

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 2nd December 2020

Ward: Whitley

App No.: 192054

Address: Reading International Logistics Park, A33

Proposal: Redevelopment to provide 15,080 sqm (GEA) of class B1(c), B2 or B8 floor space in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works (amended)

Applicant: Arlington LP UK Ltd

Deadline: 9/4/2020

Extended Deadline: 29/1/2021

Planning Guarantee 26 week target: 9/7/2020

RECOMMENDATION:

GRANT Planning Permission subject to conditions and informatives and subject to the satisfactory completion of a S.106 legal agreement.

OR Refuse permission should the legal agreement not be completed by 29th January 2021 unless a later date is agreed by the Head of Planning, Development & Regulatory Services.

The Section 106 Legal Agreement to Secure the Following:

Transport - Enter into a Deed of Dedication for the purpose of dedicating the Mass Rapid Transit Land (as illustrated by the hatched markings on Drawing no. 28791-5545-003 dated 13/06/19, received 18th November 2020) to the Council as public highway subject to the Council serving written notice on the Owner within 21 years from the effective date.

Employment Skills and Training Plan - Construction and end user skills - preparation and delivery of an ESP or financial contributions of £36,068 (construction) and £42,423 (end user)

CONDITIONS TO INCLUDE:

- 1) TL1 - 5 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) L2 - Hard and soft landscaping scheme to be submitted and approved (part details relating to services and tree pits)
- 5) L4- Landscape Management and Maintenance Plan to be submitted and approved for a 20 year period.
- 6) L4A - Landscape implementation and replacement of trees
- 7) L7 - Arboricultural Method Statement and Tree Protection Plan
- 8) Measures within the Ecological Mitigation and Management Plan to be

implemented.

- 9) No development shall take place until a scheme for the provision and management of a minimum 8 metre wide buffer zone along the southern side the Kingsley Road Ditch has been submitted to, and approved in writing by, the local planning authority.
- 10) Vegetation clearance outside of nesting season
- 11) CS1 - Hours of Construction
- 12) CS2 - Construction Method Statement to be submitted and approved (including dust control)
- 13) Construction Environmental Management Plan
- 14) C4 - No Bonfires
- 15) CO3 - Contaminated land assessment to be submitted
- 16) CO4 - Remediation scheme to be submitted
- 17) CO5 - Remediation scheme to be implemented and verified
- 18) CO6 - Assessment of previously unidentified contamination
- 19) SU5 - BREEAM Pre construction
- 20) SU6 -BREEAM Post construction
- 21) SU7 - SUDS plan to be approved
- 22) SU8 - SUDS to be implemented
- 23) DC1 - Vehicle Parking as specified
- 24) DC3 - Vehicle Access as specified prior to occupation
- 25) DC5 - Cycle Parking as specified
- 26) DC8 - Refuse and Recycling as specified
- 27) DD3 - Roads, cycle/ footpaths to be provided as specified prior to occupation
- 28) to be provided as specified
- 29) DD6 - Visibility splays to be provided as specified
- 30) DE9 - Submission and approval of a Travel Plan
- 31) DE1- Annual Review of Travel Plan for five years
- 32) DE5 - Delivery and servicing of single units to be approved
- 33) DE6- Provision of Electric Vehicle Charging Points
- 34) Lighting Strategy to be submitted and approved External Lighting to be implemented as approved
- 35) An emergency plan by the developers/construction companies should be put in place such that should there be a radiation emergency during the construction phase they have procedures in place to protect the staff All such plans should be reviewed on at least an annual basis and be available upon request by the planning authority.
- 36) An emergency plan should be put in place for all the commercial units by the management agency to cover the overall approach in advance of any units being accommodated and /or within one month of occupancy by those using the units. All such plans should be reviewed on at least an annual basis and be available upon request by the planning authority.
- 37) Floorspace limit
- 38) PD8 - Use Restriction/Prior approval restrictions

INFORMATIVES TO INCLUDE:

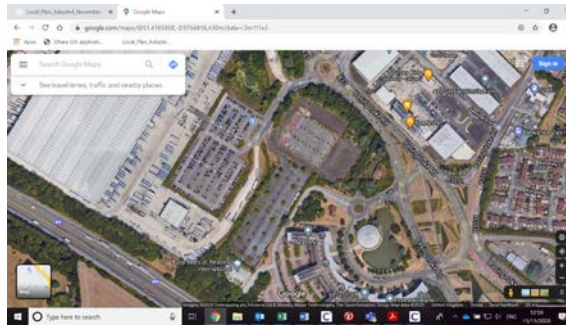
- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions

- 4) I11 - CIL
- 5) IF4 - S106
- 6) IF3 - Highways
- 7) I29 - Access Construction
- 8) IF7 - Complaints about Construction
- 9) IF1 - Positive & Proactive.
- 10) AWE- All the sites should have a working landline in order to ensure the means of notification of a radiation emergency is available to all.
- 11) Environmental permit from the Environment Agency may be required

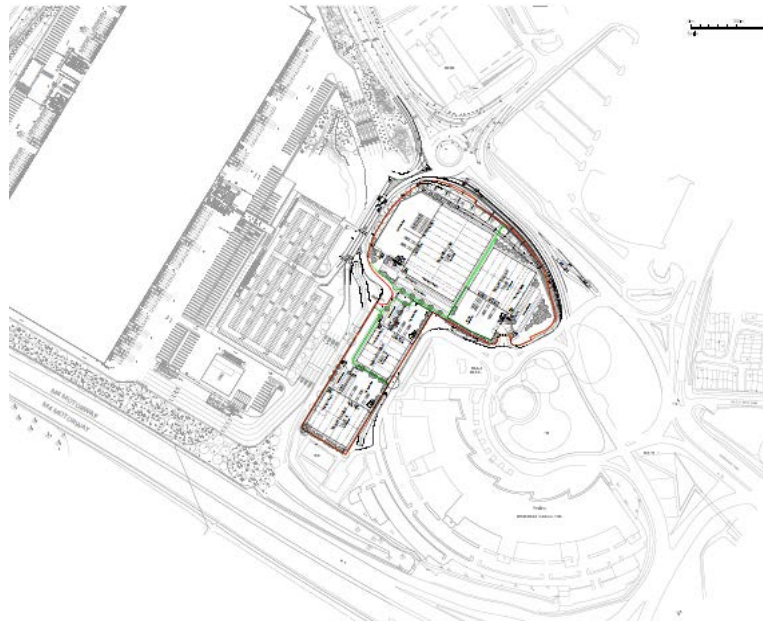
1. INTRODUCTION

- 1.1 The site is 3.46 hectares in area located in south Reading alongside the A33 close to Junction 11, and was previously used as part of the Berkshire Brewery. It is a predominantly commercial area with industrial warehousing to the west (Tesco distribution centre) and to the east a hotel and retail units.
- 1.2 A full planning permission was granted in 2002 (00/01447/FUL) for office development of just under 34,000sqm, in a six storey circular building with plant on the roof. This was subsequently varied (06/00627/VARIAT & 09/00685/VARIAT). The site is part of what was originally known as Phase III of the Reading International Business Park.
- 1.3 Pre-application discussions for the 2009 VARIAT concluded that the demolition of the original warehouse would have comprised a material operation, which would have implemented the 2006 permission. The 2009 permission was the amendment of all the original pre-commencement conditions by inserting the words "with the exception of demolition works" where appropriate. It is therefore considered to be an extant permission and a material consideration in the decision-making assessment for this application.
- 1.4 However, the applicant has advised that there has not been market interest for office development for more than 10 years on this site, but states that there is current market demand for B8 warehousing and distribution.
- 1.5 In terms of specific relevant local planning policies in the Reading Borough Local Plan these are as follows:
 - The site is an allocated employment site (Policy SR4e) within the Core Employment Area (Policy EMP2b);
 - Within the Air Quality Management Area (Policy EN15);
 - Adjacent to the listed Little Lea Cottage (Policy EN1);
 - Subject to a TPO (12/18) (Policy EN14);
 - Adjacent to one of the MRT routes, which runs in front of the site alongside the A33 (Policy TR1, TR2);
 - Includes part of an Existing or Proposed Green Link (Policy EN12).

Aerial view



Location Plan



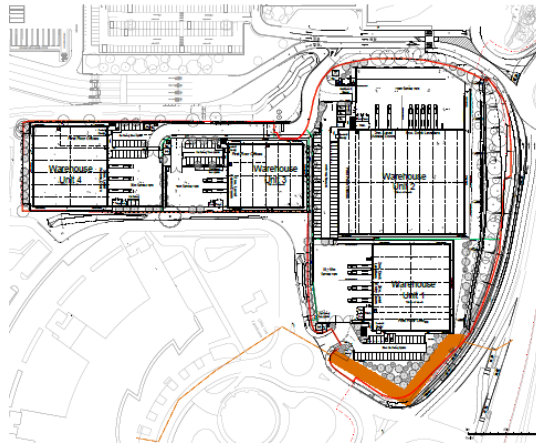
2. PROPOSAL

2.1 The proposal has been amended since application submission and is to develop:

- a total of 15,080 (GEA) (14,427sqm GIA) 4 no. units of flexible B1(c), B2 or B8 use classes of the following sizes. The amendments reduced the size of Units 1 and 2 (by total of 618sqm - overall size was previously 15,045 sqm):
 - Unit 1: 3,278 sqm (originally 3,591), (12m to u/s haunch¹) - 15.1m to top of parapet above finished floor level with 36 car parking spaces
 - Unit 2: 6,112 sqm originally 6,417), (12m to u/s haunch) - 15.6m to top of parapet above finished floor level high with 59 car parking spaces
 - Unit 3: 2,244 sqm, (10m to u/s haunch) - 13.1m to top of parapet with 19 car parking spaces

¹ the part of a beam projecting below a floor or roof slab.

- Unit 4: 2,794 sqm, (10m to u/s haunch) - 13.1m to top of parapet above finished floor level 13m with 28 car parking spaces



- Each unit would have its own service yard and ancillary offices;
- Provision of 142 no. car parking spaces, 10% of which would be with electrical charging;
- 7 no. disabled spaces;
- 44 no. cycle spaces; and
- Two access points - one from the north to serve Units 2, 3 & 4, and one from the south to serve Unit 1.

2.2 Submitted plans and documentation received 27th December 2019 (original submission date), unless otherwise stated (including amended details) are as follows:

- Site Location Plan - Drawing no: 6204-60 Rev A, received 9th January 2020
- Site Layout Plan - Drawing no: 6204-103 Rev C, received 18th November 2020
- Site Sections - Drawing no: 6204-104, received 26th June 2020
- Site Plan Unit 1 - Drawing no: 6204-130, received 13th October 2020
- Unit 1 Building Plan - Drawing no: 6204-105, received 26th June 2020
- Unit 1 Roof Plan - Drawing no: 6204-106, received 26th June 2020
- Unit 1 Elevations and Sections - Drawing no: 6204-107, received 26th June 2020
- Unit 2 Building Plan - Drawing no: 6204-108, received 26th June 2020
- Unit 2 Roof Plan - Drawing no: 6204-109, received 26th June 2020
- Unit 2 Elevations - Drawing no: 6204-110, received 26th June 2020
- Unit 2 Sections - Drawing no: 6204-111, received 26th June 2020
- Unit 3 Roof Plan - Drawing no: 6204-112, received 26th June 2020
- Unit 3 Elevations and Sections - Drawing no: 6204-113, received 26th June 2020

- Unit 3 Building Plan - Drawing no: 6204-69 Rev A, received 9th January 2020
- Unit 4 Building Plan - Drawing no: 6204-72 Rev A, received 9th January 2020
- Unit 4 Roof Plan - Drawing no: 6204-114, received 26th June 2020
- Unit 4 Elevations and Sections - Drawing no: 6204-115, received 26th June 2020
- Planting GA 1 of 5 - Drawing no: 9201 Rev P6, received 21st September 2020
- Planting GA 2 of 5 - Drawing no: 9202 Rev P6, received 13th October 2020
- Planting GA 3 of 5 - Drawing no: 9203 Rev P8, received 13th October 2020
- Planting GA 4 of 5 - Drawing no: RILP-MGS-ZZ-XX-DR-L-9204 Rev P7, received 21st September 2020
- Planting GA 5 of 5 - Drawing no: 9205 Rev P7, received 21st September 2020
- Typical Illustrative Section A-A - Drawing no: 1219 501 Rev P3, received 26th June 2020
- Typical Illustrative Section B-B - Drawing no: RILP-MGS-ZZ-ZZ-DR-L-9502 Rev P02, received 26th June 2020
- Typical Illustrative Section C-C - Drawing no: 1219 503 Rev P3, received 13th July 2020
- Typical Illustrative Section D-DD - Drawing no: 1219 504 Rev P1, received 30th October 2020
- Site Sections C-C & D-D - Drawing no: 6204-124, received 18th November 2020
- Hardworks Plan 1 of 4 - Drawing no: 1219-301 Rev P4, received 26th June 2020
- Hardworks Plan 2 of 4 - Drawing no: 1219-302 Rev P6, received 13th October 2020
- Hardworks Plan 3 of 4 - Drawing no: 1219-303 Rev P6, received 13th October 2020
- Hardworks Plan 4 of 4 - Drawing no: 1219-304 Rev P5, received 26th June 2020
- Proposed Gatehouse - Drawing no: 6204-79
- Proposed Bin and Transformer Enclosure - Drawing no: 6204-78 Rev A
- Tree Constraints Plan - Drawing no: 05197 TCP 28.4.20 Sheet 1 of 2, received 26th June 2020
- Tree Constraints Plan - Drawing no: 05197 TCP 28.4.20 Sheet 2 of 2, received 26th June 2020
- Tree Protection Plan - Drawing no: 05197/TCP 28.4.20 Sheet 1 of 3, received 26th June 2020
- Tree Protection Plan - Drawing no: 05197/TCP 28.4.20 Sheet 2 of 3, received 26th June 2020
- Tree Protection Plan - Drawing no: 05197/TCP 28.4.20 Sheet 3 of 3, received 26th June 2020
- Landscape General Arrangement Plan - Drawing no: 1219-001 Rev P9, received 13th October 2020

- Tree Removal and Retention Plan – Drawing no: 1219-002 Rev P3, received 26th June 2020
- Tree Survey, prepared by Aspect Tree Consultancy, received 26th June 2020
- Typical Cycle Shelter – Drawing no: 6204-77 Rev B, received 18th November 2020
- Typical Paving Details – Drawing no: 1219-403 Rev P3, received 13th July 2020
- External Lighting Layout – Drawing no: RILP-SPE-ZZ-OO-DR-E 3000 Rev P03, received 3rd August 2020
- Reading South MRT Safeguarding Reading International Business Park - Drawing no: 28791-554-003, received 18th November 2020
- Proposed Incoming Services Plan [Draft] RILP-BMP-ZZ-ZZ-DR-C-0012 Rev P3, received 18th November 2020
- Acoustic Environmental Noise Report, Document ref: REP-1010924-RN-AG-MF-20191014-Reading International- Rev 02, dated 21st November 2019, prepared by Hoare Lea
- Arboricultural Impact Assessment, Document ref 05197 AIA Rev A 9/9/20, prepared by Aspect Tree Consultancy, received 21st September 2020
- Design and Access Statement – Landscape Proposals, Document ref: 1219-G506 P5, dated September 2020, prepared by Macgregor Smith, received 21st September 2020
- Eastern Woodland Area Photos, ref: 1219-G509, dated Oct 2020, received 13th October 2020
- Ecological Assessment, Document ref: 7695.ECOAs.vf, dated December 2018, prepared by Ecology Solutions
- Ecological Mitigation and Management Plan, Document ref: 7695-EMMPVf, dated June 2020, prepared by Ecology Solutions, received 26th June 2020
- Letter from Ecology Solutions, ref: 7695/JS/002.let.cl, dated 15th June 2020, received 26th June 2020
- Letter from Ecology Solutions, ref: 7695/JS/003 let.aa, dated 2nd October 2020, received 13th October 2020
- Flood Risk Assessment and Outline Drainage Strategy, Report no: R100, Rev 1.0 dated June 2020, prepared by Baynham Meikle Partnership Limited, received 26th June 2020
- Framework Travel Plan, Document Ref: V1.1, dated 26/11/19, prepared by PBA
- Geoenvironmental and Geotechnical Site Investigation, Document ref: 31468-01 (00), dated February 2019, prepared by RSK
- Letter from Arlington regarding green and brown roofs, dated 2nd October 2020, received 13th October 2020
- Planning Design and Access Statement (Rev A) prepared by aja Architects Ltd, received 26th June 2020
- Proposed Drainage Strategy Plan (site wide) – Drawing no: RILP-BMP-ZZ-ZZ-DR-C-5200 Rev P3, received 26th June 2020
- Planning Statement [related to sustainability], Document ref: RILP-SPE-XX-XX-AR-N-8305, dated 12/12/19, prepared by Clancy Consulting

- Renewable/ Sustainable Energy Report, Document ref: RILP-SPE-XX-XX-RP-N-8306, dated 28/11/19, prepared by Clancy Consulting
- Transport Assessment V1.1, dated 26th November 2019, prepared by PBA, received 31st January 2020
- Utilities Strategy Rev 1.0, Document Ref; 12669-R101, dated June 2020, prepared by Baynham Meikle Partnership Limited, received 26th June 2020
- CIL Additional Information Form
- Tree Survey Report, Document Ref: CBA 11108 V1, dated November 2018, prepared by CBA Trees
- Tree Protection Fencing - Drawing no: 1219-401 Rev P1
- Tree Pit in Soft Detail - Drawing no: 1219-402 Rev P1
- Design and Access Statement - Landscape Proposals, Document ref: 1219-G506 P6, dated October 2020, prepared By MacGregor Smith, received 30th October 2020
- Illustrative Masterplan
- Application Statement, Issue 01, dated December 2019, prepared by Barton Willmore LLP
- Heritage Statement, Rev 03, dated December 2019, prepared by Barton Willmore LLP
- Air Quality Assessment, Rev: Final, dated November 2019, prepared by PBA

2.3 Community Infrastructure Levy (CIL): the applicant has duly completed a CIL liability form with the submission. The proposed B8 use is CIL liable, but not CIL chargeable, as it is one of the uses identified as zero charge within the Council's CIL Charging Schedule.

3 PLANNING HISTORY

00/01447/FUL (Civica Ref: 990690) - Demolition of existing brewery bottling plant and erection of new office (33,910sqm floorspace) with associated leisure facilities, landscaping, servicing and estate roads and provision of car park to provide 969 spaces for the proposal and retention of existing 457 spaces for the brewery - Approved 5/2/2002 subject to legal agreement.

06/00627/VARIAT (Civica ref: 060942) - Variation of Condition 1 of Planning Consent 00/01447/FUL to extend the time limit for the commencement of development for a further 3 years - Approved 22/8/2006 subject to legal agreement.

09/00685/VARIAT (Civica Ref: 090530) - Planning permission for the development permitted by Planning Consent 06/00627/VARIAT dated 22/8/06 namely development of offices with associated leisure facilities, landscaping, service roads and 969 car parking spaces for office development, together with retention of 457 existing car parking spaces for brewery use but without complying with Conditions 3, 4, 6, 7, 8, 9, 11, 12, 14, 16, 18, 21, 22, 23, 24, 25, 26

and 27 of that Consent - Approved 27/7/2009 subject to legal agreement.

190122/PREAPP - Pre-application advice for four units, totalling 15,204sqm for flexible B1(c), B2 or B8 use, with parking and landscaping [following pre-applications meetings this reduced slightly to 15,083sqm] - Observations sent 23/9/2019 - Summary:

The principle of the proposed development would be acceptable, although a greater overall quantum than the range set out in the emerging [at that time] policy. However, this is likely to be considered satisfactory subject to the scheme being able to meet policy requirements including with regard to transport, landscaping, design, ecology, transport and sustainability.

The proposal would be subject to a S106 legal agreement.

4 CONSULTATIONS

Statutory

Environment Agency

- 4.1 The Environment Agency's original comments were: This consultation is incomplete because it lacks the information, we require to make an informed assessment of the proposal.
- 4.2 We cannot advise you on this proposal until we receive the following information.
 1. The development is over 1 ha and adjacent to a main river. A flood Risk Assessment will be required for this site.
 2. The section of Kingsley Close Ditch main river that runs behind warehouse units 1 and 2 is an open channel. You may therefore require an environmental permit to undertake work. We are unsure whether a permit could be issued due to the lack of flood extent and ecological information provided.
 3. The Ecological Assessment and Design and Access Statement acknowledge that Kingsley Close Ditch and associated tree belt, which is to be retained, have the greatest ecological value on the site. However, there is no detail of how this will be protected and enhanced to provide a biodiversity net gain for the project within 8m of the river bank.
 4. The distance of any proposed works to the main river is not provided, please provide this on all appropriate drawings.
 5. We believe there may be an extant planning permission for this site. Please provide the planning application number if this is the case.

- 4.3 Advice for Applicant - The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:
- on or within 8 metres of a main river (16 metres if tidal)
 - on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
 - on or within 16 metres of a sea defence
 - involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
 - in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.
- 4.4 The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.
- 4.5 *Planning Officer note:* Following confirmation that the buildings would be at or beyond the 8m stand off and the relevant heights of the proposed buildings, and on further review of the amended information, the EA confirmed that the scheme would be acceptable subject to a condition. They stated:
- 4.6 We have reviewed the following documents:
- Email dated 23 September 2020 containing building heights, author Alison Amoah Reading Borough Council
 - Landscaping General Arrangement Plan, Drawing No. 1219-001 Rev. P7, dated 15 August 2019
 - Flood Risk Assessment & Outline Drainage Strategy: Reading International Business Park - Warehouse Units. Project Ref 12669, Report Ref R100, Revision 1.0 June 2020. Baynham Meikle Partnership Limited.
 - Hardworks Plan 1 of 4. Dated 09.09.19. Drawing No: 1219-301
 - Site Layout Plan. Dated 17.06.20. No: 6204 - 103 Planning.
- 4.7 We have reviewed the additional information sent including the heights of each of the units. We are satisfied with the reduction in size and realignment of units 1 and 2, so that they are now located 8m from the bank top of the Kingsley Close Ditch. Given the increased distance from the watercourse, the buildings should not cast excessive shade across the river corridor. Ecological enhancements that include the removal of non-native plants from the river banks will also allow more light into the watercourse and aid the establishment of the proposed marginal and wildflower planting.
- 4.8 Development that encroaches on watercourses can have a potentially severe impact on their ecological value. The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect a minimum 8 metre wide

buffer zone along the southern side of the Kingsley Road Ditch that flows through the wooded belt to the north of the site.

- 4.9 ***Planning Officer note:*** A condition was recommended for a scheme for the provision and management of an 8m minimum buffer, which is included above.

Non-statutory

AWE Off Site Emergency Planning Group

- 4.10 Summary of Considerations: The application site is within the Detailed Emergency Planning Zone of AWE (B) site and inside the area where urgent protective actions are necessary - in this case urgent sheltering. Recommendation to Planning Authority: Taking into account all the above points the AWE Off-site planning group considered the impact of the application on the AWE Off-Site Plan. As a result, due to the impact on responding agencies and the potential impact on the occupants of the proposed development, it is recommended that the Planning Authority request that conditions are added to the application.

- 4.11 If approved, the minimum requirements are:
- An emergency plan by the developers/construction companies should be put in place such that should there be a radiation emergency during the construction phase they have procedures in place to protect the staff
 - An emergency plan should be put in place for all the commercial units by the management agency to cover the overall approach in advance of any units being accommodated and /or within one month of occupancy by those using the units.
 - All such plans should be reviewed on at least an annual basis and be available upon request by the planning authority.
 - All the sites should have a working landline in order to ensure the means of notification of a radiation emergency is available to all

Berkshire Archaeology

- 4.12 The applicant has submitted with their application a *Heritage Statement* prepared by Barton Willmore and dated December 2019. This document largely addresses the historic built environment and includes little assessment of the buried archaeological heritage. Paragraph 2.7 notes the multiperiod results of nearby archaeological excavations but there is little assessment of archaeological potential beyond a line in Paragraph 4.7 that states '*...as the area surrounding the cottage [Little Lea Cottage] has largely been developed, the archaeological potential of the surrounding area is likely to be limited*'.
- 4.13 The wider area is of high archaeological potential as exemplified by the results of excavations and investigations in the late 1980s in advance of the construction of Reading Business Park, now Green Park (Moore and Jennings, 1992), to the east of this application site.

These excavations recorded Neolithic (4,000 – 2,000 BC) activity, four Late Bronze Age (1,200 – 800 BC) settlements, revealing what was at the time the largest number (33) of roundhouses from a single excavation project, alongside extensive Late Bronze Age field systems.

4.14 The application area therefore has a high archaeological potential, but it is acknowledged that the site has been previously developed. The geotechnical investigations submitted with this application recorded up to 3m of 'made ground' in the north of the site. Historic Environment Records also note that an archaeological watching brief took place within the site in 1976 and 1977 when the Courage Brewery was constructed but with little archaeological result, although details of this event are hazy.

4.15 Therefore, on balance, it is considered that the site has insufficient potential to warrant further archaeological investigation should this application be permitted and therefore no further action is required as regards the buried archaeological heritage.

Ecology

4.16 Ecology maintain an objection to the proposal. The original comments were as follows: This application is for 4 new warehouse units and their associated parking. Units 2, 3 and 4 are largely located on hardstanding, whilst unit 1 would be located in a block of woodland adjacent to the business park roundabout.

4.17 The woodland to the south and to the east are a "green link" as per the new local plan and fit the description of the priority habitat "lowland mixed deciduous woodland" as defined in the NPPF - The NPPF defines priority species and habitats as:

"Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006." [The NERC Act].

4.18 The Joint Nature Conservation Committee (JNCC) is the public body that advises the UK Government and devolved administrations on UK-wide and international nature conservation. It is constituted under the NERC Act and publishes England's priority habitat descriptions. The priority habitat description for lowland mixed deciduous woodland reads:

"Lowland mixed deciduous woodland includes woodland growing on the full range of soil conditions, from very acidic to base-rich, and takes in most semi-natural woodland in southern and eastern England, and in parts of lowland Wales and Scotland."

4.19 There is a stream that runs through the woodland and unit 2 would be less than 10m from the stream.

4.20 There is an extant permission on the site from 2009 for a smaller development (planning application ref: 09/00685/VARIAT). Planning policy has however changed significantly since the extant permission was issued and the habitats and trees on the site have matured and become more ecologically valuable.

4.21 The applicant has submitted an Ecological Assessment (Ecology Solutions - December 2018). The report is based upon walkover surveys carried out in July 2010 and November 2018. No species specific surveys have been undertaken. The report does not give an accurate assessment of the ecological value of the site for the following reasons:

1. The woodland at the southern end is referred to as "re colonising ground" with "trees" and "scrub" (see Plan ECO2) whilst the woodland along the A33 is referred to as "Tree Belt". Both these areas are woodland and fit the description of the priority habitat "lowland mixed deciduous woodland" (see footnote 1 above).

2. Paragraph 4.2.3 reads:

"The Site is considered to offer limited foraging and dispersal opportunities for any local bat populations as whole."

However, given that it forms part of a wooded belt that runs adjacent to the A33 and the application site side is likely to be unlit, it may well be an important route for commuting bats. This has not been explored. To do determine if this is the case a series of bat activity surveys, to include the deployment of static bat detectors, over the summer months would need to be undertaken.

3. The report states that the site "*supports very limited opportunities for common reptiles*". It also reports there are records of reptiles approximately 300m from the application site and reptiles have been recorded elsewhere along the A33 corridor. The woodland at the southern end of the site is certainly suitable for this group of species and without a reptile survey being undertaken it cannot be determined if the site supports this group of species.

4. Section 4.2.2 reads:

"Two trees within the Site are considered to support potential roosting features (PRF) (see Plan ECO2). An Oak tree on the western boundary has significant Ivy growth together with several rot holes and split limbs that are considered to have low to medium potential to support roosting bats."

These trees have not been subject to further surveys to confirm if they do host a bat roost.

5. Regarding invertebrates the report reads:

“4.8.2 The natural habitats within the Site are expected to support a range of common invertebrate species, although there is no evidence to suggest that any more notable species are likely to be present. It is likely that the tree belt, developed scrub and watercourse hold the most entomological interest in the context of the Site.

4.8.3. In the absence of active management, the Site’s entomological interest is increasing through natural succession, however, the Site has not advanced sufficiently in terms of a brownfield site to offer the heightened entomological interest.”

As the site has been left unmanaged it seems that it may well be of value to this group of species and without an assessment of the site by an entomologist being undertaken the above statement is unsubstantiated. The woodland habitat to the south of the site may be of particular value to invertebrates.

4.22 In addition, the proposals also do not include the enhancement of the woodland belt adjacent to the A33 nor the watercourse that runs through the woodland. This is a missed opportunity. Furthermore unit 2 is less than 10m from the stream.

4.23 The construction of Unit 1 will result in the loss of the southern woodland, which is approximately 0.5ha in area and the fragmentation of the wider green network. Insufficient information has been provided to determine the likely impacts of the proposals on reptiles, bats and invertebrates.

4.24 The proposals therefore do not comply with the following planning policy:

1) Paragraph 174 of the NPPF which reads:

“To protect and enhance biodiversity and geodiversity, plans should: [..]

promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”

[the relevant “plan” in this instance is Reading’s Local Plan and policy EN12 refers to priority habitats and species]

2) Paragraph 175 of the NPPF which reads:

“When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”

[The loss of 0.5ha of priority woodland habitat can be considered "significant harm" and no avoidance, mitigation or compensation measures are provided for].

3) Reading Borough Local Plan EN11: Waterspaces which reads:
"Where development in the vicinity of watercourses is acceptable, it will:-

[..]

- Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;

- Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;"

[Unit 2 is within 10m of the watercourse and the proposals do not appear to have explored opportunities to enhance the watercourse by for example desilting and re-profiling it.]

4) Reading Borough Local Plan Policy EN12 - Biodiversity and The Green Network which reads:

"a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and

- Areas with potential for biodiversity value and which stitch the Green Network together - designated Local Green Space and open green spaces, and existing and potential Green Links.

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable;

.. "

[The woodland at the south and along the east forms part of the identified green network, as it is a green link, a priority habitat, and as the southern woodland will be lost the network will not be maintained, protected, consolidated, extended or enhanced.]

4) Reading Borough Local Plan Policy EN14 - Trees, Hedges and Woodland which reads:

“Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended.”

[The woodland at the southern end will be lost]

4) Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document was not revoked by the National Planning Policy Framework) which reads:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. “

[As the extent to which bats and reptiles (which are groups of protected species) and invertebrates (some of which are protected species and many of which are priority species and therefore referred to in the policies above) has not been established the proposals do not accord with this policy.]

4.25 Summary

The construction of Unit 1 will result in the loss approximately 0.5ha of lowland mixed deciduous woodland and the fragmentation of the wider green network. This is contrary to paragraphs 175 and 175 of the NPPF and policies EN12 and EN14 of Reading Borough’s Local Plan.

4.26 Unit 2 is within 10m of the watercourse that runs through the woodland belt adjacent to the A33. There are no plans to enhance the watercourse and the construction of a tall building adjacent to it is likely to adversely affect it. This is contrary to policy EN11 of Reading’s Local Plan.

4.27 No bat, reptile or invertebrate surveys have been undertaken. There is therefore currently insufficient information to determine the likely impact of the proposals on these groups of species. This is contrary to policy Paragraph 99 of the government Circular 06/05.

4.28 **Planning Officer note:** Further information was submitted including:

- Ecological Mitigation and Management Plan;
- Amended layout moving built form from the watercourse to enable an 8m landscaped buffer from the watercourse to be provided.

- Completion of reptile surveys to confirm the absence of this group;
 - Reappraisal of the site and its naturalisation to assess the need for any entomological surveys;
 - Detailed evidence for the area of scrub in the east seeking to demonstrate that this area is not lowland woodland and not a priority habitat;
 - Justification provided for not completing bat activity surveys that the main bat foraging and dispersal corridor would be retained and that the local bat population would be retained at favourable conservation status.
- 4.29 Ecology reviewed the further information submitted, undertook a further walkover survey and maintained their position on all matters as set out in paras. 4.16- 4.27, providing further explanation and photographic information (copied in Appendix 1 below).
- 4.30 *Planning Officer note:* The applicant provided further detail seeking to respond to the Ecology objections, however Ecology maintain their objection. This is set out further in the Landscaping and Ecology section below, but in summary the Ecologist identifies that *“if it has been decided that there are “exceptional circumstances” and the need for the development outweighs the loss of the priority woodland habitat then you should ensure that the application complies with part B of Policy EN12: On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.”* Conditions are recommended for the submission and approval of a Construction Environmental Management Plan and a lighting strategy.
- Environmental Protection & Nuisance (EP&N)**
- 4.31 Air Quality - Increased emissions - Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this, recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM_{2.5} and PM₁₀).
- 4.32 The proposed development is located adjacent to an air quality management area and has the potential to increase emissions. An assessment should be provided as part of the application.
- 4.33 Where any increase in emissions is identified a mitigation scheme must be submitted. The mitigation scheme must quantify the emissions saving that it will bring about, in order to prove that the detrimental effect of the development can be offset.

Mitigation against increased emissions:

- Provision of cycling facilities / residents cycles
- Parking - consider reducing number of parking spaces,

graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles

- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Improvements to local public transport
- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant

- 4.34 It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, or be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.
- 4.35 Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.
- 4.36 An air quality action plan has been implemented to try and reduce levels of NO₂ in this area. The proposed development will lead to an increase in [NO₂ levels / vehicle movements / HGV movements / Other] directly conflicting with the RBC air quality action plan.
- 4.37 It is therefore necessary for the applicant to demonstrate through an air quality assessment and mitigation plan how they intend to reduce the impact of the proposed development. An assessment has been submitted and it shows they will have to incorporate control measures during the development phase to control dust. This should be done in line with Institute of Air Quality Management (IAQM) guidance on the assessment of dust from demolition and construction (Holman et al, 2014). The assessment shows that the operational phase of the development will have a negligible impact on air quality therefore no mitigation is required.
- 4.38 Contaminated Land - high risk sites - Large / complex developments or sited on former contaminative land use.
- 4.39 The developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.
- 4.40 An investigation has been carried out and submitted with the application. We are satisfied with the findings of the report and

recommend that further investigation is carried out as specified. Namely:

- Additional gas monitoring during low or falling pressure to establish a 'worst case'.
- Surface water sampling of drainage ditches.
- Further Investigation into the mounded area.

4.41 Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action. Conditions are recommended as follows to ensure that future occupants are not put at undue risk from contamination: Contaminated land assessment to be submitted; Remediation scheme to be submitted; Remediation Scheme to be implemented and verified; and assessment of previously unidentified contamination.

4.42 Construction and demolition phases - We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

4.43 Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be harmful to the aims of environmental sustainability. Recommended conditions are: Construction Method Statement to be submitted; Hours of construction and no burning on site.

RBC (former) Heritage Consultant

4.44 The Listed Buildings potentially affected are:

- Little Lea Cottage- Grade II Listed
- St. Paul's Church Hall- Grade II Listed
- Hartley Court- Grade II* Listed
- Milestone at Three Mile Cross- Grade II Listed

4.45 Little Lea Cottage (formerly listed as Little Lea Farmhouse under Whitley) is Grade II Listed. Early 17th Century, two storeys, ground floor stucco with buttresses. Timber-framed with brick nogging (stucco to south). Gable to left. Three ranges of leaded three light casements (early C19 on 1st floor to right). Projecting lean-to porch off-centre left. Tiled roof with external chimney to right hand gable end. Interior has inglenook fireplace to ground floor, west room.

4.46 The design for this proposes 4 large warehouses on a Business Park plus forming a Logistics centre, located at Junction 11 of the M4.

4.47 The proposed design for the logistics centre consists of 4 large warehouse buildings, around 10m tall with the largest (Unit 2) being around c.80m in length. The proposed buildings would be arranged in a T-shape, to the north and northeast of Little Lea Cottage, around

ca55m from the cottage at its closest point. The area closest to Little Lea would be the service yard, in which lorries would be parked-up, being only c.25m from Little Lea.

- 4.48 Whilst the cottage is located within a Business Park and the setting has been eroded, an area of open land remained to the north and northeast, facing a principal elevation of the cottage. The scale of the cottage is small and domestic and the proposals for the warehouse buildings are vast and alien to the original historic setting of the of the Listed Building. Whilst this setting has been lost, the plans for the warehouse buildings are of a different order of scale and exhibit little design or detailing which could relieve the monotony of their design. In addition, the logistics park will add busy traffic, large-scale illuminated signage and lighting to the setting of the Cottage.
- 4.49 It is also noted that the main entrance to the proposed logistics centre would be directly opposite Little Lea, increasing the impact on the setting from noise, fumes, vibration from additional lorry traffic. As noted in Historic England's The Setting of Heritage Assets (HE, 2017):

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.

- 4.50 The current setting has been eroded by the existing Business Park and the proposed site is a large area of overgrown hard-standing. However, the addition of the warehouses will dominate the setting of Little Lea, cutting it off from any remaining public views and providing an alien and intimidating back-drop to the cottage, adding to the cumulative impact.
- 4.51 In view of the size and visual intrusion of the proposed warehouse buildings, there is very little that could be envisaged to mitigate the impact of the proposals on Little Lea, even if there was some large-scale planting along the perimeter of the warehouses.
- 4.52 The harm to the significance of the Listed Building from the proposed development within the setting of Little Lea Cottage should be given great weight in the planning balance.

Natural Environment (tree officer)

- 4.53 *The original comments were as follows:* With reference to the Tree Survey Report from CBA trees dated November 2018, Landscape GA Plan 1219-001 P5, Landscape Masterplan 1219-G506 P3 dated November 2019, Tree Removal & Retention Plan 1219-002 P1, Design

and Access Statement - Landscape Proposed document dated November 2019 and the 5 Planting Plans: 2019-201 P4, 2019-202 P3, 2019-203 P4, 2019-204 P5 & 2019-205 P5:

- 4.54 Principle of development - The site is subject to TPO 12/18 which includes a woodland area (wide strip along the A33 frontage and eastern portion of the site within the Business Park) and 5 individually specified trees on the western boundary (alongside the access into Tesco from the A33). Objections to the TPO were considered at Planning Applications Committee on 3 April 2019 where Members appreciated the value of the trees on the A33 frontage and supported confirmation of the TPO in its current form.
- 4.55 I am mindful of the extant permission that the applicant has in place hence it is appropriate to compare this with the current proposal in order to identify any negative changes. In addition, since the extant permission was given in 2009, national and local policies have changed, the Council has adopted a Tree Strategy (2010 - revision due later this year), a Climate Change Action Plan (revision imminent), the revised Biodiversity Action Plan (BAP) is imminent, a Supplementary Planning Document (SPD) on Sustainable Design and Construction has been adopted, the Council had declared a climate emergency and has plans for a carbon zero Reading by 2030 (amongst other things). In other words, multiple changes and thinking have occurred since 2009 which requires the acceptability of any development on the site, regardless of planning history, to be fully considered in light of these changes.
- 4.56 As advised at pre-application stage, there is a significant difference between that approved and that proposed: approved (left), proposed (middle) with tree removal and retention for the existing application (right) in the plan extracts below. The approved drawing shows trees 'assumed for removal' in orange lined areas (including trees within the main, western (bottom) car park area), trees for retention in green and new trees as plain orange circles. It should be noted that the landscaping for the site was never approved hence the 'new' trees are indicative only and it is likely that further tree planting would have been sought within the car parking.



- 4.57 In tree/landscape terms, the new proposals have a greater impact on existing trees, requiring more trees along the northern/A33 boundary and eastern corner to be removed and allow for less new trees by virtue of 4 buildings now being proposed with associated service yards and parking, as opposed to one building on the A33 frontage surrounded by parking. Parking obviously allows new trees within it and around it; the canopies having space to grow, which buildings do not allow.
- 4.58 There is a detrimental change in the south-east portion of the woodland (adjacent to the access into Reading International Business Park) where the green buffer has decreased and a pinch-point created by the proximity of Unit 1 to the A33.



- 4.59 This difference will be visually detrimental when approaching the site from junction 11. Currently the views are of a tree screen, but as shown in the DAS, the views will become dominated by the large warehouse as a result of tree loss and insufficient space for planting. Whilst it is appreciated that the sewer easement affects tree planting ability in this area (easement mentioned in DAS but not plotted), an alternative design would have allowed retention and/or planting of new trees to maintain a suitable green buffer. Existing and proposed views shown below:



- 4.60 The A33 is a 'treed corridor' as defined in our existing and forthcoming, revised Tree Strategy. As such, it is one along which tree retention and planting is a priority (as per the Tesco site to the west). In addition, the A33 will be a high pollution zone, therefore

an effective tree belt to filter pollution will be vital. Importantly it is the gateway into Reading on this main route, hence visually important.

- 4.61 The canopy cover targets of our existing and revised tree strategy require every site to have a net gain in tree number in order to meet the objective of increasing the Borough's tree canopy - this is reiterated in policy EN14. No Arboricultural Impact Assessment has been provided to clarify the required tree removals and impact on retained trees and no number of trees felled against proposed planting has been provided to demonstrate a net gain. Both are required.
- 4.62 The proposal includes 4 large warehouses which, despite the large roof areas, none propose any green or brown roofs and no green wall elements are included. All are supported by Local Plan policies, e.g. CC2, CC3, CC7, EN12, EN15, EN16, EN18, all in turn supported by the Sustainable Design and Construction SPD. The lack of any of these elements will need to be strongly supported, which can't see evidence of - further consideration is required.
- 4.63 Tree removal and retention - As can be seen from the Tree Removal and Retention plan, a large part of the woodland area (in the eastern portion of the site) will require removal along with a strip on the site side of the northern boundary. In addition, a significant number of internal individual trees will be removed along with one TPO Oak on the western boundary. Whilst other trees on the western boundary and outside the site are shown for retention, no Arboricultural Impact Assessment has been submitted to show the potential impact on these. This includes a likely negative impact on an 'A' category Oak on the eastern boundary which is directly adjacent to Unit 3 whose footprint will be within the Root Protection Area (RPA) and which will require pruning of the Oak. I note that the retention of the western TPO Oak will be explored further, this is something that should be fully assessed and determined now, with an aim to retain - it is car parking, not a building, within its RPA hence special construction methods may be feasible.
- 4.64 Landscaping - The DAS has not been updated in relation to tree species since my email exchange with the Landscape Architect in January hence an update is required.
- 4.65 In addition, I don't consider the use of large canopy species has been maximised, e.g. to the south of Units 1 and 2 and west of the car park for Unit 4. Large canopy species provide numerous benefits and should be utilised wherever possible.
- 4.66 Unit 4 is proposed close to the southern boundary (with the nursery) and effectively right up to the eastern boundary. This results in the proposed trees on the southern boundary being confined to a narrow landscape strip directly adjacent to the building hence future pruning

is inevitable. In addition, the Unit is very close to this boundary and is likely to appear dominating to the single-storey nursery to the south, the proposed trees (whilst necessary in the development) adding to this. On the eastern boundary, no buffer is left in which landscaping can be accommodated. Whilst a landscape strip exists off-site alongside the access road, this has very limited planting and is outside the control of the applicant so of little use as screening.

- 4.67 Unit 3 (as per unit 4) is proposed effectively on the eastern boundary with no space for screening landscaping, in addition to the conflict with the off-site Oak (see comments above). Only hedge planting has been allowed for the on the west side of this unit (west of the access road to Unit 4) hence no space is provided for tree planting.
- 4.68 In relation to Units 1 & 2, comments are given above in relation to tree loss and species selection.
- 4.69 I suspect that insufficient landscaping / green buffer will exacerbate the heritage concerns in relation to Little Lea Farmhouse setting.
- 4.70 I note that a tree pit drawing has been provided for trees in soft landscape areas but not for those in hard landscape areas. The latter is a necessity to demonstrate that new trees within and adjacent to hard surfacing will be provided with sufficient soil rooting volume to thrive, i.e. grow successfully to their maximum capacity. I note reference to the use of structure soil for such tree pits within the DAS, however the preference is for the use of root cells, each pit being specifically designed for its location and species proposed.
- 4.71 The Vegetation Management and Maintenance document within the DAS will require amendments but details could be secured by condition (if the development is approved).
- 4.72 Conclusion - Submissions for the application are not sufficient in that an Arboricultural Impact Assessment has not been provided, including confirmation of the net loss or gain of trees on site. The landscape details have not been updated and are not acceptable in terms of large canopy species use. The principle of the development is, in any case, not acceptable due to the overall footprint resulting in loss of woodland, insufficient space for adequate landscaping and resulting harmful impact on visual amenity. Currently the application fails to demonstrate compliance with policies CC2, CC3, CC7, EN12, EN14, EN15, EN16, EN18 and the Sustainable Construction and Design SPD. As such, it is not supportable on trees or landscape grounds.
- 4.73 **Planning Officer note:** Following the receipt of a series of amended plans, at different points during the course of the application, and commentary by the applicant's landscape consultant, the Natural Environment officer provided further comments, which in summary are:

- Trees along the boundary with Unit 2 will now be confined to a smaller spreading tree so as not to conflict with Unit 2.
- pinch point between Unit 1 and the A33 frontage is not improved hence my previous concern in this respect still applies.
- Arboricultural Impact Assessment (AIA) (Rev A) - does not state the number of trees to be removed, and this is required to demonstrate a net gain. From the Landscape DAS, it appears 146 trees are to be planted. The document refers to the need to prune back some retained trees (and off-site trees) to allow for the new buildings. This implies that the buildings are too close and that those trees will thereafter need to be pruned to maintain clearance. Buildings should allow for existing and future canopy spreads of retained trees.
- Landscape Design & Access Statement: detailed comments on topsoil and mulch specification, watering and maintenance regime [resolved with further revision].
- Green/ brown roofs/green walls omitted still and do not agree with the justification provided by the applicant.
- Suggestions to alternative species and that the opportunity for large canopy trees have not been optimised.
- Lighting columns should be as far from trees as possible to avoid future conflict.
- Root barriers will be required to avoid conflict with drainage infrastructure and services.

4.74 However, following some further minor amendments Natural Environment considered that, although objection was maintained with respect to matters relating to green/brown roofs and green walls, enough information had been provided to make the scheme acceptable from a trees and landscaping perspective, subject to conditions as follows: hard and soft landscaping details; landscape management plan, landscape implementation and Arboricultural Method Statement and Tree Protection Plan.

Office for Nuclear Regulation (ONR)

4.75 The scale and location of the proposed development is such that ONR do not advise against this application unless the emergency planners at West Berkshire Council, which is responsible for the preparation of the Aldermaston off-site emergency plan required by the Radiation Emergency Preparedness and Public Information Regulations (REPPiR) 2001 do not consider that the proposed development could be accommodated within their off-site emergency planning arrangements. *Planning Officer note:* the emergency planners did not object, subject to conditions as included in the recommendation above.

Reading (UK) CIC

4.76 This is to confirm I have met with the potential developer and their agent to discuss the requirement for a S106 Employment and Skills Plan as part of the planning consent.

- 4.77 This would require both a construction and end use skills plan, which the developers have a clear understanding of, and are now considering a framework for. The creation of four new logistics sites in Reading opens up some issues around skills shortages in this sector - but provides a major opportunity to work with the end users to support training in warehouse skills and routes through supported employment. Ideally this will create good quality permanent work across Reading, but most especially in south Reading.
- 4.78 We understand that issues around traffic management are in full discussion and welcome any moves to mitigate pressures on traffic flow along the A33/M4 Junction 12, particularly commitment to investment in public transport and other sustainable travel options.

SUDS

- 4.79 SUDS commented as follows: The submitted drainage layout identifies a discharge rate of 10l/s which differs from the discharge rate of 62.3 l/s specified within the submitted information and 62.7 l/s as specified in the simulation report. Although all of these would be acceptable as they would represent a reduced run off rate from the existing scenario, until the discharge rate is fully confirmed final detailed designs would be required by way of conditions: sustainable drainage to be approved and then implemented as specified.

Sustainability

- 4.80 The Council's Sustainability Manager commented as follows:
- The scheme includes for limited PV (photo-voltaic cells) on south facing roofs. As the roofs will be shallow form then it would also be beneficial and possible to include PV on east and west facing roofs, and increased PV will contribute to achieving the relevant policy complaint BREEAM standard of 'Excellent'.
 - Insufficient information has been provided on the heating requirements. Reference is made to air source heat pumps, but ground source heat pumps, which are the preference (as set out in the SPD for Sustainable Design and Construction) and provide good efficiency, have been discounted, but for a reason which is unclear. Heat loss can be brought down through fabric improvements too.
 - As a Major scheme the proposal shall consider the inclusion of decentralised energy in line with Policy CC4, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. No information has been provided in the submission about decentralised energy.
 - A greater level of information on energy including details of the approach to comply with Part L and BREEM requirements is required.
 - Overall the submission says little on energy, habitat and biodiversity, waste and there is no indication of the BREEAM rating likely to be achieved.

- 4.81 *Planning Officer note:* The agent has submitted further information and clarified that the proposal would meet BREEAM 'Very Good'. Any further consultation response form Sustainability will be reported in an update.

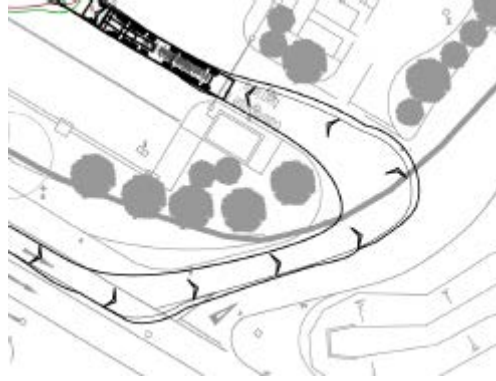
Thames Water

- 4.82 Comments are awaited.

RBC Transport Strategy

- 4.83 The following are the initial comments from Transport: The application site comprises sits within Reading International Business Park approximately 500m north west off Junction 11 of the M4. The site consists of a building demolished to floor level and an associated car park with trees and vegetation.
- 4.84 The proposals are for full planning consent and are an alternative to the extant permission 00/01447/FUL for a development consisting of 33,445 sqm of B1(a) office space and 969 car parking spaces.
- 4.85 This application proposes the development of 4 new flexible B1c/B2/B8 warehouse units with 145 car parking spaces and associated external yards, landscaping, and all related and ancillary works.
- 4.86 Access - There are two vehicular access points that will serve the proposed development. Unit 1 is accessed from the A33 via the Little Lea Gyratory. The vehicle access for Units 2, 3 and 4 for both cars and service vehicles, is from the A33 roundabout with Imperial Way which also serves the Tesco Distribution Centre. The access road into the development will be wide enough to allow two HGVs to pass safely.
- 4.87 Each unit is provided with its own access into the service yard and associated parking areas. The access arrangements are illustrated on Site Layout plan 6204 - 84. However, it requested that junction visibility splays are also demonstrated to ensure vehicles have sufficient visibility exiting the site accesses.
- 4.88 All servicing and deliveries will occur within the service yards of each unit. The Transport Assessment submitted with the application includes vehicle swept path analysis diagrams for 16.5m long articulated vehicle. However, the vehicle access for Unit 2 would not enable an HGV to enter and leave the site simultaneously (see image below). Given that the access road also serves Units 3 and 4, any HGV's waiting on the carriageway would prevent the free flow of traffic to the other units. Therefore, clarification is sought on this point.

Image from Drawing no. 43337/5501/002 Rev C



- 4.89 Plans for the future phase of the Reading Mass Rapid Transport (MRT) corridor are being developed to provide a link between Mere oak Park and Ride and the town centre. Part of the application site frontage onto the A33 is proposed to be transferred to the Highways Authority (RBC), to aid in the completion of the MRT routing, as part of this planning application proposal. The addition of an MRT link would further increase accessibility of bus services from occupiers of the proposed development providing a sustainable travel option. This supports Policy TR1 of the Local Plan. Details of the land area to be safeguarded for the MRT should be submitted and secured as part of the S106 agreement.
- 4.90 Trip Generation - The peak hour trip generation for the B1(a) extant permission was assessed using sites within the database TRICS due to the time that has elapsed since the original application. This was agreed at pre-application stage with the highway authority.
- 4.91 To estimate the multi-modal trip generation for the proposed scheme, TRICS data was also assessed selecting sites based on size, scale, location and access the sustainable modes of transport.
- 4.92 It should be noted that the extant permission provided a total of 969 car parking spaces, therefore, the proposed development represents a net reduction of 824 car parking spaces. Therefore, it is reasonable to assume that the proposed development would generate less vehicle movements throughout the course of the day.
- 4.93 The net difference in trips between the B1(a) extant permission and the proposed B1(c), B2 and B8 land use is illustrated in Table 7.8 of the Transport Assessment. The proposed use would generate 413 fewer arrivals and 43 fewer departures in the AM peak hours and 37 fewer arrivals and 316 fewer departures in the PM peak hours. Again, this is to be expected given the significantly lower parking provision on-site.
- 4.94 The applicant has undertaken an impact assessment on the A33/Imperial Way/ Tesco Roundabout junction; and the A33 Little Lea Gyratory (Northern section only). Traffic surveys undertaken on

27th June 2019 to create a baseline scenario for the junction assessments.

- 4.95 The assessment has demonstrated that the proposals will generate significantly lower levels of trips than would otherwise be generated by the extant development on the site. As noted above, the applicant has agreed to transfer part of the application site frontage to the Highways Authority (RBC), to aid in the completion of the MRT routing which will provide a sustainable travel option with potential to reduce single occupancy car trips to and from the site.
- 4.96 Parking - The site is located within Zone 3, Secondary Core Area, of the Council's adopted Parking Standards and Design SPD. In accordance with the adopted SPD, the development would be required to provide a parking provision of 1 space per 100sqm of B1(c)/ B2 use and/or 1 space per 150sqm of B8 use.
- 4.97 Table 6.1 of the Transport Assessment illustrates the proposed parking provision based on the GFA of each unit.

Table 6.1: Proposed Development Units

Unit No.	Size (sq. m GIA)	Car Parking		Motorcycle / Moped	Cycle
		Total	Disabled		
1	3,591sq.m	36	2	1	10
2	6,417sq.m	59	3	1	18
3	2,244sq.m	22	1	1	6
4	2,793sq.m	28	1	1	8
Total	15,045sq.m	145	7	4	42

- 4.98 Based on the total GFA of 15,045sqm the parking provision equates to a ratio of 1 space per 103sqm and is acceptable. The extant permission provided a total of 969 car parking spaces, therefore, the proposed development represents a net reduction of 824 car parking spaces. This is because the B1(a) office use generates a higher demand for parking than the proposed uses within this application.
- 4.99 The development provides disabled parking provision in accordance with the Council's adopted Parking Standards. The suggested levels for all zones up to 200 spaces is 5% of total capacity, equating to 7 spaces. The disabled parking spaces are conveniently located close to the building entrances.
- 4.100 In terms of cycle storage, cycle parking is provided at a ratio of 1 space per 350sqm. Each unit is provided with a cycle shelter close to the building entrance. The shelters are equipped with cycle stands. However, the Sustrans Best Practice guidance recommends that 1000mm spacing should be provided between the stands. This is also stipulated in the Council's Parking Standards and Design SPD, therefore, the layout is still to be approved. I am happy to cover this

by condition. *Planning Officer note:* a final plan has been submitted which Transport has confirmed as acceptable.

- 4.101 The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. Policy TR5 of the Local Plan also states any developments of at least 10 spaces must provide an active charging point (1 space for every 10 spaces). In view of this, the development must provide at least 14no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. The proposed site plan illustrates 15no. Electric Vehicle (EV) charging points spread across the 4 units. This will be covered by condition.
- 4.102 In terms of motorcycle parking, a provision of 1 space per unit (4 spaces) has been provided which complies with the Council's requirements for 2% of the total capacity.
- 4.103 A framework Travel Plan has been submitted because there are no known occupiers currently identified. The primary aim of the FTP is to minimise single occupancy car travel being made by staff or visitors travelling to and from the development. Section 6 sets out the Measures & Action Plan of the Travel Plan. A Travel Plan Coordinator should be appointed prior to the first occupation of the site and will be responsible for leading the implementation, monitoring and review of the Travel Plan. However, as the site occupiers are not yet known, a condition is required to ensure that a full travel plan is submitted within 6 months of occupation of each unit.
- 4.104 Suggested conditions are: CMS; vehicle parking as specified; vehicle access as specific; cycle parking to be submitted; refuse and recycling as specified; roads to be provided as specified; visibility splays to be provided as specified; Travel Plan; Annual review of Travel Plan; Delivery and servicing of single unit, to be approved; provision of EV charging points.
- 4.105 *Planning Officer note:* Amended plans were submitted in June 2020, which included an amended site layout plan 6204 - 103 rev B: Site Layout Plan, which amended the service yard access into Unit 2 resulting in a wider access, repositioned cycle store & the loss of a car parking space; addressing turning circles and visibility splays for unit 2. A plan to show the safeguarded MRT strip was submitted and confirmed as acceptable and would be included in the S106 legal agreement. Transport confirmed that the scheme is acceptable subject to the previously suggested conditions and informatives, as set out in para. 4.102 above and included in the recommendation above.

Wokingham Borough Council

4.106 No objection.

Public consultation

4.107 The following addresses were consulted, and a site notice was displayed, and no comments were received:

- Reading International Business Park
- Verizon
- Cybersource Ltd
- Tesco distribution centre
- Unit 2, 3, 3A, 4 Proctor End North
- Imperium, Imperial Way
- Logic Modelling, Imperial Way
- Generale Bank, Imperial Way

5 RELEVANT PLANNING POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) (2019) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”. The relevant sections of the NPPF are:

National Policy

Section 2 - Achieving Sustainable Development

Section 6 - Building a Strong Competitive Economy

Section 9 - Promoting Sustainable Transport

Section 11 - Making Effective Use of Land

Section 12 - Achieving Well-Designed Places

Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 15 - Conserving and Enhancing the Natural Environment

Section 16 - Conserving and Enhancing the Historic Environment

5.2 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Reading Borough Local Plan (2019)

Policy CC1: Presumption in Favour of Sustainable Development

Policy CC2: Sustainable Design and Construction

Policy CC3: Adaptation to Climate Change

Policy CC4: Decentralised Energy

Policy CC5: Waste Minimisation and Storage

Policy CC6: Accessibility and the Intensity of Development

Policy CC7: Design and the Public Realm

Policy CC8: Safeguarding Amenity

Policy CC9: Securing Infrastructure

Policy EN1: Protection and Enhancement of the Historic Environment
Policy EN6: New Development in a Historic Context
Policy EN11: Waterspaces
Policy EN12: Biodiversity and the Green Network
Policy EN14: Trees, Hedges and Woodland
Policy EN15: Air Quality
Policy EN16: Pollution and Water Resources
Policy EN17: Noise Generating Equipment
Policy EN18: Flooding and Drainage
Policy EM1: Provision of Employment
Policy EM2: Location of New Employment Development
Policy TR1: Achieving The Transport Strategy
Policy TR2: Major Transport Projects
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR4: Cycle Routes and Facilities
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
Policy SR4: Other Sites for Development in South Reading

- 5.3 Relevant Supplementary Planning Documents (SPDs) are:
- Employment, Skills and Training (April 2013)
 - Sustainable Design and Construction (December 2019)
 - Revised Parking Standards and Design (October 2011)
 - Planning Obligations Under Section 106 (April 2015)

6 APPRAISAL

The main matters to be considered are:

- Principle of Development
- Design - scale, layout and appearance and effect on Listed Building
- Transport/ Parking
- Landscaping & Ecology
- Sustainability
- Environmental Matters
- S106 & Community Infrastructure Levy
- Equalities impact

Principle of Development

- 6.1 The NPPF states (para. 10) that *“at the heart of the Framework is a presumption in favour of sustainable development”* and at para. 11 that for decision-taking this means: *“approving development proposals that accord with an up -to-date development plan without delay;”*. The overarching objectives are economic, social and environmental. The proposal would contribute towards helping to *“build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth...”*.

- 6.2 In addition, Chapter 6 states that significant weight should be placed on the need to support economic growth and productivity.
- 6.3 The site is a specific allocation under Policy SR4e of the Reading Borough Local Plan (RBLP) which states:

SR4e PART OF FORMER BERKSHIRE BREWERY SITE

Development for employment uses. The site has an existing permission for 33,910 sq m of offices, but would also be suitable for industrial and warehouse development. Related commercial uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres.

Development should:

- *Enhance the setting of the listed Little Lea Farmhouse;*
- *Provide for a green link along the A33 frontage;*
- *Include a landscaped buffer to the watercourses around the site, with development set back at least 10m from the top of the bank of the river wherever possible;*
- *Address any contamination on site;*
- *Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and*
- *Safeguard land which is required for mass rapid transit routes and stops.*

Site size: 3.7 ha 11,000-13,000 sq m of industrial and warehousing

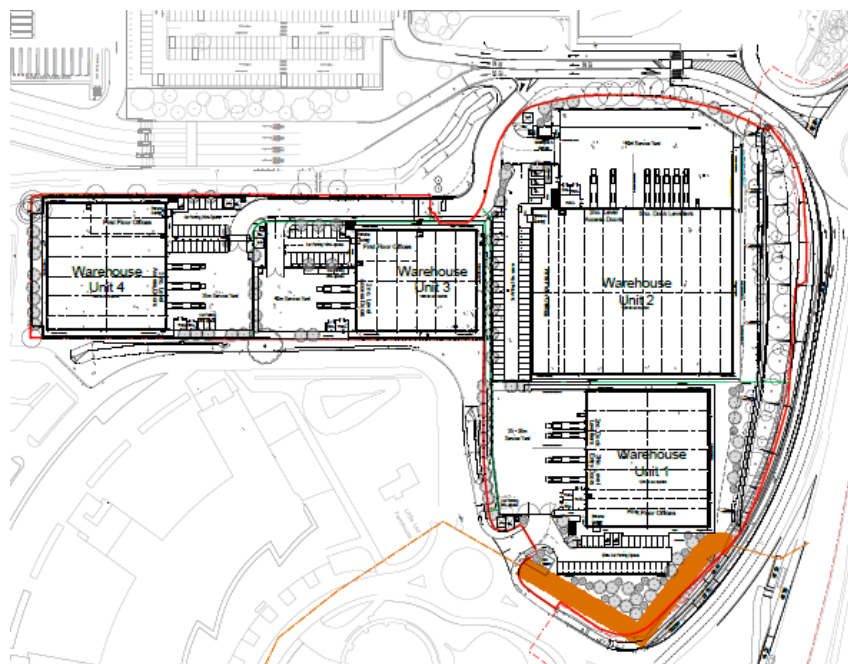
- 6.4 The RBLP also highlights the need to improve and redevelop vacant sites in the areas close to the A33 in south Reading (Para. 3.2.6) stating that *“Many of the sites that could be developed are vacant or underused and of poor visual quality and offer an opportunity to create a high-quality gateway into Reading.”*
- 6.5 It would meet Policy EM1 in contributing towards the provision of employment floorspace during the plan period.
- 6.6 It would also be located along the A33 corridor, as required under Policy EM2, and would include a variety of premises sizes as set out under Policy EM4.
- 6.7 Para 6.1.15 of the RBLP states that *“South Reading represents the largest concentration of deprivation in the Borough, with many neighbourhoods within the 20% most deprived areas in England¹¹⁴. There are particular issues with regard to skills and qualifications.”* The applicant states that the proposed scheme would provide ca 200-400 direct jobs and indirect jobs as well as jobs created through the construction phase. The proposal would therefore enable the delivery of work opportunities for local people. Reading UK CIC also

supports the provision of warehouse-type jobs in this part of the Borough to address acknowledged need.

- 6.8 As described in para. 1.2 above there is an extant permission for 33,445sqm of office floorspace and, although implemented, the applicant has made it clear that there has been no interest from office occupiers and hence the current proposal. Nonetheless, it is still a material consideration in assessing the current proposal.
- 6.9 The principle of the proposed flexible uses for B1 (c), B2 or B8 would therefore be acceptable, but subject to meeting other policy requirements and the matters specifically raised in the policy. These are addressed in the assessment below.

Design - scale, layout and appearance and effect on Listed Building

- 6.10 The NPPF (Para 124) sets out that good design is a key aspect of sustainable development.
- 6.11 Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.” Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.*
- 6.12 This locality is generally characterised by large-format commercial buildings, except for Little Lea Cottage. The proposed scheme includes for four units of varying size each with their own independent serving and parking areas and their layout has been influenced by the shape of the site, immediate context and operational factors.

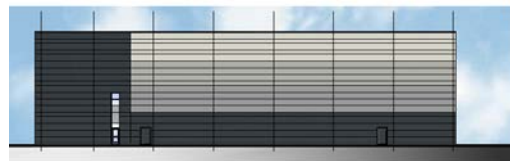


- 6.13 During pre-application discussions, officers raised some concerns over the overall footprint of the buildings, which would be greater than the extant office permission, and greater floorspace than the quantum set out within the allocation, whilst still being to achieve an effective landscaping buffer to the site and landscaping within the scheme generally. The applicants advised that the footprint and overall height were required to maximise the effective use of the site whilst meeting operational requirements for future occupier both in terms of specific internal racking systems, but also HGV loading access.
- 6.14 However, during this application there have been amendments made to the overall footprint of Units 1 and 2 and some adjustments to siting of those units and this has enabled the adequate retention of a landscaping buffer to the east and south of the south and other landscaping within the site.
- 6.15 The overall design of the buildings would be of simple form with shallow pitched roofs using external wall treatment comprising a horizontally spanning composite cladding of different types of silvers and greys with darker shades of grey for emphasis to the office element for each unit. The colour would become lighter in tone from bottom to top to reduce the apparent height of the buildings.
- 6.16 The pedestrian entrance would be double height glazed curtain walling reinforced by a glazed entrance canopy to provide a clearly visible focal point to each building. There would be large areas of glazing to the offices, would assist in breaking up the elevational form.

UNIT 1



Front



Side to A33



Rear



- 6.17 The proposed appearance of the units would generally reflect surrounding industrial and other commercial buildings (see examples of existing buildings below).



- 6.18 Although prominent in views from the A33, the site would be softened by the existing and proposed landscaping/ tree planting to meet the requirements of a treed A33 corridor as set out in Reading's Tree Strategy (2020).
- 6.19 The buildings also need to be considered in the context of existing surrounding buildings, in particular, the Verizon building, which is significant and dominating in the local context, but also the Reading Gateway complex opposite the site, east of the A33. The site would be more also be more screened by landscaping than those sites. Additionally, the consented and extant scheme would have been a 6-storey office building (ca 21+ m high), albeit with much less overall foot print.



CGI view along A33 from south

- 6.20 The application buildings would be immediately to the north and north-west of the Grade II listed building - Little Lea Cottage, although separated from it by an existing access road from the A33.
- 6.21 Listed buildings have statutory protection under sections 16 and 66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. This requires local planning authorities to have regard to the desirability of preserving their significance and in the case of listed buildings any contribution made by their setting.
- 6.22 Para. 189 of the NPPF states that *"in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."* The LPA should identify and assess the significance of a heritage asset that may be affected by a proposal including development affecting the setting (Para. 190 NPPF) *"and any harm to, or loss of the significance .. or from development within its setting), should require clear and convincing justification."*
- 6.23 Policy EN1 of the RBLP states: Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. Policy EN6 requires *"in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area..."*. SR4e requires an enhancement of the current setting of the Listed Building, which to a certain extent has been harmed by the development of large commercial buildings in the locality.
- 6.24 In commenting on the application the Council's Heritage consultant identified that the harm to the significance of the Listed Building from the proposed development within the setting of Little Lea Cottage should be given great weight in the planning balance.

- 6.25 The Applicant has submitted a Heritage Statement, which is considered to have been undertaken to an acceptable standard. This, along with other policies within national and local policy have been considered.
- 6.26 Officers agree with the conclusion within the Statement that the harm to the significance of Little Lea would be less than substantial and para. 196 of the NPPF states that *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”*
- 6.27 It is clear from the Statement how the setting of Little Lea Cottage (formerly called Little Lea Farmhouse) has greatly changed over time, and what was once within a wider agricultural landscape has now been lost as a result of development around the site, combined with the loss of associated farm buildings, and the presence of the M4 within the wider landscape.
- 6.28 The Cottage is adjacent to the existing Reading Business Park and is situated on a small area of green space opposite a roundabout and has an access road wrapping around it on 3 sides. Any previous historical and functional relationship with the application site are considered to have been lost. It is viewed within the context of the A33 with its associated smell, noise and traffic movement, which are all considered to detract from its significance.
- 6.29 Although development on the application site would change how the asset would be experienced, by further exacerbating the industrial and commercial setting, this has to be considered in the context of the site’s previous use as part of Berkshire Brewery, the effect the extant permission would have had, and that there is an allocation for the redevelopment of the site for B uses, which was examined through the Local plan process and was adopted recently. It is not considered that the application site currently provides any significantly positive setting to the Little Lea Cottage.
- 6.30 RBC’s (former) Heritage Consultant’s view is that the *“addition of the warehouses will dominate the setting of Little Lea, cutting it off from any remaining public views and providing an alien and intimidating back-drop to the cottage”*. However, it is not considered that there are current public views which would be detrimentally affected by the development proposal. The main public view is from the A33 either directly facing it (from the east) or on approach from the south. Neither would be affected by the proposed scheme.

Little Lea Cottage (white building to the centre of the image) with Reading International Business Park (Verizon building) to the left and the application site to the right



- 6.31 The Council's former Heritage Consultant also refers to the existing erosion of the setting of the Cottage from existing surrounding development, but considers that the proposal buildings, entrance, traffic and lighting would detrimentally affect the setting of the Cottage. This does not consider however, that the access road is existing and was also previously used for the Brewery. The reference to Historic England's 'The Setting of Heritage Assets' (2017) refers to the "way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places." Para. 6.26 above makes it clear that the site is already greatly affected by the noise, smell and vibration from the A33.
- 6.32 Officers consider that the retention of some existing tree screening between the edge of the proposed site and the Listed Building, with the set back of Unit 2 from the site boundary, with a green buffer and service yard, would limit the impact on the setting of the Listed Building. The proposed buildings are also set back from the site boundaries and the landscaping proposals (discussed further below) are considered to provide a sufficient green buffer via existing and

new trees and vegetation, helping to soften the impact of the development on the setting of the heritage asset. The proposed materials would also serve to visually soften the view of the buildings by using a colour palette intended to reduce the appearance of the overall height.

- 6.33 In weighing up whether the impact of harm of the scheme on the significance of Little Lea is acceptable, in accordance with NPPF (para. 196), it needs to be demonstrated that there would be public benefits which balance in its favour. The public benefits include that the scheme would create employment space of a type, especially within the current Covid climate, for which there is specific demand, in contrast to the extant offices, and it would be located within a part of the Borough with high levels of deprivation in terms of employment and skills. It would bring a vacant and untidy site back into effective use, and there would be good quality landscaping and there would be management of the site, creating a new gateway to Reading. It is also considered that the setting of the listed building, would be enhanced to a degree, in accordance with Policy SR4e, by bringing the application site back into use and thereby removing an untidy, overgrown and vacant site.
- 6.34 The proposed scheme would therefore, accord with policies CC7, EN1, EN6 and SR4e.

Transport

- 6.35 Paragraph 109 of the NPPF (2019) states that development should only be refused on highways grounds *“if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”* RBC Transport Strategy has confirmed that overall, the proposal would result in a net reduction in traffic movements compared to the extant permission of offices. Also, there is agreement with the applicant to the transfer of a strip of land, which fronts onto the A33, to RBC, as part of the safeguarding route for the MRT in accordance with Policy TR2, which would fulfil the relevant requirement in Policy SR4e.
- 6.36 The proposed scheme includes two access points, one serving Unit 1 to the south and the other the remaining units from the west. The service yards would provide sufficient manoeuvring space to serve the requirements of the units and would provide safe and efficient access and egress to the development.
- 6.37 The proposal includes for 142 no. car parking spaces of which seven would be disabled spaces. 10% of the spaces would be for electric vehicle charging. A total of 44 no. cycle spaces are proposed. This provision is shared between the units within the unit-specific parking areas and would meet relevant standards.
- 6.38 There is existing footway/cycleway provision along the A33 and there would be paths within the site to provide direct access to each Unit.

- 6.39 The site is also served by several existing local bus routes, including to central Reading and a connection to the Mere oak Park and Ride with bus stops in front of Verizon and at the Tesco Distribution Centre.
- 6.40 Based on the above and no adverse comments from RBC Transport Strategy, officers advise that the scheme would be acceptable in transport terms, subject to attaching a number of conditions (set out in the Recommendation above) and delivery of the MRT route and would therefore accord with requirements of policies TR1-TR5.

Landscaping and Ecology

- 6.41 The relevant RBLP policies to the consideration of the site from a Landscaping and Ecology perspective are summarised as follows:
- 6.42 Policy CC7 requires developments to be assessed to ensure, amongst other things, that they *“Are visually attractive as a result of good high quality built forms and spaces, ... and appropriate materials and landscaping.”*
- 6.43 Policy EN11 reads: *“Where development in the vicinity of watercourses is acceptable, it will:- ... Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance....”*
- 6.44 Policy EN12: Biodiversity and the Green Network states that the identified Green Network (as outlined on the proposals map), *“shall be maintained, protected, consolidated, extended and enhanced. Development should not result in a net loss of biodiversity and geodiversity and provide a net gain for biodiversity wherever possible. Development should:*
- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
 - *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.”* The frontage of the site is identified as within the Green Link and Policy SR4e requires for the provision of a green link as part of the allocation.
- 6.45 Policy E14: Trees, Hedges and Woodlands states that *“...trees, hedges and woodlands will be protected from damage or removal where they are of importance. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, ... to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for*

biodiversity and to contribute to measures to reduce carbon and adapt to climate change.” The allocation SR4e requires a “landscaped buffer to the watercourses around the site, with development set back at least 10m from the top of the bank of the river wherever possible”

- 6.46 The site is also within an Air Quality Management Area where retention of tree coverage is important.
- 6.47 The site is subject to TPO 12/18 which includes a woodland area (along the A33 frontage and eastern portion of the site within the Business Park) and 5 individually specified trees on the western boundary (alongside the access into Tesco from the A33). Over the period of its vacancy, since the demolition of the previous bottling plant, there has been the establishment of self-seeded trees and other scrub within both original landscaped areas and within areas of hardstanding, which remain. The site also has a watercourse through it (a ditch, known as Kingsley Close).
- 6.48 Under the extant permission for offices the scheme included the removal of TPO trees, as shown in the extracts included in para. 4.58 above. It is evident that over the period of time since that permission the appearance of the site has changed to a degree.
- 6.49 Although the impact of the proposed scheme on the site as it now stands, and current national and local policy is relevant, and clearly has weight in the decision-making process, the extant permission is also a relevant material consideration. Both the Natural Environment Officer and Ecologist raised objection to the initial submission.
- 6.50 The detail of the Natural Environment Officer’s concerns is set out in Paras 4.53 to 4.74 above. In summary, her view was that there was insufficient information regarding overall tree loss and tree gain and an Arboricultural Impact Assessment (AIA) was requested, to make this clear. Additionally, it was considered that the overall footprint of the buildings would have resulted in the loss of woodland and insufficient space for adequate landscaping.
- 6.51 There were a number of amendments made during the course of the application, which have enabled an increase in trees fronting onto the A33, additional planting along the southern boundary and retention of a TPO oak on the north-western boundary by the service yard of Unit 2 resulting from the following:
- Reduction of the size and realignment of the footprints of Units 1 and 2
 - Amending the layout of the car park to Unit 1;
 - Using a no dig construction; and
 - Moving Unit 3.

6.52 These changes and the submission of an AIA have led to the Natural Environment Officer since confirming that the scheme is acceptable in landscape/ tree terms subject to conditions, although maintains an objection with respect to there being no green/brown roofs or green walls.

6.53 However, the Ecologist has maintained their objection summarised as follows (full original consultation response at paras. 4.16 to 4.30 above and further comment, following a walkover, in Appendix 1 below):

- The construction of Unit 1 will result in the loss approximately 0.5ha of lowland mixed deciduous woodland and the fragmentation of the wider green network. This is contrary to paragraphs 175 and 175 of the NPPF and policies EN12 and EN14 of Reading Borough's Local Plan.
- Unit 2 is within 10m of the watercourse that runs through the woodland belt adjacent to the A33. The Construction of a tall building adjacent to it is likely to adversely affect it. This is contrary to policy EN11 of Reading's Local Plan.
- There is insufficient information regarding bats, reptiles and invertebrates to determine the likely impact of the proposals on these groups of species. This is contrary to policy Paragraph 99 of the government Circular 06/05.

6.54 The applicant has provided amendments and further information/clarification over the course of the application which includes the following measures:

- Moving the built form away from the watercourse, which would enable a betterment compared to the existing, so that there would be an 8m landscaped buffer from the watercourse, to achieve Environment Agency stand-off requirements to the watercourse. Native hedgerow, wildflower grassland and marginal planting would benefit biodiversity and ecology;
- Completion of reptile surveys, which the applicant confirms shows an absence of this group;
- Reappraisal of the site and its naturalisation to assess whether there is a need for any entomological survey, concluding that on-site management has prevented such naturalisation and therefore the need for survey;
- Submission of an Ecological Mitigation and Management Plan, which includes various ecological mitigation and enhancement measures, including installing biodiversity features, such as log piles from felled trees on site, placing bat boxes along the woodland as ecological enhancements; creating new habitats of high interest for invertebrates, such as wildflower grassland; Any timber from the removed scrub / trees would be retained as a dead-wood resource to benefit organisms;
- Setting out that the current watercourse supports a narrow band of self-set trees adjacent to the palisade and chain-link fence

and existing hardstanding beyond and that the aim or removing some scrub and self-set trees would be to improve light conditions to the watercourse and seek to improve the overall diversity of the watercourse and associated channel;

- Amendments to the layout of the car park serving Unit 1 to enable an increase in the number of trees fronting onto the A33 to the benefit of ecology;
- Providing justification for not completing targeted bat activity surveys *“on account of the preservation of the current principal opportunities, that would allow any current use and local populations to be maintained at a favourable conservation status”*;
- Further evidence contesting the Ecologist’s view that part of the area, which would be covered by Unit 1, to the east of the site [referred to by RBC Ecologist as south], is lowland woodland and would not meet the criteria as priority habitat. Photos have been provided to demonstrate this point, as described by the applicant as to show *“that tarmac dominates the ground at this location with principally salix scrub having developed on the margins and through the former car park cracks.”* (some examples of photos from their submission are included below).

Area in south-east of the site



Described by applicant as Recolonising ground to the east



Described by applicant as existing watercourse with narrow band of trees (to right to proposed building)



Applicant describes this as fencing marking previous development site and proximity to watercourse and current buffer



6.55 Ecology, however maintain their policy objection to the proposal as they consider that it would lead to the loss of priority woodland and biodiversity, which they consider has not been adequately mitigated or compensated for, and would therefore be contrary to policy.

- 6.56 In reaching a recommendation officers need to take a balanced view, considering all material information, and it is clear, that if it is accepted that the area to the east is a woodland, that this is a relatively recently established area, resulting from the vacancy and lack of management of a former built site. This, it is argued, would have comparatively less significance compared to more well-established areas, which were not former developed sites, and therefore its value would be lower. Nonetheless, its loss needs to be addressed against the requirements of policies EN12 and EN14, which require any loss to be avoided or mitigated or compensated for on site. It is considered that sufficient evidence has been presented of mitigation and enhancement measures, which would be sufficient to offset any losses that would occur. When balanced against the benefits that the scheme would bring, as set out elsewhere, this limited infringement of policy is considered to be acceptable in this instance.
- 6.57 Specifically, with reference to the watercourse, it is worth noting that the Environment Agency removed their original objection, being satisfied that the minimum buffer of 8m next to the watercourse would be secured, and confirmed that the suggested ecological enhancements were welcomed including those to the river corridor. It is recommended that a condition be included to ensure the implementation of measures as identified in the Ecological Mitigation and Management Plan.
- 6.58 Given that there is an extant permission, which is material to the consideration of this proposal, it is considered that the impact on wildlife habitats is not sufficiently harmful and subject to conditions and informatives, as included in the recommendation above, the proposal would accord with relevant Policies, CC7, EN11, EN12, and EN14.

Sustainability

- 6.59 As one of the local authorities which declared a 'climate emergency', the aim is to eliminate carbon dioxide emissions in Reading by 2030. In this context there are several policies within the local plan which are relevant to new development.
- 6.60 Adopted Local Plan Policy CC2 requires new development to reduce the consumption of resources and materials and includes that *"All major non-residential developments meet the most up-to-date BREEAM 'Excellent' standards, where possible"* and that *"Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective."*
- 6.61 The supporting text (para 4.1.4) accepts that *"some types of development, such as industrial uses, warehouses and schools might find it more difficult to meet these standards. In these cases,*

developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard."

6.62 Policy CC3: Adaptation to Climate Change, requires that *"all developments demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:*

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;*
-demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;*
- Use of trees and other planting....; and*
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system.....*

6.63 Decentralised Energy CC4 states *"Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision".* Supporting text in para. 4.1.19 states that although this policy would mainly apply in Central Reading there would be some potential in South Reading.

6.64 Policy CC5 requires minimisation of waste during construction and the life of the development.

6.65 Following the initial submission, the Sustainability Manager raised a few issues (as set out in para. 4.80 above). Further information has been submitted, and any additional comments from Sustainability will be reported in an update.

6.66 The submitted Renewable and Sustainable Energy Report sets out that consideration has been given to low or zero carbon technologies, which would be feasible for the development in line with BREEAM ENE04² requirements, including: solar thermal; air source heat pumps; ground source heating; biomass heating; gas fired CHP and Photovoltaic system. The applicant does not consider that there are any further opportunities for a decentralised energy system nor that there would be a district heating system, which could be used as part of this system.

² Low carbon design

6.67 The conclusion of the assessment is that photovoltaic panels provide the best solution of energy savings and such technology would suit this type of shell and core proposal. PV is proposed on roofs of all four proposed units.

6.68 Other measures have been incorporated into the design as follows:

- Building material properties have been considered with U and G values in line with the requirements of the thermal modelling, BRUKL and BREEAM. Air Permeability has been improved from a standard rate of 10m³/hr.m² to a targeted 4m³/hr.m².
- The use of Ground Source Heat Pumps has been ruled out due to the high initial installation cost of the buried pipework required.
- The energy strategy includes for the heating systems based on the following:
 - Office heating via the VRF comfort heating and cooling systems.
 - Heat recovery of heated air via Air Handling Units, Thermals or cross flow.
 - Space heating in core and toilet areas via radiant electric heating panels.
 - Domestic water heating is provided by instantaneous electrical point of use water heaters. These remove the need for large water storage facilities and need to continuously maintain the water temperatures within the storage vessels, therefore water is only heated when needed.
 - The strategy also removes the need for gas fired boilers resulting in reducing the pollutants vented to atmosphere.

Other measures of note would be:

- All lighting to be LED.
- Automatic lighting controls included.
- Control of externally lighting via Photocells and Timeclocks.
- Selection of water saving sanitaryware.
- Automatic Monitoring and Targeting.
- Using a balance of cut and fill in the design of the earthworks so as not to import or export material;
- The use of 10% rooflights to increase the natural daylighting to the warehouse building.
- Large areas of glazing to the offices to increase natural daylighting.
- The provision of covered cycle parking to promote alternative means of transport.
- The use of SuDS features.

6.69 The applicant has confirmed that the overall reduction in energy use would be a 35% improvement against national building standards and that the scheme is targeted to achieve BREEAM 'Very Good'. Policy CC2 requires this type of major scheme to achieve BREEAM 'Excellent' the applicant has set out that the criteria set by BREEAM makes it very difficult for warehouse developments to achieve the

minimum standards to achieve 'Excellent', and that in order to achieve such, "*significant changes to the scheme would make it unviable*" the applicant has "*therefore, committed to Very Good and focused on maximising the energy efficiency of the buildings.*"

- 6.70 The Natural Environment Officer also raised concern regarding the proposal not including the provision of either green and/ or brown roofs and/ or green walls, which are possible measure set out in CC3 to adapt to climate change and as a means to achieve biodiversity improvement.
- 6.71 During the application period the applicant provided further detail and justification for not providing them as set out in Appendix 2 below. Such measures form one of a range within Policy CC2, which can be used to respond to climate change, but the cost of one measure and/ or environmental disbenefits should be a material consideration in whether such a measure should be used. The proposal includes PV and a range of other measures which together mean the scheme would secure a BREEAM rating of 'Very Good'. Officers consider that the proposal would be sufficient overall to meet sustainability policy requirements, subject to conditions regarding the submission and approval of pre and post construction BREEAM, as included in the Recommendation above.

Environmental matters

- 6.72 ***Air Quality:*** Policy EN15 requires developments to "*have regard to the need to improve air quality and reduce the effects of poor air quality*". The submitted assessment shows they will have to incorporate control measures during the development phase to control dust. A construction method statement including dust control measures is therefore, recommended. The assessment shows that the operational phase of the development would have a negligible impact on air quality therefore no mitigation is required as accepted by the Environmental Protection and Nuisance Officer.
- 6.73 ***Contaminated land:*** Previous implemented works did not address ground quality issues and in line with Policies EN16 and SR4e further investigation will be required and conditions are recommended above.
- 6.74 ***Drainage & Flood Risk:*** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions or be no worse than existing. The SUDS officer confirmed that although the submitted information shows that reduced run off rates would be achieved that there are discrepancies in the information and therefore, recommends the inclusion of the standard conditions requiring the submission and approval of a sustainable drainage plan and maintenance and management plan in order to accord with Policy EN18.

Section 106

- 6.75 In accordance with Policy CC9 and TR2, the following S106 obligations would be sought:
- Employment, Skills and Training - construction and end user
 - Land transfer of an 8m strip along the A33 to provide an inbound (northbound) lane for MRT.
- 6.76 For both construction and end user skills the applicant will have the option of either developing an Employment Skills Plan in conjunction with Reading UK CIC or providing a financial contribution. Reading UK CIC has confirmed that the applicant has contacted them and have a clear understanding of both requirements and are considering a framework for each. The proposal provides the opportunity for good quality permanent work in the logistics sector in reading and specifically south Reading.
- 6.77 Safeguarding of part of the MRT route specifically accords with the requirements of Policy TR2: Major Transport Projects.
- 6.78 The applicant has confirmed their commitment to these obligations, which will be part of a S106 legal agreement.

Equalities Impact

- 6.79 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7 CONCLUSION

- 7.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019 and previous planning history. It would provide for flexible B1c/B2/B8 (distribution/warehousing) units, and would bring a vacant site back into effective use on a key gateway site on the A33. This would accord with national and local policy in terms of meeting economic objectives by providing a storage and logistics site, and would specifically bring jobs to South Reading, where deprivation, specifically in terms of skills, is high.
- 7.2 The maintained objection to the loss of some trees (considered by the Ecologist as part of a priority woodland), proximity to a watercourse and the 'less than substantial' harm identified for the Grade II listed building, have been weighed against other material considerations. These are the economic benefits of the scheme, the extant permission for office development, a net gain in tree

planting, other enhancements through specific planting, ecological enhancements and mitigation, and overall proposed management of the site. These would ensure some enhancement to the setting of the listed building, compared to its current appearance, and combined with other public benefits, which would outweigh the harm to the significance of the listed building. In addition the ecological enhancements, mitigation and overall landscaping scheme are considered to be adequate to meet policy requirements and the limited infringement of policy is considered to be acceptable in this instance.

- 7.3 Officers have worked positively and proactively with the applicant on this scheme, and amendments have been secured, which are considered to satisfactorily address policy issues and overall officers consider this to be a supportable scheme. It is therefore, recommended for approval subject to conditions and the completion of a S106 legal agreement for the provision of a contribution towards an employment, skills and training plan for construction and end user and the land transfer of a section of the MRT route to ensure it is safeguarded.

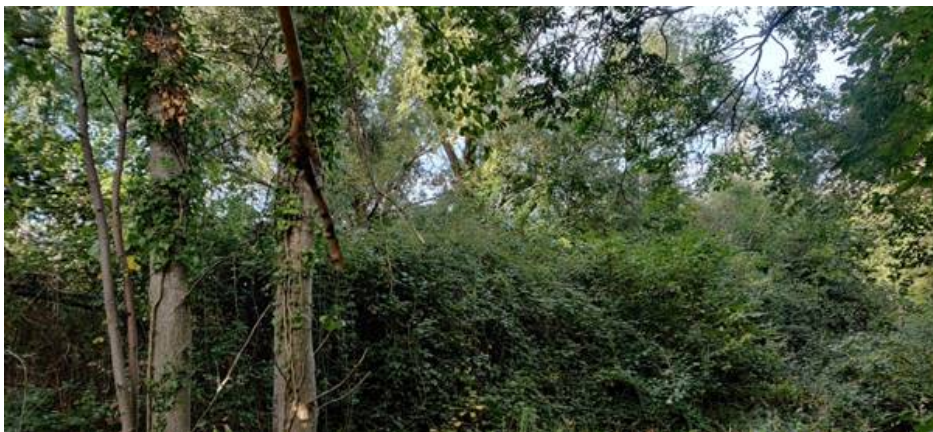
Case Officer: Alison Amoah

APPENDIX 1: Ecologist (on behalf of RBC) further comments 28/9/2020

Woodland at the S/ SE corner

The woodland at the north certainly is a woodland, and in my opinion fits the criteria of the priority habitat "lowland mixed deciduous woodland". See points below:

1. The woodland is a mix of poplar, willow, scot's pine, oak and ash. It has a diverse structure with taller trees, open areas, a good understory and a relatively diverse ground flora. The majority of the trees are greater than 5m tall. The woodland has developed on hardstanding with trees growing up between the tarmac creating an interesting woodland that will support a variety of wildlife. The woodland starts at the edge of the hardstanding on the opposite side of the fence and my measurement is that the woodland along the south and south east of the site measures 0.8ha. Some photos of the woodland are provided below:





2. The Joint Nature Conservation Committee (JNCC) defines woodland as: "Woodland is defined as vegetation dominated by trees more than 5m high when mature, forming a distinct, although sometimes open, canopy."
3. Scrub is defined as "Scrub is seral or climax vegetation dominated by locally native shrubs, usually less than 5 m tall, occasionally with a few scattered trees."
4. The applicant's ecologist tries to claim that this is scrub. The significance being that scrub is supposedly less important for wildlife and is not a "priority habitat" - although this is to a certain extent semantics in this case as this is a significant resource for wildlife whether or not one calls it scrub or woodland.
5. The woodland however certainly is woodland.
6. The woodland also fits the description of the priority habitat "Lowland Mixed Deciduous Woodland". The description as given by the JNCC reads: "*Lowland mixed deciduous woodland includes woodland growing on the full range of soil conditions, from very acidic to base-rich, and takes in most semi-natural woodland in southern and eastern England, and in parts of lowland Wales and Scotland.*" although the definition is somewhat ambiguous.
7. Part of the woodland is in the Green Link as per the proposals map.
8. Para 174 of the NPPF reads: "To protect and enhance biodiversity and geodiversity, plans should: [...] **promote the conservation, restoration and enhancement of priority habitats, ecological networks** and the protection and recovery of priority species;"
9. Policy EN12 reads:

"The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

 - **Sites with identified biodiversity interest** - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, **Priority and Biodiversity Action Plan habitats**, and the River Thames and **all its tributaries** (including the River Kennet and the Kennet & Avon Canal); and
 - **Areas with potential for biodiversity value and which stitch the Green Network together** - designated Local Green Space and open green spaces, and **existing and potential Green Links**.
10. Policy EN14 reads: "Individual trees, groups of trees, hedges and **woodlands** will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended."
11. The proposals, because Unit 1 will be built where the woodland is, do not comply with this policy.

The watercourse

The watercourse is actually better than I expected to be. It has clear water, some in stream vegetation and does not appear to be polluted. It has woody vegetation on either bank. Policy EN11 reads: "Where development in the vicinity of watercourses is acceptable, it will:- [...] Be

set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;"

Without having seen the sections I cannot comment further on this but it is worth noting that the woodland belt that runs adjacent to the stream is quite wide in places and with this in mind the development would need to be kept further back.

Presumably they have not sent you the sections?

Reptile surveys

The applicant still hasn't provided details of the reptile surveys (this needs to be in the form of a plan showing where the refugia were located and dates, times of the surveys and the weather conditions).

This is important because if they were undertaken during unsuitable weather (either too hot or too cold) or the refugia were placed in the wrong places then the survey may not have recorded reptiles if they are present.

I don't understand why this hasn't been provided.

Bat surveys

The woodland belt that runs along the stream could well be of importance for bats. It is likely to be a dark corridor (even though there are lights the dense vegetation is likely to keep much of the corridor dark). There are records of less common species in this part of Berkshire such as the *Nathusius pipistrelle* and no survey has been undertaken. The applicant has had all summer to do this and has failed to do so as they say that the area will not be affected. Unless there is no impact on this area, it seems that this is an unsubstantiated claim.

Invertebrates

Under Section 41 (S41) of the 2006 NERC Act, the Secretary of State periodically publishes a list of species that are considered to be of principal importance for the conservation of biodiversity in England.

The list currently comprises 943 species, referred to as "priority species" in the NPPF. Paragraph 117 of the NPPF states that: "Planning policies should [...] promote [...] the protection and recovery of priority species populations".

The list includes 379 terrestrial invertebrates. In our previous response 27 March 2020, we stated that an invertebrate survey should be undertaken. This was not been done and no mention of invertebrates if made in the applicant's response.

Brown field sites such as these with a mosaic of habitats, including woodland, open areas, banks and artificial substrates are can be some of the UK's most important sites for invertebrates (see <https://cdn.buglife.org.uk/2019/08/Planning-for-Brownfield-Biodiversity.pdf>). Despite this no assessment has been undertaken.

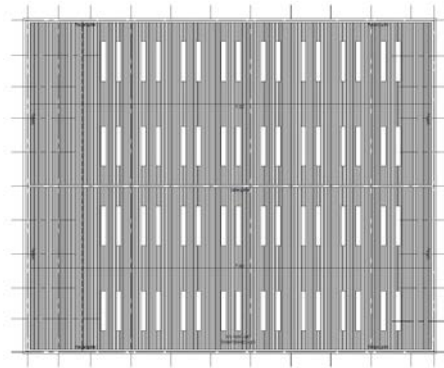
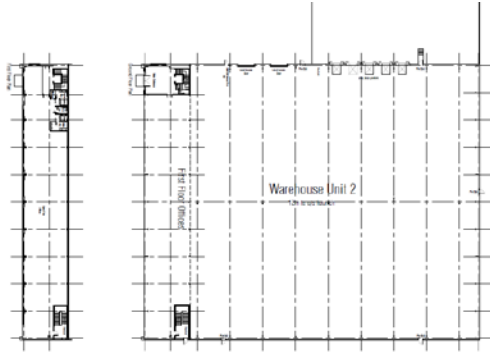
The assessment would need to be undertaken by a specialist entomologist over the summer months. We therefore have no information about the value of the site for invertebrates.

It has therefore not been demonstrated that the development (in particular Unit 1) will not have an adverse impact on priority invertebrate species.

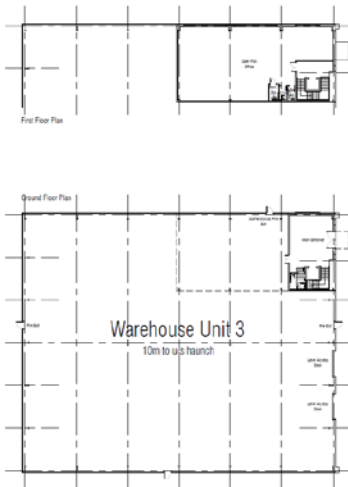
APPENDIX 2: Justification from applicant regarding not using green/brown roofs and/or green walls

- The portal frame structure would need to be strengthened to accommodate the increased roof load and would require additional columns making buildings inflexible and would not meet the needs of potential future occupiers;
- Additional foundations would be required, which would be an environmental dis-benefit; significantly more building materials would be required requiring more existing material to be taken off site for disposal;
- A re-evaluation of structural requirements and resulting increases in steel and concrete would not only increase costs significantly, but would also require significant amounts of energy for the steel and concrete production for the construction of a warehouse. This would be such that the disbenefit to the environment would be greater than the offset of the green roof provided;
- Performance of green roofs for reducing surface water run off is hampered during cold and wet weather;
- The cost of effective maintenance of green roofs dissuades some operators and permanent access provision would be required, which reduces land for employment floorspace.

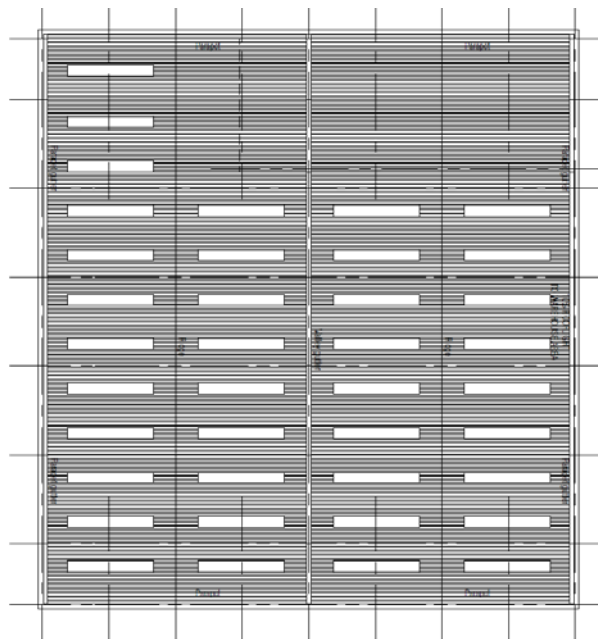
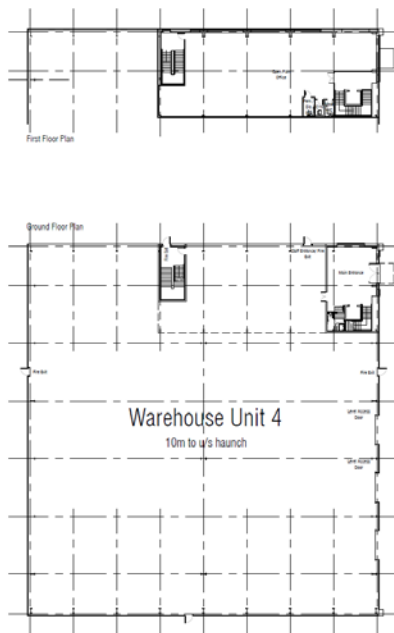
Unit 2



Unit 3

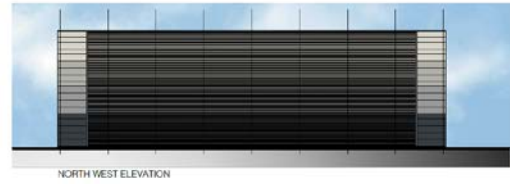
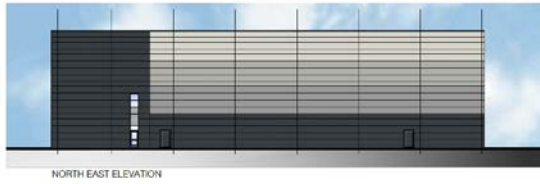
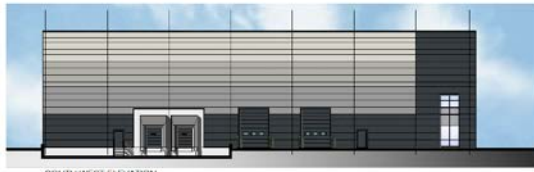


Unit 4

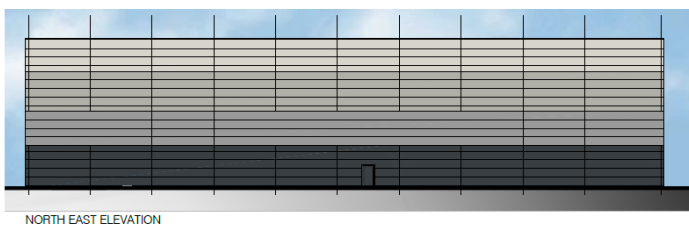


Elevations

Unit 1



Unit 2



Unit 3



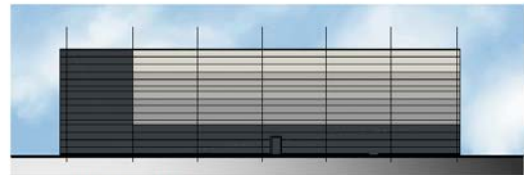
SOUTH WEST ELEVATION



NORTH WEST ELEVATION



NORTH EAST ELEVATION



SOUTH EAST ELEVATION

Unit 4



NORTH EAST ELEVATION



NORTH WEST ELEVATION



SOUTH WEST ELEVATION



SOUTH WEST ELEVATION

Landscape Master Plan

READING INTERNATIONAL LOGISTICS PARK
Design & Access Statement - Landscape Proposals

LANDSCAPE MASTERPLAN



- 1 Entrance Gateway
- 2 Existing Tree Belt
- 3 Building Main Entrances
- 4 Structural Park Landscape to Southeast Boundary
- 5 Main Car Park Areas
- 6 Landscaped Areas to the Site's Perimeters
- 7 Pedestrian Link