

P25-S3688-FUL PARK FARM MAPLEDURHAM

Proposed Conversion of Agricultural Buildings to B8 (Storage) at Park Farm

Caversham and District Residents' Association (CADRA) recognises the pressures on rural estates to diversify and reuse agricultural buildings. However, we have significant concerns that the proposed B8 use at Park Farm will lead to an unacceptable increase in traffic on narrow rural lanes and public rights of way, increasing the risk to walkers, cyclists, and equestrians. We are also concerned that the proposed building alterations will result in a material loss of biodiversity.

Popular Public Access

The access routes to Park Farm—public roads, bridleways and rights of way—are well used by families and individuals from Reading and South Oxfordshire. The current very low traffic encourages safe and healthy outdoor activity. The routes are good for cycling, year-round. The traffic was largely predictable farm-related by drivers familiar with vulnerable users.

Visitors to commercial storage units are unlikely to have the same familiarity with rural road etiquette, increasing the risk to walkers, cyclists, and equestrians.

Transport Statement (TS)

The submitted Transport Statement contains several deficiencies, and its conclusion of an “imperceptible” traffic impact is not supported by evidence.

1. No quantified baseline for the existing dairy use

The TS provides no numerical data on historic dairy-related traffic (milk tankers, feed deliveries, livestock transport, slurry removal, staff, contractors). Without a quantified baseline, it is impossible to claim that B8 use will generate less or comparable traffic.

2. Incorrect TRICS category used

The TS uses an *Industrial Units* dataset rather than the appropriate *Warehousing/Storage (B8)* categories. Industrial units typically generate lower van-based traffic than B8 storage and distribution. This choice understates peak-hour movements, delivery activity, and staff trips.

3. Access via a public bridleway is not assessed

The access routes in both directions are narrow, unlit public roads, bridleways and farm tracks shared with walkers, cyclists, and horses. None of the TRICS comparator sites are accessed via a bridleway. Applying suburban/industrial estate trip rates to this rural context is not valid. The TS does not assess conflict risk, passing constraints, or seasonal surface conditions.

4. B8 traffic patterns differ materially from dairy farming

Dairy farms generate predictable, low-frequency HGV movements. B8 uses generate continuous van traffic, staff commuting, courier activity, customer collections, and pronounced peak-hour flows. Given the location it is highly unlikely that staff would use public transport, contrary to TS claim. Even if daily totals were similar, the impact profile is far more intrusive. The TS does not address this shift.

5. Likely multi-tenant occupation is ignored

Six barns will almost certainly host multiple operators, each with their own deliveries and staff. TRICS assumes single-operator sites. The TS therefore underestimates cumulative traffic.

6. No assessment of intensification or future scenarios

Once B8 use is permitted, occupancy, hours, and operator type can intensify. NPPF 110–116 require assessment of reasonable future scenarios, which the TS does not provide.

7. Additional Points

1. **Ambiguity of Use:** “Class B8” covers a wide range of intensities. A low-turnover storage tenant has a very different impact from a multi-unit self-storage or courier-linked operation.

2. **Pedestrian Safety:** The narrow estate roads currently function safely because traffic is predictable and low-speed. Introducing high-frequency commercial traffic without a defined tenant profile creates unacceptable risk.

If permission is granted, CADRA requests a condition restricting the use to *dead storage only*, explicitly prohibiting courier distribution, fulfilment, or high-turnover self-storage.

Biodiversity and Wildlife Habitat

The application does not adequately address the ecological consequences of converting open agricultural barns into sealed commercial units.

CADRA is concerned that the Ecological Impact Assessment (EIA) underestimates the ecological value of the site and the impacts of the proposed conversion.

1. Survey timing appears to have missed the ecological function of the former dairy unit

We cannot know precisely when the barns and yards were cleaned relative to the survey date. However, the EIA was undertaken **after the dairy herd had been removed**, and the report describes the barns as “redundant” and “cleared”. This means the survey did not capture the ecological conditions associated with an active dairy operation.

2. The report does not reflect long-term bird activity observed at the site

Local users of the footpaths and bridleways have, over many years, observed:

- Large flocks of corvids (crows, rooks, jackdaws) feeding around the barns, yards, slurry areas and feed residues.
- Regular presence of smaller woodland and garden birds using the barns, hedgerows and yard edges for foraging and shelter.

These observations indicate that the dairy operation provided a **reliable and productive foraging resource**. It is surprising that the EIA makes no reference to corvid activity, given their consistent presence around the farm during its operational life.

3. Loss of foraging and nesting opportunities is understated

The EIA concludes that most habitats are of “negligible” value. This overlooks:

- The nutrient-rich foraging opportunities created by dairy operations.
- The invertebrate biomass associated with slurry, feed residues and disturbed ground.
- The internal nesting and roosting niches within open barns.

Sealing the buildings and removing all organic material will result in a **net loss of habitat**, even if the land is technically “developed land”.

4. Biodiversity Net Gain exemption does not remove the need for local mitigation

Even if the development does not qualify under statutory BNG rules, local biodiversity policies still apply. The loss of nesting and foraging opportunities requires meaningful mitigation.

Requested Mitigation

CADRA requests a formal Ecological Enhancement Plan including:

- Integrated bird boxes and nesting bricks designed to replace lost internal nesting opportunities.
- Measures to support invertebrates and small birds (e.g., rough grassland, log piles, native planting).
- A sensitive lighting strategy to protect nocturnal species.

Conclusion

The application lacks the operational detail required to demonstrate that traffic impacts will be negligible. The Transport Statement relies on an unquantified baseline, an inappropriate TRICS dataset, and comparator sites that do not reflect the rural bridleway access or likely multi-tenant nature of the development. The ecological assessment also fails to reflect the site's long-standing role as a foraging resource for corvids and other birds and does not provide adequate mitigation.

Until the applicant can define the intensity of the proposed B8 use and provide a robust, context-appropriate transport and ecological assessment, the application should be considered premature and insufficiently evidenced. CADRA objects to this application.

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