 – Conclusion: summarises the key benefits of the proposed development and the reasons why planning permission should be granted.

2.0 Background

Site Context

- 2.1 The site lies within the administrative area of Wokingham Borough Council.
- 2.2 The site lies below Hogwood Industrial Estate in Arborfield Green. The Ind. Est. has expanded significantly southwards towards the site since the previous approval under allocation in the Local Plan.
- 2.3 The site is part of a small commercial area within Eversley, accessed from Reading Road it sits alongside ribbon and backland residential development. Eversley Telephone Exchange adjoins the site to the west.
- 2.4 It is a previously developed brownfield site that is well situated to the highway. The site consists of an access, hardsurfacing and three buildings with planting around the perimeter boundaries. There is a permitted telecommunications mast at the rear of the wider site.
- 2.5 Whilst there have been discussions between the applicant and the Council over activities on the site it has clearly been in constant use since at least 1999. This can be seen in available aerial photographic images:



Source: Google Earth dated 12/1999

- 2.6 The wider area is typified by further sporadic development, fields and land associated with large estates.

Planning History

- 2.7 There is an extensive planning history related to the site. The most recent being the approval for what is currently being re-applied for. This was granted 12th March 2020 under planning reference: 193059 for, *"Full application for proposed change of use to provide light industrial (Use Class B1) and internal and external storage and distribution (Use Class B8) on the site with associated parking."*
- 2.8 The below planning history is taken from that application February 2020 Committee Report, with applications considered relevant at the time highlighted in that report:

PLANNING HISTORY (more relevant approvals are highlighted)		
The subject site historically comprised an agricultural use.		
This site adjoins to the south (to the rear of 78 Reading Road) forms part of the wider landholding. It historically comprised a horticultural use, which has since discontinued with no applications since 1993. It does not form part of this application.		
Rear of 80 Reading Road		
App Number	Proposal	Decision
BR6192	Agricultural building	Approved 14 March 1977
BR18222	13 livestock pens	Approved 14 April 1977
20124	Turkey rearing building	Approved 18 March 1982
40308	Use of agricultural buildings for Class B1 electrical contractors depot and office	Refused 21 December 1992
40307	Use of farm buildings for Class B8 use	Refused 11 January 1993
40783	Use of main building for Class B8 use	Approved 18 May 1993
A/93/230988	Appeal against conditions in F/1993/40783	Part upheld 23 March 1994
41836	Use of three farm buildings for Class B1 use and demolition of other buildings	Refused 29 November 1993
A/93/231396	Appeal against refusal of 41836	Dismissed 23 March 1994
F/1999/69461	Erection of building, use of existing buildings and open storage for preparation, storage and distribution of meat products	Refused 8 July 1999
F/1999/69922	CoU for open storage of building materials	Refused 6 October 1999
F/1999/69946	CoU of Building A for storage and offices	Refused 6 October 1999
F/1999/69947	CoU of Building C from Class B1 to B8	Refused 6 October 1999
F/2002/6868	Two detached dwellings	Refused 8 August 2002

A/03/1110174	Appeal against refusal of F/2002/6868	Dismissed 9 October 2003
F/2003/9350	CoU from agricultural to waste transfer station	Refused 3 December 2003
A/04/1149917	Appeal against refusal of F/2003/9350	Dismissed 8 February 2005
F/2008/2064	CoU from Class B1 to B8 for the storage of eight minibuses (retrospective)	Approved 10 November 2008
VAR/2008/2674	Variation of Condition 7 of F/2008/2064 to allow an increase in buses from 8 to 40	Refused 3 February 2009
F/2014/2170	Retention of replacement building and retention of use of all buildings and hard-standing for Class B2 use (retrospective)	Refused 22 January 2015

ENFORCEMENT HISTORY		
Ref Number	Proposal	Decision
-	Use for storage and distribution of building materials	Opened 2000
RFS/2004/00109 and others	Depositing of waste materials and burning of rubbish	Opened 19 February 2004
RFS/2008/00240 RFS/2008/00278	Use of site for business purposes (storage of minibuses)	Opened 6 May 2008 Application lodged
-	Stop using the land as a waste transfer station, skip hire centre and storage of skips, lorries and waste materials, remove skips, lorries and waste materials and restore the land by providing 150mm topsoil	Opened 2005
-	Appeal against 2005 enforcement notices	Dismissed 2006
RFS/2014/00165 RFS/2015/00250	Unauthorised use of land by several small businesses	Opened 10 April 2014 Notice issued 1 October 2015
C/15/3138106	Appeal against RFS/2014/00165	Dismissed/enforcement notice upheld 12 September 2016
RFS/2015/082396	Unauthorised roofing business	Opened 25 August 2015 Use ceased 8 March 2018

2.9 The Committee Report noted the following points:

- a) "The site originally comprised a turkey farm and forms part of a larger landholding that included a horticultural use."
- b) "The subject proposal seeks to utilise three original agricultural buildings and the surrounding curtilage for Class B1 and B8 use, including open air storage."
- c) "The principle of the development is acceptable on account of a lawful Class B8 use on the application site (which does not extend to the wider site)."

Community Involvement Statement

- 2.10 No consultation has been carried out because the application is minor change of use submission within the parameters of the planning history and activities on site.
- 2.11 The use classes applied for are historically either previously approved or considered to be acceptable within a residential area.

3.0 Proposals

- 3.1 The scheme proposes regularisation of the existing activities on site in line with the previous permission to facilitate:
 - a) proposed change of use to provide light industrial (Use Class E(g)) and internal and external storage and distribution (Use Class B8) on the site with associated parking.
- 3.2 The current proposed scheme has not deviated from what was approved previously.
- 3.3 The existing buildings on site will be utilised for a mix of light industrial and storage uses, with 16 parking spaces including DDA compliant spaces.
- 3.4 There will also be areas for internal and external storage within the redline identified on the Site Location Plan, including within the smaller storage building.

4.0 Policy Context

National Planning Policy

- 4.1 The government published an updated National Planning Policy Framework (NPPF) in December 2024.
- 4.2 The economic target identified at paragraph 8 remains one of the three overarching objectives of the planning system.
- 4.3 The NPPF provides positive support for commercial development under Section 6 Building a strong, competitive economy.
- 4.4 NPPF para 85 states, *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*
- 4.5 Under paragraph 88 it states that planning policies should support and enable, *"the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings..."*
- 4.6 NPPF paragraph 89 notes that, *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport... The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

Local Planning Authority (LPA)

- 4.7 The Development Plan for Wokingham Borough is presently formed by the:
 - Core Strategy DPD – adopted January 2010,
 - Managing Development Delivery DPD – adopted February 2014,
 - Finchampstead Neighbourhood Development Plan – made September 2023.
- 4.8 The Development Plan policies considered of potential relevance to the proposal of this scale are set out below:
 - a) CP1 Sustainable Development
 - b) CP7 Biodiversity
 - c) CP11 Proposals outside Development Limits
 - d) CC02 Development Limits
 - e) CC06 Noise

- f) CC07 Parking
- g) CC09 Development and Flood Risk
- h) CC10 Sustainable Drainage
- i) TB21 Landscape Character
- j) TB23 Biodiversity and Development

4.9 The Core Strategy was reviewed and the Council submitted their new Publication Local Plan 2024 to the Secretary of State on 11th December 2024. The Council are currently responding to the Inspector's Initial Questions. As it has yet to be examined it is considered to currently carry limited weight.

4.10 The Neighbourhood Plan contains the following policies potentially relevant to the scheme:

- a) AHD1 Development within Development Limits
- b) D2 Preserving the Rural Culture of the Parish
- c) GS1 Key Local Gaps and Green Wedges
- d) IRS2 Protection of Outstanding Views
- e) TC1 Supporting Businesses

5.0 Planning Assessment

- 5.1 This section provides a detailed assessment of the proposals against the principally relevant national and local planning policies and other material considerations.

Principle of Development

- 5.2 The redline application site is previously developed brownfield land with the majority in B8 lawful use and a small area highlighted as being within agricultural use. The site has been in active use for many years, and has a number of enforcement notices on the area outside of the redline.
- 5.3 The applicant sought to regularise the storage and light industrial uses occurring across the application part of the site and gained planning permission in 2020 for the same uses currently applied for.
- 5.4 The planning permission was granted just before the declaration of the COVID pandemic by the World Health Organisation (WHO) in March 2020. The end of COVID as a public health emergency was declared in May 2023. This entire period of uncertainty covered the planning permission which lapsed.
- 5.5 The Development Plan that the previous approval was determined against remains the current adopted Development Plan. It is therefore considered that a similar decision can be reached based on the previous analysis.
- 5.6 The site is shown to lie in the countryside within the adopted Proposals Map. The previous assessment acknowledged this and highlighted policy CP11 of the Core Strategy, but stating it needed to be read against the planning history of the site.
- 5.7 The analysis essentially identified that:
- “19. The proposal seeks to utilise buildings 1, 3 and 4 for Class B1 use and the surrounding curtilage for Class B8 open air storage and vehicle parking and access.” And
- “20. Buildings 1, 3 and 4 are lawful structures as part of the upheld appeal for 40783 and this is reinforced in the assessment of the most recent refusal in 2014. Buildings 3 and 4 have a Class B8 use and a restrictive condition in F/2008/2064 limits any change of use without planning permission.”
- Building 1 would essentially be converted from its agricultural use to B1 use.
- “24. Externally, the existing lawful use allows for a reasonable but undefined curtilage surrounding the buildings that is mostly confined to access and parking. The extent of proposed external Class B8 storage in this application will be less than the existing Class B8 use, as the minibuses were viewed as stored items and not parked vehicles.”
- 5.8 The Committee Report concluded:

"In conclusion, when accounting for the existing lawful use, the proposal represents an appropriate increase in the area of Class B1 floorspace, an indiscernible or negligible change in open Class B8 storage and a modest and entirely reasonable intensification of the site in an appropriate countryside and residential location. It is in accordance with the intent of Policy CP11, which is to maintain the quality of the environment and it is compatible with the NPPF insofar as it allows for an appropriate expansion of an approved rural enterprise without detriment to the character of the surroundings. The principle of the development is therefore acceptable, as is explored in the remainder of the report."

- 5.9 In an update to Members in response to the comment "...the unspecified mix is unacceptable." The Officer noted "The fact that the mix of Class B1 and B8 uses is not specified is acceptable as the application has been assessed on the basis on [sic] both eventualities with similar character, traffic and neighbour amenity impacts."
- 5.10 For clarity, whilst this submission would regularise the existing E(g) use within the agricultural building shown as '1' in the previous Officer's Report, the application is for a flexible E(g) and B8 use across the redline site and within all buildings.

Changes in Policy since Previous Permission

- 5.11 The NPPF has been updated a number of times, with December 2024 being the latest version. It continues to support economic development in the countryside including the sustainable growth and expansion of all types of business in rural areas.
- 5.12 The adopted Local Plan remains the same for determination purposes. The emerging LP shows the site lying within the countryside but not covered by the proposed valued landscape or local wildlife designations. Arborfield Green remains allocated as a Strategic Development Location.
- 5.13 The Finchampstead Neighbourhood Plan (FNDP) was 'made' post the previous approval. A key consideration of the FNDP is to avoid any development north which would effectively coalesce informal built areas and the village of Eversley with the SDL at Finchwood Park.
- 5.14 The site is shown as falling within one of these identified informal built areas, but for the avoidance of doubt, the proposed development is almost entirely on previously developed land and does not expand the existing boundaries or curtilage of the site in any way. Given the existing uses approval would therefore not lead to any form of coalescence.
- 5.15 Policy AHD1 supports development outside of the development locations "...where they are in accordance with national and Borough planning policies." Policy D2 relates to new development but it is worth noting that the existing site is well situated against existing built form and is modest in scale. The approval will enable the site to be tidied up improving the local landscape as a result. The applicant would be happy to accept again the previously imposed conditions on boundary treatments and hard/soft landscaping. Policy GS1 sets out important local gaps and green wedges

to safeguard these areas from development. The site does not fall in any of these and the proposal will not impact upon any of them. The site does not fall in or impact upon any of the identified 'Outstanding Views' under policy IRS2. It may fall just outside of the end of Cone 'A' but is at a significant distance from the starting viewpoint. The existing buildings have lawful activities permitted to occur on site, none of which will be visible at this distance, particularly given the intervening boundary planting. Policy TC1 states that commercial uses in a countryside location will be supported where they allow existing buildings to be appropriately converted which are of permanent and substantial construction. The application proposal complies with these requirements as the buildings do not require any works to be utilised.

- 5.16 Given the existing nature of the site, the aspirations of the Council and its suitable location it is considered that the proposed development is in accordance with National and adopted policies and should remain acceptable to the LPA.

Technical Considerations

Design and Layout

- 5.17 The scheme is a proposal to utilise existing buildings and hard surfacing in a similar manner to the lawful use and historic activities.
- 5.18 No physical changes to the buildings are specifically proposed. The existing gravel hardstanding in the site will be re-surfaced/made good to facilitate the formalised parking that is shown on the Proposed Block Plan. The access will be resurfaced.
- 5.19 The requirements of policy CP1 are considered met where they apply to a development of this small scale.
- 5.20 The surrounding landscape treatment would remain unchanged by the proposed development. Policy TB21 on landscape character as far as it applies to a development of this scale is considered met.

Heritage

- 5.21 There are no identified heritage assets either on the site or within the area whose setting would be impacted upon by the proposed development.

Access, Parking and other Highway Matters

- 5.22 This is a minor development which does not raise any transport issues. Localised widening of the access will occur within the site, away from the junction.
- 5.23 The previous scheme was considered acceptable in terms of highways impacts, particularly given the existing lawful use. The application is accompanied by an updated Transport Statement that

analyses changes in policy since that earlier decision and determines that the scheme remains acceptable.

- 5.24 The amount of parking spaces being provided is the same as was previously approved. The requirements have not changed and therefore the scheme is considered to accord with LP Policy CC07.
- 5.25 In accordance with paragraph 116 of the NPPF no severe cumulative impacts on the road network or unacceptable impacts on highway safety have been identified as a result of the proposal. The development is therefore considered acceptable on highway grounds according with the development plan and national policy.

Drainage and Flood Risk

- 5.26 The site lies within Flood Zone 1 and is at a very low risk of surface water flooding. The works are proposed within an existing brownfield site and therefore comprise development for which no flood risk issues are considered to arise.
- 5.27 The development will ensure at the design stage that the site does not contribute to any surface water issues and will be drained effectively by connecting to the existing surface water drainage system.
- 5.28 The requirements of policy CC09 and CC10 are therefore considered met under the proposal.

Trees, Ecology and Biodiversity

- 5.29 Ecology and trees are not considered to be an issue with this application given the minor nature of the proposal, location, existing use and layout.
- 5.30 The site has been assessed under the Biodiversity Net Gain (BNG) regulations. There are no works proposed which will have an ecological or habitat impact under the scheme and therefore the application falls under the 25sqm *de minimis* threshold. A BNG assessment is therefore not required.
- 5.31 Furthermore advice on the DEFRA website states that, *"It's worth remembering that existing sealed surfaces such as tarmac or buildings are assigned a zero score in the statutory biodiversity metric, meaning that these surfaces are effectively exempted from the 10% net gain requirement."*

This exemption ensures that BNG is applied proportionately and that a development does not incur unnecessary extra cost to, for example, comply with accessibility requirements as in the example above. It also encourages developers to design in ways to avoid impacting the habitat on site in the first place, following the biodiversity gain hierarchy."

5.32 This is confirmed within National Planning Policy Guidance (NPPG), "*...the car park would be classified as developed land: sealed surface which has a biodiversity value of zero under the statutory biodiversity metric...*" Paragraph: 004 Reference ID: 74-004-20240214.

5.33 In addition, this is a regularisation of existing activities on site, on existing gravel hardstanding within buildings that have no works proposed and no associated demolition. An ecological assessment is also therefore not considered required.

5.34 There are not trees within the application redline and the submission is for change of use only. Therefore no ecology or habitat impacts are considered to arise from the proposed development and the requirements of policies CP7 and TB3 are met.

Amenity Impact

5.35 Given the existing nature and lawful activities of the site and the proposed additional use being within the E(g) light industry use class which is residential area compatible, no associated amenity impacts on the nearby dwellings have been identified.

Contamination

5.36 There are no associated contamination issues identified with this change of use application.

Noise

5.37 Xx [waiting for the report]

5.38 Requirements of policy CC06 on noise are considered met.

6.0 Conclusion

- 6.1 There is local and national policy support for the proposed development which will deliver a positive contribution to the economy and the environment as referred to in this Planning Statement and NPPF paragraph 85.
- 6.2 The proposed development is considered acceptable and replicates the details of the previously approved submission. Whilst there have been changes in planning policy since that decision, it is considered that the national and local picture remains supportive of proposals such as this within the countryside.
- 6.3 The scheme makes use of brownfield, previously developed land which has a lawful B8 use on the majority of the applications site, with buildings and hardstanding already in place.
- 6.4 There are no identified technical reasons why the proposed change of use cannot occur.
- 6.5 This submission has confirmed that analysis through detailed assessment, with no harms identified on site that cannot be mitigated against.
- 6.6 No ecological or arboricultural harms have been identified and there is no requirement for Biodiversity Net Gain on site.
- 6.7 There are also no associated negative amenity impacts as a result of the proposal in this location on the surrounding area.
- 6.8 The application proposal is therefore considered supported by local and national policy and as a result, we respectfully request that the application be approved.