

COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 16

PLANNING APPLICATIONS COMMITTEE: 7th November 2018

Ward: Whitley

App No: 181518

App Type: FUL

Address: Imperium, Imperial Way

Proposal: Change of use of 2nd floor (2658sqm GIA) to a flexible use comprising either: Office (Class B1a); or a mixed use consisting of office (B1a) and training and commercial conference facilities (Sui Generis) and physical works to replace high level glazing with louvres and install plant on the roof space. (amended)

Applicant: EEF

Date valid: 28th August 2018

Major Application: 13 week target decision date: 27th November 2018

Planning Guarantee: 26 week date: 25th February 2019

RECOMMENDATIONS

GRANT Planning Permission subject to conditions and informatives

CONDITIONS TO INCLUDE:

- 1) Standard Time Limit
- 2) Approved Plans
- 3) Materials
- 4) Existing car parking provision of 130 car parking spaces is retained as shown on the approved plan.
- 5) L6A - No development shall take place until an Arboricultural Method Statement and Tree Protection Plan has been submitted and approved.
- 6) Retain the internal floorspace as on the approved plan
- 7) Submission and approval of an End User Employment, Skills and Training Plan

INFORMATIVES TO INCLUDE:

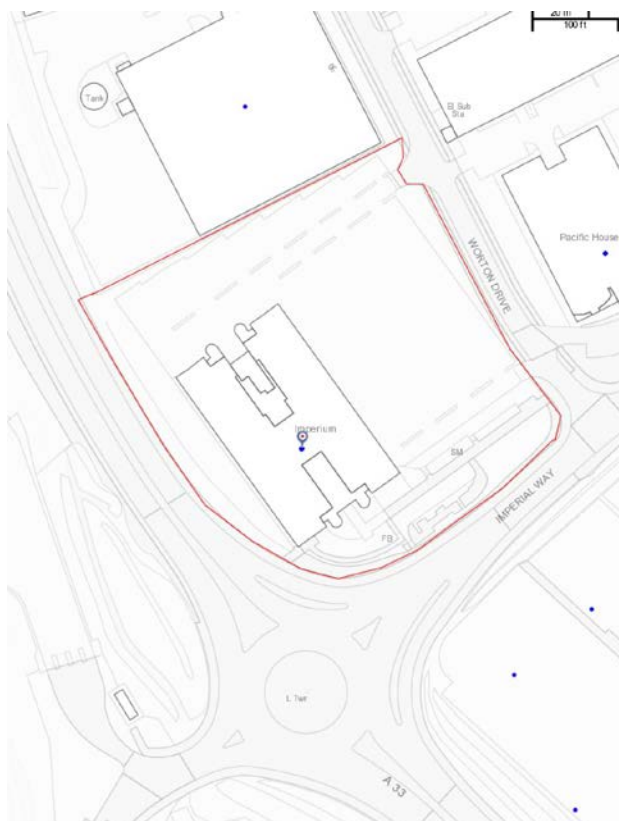
1. Terms and conditions.
2. Building control approval.
3. Pre-Commencement conditions.
4. CIL- not chargeable
5. Positive and proactive.

1. INTRODUCTION

1.1 The 1.6ha site is occupied by a large B1a office building of three floors ca 8,000sqm of floorspace. It is located on the corner of the A33 Relief Road and Imperial Way. The surrounding area is largely commercial and industrial development, although it is opposite the former Worton Grange site which is now a mixed use scheme including commercial, retail and residential uses.

1.2 The building is offered on a multi-let basis and has a number of occupiers at present, however, the vacancy rate is at about 50% with parts of the building having been unoccupied for long periods of time. The application site is the second floor of this building (2658sqm) and has been vacant for around three years.

- 1.3 The overall site has 405 car parking spaces and 26 cycle spaces, with 130 specifically for the second floor unit.



Location Plan

- 1.4 The site is located within the Core Employment Area (SA12c: South of Basingstoke Road) as defined within the Sites and Detailed Policies Document Policy SA12, and is within an Air Quality Management Area (Policy DM19). The site is covered by TPO 37/13, which covers all the trees, of any species, around the perimeter of the site.
- 1.5 Pre-application advice was sought and the applicant was advised that the principle would be acceptable subject to further detail on transport and employment, skills and training provision.
- 1.6 As the proposal is a development comprising a material change of use of floor area in excess of 1000sq.m it is a Major application, as defined by the General Development Management Order (2015).

2.0 PROPOSAL AND SUPPORTING INFORMATION

- 2.1 The applicant explains that EEF is a leading organisation offering business support and training consultancy for the manufacturing and engineering sector. EEF Venues (part of the overall EEF company) provide a collection of venues giving organisations access to conference facilities and meeting rooms in prime locations across the UK. The company provide training and support on a range of subject matters. Companies can become members of EEF through subscription and can access its wide range of member support services including conferencing and training events at Reading and other regional locations.

- 2.2 The proposal is for the change of use of the B1(a) premises to a flexible use either a mix of B1(a) office and training and conference facilities (sui generis) or B1 (a) office.
- 2.3 To facilitate this change there would be modifications to the elevations of the building summarised as follows:
- Replacement of high level windows with louvre panels on the East (Worton Drive) and West (A33) elevations.
 - Installation of M&E plant to the roof, described as 5mx5m space allocated for new heat pump condensers and fans to a maximum height of 2.5m.
- 2.4 The Planning Statement sets out that the proposed floor area would consist of small, medium and large meeting/training rooms, meeting rooms, conference rooms, breakout and refreshment facilities to host training courses provided by EEF and third party providers from 8/10 people up to 150. Additionally the proposed floor plan would include office floor space that supports the core function of the running of the EEF business, and ancillary space. It is currently envisaged that there would be employment for 30 staff and that the location could have up to 420 delegates on site at one time.
- 2.5 The following plans and supporting information have been considered:

Received 29th August 2018:

- Location Plan
- Block Plan
- Site Plans, Existing & Proposed Plans - Drawing no: EFV-ONE-ZZ-XX-DR-A-0001 (P02)

Received 18th September 2018:

- Concept Floor Plans- Drawing no: EFV-ONE-ZZ-ZZ-DR-A-0002 (P01)

Other documentation:

- Planning Statement, document ref: P0654-EFV-ONE-XX-XX-RP-A-001 (P01), prepared by One Creative Environments, received 29th August 2018
- Transport Statement, document ref: VN81106, dated August 2018, prepared by Vectos, received 29th August 2018
- CIL Additional Information Requirement Form, received 29th August 2018

3. PLANNING HISTORY

Relevant history as follows:

- 88/TP/217 - Erection of B1 use with associated parking - Approved 30/9/1988
- 88/TP/218 - Erection of B1 use with associated parking - Approved 30/9/1988
 - 07/01632/FUL - New Sliding Door to main entrance, alterations to car park and landscaping - Approved 7/3/2008
 - 08/01340/NMA - Minor amendment to planning consent 07/01632 - Approved 21/11/2008
 - 151889/FUL - Existing building refurbishment comprising new hard and soft landscaping, new external entrance and signage - Approved 12/1/2016
 - 180792/PREAPP - Pre-app advice for proposed change of use of 2658sqm (second floor) to office (B1(a)) OR a mixed use including office and training/commercial conference centre (sui generis). - Observations sent 21st June 2018

4. CONSULTATIONS

(i) Statutory

4.1 None

(ii) Non-Statutory

Environmental Protection and Nuisance

4.2 The Planning officer has reviewed the standing advice which sets out the requirement for a noise assessment for mechanical plant where there are nearby noise sensitive receptors. The nearest residential development is some distance from the application site, and the area is largely dominated by commercial premises, and is adjacent to the A33 and Imperial Way. No assessment has been requested in this instance.

Natural Environment

4.3 The site is subject to Area TPO 37/13, which includes all species. I note the application is for a change of use but includes replacement of high level glazing and installation of a roof plant. Works will require materials to be brought onto site and working on the outside of the building.

4.4 There is no mention of the TPO or tree related policies in the Planning Statement hence I do have some concern that the trees have not been considered and hence may not be protected from any external works or related activity, e.g. storage of materials. The north and east of the building is hard surfacing so storage of materials etc and access over this would not impact trees. The trees within the car park are relatively small, so there should be adequate space for works. However, given the protected status of the trees on site, it is reasonable to ask for a brief Arboricultural Method Statement (AMS) to confirm how external works will be carried out whilst protecting adjacent trees and confirmation of areas allocated for storage, site welfare etc (if required externally). It would be preferable to seek this information during the application process, rather than via condition.

4.5 *Planning Officer note:* As the contractor has not yet been selected, and therefore the detailed set up for the works area on site has not yet been determined, the applicant has requested that the submission and approval of an AMS be attached as a pre-commencement condition. This is included within the recommendation above.

Reading UK CIC

4.6 Reading UK CIC, the Economic Development company for Reading, notes the proposal for the change of existing office space on Imperial Way into a training and conference venue, with EEF providing services to a broad range of local companies. We welcome the provision of training programmes, which we understand will provide upskilling opportunities across a broad range of sectors, and will include apprenticeship development.

We also welcome the opportunity to work with EEF on an employment and skills plan which will ensure all opportunities for local training and recruitment are maximised.

Transport -RBC

4.7 Imperium is a large office building (Class B1(a)) located on the corner of the A33 Relief Road and Imperial Way. The existing use of the site is restricted to Office (B1(a)) only. The ground floor and first floor will remain unchanged by the proposed

change of use. The proposals consist of a change of use of the second floor to either B1a office use or a mixed use consisting of office and training and conference facilities (sui generis).

- 4.8 The proposed facility at the application site would include the following functions:
- Office floor space that supports the core function of the running the EEF business, which is expected to employ around 30 staff;
 - Small, medium and large meeting/training rooms to be used to host EEF and third-party courses, conferences, etc
- 4.9 Vehicular access is taken from Worton Drive which is immediately to the east of the site and forms a priority junction with Imperial Way. The existing car parking at the site provides for a total of 405 spaces in a surface level car park and also an undercroft parking level. These spaces are allocated to individual occupiers (within the building) and the allocation is based on a ratio of 1 space per 219sqft (1 space per 20 sqm) of net office space. A total of 130 spaces are to be allocated to the proposed occupier of the second floor of the building. It is proposed that 20 spaces will be available for EEF staff with the remainder being available for visitors (attendees of training and conference events).
- 4.10 It is stated that the proposed operator is content that 130 spaces will satisfactorily meet their overall requirements for car parking at the site. However, no information has been submitted regarding the maximum capacity of the conference/meeting facilities or the potential number of attendees if the site was fully occupied.
- 4.11 The application is supported by a Transport Statement and the proposed car parking provision has been assessed using TRICS data for the Exhibition Centre category of use. TRICS is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process. Three sites have been selected from this use category and a parking accumulation exercise has been carried out using the arrival and departure rates from the three selected sites. This forecasts that the car park will have a maximum occupation of 77 cars on a weekday which represents around 59% of the car park capacity.
- 4.12 However, I have reviewed the sites selected and I am concerned that only one of the site is comparable to the proposed development in terms of location, size and on-site parking provision. The TRICS best practice guide states that the general rule for obtaining a representative sample of data is to include as many sites as possible, however, it is better practice to have a lower but practical number of sites acceptable to the selection criteria. Site references GM-07-S-01 (Oldham) and HE-07-S-01 (Hereford) have a very low parking provision for the size of the developments whereas the conference centre located near Caerphilly site reference RC-07-S-01 is comparable in terms of size and parking provision to the proposed development. Looking at the parking accumulation survey for the Caerphilly site within TRICS, it is evident that the demand for parking spaces exceeded the provision within the site. Further, on the day of the survey, the occupancy of the site was at approximately 53-54% of maximum occupancy levels, meaning that the parking demand would exceed the survey levels if the site was fully occupied. It was noted that the maximum parking accumulation exceeded the number of parking spaces at the site as additional off-site parking was also included during the surveys.
- 4.13 In view of the above, I am not satisfied that the parking assessment undertaken within the Transport Statement for the proposed training and conference facilities provides an accurate parking assessment. Therefore, further information is

requested regarding the floor area of the conference space (excluding office areas and ancillary spaces), and the maximum capacity for each of the conference rooms and meeting/training rooms facilities.

- 4.14 It should be noted that the Council's adopted Parking Standards and Design SPD, requires a parking provision of 1 space per 50sqm of B1(a) office use and 1 space per 7.5 seats for conference facilities.
- 4.15 The existing servicing and refuse collection arrangements will be retained for the site. The undercroft parking area also provides for 36 cycle parking spaces which is in line with the Council's parking standards for B1(a) office use.
- 4.16 The applicant is requested to submit additional information to ensure the development provides parking in line with the Council's adopted parking standards.

(iii) Public Consultation

- 4.17 Unit 30 Worton Drive, Thames Valley Chamber of Commerce, Imperial Way were consulted. No comments were received. A site notice was displayed.

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) - among them the 'presumption in favour of sustainable development'.
- 5.2 The following national and local planning policy and guidance is relevant to this application:

Relevant Policies:

National Planning Policy Guidance

National Planning Policy Framework (NPPF)

Reading Borough Local Development Framework Core Strategy Document (2008, altered 2015).

Policy CS1 (Sustainable Construction and Design)

Policy CS2 (Waste Minimisation)

Policy CS5 (Inclusive access)

Policy CS7 (Design and the Public Realm)

Policy CS9 (Infrastructure, Services, Resources and Amenities)

Policy CS10 (Location of Employment Development)

Policy CS11 (Use of Employment Land for Alternative Uses)

Policy CS12 (Maintaining a Variety of Premises)

Policy CS20 (Implementation of Reading's Transport Strategy)

Policy CS22 (Transport Assessments)

Policy CS23 (Sustainable Travel and Travel Plans)

Policy CS24 (Car/Cycle Parking)

Policy CS34 (Pollution and Water Resources)

Policy CS38 (Trees, Hedges and Woodland)

Reading Borough Local Development Framework: Sites and Detailed Policies Document (2012, altered 2015)

Policy DM1 (Adaptation to Climate Change)

Policy DM3 (Infrastructure)

Policy DM4 (Safeguarding Amenity)
Policy DM12 (Access, Traffic and Highway-Related Matters)
Policy DM19 (Air Quality)
Policy SA12 (Core Employment Areas)

Supplementary Planning Guidance/Documents

Revised Parking Standards and Design (2011)
Employment, Skills and Training (2013)
Planning Obligations Under S106, April 2015

Emerging Local Plan - Submission Draft Reading Borough Local Plan (March 2018)

Policy EM3 (Loss of Employment Land)
Policy EM4 (Maintaining a Variety of Premises)
Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)

6. APPRAISAL

6.1 The main issues to be considered are:

- (i) Principle of Development
- (ii) Transport and Accessibility
- (iii) Design & Appearance
- (iv) Sustainability
- (v) Environmental Matters
- (vi) Infrastructure Provision (S106 and Community Infrastructure Levy)

(i) Principle of Development

6.2 The site is within the Core Employment Area under Sites and Detailed Policies Document Policy SA12 (SA12c: South of Basingstoke Road). Core Strategy Policy CS11 explicitly states that within the Core Employment Area, the overall level of employment land should be maintained. Policy SA12 states that these will be the main location for industrial and warehouse uses. Para 15.2.6 of Policy SA12 states that "where policies in this document and the Core Strategy refer to the need to maintain the overall supply of employment land (e.g. CS11) in addition to offices, industry and storage and distribution (use classes B1, B2 and N8) it includes any use that can only reasonably be accommodated on industrial land, which may include some sui generis uses".

6.3 The proposed mix of uses would include the regional office of EEF (currently in Atlantic House, Reading), commercial events including conference, training courses, recruitment drives and meetings, and would complement the employment use of the area. This would also be compatible with the existing approved use of the building as offices. The events would be organised by EEF and would accommodate directly run EEF training and conference events and requests from EEF's membership who are offered discounted rates as part of their membership package. EEF training courses would also be available to third party, non-member companies. In addition facilities could also be booked by other companies wishing to run their own courses and training events. The applicant has advised that such bookings tend to come from a number of professional service bodies including, Banking, and Property Services and are therefore related to commercial support and training activities of the proposed occupier.

6.4 Reading (UK) CIC, the Council's economic development company, is supportive of the proposed user who provides training programmes and upskilling opportunities across a broad range of sectors, and including apprenticeship development.

- 6.5 Including the alternative B1(a) use would allow the use to revert to office use under permitted development rights (as they currently exist), which would ensure a continued employment use should the sui generis use cease.
- 6.6 It is considered that the proposed scheme would comply with Policies CS10, CS11 and SA12.

(ii) Transport and Accessibility

- 6.7 A Transport Statement (TS) has been submitted and this identifies that the overall building has an existing car park with a total of 405 spaces in a surface level and undercoft car park, including 11 disabled spaces. There are three spaces for electric vehicles, with a further three identified for future growth, which would exceed standards for electric vehicle charging spaces in the emerging policy. There are 26 cycle spaces.
- 6.8 Car parking is allocated to individual occupiers at a ratio of 1 space per 219 sqft (20sqm) of net office space. The proposal site therefore has an allocation of 130 spaces. It is proposed that 20 will be available for EEF staff and the remainder for visitors, i.e. the attendees of the training and conference events.
- 6.9 The conclusion of the TS is that there will be a lower level of trips compared to the existing B1(a) use, that parking would continue to operate with spare capacity and that delivery and servicing would take place as existing.
- 6.10 By applying our parking standards to the delegate number the applicant has provided, demonstrates that there would be sufficient car parking to serve the proposed development, However Transport officers have requested further information/ clarification on capacity of rooms/ delegate numbers, so that this can be confirmed.
- 6.11 However, based on the submitted Transport Statement it is considered that the scheme would not raise significant transport issues and would accord with the relevant policies CS23, CS24 and DM12, Parking Standards SPD, and emerging policy TR5. A recommended condition is included ensuring that the provision of parking spaces is retained. Further details will be reported in an update report including any additional conditions.

(iii) Design & Appearance

- 6.12 The proposals include very limited changes to the external appearance of the existing building. These would include the replacement of some of the existing windows at 2nd floor with aluminium coloured louvres to match existing cladding colour.
- 6.13 The additional roof plant would not be visible to the public and therefore would be acceptable.
- 6.14 The proposed changes to appearance would be acceptable, would be appropriate within the office/ employment context and would accord with Policy CS7.

(iv) Sustainability

- 6.15 In line with Policy CS1, the proposal should seek to incorporate sustainable construction and design features and in accordance with DM1 all developments will

need to demonstrate that they have been designed to incorporate measure to adapt to climate change.

- 6.16 The agent has confirmed that the planned refurbishment of the 2nd floor area would incorporate new M&E services using energy efficient products and controls were possible, these would include LED lighting with occupancy controls, high performance VRF air conditioning units, heat recovery units and energy controls that are both simple and energy efficient.
- 6.17 Such works are considered to meet policy requirements.

(v) **Environmental Matters**

- 6.18 The proposal includes for new plant on the roof. The context of the application site is that there is existing roof mounted air handling units and heat pump condensers, the area is dominated by commercial premises, and is adjacent to the A33 and Imperial Way. It is not considered that the modest additional roof plant, to provide for new heat pump condensers and fans, would have a significant detrimental effect on the surrounding area.
- 6.19 The application site is in an Air Quality Management Area. The change of use would not cause a significant change to the existing air quality.

(vi) **Infrastructure Provision (Section 106 and Community Infrastructure Levy)**

- 6.20 The applicant EEF is a provider of training and business support and they have their own apprentice training centre in Birmingham and manage apprentice placements throughout the UK. They would train new staff for the application site and would have specific training/ apprentice opportunities for kitchen staff, and they have work experience days as part of their normal activities. In this context Reading UK CIC has confirmed that they would engage with EEF to monitor local recruitment and training and offer support as a training space provider. The applicant has agreed to prepare an End User Employment, Skills and Training Plan, which would meet policy requirements of CS9, DM3 and the SPD. However, the level of monitoring required would be relatively minimal as the types of outputs would be part of the 'day-to-day' business of EEF. Therefore, a condition rather than a S106 legal obligation, is recommended in this case.
- 6.21 The development would involve the creation of additional floorspace, which would be liable for Community Infrastructure Levy (CIL). However, there is no charge for B1(a) use within this location, nor for "all other chargeable developments", therefore the scheme would not be chargeable.

(vii) **Equality**

- 6.22 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the current application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular planning application.
- 6.23 In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development, and indeed the proposal includes for community outreach projects which specifically benefit the

key equality protected characteristics including age and disability. Appropriate consideration has been given to those with disabilities using the proposed facilities.

7. CONCLUSION

- 7.1 The proposed uses would be consistent with policy aims within a Core Employment Area and an end user training, employment, and skills plan would be secured through condition. The application is therefore recommended for approval as set out in the recommendation above.

Case Officer: Alison Amoah

