



Planning Statement

Headley Park 9 – Units 2-7

**Planning Application to allow 24-hour
operational use**

Rookman Properties Ltd

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Planning Statement

Headley Park 9 – Units 2-7

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Alder King Planning Consultants on behalf of Rookman Properties Ltd in connection with a section 73 (s73) application seeking to remove condition 13 of planning permission 13397 to allow 24-hour operational use at Headley Park 9 (Units 2-7), Headley Road East, Woodley, Reading. This application is submitted alongside a separate planning application seeking to also allow 24-operational use at Unit 1 Headley Park 9.
- 1.2 The Statement describes the application proposal, relevant planning history and planning policy, and assesses the proposal against relevant planning policy considerations.

2.0 Application Site, Surroundings and Planning History

Application Site & Surroundings

- 2.1 The application site comprises 6 no. commercial units (Units 2-7) and associated car park and is known as Headley Park 9. The Headley Park 9 site also includes Unit 1, but the operational hours for this unit are covered by a separate planning permission as set out in the planning history section below and so a separate planning application has been submitted specifically in respect of Unit 1.
- 2.2 The site is accessed off Headley Road East which runs along the southern boundary of the site, beyond which are further industrial and commercial units.
- 2.3 Immediately to the east of the site lies further industrial and commercial units at Base 329 and to the north lies a telephone exchange. To the west of the site lies two-storey residential dwellings along Headley Road East.

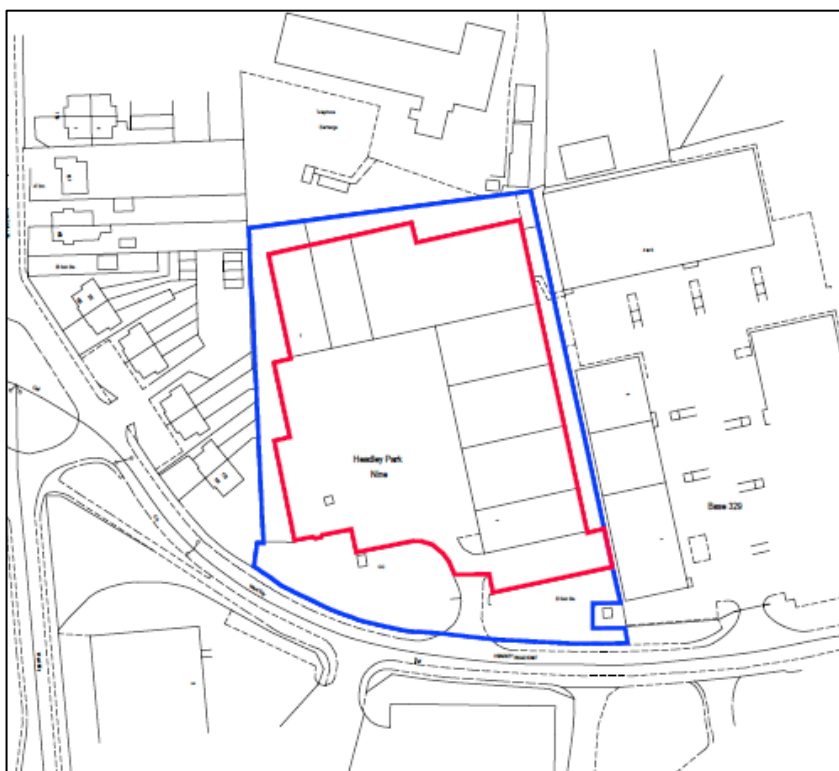


Figure 2.1: Site Location Plan

Planning History

2.4 The relevant planning history of the site is summarised below.

Table 2.1: Relevant Planning History

Unit(s)	LPA Ref	Description of Development	Decision (date)
Headley Park	01490	Outline for new warehouse development. Condition 20 limited hours of operation as follows: <i>No work of any sort shall take place on the premises between the hours of 10pm and 6am inclusive on any week day and not at all on Sundays and Bank Holidays.</i>	Approved (March 1975)
Area 9	13397	New warehouse development with ancillary offices at area 9. Condition 13 limited hours of operation as follows: <i>No work of any sort shall take place and no machinery shall be operated on the premises between the hours of 6pm and 7am on weekdays, nor at any time on Sundays and Bank Holidays.</i>	Approved (April 1981)
7	021296 (VAR/2002/6352)	Variation of condition 20 of 01490 and condition 13 of 13397 to allow Sunday and Public Holiday working at Unit 7. Conditions 3 and 4 limited hours of operation as follows: <i>3. No work of any sort shall take place on or at the premises other than between the hours of 6am to 10pm Mondays to Saturdays inclusive and 8am to 9pm on Sundays and Bank and National Holidays.</i> <i>4. Notwithstanding condition 3, no work of any sort shall take place on or at the premises on more than fifteen days which are Sundays, Bank and/or National Holidays, in any calendar year.</i>	Approved (June 2002) The permission was personal to the applicant only (National Blood Service) (condition 2).
5	091276 (VAR/2009/1297)	Variation of condition 20 of planning application 01490 to permitted 24 hour usage of Unit 5.	Withdrawn (August 2009)
5	090413 (VAR/2009/2529)	Variation of condition 13 of application 13397 to permit extended hours of usage to 7am to 9pm (Mondays to Saturdays) and 9am to 6pm Sundays and Bank Holidays.	Approved (March 2010) Temporary one year permission.
5	111092 (VAR/2011/0480)	Variation of condition 13 of application 13397 to permit extended hours of usage to 7am to 8pm (Mondays to Saturdays) and 10am to 4pm Sundays and Bank Holidays on a permanent basis.	Approved (April 2011)
4	111330 (F/2011/0361)	Change of use from B1a and B2 use to soft play centre (D2) use.	Approved (August 2011)

			Temporary permission until 31 st December 2015.
1	131945 (F/2013/1083)	Change of use from warehouse with ancillary offices (B8) to mixed use of food preparation, warehouse with ancillary offices (sui generis) use. Condition 5 limited hours of operation as follows: <i>The use hereby approved shall take place between the hours of 1700 and 2100 only and at no other times.</i>	Approved (July 2013)

- 2.5 The above planning history demonstrates that the local planning authority has previously accepted extended operating hours at the application site. For example, Unit 5 is currently permitted to operate from 7am to 8pm Mondays to Saturdays and 10am to 4pm on Sundays and Bank Holidays.

3.0 Application Proposals

- 3.1 The application seeks to remove condition 13 of planning permission 13397 to allow 24-hour operational use at Headley Park 9 (Units 2-7), Headley Road East, Woodley, Reading.
- 3.2 The applicant is seeking to remove the operational restriction at the site to allow for more flexibility for current and future occupants of the units at Headley Park 9. The condition, which dates back to 1981, is not consistent with the way in which modern occupiers work with increasingly more flexibility required with regard to operational hours. As it stands, there is a risk that current and/or future occupants of the units at Headley Park 9 will seek to (re)locate to other sites that are not subject to such a restrictive condition.
- 3.3 Condition 13 is sought to be removed as it does not meet the tests of conditions, as will be set out in the following sections of this statement.

4.0 Planning Policy Context

Introduction

- 4.1 The development plan constitutes the Core Strategy (adopted in 2010) and the Managing Development Delivery local plan (adopted in 2014). Material considerations include the National Planning Policy Framework (NPPF).

Development Plan

Planning Policies Map

- 4.2 The site is located within the Woodley Major Development Location and within the 'Headley Road East (Woodley Airfield)' Core Employment Area, which covers an area to the north and south of Headley Road East. An extract from the Planning Policies Map is shown at Figure 4.1 and defines the Core Employment Area.

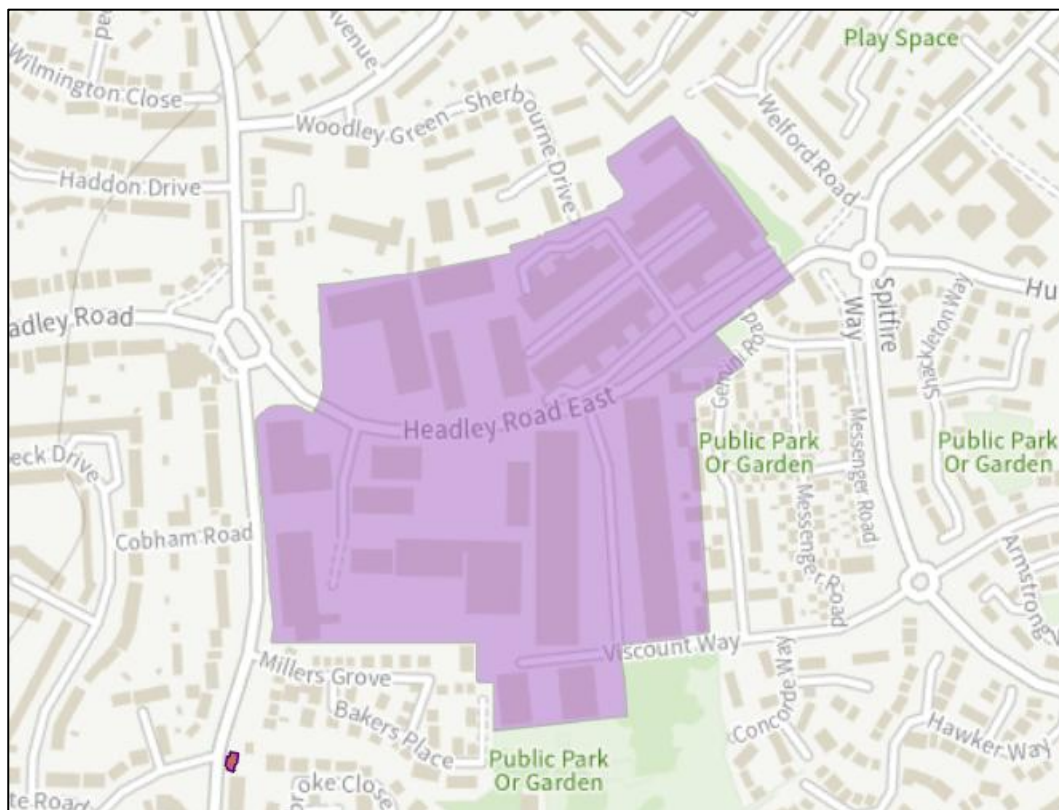


Figure 4.1: Extract of Planning Policies Map – Core Employment Area

Core Strategy (CS)

- 4.3 Policy CP1 (sustainable development) identifies set criteria that development proposals must meet including criterion (8) which states that planning permission will be granted for development proposals that avoid areas where pollution (including noise) may impact upon the amenity of future occupants.
- 4.4 Policy CP9 (scale and location of development proposals) recognises that the scale of development proposals in Wokingham must reflect the existing or proposed levels of facilities and services at or in the location, together with their accessibility. The policy states that development proposals within development limits will be acceptable in, inter alia, the major development location of Woodley.
- 4.5 Policy CP15 (employment development) states that development for business, industry or warehousing will be permitted, including the expansion or intensification of existing employment uses provided it is within one of the Core Employment Areas, including Headley Road East, Woodley.

Managing Development Delivery (MDD)

- 4.6 Policy CC06 (noise) states that proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed) from noise impacts in line with Appendix 1 of the MDD.
- 4.7 Policy CC06 also notes that where there is no adverse impact (no observed effect level) then noise will not be a material consideration. Where there is an adverse effect (low observed adverse effect level to significant observed adverse effect level), then identified criteria should be addressed including reviewing the site layout and/or design, or implementing physical mitigation measures.
- 4.8 Policy TB11 (core employment areas) identifies that the Core Employment Areas are listed in Policy CP15 of the CS. The supporting text, at paragraph 3.50, recognises that the majority of employment growth will occur in the Core Employment Areas.

Material Considerations

National Planning Policy Framework (NPPF)

- 4.9 The NPPF was updated in August 2026 and is a material consideration in planning decisions. The relevant paragraphs within the NPPF are set out below.
- 4.10 Policy DM6 (use of planning conditions and obligations) recognises that planning conditions should only be attached to planning permissions and other associated consents for development where they are:

- a. Necessary to make the development acceptable in planning terms;
- b. Relevant to the development and to planning considerations generally;
- c. Sufficiently precise to make them capable of being complied with and enforced; and
- d. Reasonable in all other respects.

- 4.11 Policy S3, criterion (c), recognises that development proposals that accord with both an up-to-date development plan and the decision making policies in the Framework should be approved without delay.
- 4.12 Policy P3 (living conditions and pollution), paragraph (1), states that development proposals should be appropriate for their location, taking into account likely effects of pollution on health, living conditions and the natural environment.
- 4.13 Paragraph (2) of Policy P3 sets out that development proposals should, *inter alia*, not give rise to unacceptable levels of noise pollution on or beyond the site.
- 4.14 Policy E2 (meeting the need for business land and premises) recognises that to support business growth, substantial weight should be given to the economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt, especially where this would support the economic vision and strategy for the area.

5.0 Planning Assessment

Introduction

- 5.1 This section of the statement provides an assessment of the key planning considerations relating to the principle of the proposed development and matters relating to residential amenity.

Principle of Proposed Development

- 5.2 As set out in section 4 of this statement, the application site is located within an identified Core Employment Area where proposals for the expansion or intensification of existing employment uses will be permitted in accordance with Policy CP15 of the CS.
- 5.3 The application proposal, which seeks the removal of condition 13 restricting the operational use of Headley Park 9 to allow for the potential intensification of the employment site and to adapt to the requirements of modern occupiers, is fully in accordance with Policy CP15 of the CS.
- 5.4 The proposal also accords with Policy E2 of the NPPF which recognises that substantial weight should be given to the economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt, especially where this would support the economic vision and strategy for the area.
- 5.5 The proposal to allow greater flexibility to the operational hours for occupiers at Headley Park 9, which is within an identified Core Employment Area, is fully in accordance with both the development plan and national policy as set out in the NPPF.

Residential Amenity

- 5.6 A Noise Assessment (NA) has been prepared by NALO Group Ltd and is submitted in support of the planning application. The NA provides a description of the existing noise environment on and around the site, together with an assessment of the effects of 24 hour operations at Headley Park 9.
- 5.7 The NA concludes that on the basis of keeping doors, shutters and windows closed during the night-time (23:00 to 07:00) there will be no discernible noise break out from internal operations at Headley Park 9. Furthermore, a background noise comparison has been undertaken which shows that worst-case average noise levels are predicted to be all below background sound levels at all identified noise sensitive receptors during daytime and nighttime periods.

- 5.8 The NA also confirms that noise intrusion assessments show that noise in internal locations (including worst-case door slam noise) at nearby receptors (even with windows open) will be within the planning tests of Significant Observed Adverse Effect Levels.
- 5.9 Given the foregoing, the NA concludes that NPPF Policy P3 has been met as no significant adverse effects are predicted to occur. In addition, the NA concludes that the Policy CC06 45 dB nighttime external No Observed Effect Level criteria has been comfortably met.
- 5.10 In summary, and as set out in the submitted NA, the application proposal to allow 24 hour operational use of the units at Headley Park 9 is fully in accordance with national policy set out in the NPPF and Policy CC06 of the MDD as it will not give rise to unacceptable levels of noise pollution on or beyond the site.

Assessment of Condition 13 Against the 'Tests' of Conditions

- 5.11 As set out above in this statement, condition 13 was applied to permission 13397 back in 1981, which is now some 45 years ago. The operation of commercial occupiers has significantly changed over the years and many occupiers seek flexibility in their operations.
- 5.12 Given the findings of the NA, as summarised above, condition 13 is not necessary to make the development at Headley Park 9 acceptable in planning terms. It has been demonstrated that the potential 24 operational use of the site will not give rise to unacceptable levels of noise pollution to the nearest neighbouring residents. As such, a condition restricting the operational hours at Headley Park 9 is unnecessary.
- 5.13 As the condition is not necessary, it can also be concluded that condition 13 is not reasonable in all other respects. The restrictive condition has the effect of placing an unnecessary restriction on existing occupiers at Headley Park 9 and potentially will have the effect of making the units less desirable to potential future occupiers of the units. This could result in other sites, potentially outside of Wokingham, which aren't subject to such a restrictive condition, being much more attractive to potential future occupants of the units should existing occupiers leave.
- 5.14 In conclusion, condition 13 is not necessary or reasonable on the basis of the evidence submitted in the NA. As such, condition 13 does not meet tests (a) or (d) of Policy DM6 of the NPPF and should therefore be removed.

6.0 Conclusion

- 6.1 The application seeks to remove condition 13 of planning permission 13397 to allow 24-hour operational use at Headley Park 9 (Units 2-7), Headley Road East, Woodley, Reading.
- 6.2 When assessed against relevant planning policy provisions in the development plan and NPPF, it is clear that the application proposals are acceptable. In summary:
- Substantial weight should be given to the economic benefits of allowing greater flexibility for the operational use of Units 2-7 Headley Park 9, within an identified Core Employment Area, in accordance with the NPPF and Policy CP15 of the CS.
 - The submitted NA demonstrates that the application proposal is fully in accordance with national policy set out in the NPPF and Policy CC06 of the MDD as it will not give rise to unacceptable levels of noise pollution on or beyond the site and thereby the amenity of local residents will be protected.
 - On the basis of the findings of the NA, condition 13 is not necessary or reasonable. As such, condition 13 does not meet tests (a) or (d) of Policy DM6 of the NPPF and should therefore be removed.
- 6.3 In conclusion, the application proposal is in full accordance with the development plan, as well as national policy as set out in the NPPF. As such, planning permission should be approved without delay in accordance with Policy S3 of the NPPF.



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