

## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 23rd June 2021

**Ward:** Whitley

**App No.:** 201853/FUL

**Address:** Brunel Retail Park, Rose Kiln Lane

**Proposal:** Demolition of existing buildings. erection of 2no. buildings for use within Classes E(g)(iii), B2 and B8, along with access and servicing arrangements, car parking, landscaping and associated works.

**Applicant:** MCTGF Trustee 1 Ltd & MCTGF Trustee 2 Ltd

**Date validated:** 21<sup>st</sup> December 2020

**Major Application:** 13 week target decision: 22<sup>nd</sup> March 2021

**Extended Deadline:** 2<sup>nd</sup> July 2021

**26 week Planning Guarantee:** 21<sup>st</sup> June 2021

**Ward:** Whitley

**App No.:** 201842/FUL

**Address:** Brunel Retail Park, Rose Kiln Lane

**Proposal:** Continued use of Units 1, 2, 3a, 3b, 4, 5 and 6a within Class E providing a ground floor area of 11,329 square metres following consolidation of the Retail Park

**Applicant:** MCTGF Trustee 1 Ltd & MCTGF Trustee 2 Ltd

**Date validated:** 18<sup>th</sup> December 2020

**Minor Application target decision:** 12<sup>th</sup> February 2021

**Extended Deadline:** 2<sup>nd</sup> July 2021

**26 week Planning Guarantee:** 18<sup>th</sup> June 2021

### RECOMMENDATION:

#### 201853/FUL

**GRANT** Planning Permission subject to conditions and informatives.

#### CONDITIONS TO INCLUDE:

- 1) TL1 - 3 yrs
- 2) AP1 - Approved Plans
- 3) In accordance with Phasing Plans
- 4) M2 - Materials to be submitted and approved
- 5) N2 - Mechanical Plant noise assessment to be submitted and approved
- 6) Service Yard Management Plan to be submitted and approved prior to occupation
- 7) CO3 - Contamination assessment including land gas to be submitted
- 8) CO4 - Remediation scheme to be submitted
- 9) CO5 - Remediation scheme to be implemented and verified
- 10) CO6 - Unidentified contamination
- 11) C1 - Hours of Construction
- 12) C2 - Construction Method Statement to be submitted and approved
- 13) Demolition Method Statement to be submitted and approved
- 14) C4 - No Bonfires
- 15) Phase 2 (Unit B) shall commence within 1 year of the demolition of Units 6b, 7, 8, 9, 10 and 11 pursuant to Condition 13.
- 16) DC7 - Refuse and Recycling to be approved (to be vermin proof)
- 17) L2- Hard and soft landscaping scheme to be submitted and approved
- 18) L3 - Boundary details to include acoustic fencing of a minimum 4m high to be

- submitted an approved
- 19) L4 - Landscape Management Plan to be submitted and approved
  - 20) L5 - Tree retention
  - 21) L6 - Tree protection measures
  - 22) L7 - Arboricultural Method Statement to be approved.
  - 23) L10 - Habitat enhancement - Prior to occupation the submission and approval of a habitat enhancement plan.
  - 24) No vegetation clearance between March and August
  - 25) Construction Environmental Management Plan to be submitted and approved
  - 26) N18 - In accordance with the approved external lighting plan
  - 27) SU6 - BREEAM Post construction
  - 28) SU7 - SUDS plan to be approved
  - 29) SU8 - SUDS to be implemented
  - 30) SU1 - Details of PV panels to be submitted and approved
  - 31) DC1 - Vehicle Parking as specified
  - 32) DC3 - Vehicle Access as specified prior to occupation
  - 33) DC5 - Cycle Parking as specified
  - 34) DE6- Provision of Electric Vehicle Charging Points
  - 35) DD2 - Set back of gates - Any gates provided to the Gillette Way access shall open away from the highway and be set back a distance of at least 17m metres from the nearside of the carriageway of the adjoining highway.
  - 36) DD6 - Visibility Splays as approved
  - 37) DD9- Travel Plan
  - 38) DE1 - Annual Review of the Travel Plan
  - 39) No building within Phase 1 of the development shall be occupied until the existing redundant footpath in the grass verge along Gillette Way to the east of the application site has been removed and reinstated to grass verge
  - 40) S278 - Within 5 months of first commencement of either phase the applicant should enter into a Section 278/38 agreement with the Local Highway Authority to secure the pedestrian and vehicular accesses in accordance with drawing (tbc). The vehicular and pedestrian accesses for either phase shall be completed prior to any occupation of that phase and retained as such thereafter.
  - 41) No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.  
Reason: To protect water infrastructure in accordance with Policy EN16 of the Reading Borough Local Plan 2019.
  - 42) No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
Reason: To protect water infrastructure in accordance with Policy EN16 of the Reading Borough Local Plan 2019.
  - 43) Employment, Skills and Training Plans for construction and end user to be submitted and approved

**INFORMATIVES TO INCLUDE:**

- 1) IF5 - Terms and Conditions

- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I11 - CIL
- 5) IF3 - Highways
- 6) IF7 - Complaints about Construction
- 7) IF8 - Encroachment
- 8) Thames Water - The proposed development is located within 15 metres of Thames Water's underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.  
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

- 9) IF1 - Positive & Proactive.

#### **201842/FUL**

**GRANT** Planning Permission subject to conditions and informatives

#### **CONDITIONS TO INCLUDE:**

- 1) AP1 - Approved Plans
- 2) Conditions 3-8 of this permission shall not come into effect unless and until Units 6b, 7, 8, 9, 10 and 11 (as shown on Drawing no: Location Plan - Retained Retail - Drawing no: 19032\_PL40 Rev A, received 10<sup>th</sup> June 2021) are demolished pursuant to planning permission 201853.
- 3) The retained units 1, 2, 3a, 3b, 4, 5 and 6a (as shown on Drawing no: : Location Plan - Retained Retail - Drawing no: 19032\_PL40 Rev A, received 10<sup>th</sup> June 2021) shall only be used for the following parts of Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended) and for no other purpose:  
 E(a) Display or retail sale of goods, other than hot food; E(b) Sale of food and drink for consumption (mostly) on the premises; E(c) Provision of: E(c)(i) Financial services; E(c)(iii) Other appropriate services in a commercial, business or service locality; and E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms).
- 4) Any units operating under E (a) use class, as defined in Condition 3, shall only be used for the retail sale of goods of DIY; furniture; home furnishings; floor coverings; electrical and photographic goods; automotive parts and accessories; cycles; products for and including domestic pets; sports goods; leisure goods; clothing and footwear; food and drink for consumption on the premises; and items that are ancillary to the main range of goods sold. No more than one retail unit to also be used for the sale of ambient (can be stored at room temperature in a sealed container) food and drink and confectionary goods; household goods; pharmaceutical goods and toiletries; garden goods, toys; toiletries; and ancillary items and for no other purpose within Class E of the Town and Country Planning (Use Classes) Order 1987.
- 5) Notwithstanding Condition 4, no more than 3 retail units shall be used for the sale

of clothing and footwear.

- 6) Notwithstanding Condition 3, no more than 2 retail units shall be used within Class E(a) Display or retail sale of goods, other than hot food; E(b) Sale of food and drink for consumption (mostly) on the premises, of the Use Class Order 1987 (as amended).
- 7) No more than 2no. units should be subdivided to measure less than 465 square metres.
- 8) No more than 15% of the gross floor area of Unit 2 (as shown on - Drawing no: 19032\_PL40 Rev A, received 10<sup>th</sup> June 2021) shall be used as an ancillary pet care service including veterinary services.

#### **INFORMATIVES TO INCLUDE:**

- 1) IF5 - Terms and Conditions
- 2) IF1 - Positive & Proactive.

### **1.0 INTRODUCTION & BACKGROUND**

- 1.1 Brunel Retail Park is an established retail park of 3.5 hectares in area on Rose Kiln Lane, located approximately 3km south of Reading town centre, to the east of the A33. It currently has 11,328sqm of floorspace (plus 3,447sqm mezzanine floor space) and is comprised of 13 units. The site is accessed via Rose Kiln Lane, via a 4-arm roundabout junction with a total of 451 car parking spaces to the front, and within the service area to the rear, the latter accessed off Gillette Way to the south-east. Immediately to the north and south is a mix of industrial units, and to the east, the Morrison's superstore. To the south west is the Kennet Island residential area.
- 1.2 The River Kennet runs roughly north-south to the west of the site. The closest residential receptors are approximately 200m to the south-west on Greenham Avenue, within Kennet Island.
- 1.3 The Retail Park was originally granted planning permission for A1 retail units in 1994 with conditions limiting the goods which could be sold, the number of units and the range of minimum sizes of units. The plan below shows the current unit numbers and occupiers of the Retail Park.



Unit Number	Existing Occupier	Ground Floor Area (GIA) (sqm)	Mezzanine Floor Area (sqm)
1	Halfords	701	341
2	Pets at Home	935	n/a
3a	Vacant	1202	n/a
3b	Next	1212	600
4	Go Outdoors (sold out of administration)	1868	1538
5	Vacant	931	n/a
6a	Dreams (sold out of administration)	467	339
6b	Shoe Zone	459	n/a
7	Vacant	937	n/a
8	B&M	1897	275
9	Laura Ashley (in administration)	460	354
10	Subway	94	n/a
11	Costa	165	n/a
<b>Total</b>		<b>11,328</b>	<b>3,447</b>
<b>Total Floorspace</b>		<b>14,775</b>	

- 1.4 Since that time there have been a number of planning permissions granted, most notably an extension to Unit 3 in 1995, extensions and refurbishment of Unit 8 in 2004; two new units in 2011; variation of conditions 12 and 14 to vary the range of goods which could be sold within Unit 3; the number of units which could sell clothing and footwear and the percentage of sales area for specific types of goods; two new units for A1/A3 use (currently Costa and Subway) in 2013; and a new mezzanine in Unit 4 in 2017.
- 1.5 The site is partially within: a Biodiversity Opportunity Area 50m buffer (Policy EN12); Flood Zone 2 (Policy EN18); an area of contaminated land (Policy EN16). It is also close to the Air Quality Management Area (Policy EN15), which is along the corridor of the A33; adjacent to a Major Landscape Feature (Policy EN13); just north of the 'Land North of Manor Farm Road Major Opportunity Area' (Policy SR2); just west of the Whitley District Centre (Policy RL1); just south of the Core Employment Area 'North of Basingstoke Road' (Policy EMN2e). Rose Kiln Lane is a Classified Road (Policy TR3) and there is a Tree Protection Order (TPO) TPO 118/05 at the eastern end of the site along the Rose Kiln Lane frontage.

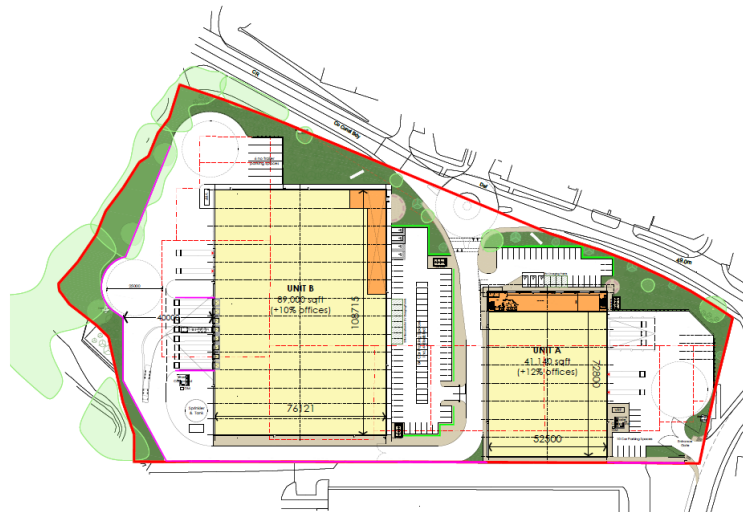
*Location plan/ Aerial photo not to scale*



- 1.6 One of the two related applications is a 'major' development, and therefore, both are being referred to the Committee.

## 2.0 PROPOSAL

- 2.1 Two applications have been submitted and are considered together within this committee report as they are directly related, which is explained below.
- 2.2 **Application 1 (201853)** is the proposed redevelopment of the whole site to provide 2 new industrial warehouse units (Unit A and Unit B) set out as 2 phases (Phase 1- Unit A; Phase 2 - Unit B).



- 2.3 **Application 2 (201842)** is dependent on the part implementation of Application 1 with the build out of Phase 1 (Unit A only). This option would result from the part demolition of some of the existing retail units to the east end of the site and the construction of Unit A. The purpose of the proposed phasing presented under 201853 is to provide flexibility for the future of the site, i.e. If Phase 1 (Unit A) only were constructed this would be alongside the retention of some of the existing retail (as shown in the plan below - red dashed outline denotes the area to be demolished).



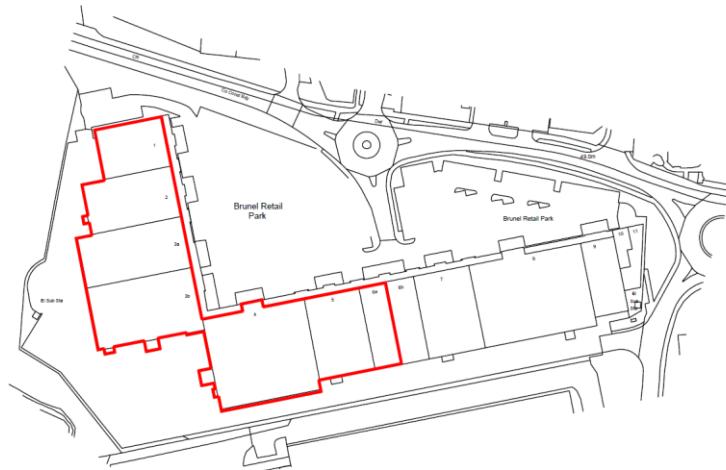
Phase 1

- 2.4 The proposed floor space under Application 1, would be:

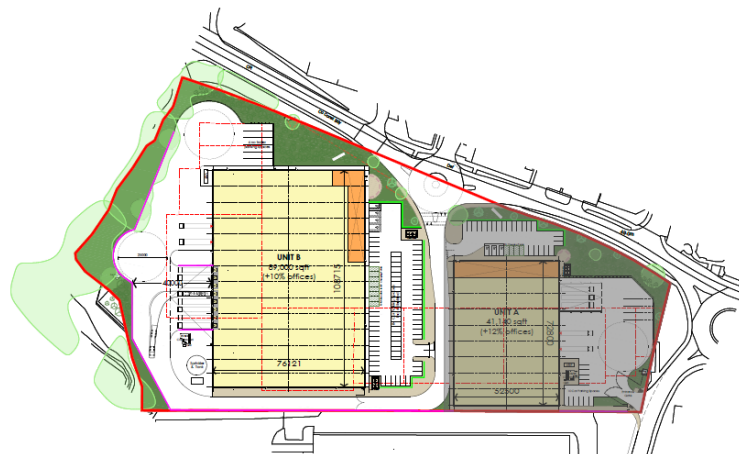


Phase 1 - Unit A (4,281 sqm) with B2/B8 at ground floor (3,822sqm) and office at first floor (459sqm);  
 Phase 2 - Unit B (9,095sqm) with B2/B8 at ground floor (8,268sqm) and first and second floor offices totalling 826sqm.

- 2.5 **Application 2 (201842)** proposes the continued use of Units 1, 2, 3a, 3b, 4, 5 and 6a equalling 11,329sqm (shown with the red line on the plan below) within Class E, following demolition of some of the existing units. This would only be implemented in the event that Phase 1 of Application 1 (201853), i.e. Unit A, were implemented.



- 2.6 A final stage of development of the site, based on relevant market conditions, would be the demolition of the remaining units (1, 2, 3a, 3b, 4, 5, and 6a) and the implementation of Phase 2 (Unit B) of Application 1 (shown below). This would result in no retail on site.



Phase 2

- 2.7 The basis for the applications is stated in Paragraph 1.3 of the submitted Application Statement, which states *“The UK retail sector is undergoing structural changes that have been exacerbated by the COVID-19 pandemic. Those changes are affecting all parts of the sector with many high-profile failures over the last 2 years that have led to surplus stock. There has also been ..... traditional out of centre retailers further reducing their store requirements given improvements in supply chain and multi-media retailing. The recent pandemic has acted as an accelerator to this rapidly*

*changing sector, meaning that retail park owners are reviewing their options for out of centre sites including repurposing all or part for alternative uses. This is exactly the case with Brunel Retail Park.”*

#### Community Infrastructure Levy

- 2.8 The applicant has duly completed a CIL liability form with the submission. The proposed uses are CIL liable, but not CIL chargeable, as they are uses identified as attracting a zero charge within the Council's CIL Charging Schedule.

#### Plans and Supporting Documents

- 2.9 The following plans and supporting documents (included amended) have been assessed:

#### ***Received 21<sup>st</sup> December 2020 (unless otherwise stated):***

- Location Plan - Drawing no: 19032\_PL01
- Existing Site Plan - Drawing no: 19032\_PL02
- Constraints Plan - Drawing no: 19032\_PL03
- Proposed Site Plan - Drawing no: 19032\_PL04 Rev A, received 9<sup>th</sup> June 2021
- Proposed Phasing Plan - Drawing no: 19032\_PL05 Rev G, received 9<sup>th</sup> June 2021
- Location Plan - Retained Retail - Drawing no: 19032\_PL40 Rev A, received 10<sup>th</sup> June 2021
- Proposed Sections (Boundaries) - Drawing no: 19032\_PL06 Rev A, received 9<sup>th</sup> June 2021
- Phase 1 Retail Elevation - Drawing no: 19032\_PL26
- Unit B - Proposed GA Plan - Drawing no: 19032\_PL11
- Unit B - Proposed GA Plan [Roof] - Drawing no: 19032\_PL12
- Unit B - Proposed GA Office Plans - Drawing no: 19032\_PL13
- Unit B - Proposed Elevations - Drawing no: 19032\_PL14
- Unit A - Proposed GA Plan - Drawing no: 19032\_PL21
- Unit A - Proposed Roof Plan - Drawing no: 19032\_PL22
- Unit A - Proposed GA Office Plans - Drawing no: 19032\_PL23
- Unit A Proposed Elevations - Drawing no: 19032\_PL24
- Unit A Proposed Sections - Drawing no: 19032\_PL25
- Proposed Typical Cycle Shelters - Drawing no: 19032\_PL31 Rev A, received 9<sup>th</sup> June 2021
- Proposed Waste Compound Enclosures - Drawing no: 19032\_PL32 Rev A, received 9<sup>th</sup> June 2021
- Proposed Landscaping Scheme - Drawing no: A4828 03 Rev D, received 2<sup>nd</sup> June 2021
- Existing Utility Services - Drawing no: 1990-EX-9001 Rev PL1
- External Lighting Planning Submission - Drawing no: 1990-EX-6301 Rev PL2, received 14<sup>th</sup> May 2021
- Proposed Signage Locations - Drawing no: 19032\_PL07 Rev A, received 9<sup>th</sup> June 2021
- Disconnections, Diversions and New Connections - Gas - Drawing no: 1990-EX-9002 Rev PL1
- Disconnections, Diversions and New Connections - Water - Drawing no: 1990-EX-9003 Rev PL1
- Disconnections, Diversions and New Connections - BT - Drawing no: 1990-EX-9004 Rev PL1



- Disconnections, Diversions and New Connections - Electric - Drawing no: 1990-EX-9005 Rev PL1
- Proposed Changes to Service Yard Access - Drawing no: 2020-3816-DWG-212, received 3rd June 2021
- Rose Kiln Lane Access Alterations - Drawing no: 2020-3816-DWG-211, received 3<sup>rd</sup> June 2021
- Swept Path Analysis using a 16.5m Articulated Vehicle - Drawing no: 2020-3816-AT-122 (1), received 3rd June 2021
- Swept Path Analysis using a 16.5m Articulated Vehicle - Drawing no: 2020-3816-AT-121, received 3rd June 2021
- Swept Path Analysis using a 16.5m Articulated Vehicle - Drawing no: 2020-3816-AT-119, received 3rd June 2021
- Swept Path Analysis using a 16.5m Articulated Vehicle - Drawing no: 2020-3816-AT-118 (1), received 3rd June 2021

*Other Documents:*

- Air Quality Assessment, dated November 2020, Issue 2, prepared by WYG
- Design and Access Statement, prepared by Fletcher Rae, received 9<sup>th</sup> June 2021
- Ecological Assessment, dated December 2020, Document ref: 9325.EcoAs.vff1, prepared by Ecology Solutions (includes Biodiversity Net Gain Briefing (Appendix 2))
- Energy Statement, dated 23<sup>rd</sup> October 2020, Document ref: 1990 R001 Rev 0, prepared by Crookes Walker Consulting
- External Lighting Report, prepared by Cooker Walker Consulting
- Flood Risk Assessment, dated 10<sup>th</sup> November 2020, Document ref: 20-043, prepared by Bradbrook Consulting
- Flood Risk Sequential Assessment, dated 8<sup>th</sup> June 2021, Document ref: Q100647, prepared by Quod, received 8<sup>th</sup> June 2021
- Geo- Environmental Assessment, dated January 2021, Ref: 18-0642.03, Issue 1, prepared by Delta Simons, received 27<sup>th</sup> April 2021
- Noise Assessment, dated November 2020, Issue 2, prepared by WYG
- Planning Statement, dated December 2020, Document ref: Q100647, prepared by Quod
- Preliminary Risk Assessment, dated October 2020, Document ref: 18-0642.02 Issue 1, prepared by Delta Simons
- Service Yard Management Plan [Draft] dated May 2021, prepared by Tetra Tech, received 12<sup>th</sup> May 2021
- Sustainability Statement, dated November 2020, prepared by Envision
- Transport Assessment, dated November 2020, prepared by TPP Consulting
- Tree Survey Report, dated 30<sup>th</sup> April 2021, Rev C, prepared by Environmental and Sustainability Consultants, received 7<sup>th</sup> May 2021
- Air Quality Comments Response, dated 18<sup>th</sup> February 2020, prepared by Tetra Tech, received 1<sup>st</sup> March 2021
- Noise Comments Response, dated 3<sup>rd</sup> February 2021, prepared by Tetra Tech, received 1<sup>st</sup> March 2021
- Noise Response Document, dated 19<sup>th</sup> May 2021, prepared by Tetra Tech, received 25<sup>th</sup> May 2021
- Response to Environmental Health - Noise, prepared by Quod, received 25<sup>th</sup> May 2021
- Response to Natural Environment comments received 16<sup>th</sup> March 2021, and 7<sup>th</sup> May 2021

- IOT.TZ.EAS Zhaga Smart Controller [dimming of lights], received 29/4/21

### 3.0 PLANNING HISTORY

The following is a summary of some of the main decisions.

**94/00443/FD (940948)** - Erection of Non-Food Retail Warehouses (A1) with ancillary service area & car parking for 510 cars - Approved 23<sup>rd</sup> December 1994

**95/00255/FD (950019)**- Erection of non-food retail extension to Unit 3 & 30 additional car parking spaces - Approved 19<sup>th</sup> September 1995

**04/01113/FUL (041089)**- Extension to Unit 8 and refurbishment of existing retail park including the re-cladding of existing park, the erection of four advertising totem stands and the erection of new entrance features to the units - Approved subject to a S106 legal agreement 14<sup>th</sup> December 2004

**10/00540/CLP (101267)**- Certificate of lawfulness for proposed use as a pet care and treatment centre - Granted 17<sup>th</sup> May 2010 [Pets at Home]

**11/00431/FUL (110118)**- Minor alterations to elevations and internal works to create two new units and reconfiguration of car park - Approved 12<sup>th</sup> May 2011 (N.B. Units 3a and 3B)

**11/00967/VARIAT (110655)** - Minor alterations to elevations and internal works to create two new units and reconfiguration of car park without complying with condition 5 of planning permission 11/00431/FUL - Approved 3<sup>rd</sup> August 2011

**11/00673/VARIAT (111326)**- Erection of non-food retail warehouses (A1) with ancillary service areas and car parking for 510 cars without complying with conditions 12 and 14 of planning permission 94/0043/FD- Approved 5<sup>th</sup> October 2011

**11/01362/NMC (111445)**- Non-material change to planning permission 11/0431/FUL to allow reconfiguration of the sub-divided units and the relocation of the entrance doors at Unit 3C - Withdrawn 26<sup>th</sup> October 2011

**131106/VAR** - Variation of planning permission 94/00443/FD to exclude Unit 1-2 (PC World) Brunel Retail Park, Rose Kiln Lane, Reading, RG2 0HS from complying with conditions 12 and 14- Approved 18<sup>th</sup> October 2013

**131743/FUL** - Erection of two new units for use within Class A1 and / or A3, alterations to the wider site and car park layout and associated works. Approved - 18<sup>th</sup> March 2014 (N.B. Units 9 and 10)

**141189/NMA** - Non material change to planning permission 131743 to alter the timescales for the submission of a BREEAM Interim Certificate - Agreed 20<sup>th</sup> August 2014

**141264/NMA** - Application for a non-material amendment following a grant of planning permission (131743) relation to alterations to the approved elevations. Agreed 5<sup>th</sup> September 2014

**150315/NMA** - Non material change to planning permission 131743 relating to the fencing and rear servicing. Agreed 19th March 2015

**151140/NMA** - Application for a non-material amendment following a grant of planning permission (131743) - Agreed 23<sup>rd</sup> July 2015

**170215/FUL** - Works to Unit 4 including reconfiguration of existing mezzanine floorspace and insertion of additional mezzanine floorspace of 1,053sqm, the creation of an external display area of 465sqm and associated works including new fire doors. - Approved 29<sup>th</sup> June 2017

**200715/PREAPP** - Application 1 - Redevelopment of Units 6b,7,8,9,10 and 11 to provide a single industrial unit, with dedicated car park and service yard. Application 2 - Part change of use and reconfiguration of Units 5a and 6, to accommodate the displaced Dreams, Shoe Zone, Subway and Costa Units. Application 3 - External alterations to and amalgamation of units 3a and 3b to accommodate the displaced B & M. (amended) - Observations sent 31<sup>st</sup> July 2020

#### **4. CONSULTATIONS**

##### **(i) Statutory**

- 4.1 No statutory consultations were required given the nature of the application.

##### **(ii) Non-statutory**

##### ***RBC - Transport***

- 4.2 The Park which is located to the south of Reading town centre in a commercial area comprises circa 11,328sqm of retail floorspace (excluding mezzanines) with parking for up to 451 cars including 367 in the car park. Tenants include B&M, Halfords, Go Outdoor and Next along with Costa and Subway, with 4 units either vacant or in administration. It should be stated that when the mezzanine floor areas are included the total floor area equates to 14,775sqm.
- 4.3 Access to the customer car park is taken from Rose Kiln Lane via a 4-arm roundabout junction, with access to the service yard taken via a priority-controlled junction on Gillette Way.
- 4.4 The surrounding area is predominantly commercial in nature with a large warehouse to the south, a Morrison's supermarket with petrol filling station to the east and predominantly industrial units to the north and north-east. The River Kennet which runs in a broadly north-south orientation to the west of the Park, with the closest residential properties located southwest of the aforementioned warehouse.
- 4.5 The A33 which runs in a north-south orientation to the west of the River Kennet is one of the primary routes into and out of Reading town centre from the M4 to the south, with open land to the west of the road.
- 4.6 The proposed development is broken down into two phases and these are described as follows:

**Phase One:**

- Retail floorspace will be reduced by 4,631sqm and a new 4,263sqm warehouse will be constructed with 10,134sqm (inc. mezzanine) of retail retained.
- Car parking for the retail element will reduce to 295 spaces with 232 spaces provided in the customer car park and 65 spaces for staff in the service yard.
- A total of 43 spaces will be provided for the employment floorspace in accordance with the maximum standards for Zone 3.
- Access to the retail customer car park will be from Rose Kiln Lane as per the existing situation. The route will be extended through to the service yard to the rear of the retail terrace, and also facilitate access to the staff car park for the new warehouse where a new priority-controlled junction will be provided. It is proposed to “Stop Up” part of the existing access south of the retained pedestrian refuge island.
- The existing service yard access on Gillette Way will be modified to facilitate access to the warehouse service yard.

**Phase Two:**

- 11,328sqm (14,775sqm with mezzanine floor) of retail floorspace will be removed.
- Two new warehouses will be constructed with a floor area of 13,376sqm (with 4,281sqm for Unit A (Phase one) and 9,095sqm for Unit B (Phase 2)).
- A total of 127 spaces will be provided across both units, with 84 spaces for Unit B and 43 spaces for Unit A, in accordance with standards which would permit between 61 and 90 spaces for Unit B and between 29 to 43 spaces for Unit A. 10% of spaces to be provided with active charging points.
- Access for Unit B will be taken from Rose Kiln Lane and access to the Unit A service yard from Gillette Way.

#### **4.7 Vehicle Access Arrangements**

***Phase One:***

Vehicular access to the retail customer car park will be from Rose Kiln Lane as per the existing situation. This route will be extended through to the service yard to the rear of the retail terrace and will also facilitate access to the staff car park for the new warehouse. The proposed access to the staff car park is circa 13m from the roundabout which is less than the Council’s Geometric Design Guide for Access onto Classified Roads which states the following:

*Where a commercial access road joins a classified road no junctions with other roads or accesses to parking areas should be provided along the first 20 metres of the access road*

The justification provided is not sufficient to accept any relaxation in this instance and therefore the access in this location is not accepted by the Highway Authority.

It should also be stated that the applicant has provided no visibility splays for this car park access and the submitted drawings indicate the provision of

trees and cycle parking that would significantly impede any visibility for drivers exiting this car park.

Revised drawings would therefore be required illustrating visibility splays for any access to a car parking area which should be 2.4m x 43m.

The proposed altered access onto Gillette Way illustrates the provision of gates within 6m of the Public Highway which is a significant reduction from the set back distance of 20m as is provided currently. The proposal will therefore result in articulated vehicles obstructing the flow of traffic along Gillette Way whilst they await entry into the site and as such this cannot be supported by the Highway Authority. Any access design and gate location should ensure that no vehicle is obstructing the carriageway.

It is also noted that the proposal seeks to alter the kerb line for the Gillette Way entrance but the redline plan does not extend to include these works. The redline plan should therefore be revised to include all necessary Highway works.

It is proposed to Stop Up the section of the access south of the retained pedestrian refuge island on Rose Kiln Lane. The Highway Authority do not agree with any proposal to stop up this section of land as it will remove the Council's ability to undertake future improvements to the roundabout should they be needed to help the traffic flows in the area.

It is stated that it will be necessary to Stop Up a section of highway within the existing service yard road accessed from Gillette Way. In principle I would be happy with this proposal subject to the design criteria for the access, highlighted above being met.

The Transport Assessment states that drawings indicating the vehicle tracking is shown in Appendix C, however on review of the TA it is noted that Appendix C is not provided. As such the Highway Authority are unable to ascertain whether the internal road network is sufficient.

Given the above the Highway Authority do not accept the access arrangements currently presented.

### ***Phase Two***

To facilitate Phase 2 of the development no changes are proposed to the Rose Kiln Lane junction further than are included as part of Phase 1 but it is noted that the internal road from Rose Kiln Lane would be realigned.

The proposal does however include a dedicated access to the parking for Phase 2 and therefore visibility splays would be required at this junction/access of 2.4m x 43m.

- 4.8 Pedestrian and Cycle Access - The proposed development includes alterations to the vehicle access onto Gillette Way but no improvements are proposed for pedestrians and cyclists to the site or along Gillette Way. The proposed junction improvements should include the provision of pedestrian crossing facilities and revised drawings submitted to identify this.
- 4.9 A footway is currently provided to the east of the site that leads to the side of the existing Costa coffee however this would no longer be required given

that pedestrian access is being removed. The proposed scheme should therefore remove the footway and reinstate the grass verge.

- 4.10 Vehicle Trip Generation - It has not been possible to undertake surveys at the Park due to the ongoing COVID-19 pandemic and as such the potential changes in trips for the weekday morning and evening peaks plus Saturday afternoon has been estimated based on trip rate information from the TRICS database as follows:

- Retail Use: All sites in the retail park excluding food category in England outside London surveyed since January 2012. The exercise revealed a total of 3 weekday and 10 Saturday surveys.
- Employment Use: All surveys in separate categories for the Light Industrial, General Industrial and Parcel Distribution Centres for the Class B1c, B2 and B8 uses respectively, considering all sites in England outside London with a gross floor area of between 1,000qm and 10,000sqm. As no TRICS data was available for a Saturday period for the Employment use, the highest weekday trip rates were adopted for each case.

- 4.11 The use of TRICS data to establish trip generation is accepted and although some of the sites were not comparable to the application site the Highway Authorities own assessment identified a difference in trips generated that was minimal, I therefore have no objection to the trip rates provided for the B1, B2 and B8 uses.

- 4.12 The retail trip rates supplied by the applicant have been reviewed and it is noted that although some of the sites for a weekend are not comparable to the application site the Highway Authority agrees that the existing site would have generated higher levels of vehicle movements than the proposed development.

- 4.13 A 33% reduction for linked and pass-by trips has been applied to the retail flows to provide a robust assessment, with no reductions applied to the commercial floorspace. Furthermore, the assessments do not take into account retail mezzanine floorspace. The Highway Authority are happy that this is an acceptable approach.

***Phase One (Unit A - B2/B8 industrial/warehouse use (4,281sqm including 459sqm of office)***

The proposed development would result in a reduction in vehicle movements within the PM Peak and Saturday Peak period with there being no change to the overall number of trips within the AM Peak. Overall, given that the proposal would result in a reduction in trips, the principle of the Phase one proposal is acceptable in trip generation grounds.

***Phase Two - Unit B - B2/B8 industrial/ warehouse (9,095sqm including 826sqm of office)***

Given the significant reductions in trips over the course of the assessed period against the increase in 20 vehicle trips in the AM Peak, the equivalent of 1 every 3 minutes, the Highway Authority are happy that no junction assessments would be required and that the proposed trip generation is considered acceptable.

- 4.14 HGV Movements - The overall anticipated change in HGV movements during each peak period based on TRICS [trip generation] data, where the

maximum increase is expected to be in the region of 9 to 10 two-way HGV movements during all peak periods, associated with the completed phase two development. This level of increase is not considered to be severe on the basis that all overall vehicle trips will significantly reduce during the weekday evening and Saturday peak periods.

- 4.15 Car Parking - Currently there is a total of 451 parking spaces at the Retail Park including 367 parking spaces in the car park and 84 spaces in the service yard; this equates to a ratio of 1 space per 25sqm GFA overall, or 1 space per 31sqm in the customer car park. The provision includes 26 disabled spaces and 18 reserved for parents with small children.
- 4.16 Parking standards are set out in the October 2011 Supplementary Planning Guidance “Revised Parking Standards and Design” for development within Zone 3 in which the Park sits is as follows:
- Non-Food Retail: a maximum of 1 space per 30sqm GFA;
  - Class B1(a) and B1(b): a maximum of 1 space per 50sqm GFA;
  - Class B1(c) and B2: a maximum of 1 space per 100sqm GFA; and
  - Class B8: a maximum of 1 space per 150sqm GFA.

Accessible spaces should be provided as follows:

- All developments with less than 200 spaces - a minimum of 3 spaces or 5% whichever the greater.
- Retail with more than 200 spaces - 3 spaces plus 4% of the overall capacity.
- Commercial with more than 200 spaces - 6 spaces plus 2% of the overall capacity.

#### ***Phase One***

The proposed scheme would provide parking for 295 cars for the retail element and 43 spaces for the commercial element.

Retail Parking: the proposals include 232 space in the customer car park and 65 spaces for staff in the service yard which equates to 1 space per 34sqm overall and 1 space per 44sqm for customers. It should be stated that these ratios are based on the floor areas that include mezzanines and is deemed acceptable. The provision includes 15 disabled spaces of which 12 are in the car park and 3 in the service yard. The overall provision is in accordance with standards and is deemed acceptable.

However, the submitted drawings only illustrate the provision of 13 disabled bays and therefore a revised drawing is required increasing the proposed provision to meet the Councils standards.

The proposal includes no provision for electric charging but as this is an existing use and is therefore accepted.

Commercial Parking: The proposal, which include a mix of B Class uses with ancillary office space, would be provided with parking for 43 cars including 33 in the car park and 10 in the service yard. This overall provision equates to 1 space per 95sqm GFA and in principle is deemed acceptable given the flexible use on the site.



The provision includes 2 disabled spaces however, in line with the Council's Policy the provision of disabled bays should be a minimum of 3, a revised drawing should therefore be provided increasing the proposed disabled provision.

The Council's Policy stipulates that a provision of 10% of parking should be in the form of electric charging bays, which would equate to a provision of 4 spaces, however the submitted drawings only illustrate the provision of 3 EV charging facilities in the car park. Revised drawings are therefore required illustrating the provision of 4 EV charging bays.

### ***Phase Two***

The proposed layout illustrates a total of 177 spaces across both commercial units as follows:

Unit A - a total of 43 spaces as per Phase 1 above with 33 spaces in the car park and 10 in the service yard, with 2 disabled spaces and 4 with EV Charging facilities. As has been stated above revisions are required to the drawing to meet the required standards for disabled parking and EV charging.

Unit B - a total of 84 spaces which is in line with policy that would permit between 61 and 90 spaces. The provision includes 4 disabled spaces and 8 spaces with EV (electric vehicle) Charging. This provision has been deemed acceptable.

All car parking layouts comply with National requirements.

4.17 Cycle Parking - There is currently parking for up to 52 bicycles with 26 hoops all of which are located in the vicinity of the Costa and Subway units at the eastern end of the Park.

4.18 Cycle parking standards are set out below:

- Class B1(a): a minimum of 1 space per 200sqm GFA;
- Class B1(b) and B1(c): a minimum of 1 space per 250sqm GFA;
- Class B2 - B7: a minimum of 1 space per 350sqm GFA; and
- Class B8: a minimum of 1 space per 450sqm GFA.

### ***Phase One***

The proposals will include parking for up to 40 bicycles with 20 hoops for the retained retail element located in the vicinity of the entrance to each unit. The provision equates to 1 space per 253sqm GFA which although fewer than existing, are better located and deemed acceptable for the reduced quantum of retail floorspace.

This proposed provision and location of the cycle parking is deemed acceptable.

Parking for up to 12 bicycles will be provided for the new warehouse at a ratio of 1 space per 355sqm GFA. The applicant has stated that this would be in accordance with standards with the application seeking a flexible consent with Class B1(c) / B2 / B8 uses with ancillary offices with standards as follows:

This approach is agreed by the Highway Authority and are happy that the tenant will monitor demand for the spaces through a Travel Plan and provide more should demand dictate.

### ***Phase Two***

The proposed layout illustrates parking for up to 36 bicycles as follows:

- Unit A - Parking is provided for up to 12 bicycles as per Phase 1.
- Unit B - Parking for up to 24 bicycles will be provided at a ratio of 1 space per 379sqm GFA (between the B2 and B8 standard), and

Again, as per Phase One this approach is agreed by the Highway Authority and are happy that the tenants will monitor demand for the spaces through a Travel Plan and provide more should demand dictate.

Please ask the applicant to submit suitably amended plans / information to address the above prior to determining the application.

- 4.19 ***Planning Officer note:*** During the course of the application a series of amendments and clarifications were provided by the applicant in response to matters raised. The Transport Development Control Manager has confirmed that from a transport perspective matters are now resolved subject to some final plan details.

### ***Environmental Health***

- 4.20 Noise generating development:

(i) Mechanical plant noise - The noise assessment submitted concludes that the noise from mechanical plant is likely to meet our criteria of 10 dB below background. Further details will need to be submitted once the details of the plant are confirmed to demonstrate that the criteria are met, therefore, a condition is recommended - N2 - Mechanical Plant Noise Assessment.

- 4.21 (ii) Operational noise/HGV movements - I am concerned that the noise assessment is predicting that noise will have an impact on nearby residential properties given that they are currently some distance away and there is likely to be additional residential uses in closer proximity in the future should the Reading Borough Local Plan allocation (SR2) to the south of the site come to fruition.

- 4.22 At receptors R02 and R03, the closest ones on Kennet island, the noise is predicted to be 6 and 7 dB above background during the day, and 5 dB above background at night time (with the night time levels including the provision of an acoustic fence). This is likely to mean that the occupants of these properties will hear the HGV movements and it may cause them to wake up as these activities are not likely to be noises that blend into the background as they are not continuous noise. Further consideration should be given to reducing the noise at source. Can the HGV docking station be designed such that it is acoustically insulated? Can the site be redesigned so that the noisiest elements of the development are not on the side where the residents are?

- 4.23 There are no residents to the north, therefore it would make more sense for the noisiest activities to be that side of the buildings. Visual screening e.g. trees could be used to mitigate the visual impact of servicing taking place on the north side. The assessment notes that Kennet Island properties would have been designed with acoustic enhancements which are likely to

mitigate some of the impacts, however, we receive a relatively high number of complaints about noise from residents of Kennet Island about existing commercial uses therefore, I am not convinced that such acoustic measures are effective therefore, I do not think they should be taken into account in this assessment unless they can be tested and proven.

- 4.24 In terms of the assessment methodology itself, please can it be clarified what the assumptions are in the HGV docking and parking assessments in terms of the number of movements per time period? The HGV movements assessment assumes 40 per hour.
- 4.25 Air Quality - Increased emissions: The air quality assessment submitted concludes that there will be a slight positive impact on air quality as a result of the development as it will result in less traffic movements than the current use.
- 4.26 I am concerned that there may be an increase in HGV movements as a result of the proposed use, as a storage and distribution use is likely to involve more HGV movements than shops. What assumptions have been made regarding the change in the HGV movements and the higher impact on air quality that is caused by HGVs compared to cars? Has a reasonable worst-case occupant been assumed in terms of the amount of HGV activity that would be involved in B8 use?
- 4.27 Contaminated land: The 'phase 1' desk study submitted with the application has demonstrated that a phase II intrusive investigation is required including a land gas risk assessment. The land gas risk assessment is of particular importance, due to the site being located close to former landfills, and the risk that land gas poses to a commercial occupier being as high as it would be for residential users.
- 4.28 Recommended conditions CO3 - Contaminated Land Assessment to be submitted; CO4 - Remediation Scheme to be submitted; CO5 - Remediation Scheme Implement and verification); CO6 - Unidentified contamination. These are required to ensure that future occupants are not put at undue risk from contamination.
- 4.29 Light: The proposed lighting seems acceptable in terms of light overspill and glare. Ideally the level of lighting should be reduced at night or when the premises is not in use in order to minimise any impact on amenity therefore further information or commitments to this effect would be welcomed.
- 4.30 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).
- 4.31 Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.
- 4.32 Recommended conditions are: submission and approval of a Construction Method Statement (C2); Hours of construction (C1); No bonfires (C4)

- 4.33 Bin storage - rats: There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. I recommend the following condition.
- 4.34 **Planning Officer Note:** Further information and clarification was provided by the applicant. The Environmental Health Officer confirmed the following:
- The applicant's additional comments regarding air quality are satisfactory and demonstrate that air quality is not predicted to worsen as a result of the development and no mitigation is required.
  - For lighting a condition is required to ensure that the proposed automatic dimming is put in place and that the amount of dimming is defined.
  - Further investigations into land gas will be required for areas under existing buildings and standard contamination conditions are therefore, still required.
  - In terms of operational noise she required further evidence to demonstrate that a Service Yard Management Plan would provide sufficient additional mitigation for night time noise.

***RBC- Natural Environment***

- 4.35 The following is a summary of comments: This large, 3.5 hectare site is one of the dominating views of Rose Kiln Lane and is located in Whitley, a ward with just 8% canopy cover. Rose Kiln Lane is a busy route, connecting two adjacent traffic corridors, Basingstoke Road and A33. On both western and eastern ends, the site is just slightly short on touching the AQMA (Air Quality Management Area), therefore any significant canopy cover changes on site arguably directly affects air quality within the AQMA. In this context, enhancing the vegetation cover on this site is important due to its overriding role in the character of the area.
- 4.36 It is also subject to TPO 118/05 for a mature London Plane located on the north-eastern boundary (T1 of tree survey), which benefits from ample space for crown growth with no pressure from existing development.
- 4.37 It is noteworthy that two phases are proposed for completing this development. Currently, we assess the two as a whole, but if this planning permission deals with the site in two phases, the Arboricultural Method Statement and the rest of the relevant tree documents will have to account for that situation.
- 4.38 With reference to the Proposed Landscaping Scheme Drg. No. 03 Rev A dated 14.10.20, Design and Access Statement dated 28.10.20 and the Tree Survey Report Rev A dated 25.11.20, I note the following:
- 4.39 Trees - The tree survey identified 11 individual and 5 groups of trees: 1 category A tree, 8 category B trees and 2 category C trees. The groups of trees have all been assigned as category B. However, it is unfortunate that removal of two frontage (T8 Aspen and T3 London Plane) category B trees is necessary due to the chosen design of the car park layout and servicing yard for Unit 1. Category B trees are expected to provide benefits for more than 20 years so there is significant loss attributed to this removal. Due to its location, removal of tree T8 will have limited impact of visual amenity,

however, in the case of T3, it's removal will be of significant impact due to its prominent location on the frontage. Therefore, consideration to proposed parking adjacent or overlapping current position of T3 should be given in order to avoid the loss of an established, healthy, frontage Plane tree.

- 4.40 Unit B's north-eastern corner is too close to an existing young London Plane tree T6. This tree species is expected to grow a large, extended crown and it needs space to do so. This is a category B tree that will provide benefits and grow for at least 20 more years, therefore this projection's relation to the proposed development will exacerbate pruning pressure or nuisance. The Arboricultural Implications Assessment does not address this matter, which it should.
- 4.41 The proposed development's impact on existing trees' (Root Protection Areas) RPAs is not reliable as the RPA is not accurately shown on plans in relation to likely rooting pattern.
- 4.42 The Tree Survey Report does not indicate which trees are considered for pruning works. It is important to appreciate the required extent of facilitative pruning as part of the assessment of the impact of the proposals.
- 4.43 Significant hardstanding area, along the Rose Kiln Lane frontage, will be converted from hard to soft surfacing to form a '*new native shelterbelt*'. It is implied that conversion works will be carried out within existing trees' RPAs, possibly including the TPO tree, but the AMS does not mention this or how it will be done. This is an important omission that needs to be addressed and no harm to roots of retained trees must be demonstrated, otherwise the implied works would be unacceptable.
- 4.44 The current temporary fencing provision shown on the Tree Protection Plan (TPP) does not account for the 2 stages/locations protective fences that will be required: the one shown on the plans, protecting the entire RPA of the existing trees during construction works, and a second one, closer to the tree's trunk, protecting the tree during conversion of hard to soft landscaping/surfacing. These must be shown to appropriately demonstrate lack of harm to existing trees.
- 4.45 A comprehensive schedule for when an Arboricultural consultant should be present on site and what actions are part of the monitoring must be included in the AMS.
- 4.46 Landscaping - The Proposed Landscaping Scheme plan indicates "shelterbelt planting" on the western boundary, but appears to be outside the red line - clarification is required.
- 4.47 Part of this landscaped screen planting is located adjacent or even under the existing trees' large crowns, the most prominent example being the area around the TPO tree. It should be noted that careful consideration must be taken for species and their tolerance to shade and resource scarcity, especially water, due to increased competition in order to guarantee a sustainable establishment.
- 4.48 The species selection within the Landscape Strategy in the DAS is strongly defined by its ornamental character. There is space for some large canopy

species which is supported by the Tree Strategy. Given the tree loss and impact this development has on existing vegetation, the species proposed for planting should maximise the space available and use opportunities for large crowns - both on a visual amenity value, as well as to increase the capacity of rain water retention along with other benefits.

- 4.49 The proposal allocates only 5-8% of the area for new planting. For a full redevelopment of the site, considering the SUDs requirements, a more extensive provision for new planting must be considered, or justification on why it is not should be provided.
- 4.50 Greening solutions such as green walls or green roofs, have been wholly disregarded and no explanation has been provided for doing so. The proposed buildings are greater in mass and street appearance than the existing one, which enforces the opportunity to break the street perspective via green walls. Provisions for green walls or an explanation on their unsuitability for this design, should be provided in order to demonstrate appropriate consideration for landscaping principles. The Council's 2019 Climate Emergency Declaration, Policy EN14 Trees, Hedges and Woodlands as well as Tree Strategy support the above requests for more planting and modern green walls provisions, as does the site's location in a low canopy ward.
- 4.51 This is a total redevelopment of the site which should factor in 'soft' SUDs to improve biodiversity and runoff levels.
- 4.52 With regards to the Proposed Landscaping Scheme, I note the lack of watering schedule for the new vegetation, these details can be corrected and secured by condition, once everything else is accepted.
- 4.53 I cannot see that proposals for routes of services into the site have been provided. This is required to demonstrate lack of conflict with retained trees and proposed trees.
- 4.54 In conclusion, the natural environment related documents provided at this stage show a number of technical inconsistencies and inaccuracies, do not demonstrate acceptability in relation to trees and the landscaping principles have not been satisfactory demonstrated, therefore the application is not currently supported on tree or landscape grounds.
- 4.55 **Planning Officer note:** Following amendments and clarifications from the applicant, the Natural Environment Officer confirmed that the scheme would be acceptable subject to conditions as included in the recommendation above.

**RBC- Ecology**

- 4.56 The application site [201853] comprises a retail park (large retail units, hardstanding, and hedging) adjacent to the River Kennet and associated wetland habitats. The proposals are for the demolition of the retail units and the erection of two large B use units.
- 4.57 The ecology report concludes that there are unlikely to be any adverse impacts on protected species or priority habitats. Should the application be approved conditions should be set to ensure that full details of the landscaping scheme are submitted to and approved by the council and that

no lighting other than that shown on the submitted plans is installed unless otherwise agreed in writing by the council.

***SUDS Manager***

- 4.58 The proposal includes a 50% reduction of the 1 in 100-year event which in principle is acceptable. However, the drainage strategy undertakes no assessment of the 1 in 1-year event or 1 in 30-year event which is a mandatory assessment in accordance with National Guidelines.
- 4.59 In addition the private drainage system is located on the Public Highway which extends further into the site than is identified on the proposed drainage layout. A revised drainage layout is therefore required that only includes the development site.
- 4.60 It should also be noted that the development includes two separate phases and therefore a drainage strategy should be provided for both eventualities, i.e an in between strategy between the builds of Phases 1 and 2 or should phase 1 only be developed.
- 4.61 Please ask the applicants agent to submit suitably amended plans information prior to determining this application.
- 4.62 ***Planning Officer note:*** Amended SUDs information is awaited and will be reported in an update.

***Thames Water***

- 4.63 The following is a summary of Thames Water's comments:  
Waste Comments - no objection; Surface water drainage - if the developer follows the sequential approach to the disposal of surface water we would have no objection; The scale of the proposed development does not materially affect the sewer network.
- 4.64 Water comments - Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.

*No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.*

*Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development"*

- 4.65 The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m,



of strategic water mains. Thames Water request that the following condition be added to any planning permission.

*“No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.*

*Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.*

- 4.66 The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission.

*“No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.*

*Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.”*

- 4.67 There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

- 4.68 The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted.

*“The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes*

*you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)"*

4.69 There are easements and wayleaves to the west of the site. These are Thames Water Assets. The applicant should contact Thames Water to discuss their proposed development in more detail.

4.70 **Planning Officer Note:** Following discussion between the applicant and Thames Water the consultation response was amended to exclude the recommended clean water condition as set out in paragraph 4.60 above.

**RBC - Sustainability Team**

4.71 No comments received at time of writing. Will be reported in an update.

**(iii) Public/ local consultation and comments received**

4.72 Site notices were displayed. One objection and one observation were received from residents living within Kennet Island (Gweal Avenue & Montagu House) as follows:

- The increased noise pollution. As a resident of Kennet Island there is noise pollution at all hours already coming from units on Gillette Way and Commercial Road. These warehouses will increase that noise pollution regardless of any noise mitigation put in place and thereby having a negative effect on KI residents' quality of life and sleep.
- Please ensure that new buildings address the issue of the noise of alarms
- Traffic congestion is already an issue on Rose Kiln Lane and Manor Farm Road at peak traffic times. This will add to the congestion and pollution in this area and also having ill-effect on KI residents' health.
- Gillette Way is already a road in poor condition and not up to demand already placed on it. Vehicles do take this Road at speed and often times swerve to avoid pot holes. Increased traffic will most likely lead to accidents.
- Kennet Island has too many HGVs attempting to cut through. This development will increase the HGVs. Please ensure that the roads in Kennet Island are designated as no HGVs formally and consider additional road measures to stop this happening.
- There is a lot of waste tipped and littering the riverside from the existing retail park. Please ensure that bin enclosures are locked and not publically accessible and moved away from the riverside fence to prevent this being a commercial waste fly-tipping hotspot.

## **5.0 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 local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (NPPF)

Section 2 - Achieving Sustainable Development  
Section 6 - Building a Strong Competitive Economy  
Section 8 - Promoting Healthy and Safe Communities  
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

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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 EN11: Waterspaces  
Policy EN12: Biodiversity and the Green Network  
Policy EN13: Major Landscape Features and Area of Outstanding Natural Beauty  
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 Development  
Policy EM2: Location of New Employment Development  
Policy EM4: Maintaining a Variety of Premises  
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 RL1: Network and Hierarchy of Centres  
Policy RL2: Scale and Location of Retail, Leisure and Culture Development  
Policy RL5: Impact of Main Town Centre Uses  
Policy SR2: Land North of Manor Farm Road Major Opportunity Area

Supplementary Planning Guidance/Documents

- Revised Parking Standards and Design (2011)
- Sustainable Design and Construction (2019)
- Employment, Skills and Training (2013)
- Planning Obligations under S106 (2015)

Other Relevant Documents

- Technical Guidance to the NPPF (Mar 2012)
- National Planning Policy Guidance: Flood Risk and Coastal Change, March 2014

- National Policy Guidance: Preparing a Flood Risk Assessment: Standing Advice, 26<sup>th</sup> February 2021
- National Policy Guidance: Review Individual Flood Risk Assessments: Standing Advice for Local Planning Authorities, 26<sup>th</sup> February 2021
- National Planning Practice Guidance: Noise, 27<sup>th</sup> July 2019
- Tree Strategy (2020)
- National Design Guide (MHCLG, October 2019)

## 6.0 APPRAISAL

6.1 The main issues to be considered are:

- (i) Principle
- (ii) Transport/ Parking
- (iii) Environmental Matters
- (iv) Flood Risk & Drainage
- (v) Landscaping & Ecology
- (vi) Design
- (vii) Sustainability
- (viii) S106

### (i) Principle

6.2 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development, which lies at the heart of the National Policy Framework (para. 11 NPPF).

6.3 It goes on to state that *“Planning applications that accord with the policies in the development plan .....will be approved without delay, unless material considerations indicate otherwise.....”*

6.4 The three overarching objectives defined in the NPPF, to achieving sustainable development are economic, social and environmental. With regard to the economic role, the proposal would contribute to economic activity through contributing to *“building a strong, responsive and competitive economy”* as defined in the NPPF, both through the construction period and as part of the ongoing operation of the proposed distribution and retail uses. The proposal would also enable businesses to adapt and would support economic growth (para 80. NPPF).

6.5 The site is an existing retail park, but not within a designated retail centre, located in South Reading. Paragraph 3.2.6 of the Reading Borough Local Plan (RBLP, 2019) states that South Reading is one of the main parts of the Borough where there are significant sites potentially available for development, particularly in the area close to the A33. It goes on to state that South Reading will be the location to meet much of Reading’s need for new employment floorspace, with a strong focus on industry and warehousing.

6.6 Policy EN1 of Reading Borough Local Plan (RBLP, 2019) Policy EM1 sets out the quantum of new office and industrial/ warehouse development over the Plan period. It states that *“Proposals to provide a freight consolidation centre in a location with good access to the strategic highway network will be supported, subject to other policies in this plan”*.

- 6.7 Policy EM2 identifies the relevant locations for such development and for major employment uses, including industrial and storage and distribution states that these should be in the A33 corridor or in the Core Employment Areas. The site is located just to the east of the A33 and falls within the defined 'Corridor' (Fig 6.1, RBLP), and is located opposite employment area EM2e: North of Basingstoke Road, and therefore, in terms of its specific location is considered to be acceptable in principle.
- 6.8 The site is immediately to the north and adjacent to the site allocation SR2 a primarily residential area (between 680 and 1,020 dwellings) along with an extension to the Whitley District Centre, school provision and open space and public realm improvements, and small business units for mixed use including residential. Therefore, any proposal needs to ensure that it does not jeopardise the bringing forward of the allocated site. At pre-application stage the applicant was advised that any scheme would need to ensure that the impacts on residential amenity were addressed minimised and mitigated, such as the requirement for a sufficient buffer between the access to the proposed service area and the allocated site, as well as relationships to existing residential uses. Further detail on this is set under the Environmental Matters section below.
- 6.9 The proposal also includes for ancillary offices and as these would be ancillary to the E/B uses then it is considered that the requirement for a sequential test (Para. 86 of NPPF) does not apply in this case.
- 6.10 Application 2 (201842) relates to consolidating the existing retail park into some of the existing units to the western side of the park, should application 1 (201853) be part implemented (Unit A only). The established permissions for the park cover the former A1 and A3 uses now within the new E use class (Commercial, Business and Service Use class - Schedule 2), as introduced under The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757), which came into effect 1<sup>st</sup> September 2020.
- 6.11 The existing permissions for the retail park (as listed above) specify the type of goods which can be sold, the number of units which can sell specific types of goods and the proportion of floor area related to the selling of specific goods. The proposed scheme for the retained units (Application 2 - 201842) is to create a streamlined and more flexible permission than existing permissions covering the retail park. The applicant has suggested a number of conditions, which are included in the recommendation above, and these are considered acceptable in principle as they would reflect the thrust of existing permissions, whilst providing further flexibility and on the basis that the overall retail space would be reduced overall.
- 6.12 As there would be no overall net increase of retail space there is no requirement to apply a sequential test under para 86 of the NPPF, with respect to impact on town centres or other retail centres.
- 6.13 As the implementation of Application 2 would only occur with the part implementation of Application 1, a Grampian condition is included within the recommendation for Application 2. Any required demolition of existing retail space would only occur within the context of implementing Application 1.

- 6.14 The overall proposals would provide a flexible approach to delivering future viable development options for the site. It is considered that, whether the development were part warehousing/ industrial and part retained retail or wholly industrial, the applications would be acceptable in principle, according with making effective use of land (NPPF) and employment policies, including contributing towards warehouse/ industrial floorspace by 2036. Although the principle of the use and location are considered acceptable this would be subject to satisfactorily meeting other policy requirements as addressed further below.
- 6.15 To address the situation of ensuring that Unit B is implemented, should the retail be demolished in its entirety, a specific condition is recommended requiring the implementation of Unit B (Phase 2) within a year of demolition of the retail units.
- 6.16 The following sections focus on the new buildings proposed under 201853, although refer to the option, which would include some retained retail units, where relevant.

**(ii) Transport/ Parking**

- 6.17 The scheme would include retaining the access from Rose Kiln Lane to serve the staff parking for Units A & B and the service yard to the rear of Unit B to the western part of the site. Unit A would have 33 car parking spaces including 2 disabled spaces and Unit B 84 including 4 disabled spaces. The existing access point on Gillette Way would be used for the service yard for Unit A. 10% of the vehicle parking spaces would be provided with active charging points.
- 6.18 The total cycle space provision would be 40 spaces for the retained retail element, 12 for Unit A and 24 for Unit B. The proposed provision and location of the cycle parking is deemed acceptable.
- 6.19 The Transport officer's original comments are included above and in summary the issues with the originally submitted information were as follows:
- The access to the staff car park for Unit A would be too close to the Rose Kiln Lane roundabout;
  - Visibility splays would need to be shown;
  - Gates serving the service yard to Unit A would need to be set further from Gillette Way, so that vehicles would not obstruct the carriageway;
  - There should be no stopping up of the access south of the pedestrian refuge on Rose Kiln Lane;
  - A revised red line plan would be required to include the area of kerb for alteration on Gillette Way;
  - The proposed junction improvements on Gillette Way should include pedestrian crossing facilities;
  - The footway to the east at the side of existing Costa should be removed and the grass verge reinstated; and
  - Amended drawings would be required to show the correct number of disabled bays and EV charging bays.
- 6.20 During the course of the application there have been ongoing discussions between the applicant and the Transport Development Control Manager, and amended information submitted. Following the amended information

one additional matter was raised by Transport which relates to left-hand turning movements into the site from Rose Kiln Lane. A further option has been presented and discussed and from a transport perspective would be acceptable. However, there could be an effect on a proposed retained tree and therefore, further comments from the Natural Environment Team will be reported in an update.

- 6.21 Transport has confirmed, however, that subject to resolving this matter and submission of final plans the scheme would be acceptable (both Phase 1 & 2) and subject to conditions and informatives would comply with Policies TR1- TR5.
- 6.22 In terms of the requirements to remove a path over the verge to the east of the current Costa the recommendation includes a Grampian condition requiring the developer to complete the works on land owned by the Council (see condition 39 in the recommendation above).
- 6.23 With respect to stopping up a section of existing highway within the existing service yard road, and changes to the highway, these would be subject to a S278 Highways Agreement, which will cover both the creation of the access for the staff car park and changes to the service yard access. This requirement will form a further condition.

**(iv) Environmental Matters**

- 6.24 Noise - Policy CC8 (Safeguarding Amenity) states that development should not cause a significant detrimental impact to the living environment of existing or new residential properties including, but not solely, with respect to artificial lighting and noise. The nearest residential dwellings are within Kennet Island at ca 85m at the closest point (Harlequin House). Although at a reasonable distance from and set at a lower level than the application site the Environmental Health Officer (EHO) has confirmed that there are often complaints from residents regarding existing commercial premises, in terms of noise and disturbance created by operational activities, and this is borne out by the objections/ comments received for this application.
- 6.25 Policy EN16 (Pollution and Water Resources) states that *“Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution;....”* It is important, therefore, that the proposal does not exacerbate these issues.
- 6.26 The EHO reviewed the submitted Noise Assessment and concluded that the daytime and night time noise would be above existing background noise levels (by 6-7db and 5db respectively). They identified the need for HGV noise to be reduced at source and suggested an acoustically insulated docking station and moving noisy activities to the side away from residents.
- 6.27 The EHO did not agree with the applicant that the Assessment demonstrated that the noise levels within nearby dwellings during the daytime and night time would be within *“... the target noise intrusion criteria that relate to internal resting conditions and sleep disturbance. Consequently, there is expected to be a negligible change to existing ambient noise levels.”* as they contended. The EHO, therefore, requested further details of mitigation measures to ensure that the operation of the site would be within acceptable noise levels.



- 6.28 The applicant subsequently submitted a draft Service Yard Management Plan, the objective of which is to ensure that external operations operate efficiently and effectively and seek to minimise potential disruption on the highway and noise disturbance to local residents. The applicant identified that studies at other sites have shown that operational noise levels can be typically reduced by 5-7db. This is in addition to the originally proposed 4m high acoustic barrier, which together they consider would ensure that operational noise levels would be reduced in line with the requirements of the NPPF and that night time noise criteria would be met.
- 6.29 Following this further information and clarification from the applicant, the EHO confirmed their acceptance that, although the Noise Assessment identifies that operational noise levels would have the potential to exceed background noise levels during the daytime, once mitigation measures are taken into account, the operational noise levels would be expected to be below background noise levels. However, the EHO was still concerned regarding the night time noise and the suitability of using a Service Yard Management Plan, compared to further physical mitigation measures, as an effective measure to reduce noise levels. The Officer requested further clarification, specifically with respect to evidence of the quantifiable noise reductions as set out by the applicant.
- 6.30 The Noise consultant provided further clarification (Noise Response received 10<sup>th</sup> June 2021) with respect to the effectiveness of Surface Yard Management Plans (SYMP). This refers to a Government backed research document<sup>1</sup> which shows that good practices and SYMP can reduce noise levels by up to 10dB. A condition is included for the submission and approval of a SYMP and this could include physical measures such as the type of road and docking bay surface; use of rubber wheeled cages; white noise reversing alarms; as well as operational/ management controls.
- 6.31 Any further comments from the EHO officer will be reported in an update. Planning Officers consider that sufficient mitigation measures have been identified to ensure that operational noise levels will be at acceptable levels that would avoid the potential for any significant adverse impacts in relation to noise, in line with the requirements of the NPPF and Policy CC8 and EN16.
- 6.32 In terms of noise generating equipment and the requirement for plant noise level to be at least 10db below the existing background noise (Policy EN17) the submitted Noise Assessment confirms that the maximum noise levels would meet this requirement. A condition requiring the submission and approval of a mechanical plant noise assessment is included within the recommendation above.
- 6.33 Officers agree with the applicant that limited weight should be given to EHO concerns over the impact of the proposed scheme on future occupiers, i.e. with respect to a local plan allocation, to the south of the site, for a mixed use (including residential) development under Policy SR2 'Land North of Manor Farm Road Major Opportunity Area'. The RBLP includes for the "need for strong buffer to existing commercial uses" (see plan extract and key below). However, the applicant has confirmed that proposed acoustic fencing would go along the southern boundary. Any future scheme to the

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<sup>1</sup> Quiet Deliveries Demonstration Scheme (QDDS) Prepared for the Department for Transport / QDDS Consortium, May 2011

south, should it come forward, would need to also incorporate the provision for a buffer within that site.

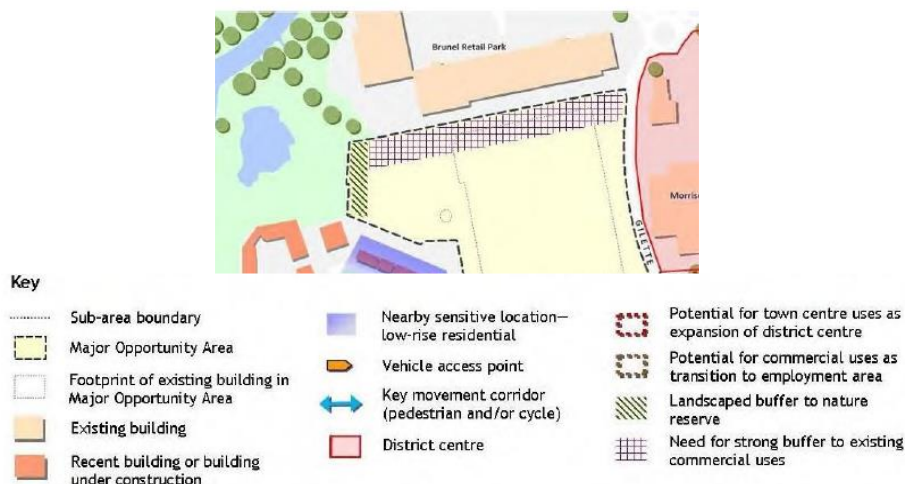


Figure 6.3: Land North of Manor Farm Road Major Opportunity Area Strategy

### Air

- 6.34 The site is located on the edge of an Air Quality Management Area (Policy EN15), and the EHO has confirmed that the submitted assessment demonstrates that air quality is not predicted to worsen as a result of the development, and the proposal is therefore, acceptable in this regard.

### Contamination

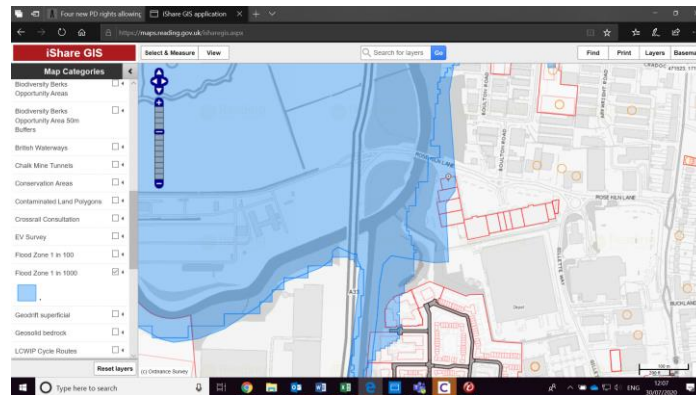
- 6.35 Policy EN16 states that *“development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.”*
- 6.36 The EHO has confirmed that as the submitted studies identify that a further land gas risk assessment would be required for the areas under existing buildings, contamination conditions are required to ensure that risks to future occupiers are minimised and remediated. Such an assessment is of particular importance, due to the site being located close to former landfills, and the risk that land gas poses to a commercial occupier being as high as it would be for residential users.

### (v) Flood Risk & Drainage

- 6.37 The majority of the site is within Flood Risk Zone 1 and a small area of the western part of the site is in Flood Risk 2 (Medium risk - see map extract below). The proposed development type falls within the defined ‘Less Vulnerable’ classification as set out in the NPPF. It does not fall within the type of use for which consultation with the Environment Agency is required<sup>2</sup>

<sup>2</sup> ‘Review Individual Flood Risk Assessments: Standing Advice for Local Planning Authorities’, National Planning Policy Guidance, 26<sup>th</sup> February 2021 <https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities>

and standing advice needs to be followed for managing flood risk<sup>3</sup>. Such advice relates to surface water management, access and evacuation, and floor levels.



- 6.38 The NPPF (para.155) states that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*
- 6.39 As part of the site is within Flood Risk Zone 2 Para. 163 of the NPPF requires that when determining applications LPAs should ensure that flood risk is not increased elsewhere, and this is also set out within RBLP policy EN18. It states that *“Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”*
- 6.40 A Sequential Test is to be applied to steer new development to areas with the lowest risk of flooding. If there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding then the proposed development should not be permitted. The NPPG on Flood Risk and Coastal Change provides further detail on the Sequential Test. Paragraph 33 requires the area to which to apply the Sequential Test should be defined by local circumstances and relate to the catchment for the type of development proposed. Also when applying the Sequential Test the guidance states that *“... a pragmatic approach on the availability of alternatives should be taken.”*
- 6.41 It is for the Local Planning Authority to decide on whether the Sequential Test has been passed and needs to be satisfied that proposed development would be safe and would not lead to increased flooding elsewhere. In terms

<sup>3</sup> 'Preparing a Flood Risk Assessment: Standing Advice', National Planning Policy Guidance, 26<sup>th</sup> February 2021 <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice#standing-advice-for-vulnerable-developments>

of the submitted Sequential Test it states that *“The vision and need for the Development are to address current and future employment needs, through expanding and broadening the offer of employment floorspace in an area of predominately commercial uses. The location-specific need that the proposal is intended to serve will not be met by locating the scheme elsewhere.”* The assessment reviewed a number of allocated employment sites and sites along the A33 (Document 5 within the Sequential Assessment). It concludes that there are no sequentially preferable sites of an equivalent size, within the A33 Corridor or the allocated Core Employment Areas which are available and / or suitable to accommodate the proposed development and are entirely within Flood Zone 1. Officers consider that the assessment has been undertaken in accordance with national policy and guidance requirements.

- 6.42 The submitted Flood Risk Assessment (FRA) identifies that the western boundary of the site has a steep fall towards the river, a difference of almost 8m, and that the current flood risk from all sources of flooding is low. Also, it states that having reviewed the detailed maps from the Environment Agency the site is actually wholly within Flood Risk Zone 1.
  - 6.43 The proposal for Application 1 would involve demolition of the existing structures and paved areas and construction of 2 new units with associated parking and landscaped areas. All existing woodland would be retained and enhanced, and there would be further landscaping enhancement to other parts of the site.
  - 6.44 The FRA sets out that that the site is currently served by a surface water drainage network and runoff is discharged into the River Kennet via an outfall pipe along the western boundary. The existing brownfield discharge rate is 424l/s. It is proposed to reduce 50% of the brownfield discharge rate to provide a betterment over the existing condition. This would accord with Policy EN18, which states that *“Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.”*
  - 6.45 The FRA includes an assessment of different SUDS measures and concludes that an attenuation tank with controlled discharge would be the most appropriate for the site taking into account ground conditions, topography and viability of system. The SUDS officer requires some further detail as set out in the consultation comments above, which the applicant will be submitting and which will be reported in an update, but overall is raising no objection to the proposed approach. Relevant SUDs conditions are included in the recommendation above.
  - 6.46 The FRA demonstrates that the proposed development would not increase the risk of flooding to the site or surrounding area and would accord with relevant national and local policies.
- (vi) **Landscaping & Ecology**
- 6.47 The site currently has landscaped areas to the Rose Kiln and Gillette Way frontages, which includes a protected tree. The western part of the site is within the buffer zone for a Biodiversity Opportunity Area of the River Kennet and adjacent to the Kennet and Holy Brook Meadows Major Landscape Feature.

6.48 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.”*

6.49 Policy EN14 states that: *“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 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, or off-site in appropriate situations, 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. Measures must be in place to ensure that these trees are adequately maintained.”*

6.50 Policy EN12 states: *“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; and □ Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.”*

6.51 Policy EN13 states that: *“Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.”*

6.52 Brunel Retail Park is located within Whitley ward which has a low canopy cover, less than the 12% canopy cover, which the Borough Council wishes to achieve, as set out in the Council’s Tree Strategy. The Borough Council seeks to enhance tree numbers in areas with limited tree cover with a commitment to protect the existing trees. Brunel Retail park itself has very limited tree cover overall and any significant proposals should seek to redress this, in accordance with the Strategy/policy.

6.53 One Plane tree to the front of the site is protected as T1 of Tree Preservation Order 118/05 and there are also a number of other significant trees elsewhere within the site.

6.54 The overall landscape strategy for the site includes for enhancing and improving the existing areas of vegetation to the western and northern site boundaries.

6.55 The Natural Environment (Tree) Officer raised some issues with the initial submission and these are set out in paragraphs 4.35-4.57 above. In summary his view was that there was the need for additional tree planting; that common rather than ornamental species of trees should be chosen; shade-tolerant and a flora mix should be incorporated into the proposed screen planting; and consideration should be given to green walls and green roofs and other natural SUDS solutions.

6.56 Several amendments have been made to the landscaping scheme during the course of the application and the amended proposal includes for:

- Retention of 6 trees (including the TPO tree) and the woodland area;
- 26 new native shelterbelts comprising native trees and shrubs with understorey planting to reinforce the existing woodland and soften the view of the new buildings, and including new trees along the central access road;
- New native hedgerow with ground flora species at the base;
- Removal of two existing trees to facilitate the redevelopment works;
- Low level ornamental shrub planting;
- Shade tolerant plants; and
- Break out spaces.



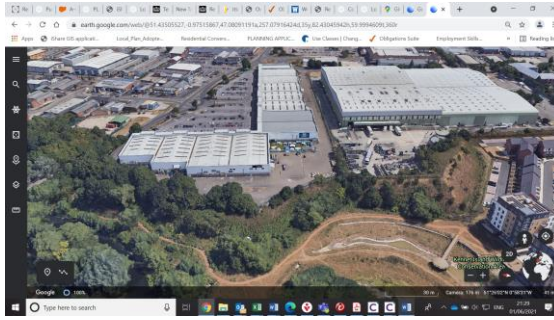
- 6.57 The Natural Environment Officer has confirmed that the amended scheme is acceptable in landscape/ tree terms, subject to conditions, although maintains an objection with respect to there being no green roofs or green walls proposed. This is referred to further in the Sustainability section below.
- 6.58 The overall proposal would enhance the existing landscaping and include biodiversity enhancement through: proposed bird and bat boxes; species rich grass verge; native hedgerow with ground flora; and native trees and shrubs with understorey planting.
- 6.59 The site is to the east of the Kennet Valley East Biodiversity Opportunity (BOA) Area and the retention of the broadleaved deciduous woodland along the western boundary would provide a sufficient ecological buffer zone between the redevelopment and the BOA. In order to ensure that there would be no detrimental impacts on the BOA a condition is recommended for the submission and approval of a Construction Ecological Management Plan.
- 6.60 The site is currently of relatively low ecological value and the proposed development would maintain the priority woodland.
- 6.61 The Ecological Assessment identifies a number of potential ecological enhancements including:
- Bat boxes in trees;
  - Bat boxes in trees and on the buildings;
  - New fencing to provide small gaps for small mammals;

- Log piles within the broadleaved deciduous woodland would provide year-round shelter for Hedgehogs and other small mammals;
  - Insect nesting aids.
- 6.62 The submitted Ecological Assessment includes a Biodiversity Net Gain Briefing Note (Appendix2), which confirms that having assessed the proposal against the Biodiversity Metric 2.0 (Natural England, 2019) that there would be overall gains in habitat and hedgerow units, which would equate to a 12.4% net gain in biodiversity<sup>4</sup>.
- 6.63 A condition is recommended requiring the submission and approval of an ecological enhancement plan based on the proposed measures above. These combined with the landscaping measures would ensure that policy requirements would be met.
- 6.64 The Ecologist had no objections subject to attaching landscaping and lighting conditions.
- 6.65 The proposals are considered to the existing landscaping features of the site and include a net gain in biodiversity which accords with Policies, CC7, EN12, EN13 and EN14.
- (vii) Design
- 6.66 Section 12 of the National Planning Policy Framework (NPPF) places significant weight on ensuring good design which is a key aspect of sustainable development and should positively contribute towards making places better for people. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.
- 6.67 RBLP 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. Developments will also be assessed to ensure that they respond positively to their local context”*
- 6.68 The site is close to the River Kennet and within the buffer for a Biodiversity Opportunity Area. Under Policy EN11 there is the requirement for water spaces to be protected, enhanced and that *“there will be no adverse impact on the function and setting of any watercourse and its associated corridor”*.
- 6.69 The Retail Park is located on a raised site in an area comprised largely of industrial/ other commercial buildings and extensive tarmac car parking areas with largely peripheral landscaping only. There is a range of styles and ages of building, with cladding materials, predominantly in white and grey, with flat or slightly curved roofs, with varying levels of glazing. Immediately to the south of the site (the building to the right in the image below) is a very large industrial building (Trade Team).

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<sup>4</sup> Biodiversity Net Gain Metric Assessment (Appendix 6 of the Planning Statement)





- 6.70 The layout of the two new buildings has resulted from not only the desire to make the most efficient use of the shape of the site, but to utilise the existing and well-established main access from Rose Kiln Lane, and to enable the site to be developed in phases. This has led to the proposed larger building (Unit B) being positioned within the western half of the site. It would be oriented with its front elevation facing east, to relate to the retained access point and parking provision. There would be enhanced landscaping to the north of the building along Rose Kiln Lane, with an elevation to the north which would include full height glazing, variations in material finish and colour, which would create visual interest, whilst achieving good energy efficiency and a quality appearance, and at the same time achieving the functional space required for its industrial use.



- 6.71 The smaller of the two, Unit A, would be sited with its front elevation to Rose Kiln Lane, and like the principal elevation of Unit B, would incorporate a projecting colonnade canopy supported on slender circular columns, combined with glazing and full height curtain walling. The materials would include composite cladding, wavy ('sinusoidal') profile cladding, aluminium framed curtain walling, and a pressed metal canopy, using a small colour range of greys and silvers. The top band of the building would be in a light colour to minimise the perception of height and the colours seek to reflect the principle colour of the original park. It is considered that the proposed scheme would blend within the overall street scene and relate well to the wider area. A sample board of materials has been requested to be available for the Planning Applications committee to view.

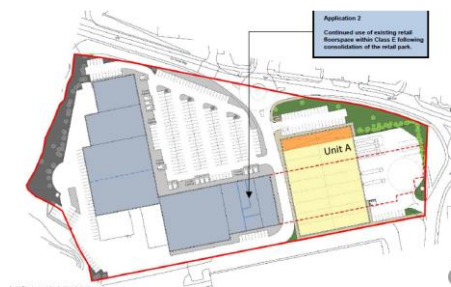


**View west along Rose Kiln Lane (Unit B to the right, Unit A in the background)**



**View west along Rose Kiln Lane with part retained retail units and Unit A**

- 6.72 Officers consider that the overall design of the buildings themselves, in the context of their function as largely warehouse structures, would create buildings which are good quality with visual interest, and would along with the enhanced landscaping, improve the appearance of the site. The design includes using different textured materials both horizontally and vertically, and floor to ceiling glazing, to reduce the perceived size and mass of the buildings.
- 6.73 Although the buildings would be sited closer to the road than the existing buildings, the existing landscaped areas would be maintained and enhanced, and the siting would be consistent with other commercial buildings in the area. It is considered that the set back from the road is sufficient to ensure that the buildings would not be overly dominant in their context.
- 6.74 Should Unit A only be implemented alongside the part retained retail park, this would create two distinct sections to the overall site (see plan below), but Unit A would still have a good set back from Rose Kiln Lane and there would be consistency of the landscaping and parking areas to the front, and sufficient spacing between the built form, so that the retail park and proposed building would not be overbearing on each other and there would be a continued appearance of openness.



- 6.75 The overall footprint of the two proposed buildings is large, but the overall built form on site would not be significantly different to the current buildings and there would be sufficient distance between the buildings and breaking up of the site with landscaping and parking areas to ensure that the buildings would not be overly dominant within the site.
- 6.76 Unit A would be an overall maximum external height of 12.8 metres (top of pitched roof sections), but the main mass of the building would have a maximum height of 11.5 metres. This would be similar in height to the existing retail units, and is required to achieve the internal clear height required for the proposed logistics use. Should Unit A only be implemented

then this building would sit comfortably adjacent to the part retained retail units under Application 2.



Proposed street scene along Rose Kiln Lane - Unit A development and partial retention of existing retail units

- 6.77 Unit B would be taller than Unit A with a maximum external height of 15.8m, with the main mass of the building at a height of 13.8m, but would still be considered acceptable within the context, and similar to the height of the Trade Team building to the south of it.



Proposed street scene along Rose Kiln Lane - full development of Units A & B

- 6.78 Overall it is considered that the proposed buildings would achieve a good balance between function and design and that the overall proposed layouts would work effectively for both options of full implementation of the two new buildings or Unit A with retention of some of the retail units. The Transport officer raised specific concerns over the original layout from a transport perspective and the scheme has been amended, during the application, in response. This is discussed further below. Landscaping matters are also addressed below.

- 6.79 The design, scale, massing and layout of the scheme is considered acceptable and would accord with Policy CC7. It is not considered that there would be any detrimental impact on the River Kennet Biodiversity Opportunity Area (Policy EN12) to the west of the site.

#### (vii) **Sustainability**

- 6.80 There are several policies within the local plan which are relevant to new development and sustainability. The newly adopted Supplementary Planning Document 'Sustainable Design and Construction (2019)' also emphasises the need and importance of securing positive environmental improvements as part of any new major development.
- 6.81 The overarching sustainability policy CC2 requires proposals for 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."*
- 6.82 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."*

- 6.83 Policy CC3: Adaptation to Climate Change, requires that *“all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.”*
- 6.84 Policy CC4: Decentralised Energy 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.
- 6.85 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 6.86 The submitted Sustainability Statement and BREEAM Pre-assessment confirm that the proposed development would comply with Policy CC2 by meeting BREEAM “Excellent” standards.
- 6.87 Both Unit A and B will incorporate a range of sustainability measures, including the following:
- SUDs Strategy to achieve at least a 30% reduction in peak discharge rates compared to the existing;
  - Low water use fittings and fixtures and the incorporation of rainwater harvesting for flushing WCs;
  - EVCP;
  - Sustainable material selection; and
  - Responsible construction practices
- 6.88 The applicant proposes an energy strategy to meet BREEAM Excellent, incorporating energy demand reduction through passive measures such as improved fabric and being more air tight. A number of low/zero carbon technologies have been reviewed and the following are proposed:
- High efficiency LED lighting with PIR control and daylight sensing;
  - High efficiency mechanical ventilation with heat recovery and low specific fan power
  - Variable Refrigerant Flow (VRF) system, which utilises Air Source Heat Pump technology;
  - Photovoltaic power supply contribution 300sqm
- 6.89 The applicant states that the site is not in the vicinity of a district heating network and considers that CHP units are not feasible for the proposed scheme.
- 6.90 The applicant has confirmed that the proposed buildings would achieve a 29% improvement and 37% improvement for Units A and B respectively over the Target Emission Rate for carbon dioxide emissions.
- 6.91 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. 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 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 'Excellent'. Further justification has been sought from the applicant as to why the proposal does not currently include green/ brown roofs or and/ or green walls, and this will be reported in an update.

- 6.92 Overall, however, Officers consider that the proposal would be sufficient to meet sustainability policy requirements, subject to conditions regarding the submission and approval of post construction BREEAM, as included in the Recommendation above.

(viii) **S106**

- 6.93 In accordance with Policy CC9 and TR2, the following obligation would be sought:

- Employment, Skills and Training - construction and end user

- 6.94 However, as the applicant has confirmed that for both construction and end user skills that they would prepare Employment Skills Plans in conjunction with Reading UK CIC, it is considered agreeable for this to form a recommended condition. The proposal would provide the opportunity for good quality permanent work in the logistics sector in Reading and specifically South Reading.

**Equalities Impact Assessment**

- 6.95 In determining this application the Committee is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender, and sexual orientation. 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. 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 Application 201853 would result in creating flexible E(g)(iii)/B2/ B8 (distribution/ warehousing) employment floorspace, which would accord with national and local policy. This would be in terms of contributing to delivering the required industrial and / or warehouse floorspace of 148,000 square metres by 2036, as set out in RBLP Policy EN1, the delivery of economic development supported by the NPPF/ Also meeting local 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 Suitable mitigation measures are included to ensure that the proposal would not cause significant detriment with respect to noise, and the recommendation includes contamination conditions to ensure that the end use is safe for future occupants, and the drainage strategy would improve surface water run off rates. The proposal would provide additional greening of the site with a net gain in tree planting, enhanced landscaping and

ecological enhancements and the new buildings are set to achieve BREEAM Excellent rating in accordance with policy requirements.

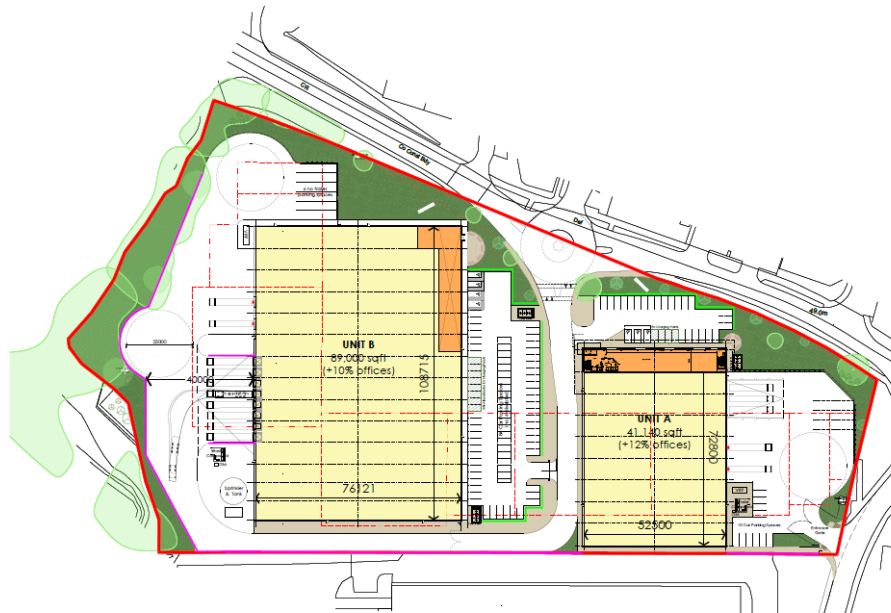
- 7.3 Application 201842, which would be triggered if Application 1 were part implemented, would increase the flexibility for the uses within the retained retail part of the site, which would respond positively to market conditions and support wider economic development as set out in the NPPF.
- 7.4 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 informatives.

Case Officer: Alison Amoah



## APPENDIX 1: PLANS

### Proposed Site Plan



### Proposed Elevations

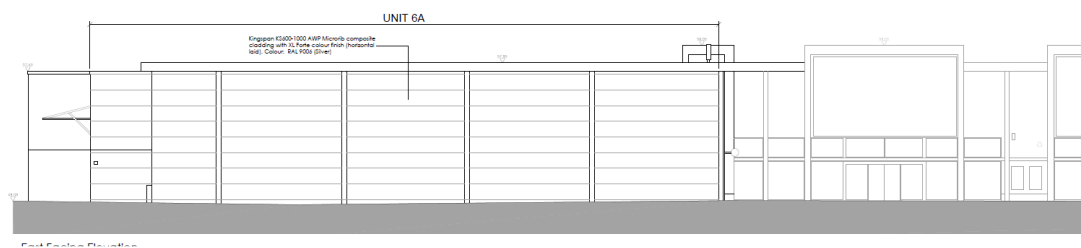
#### Unit A



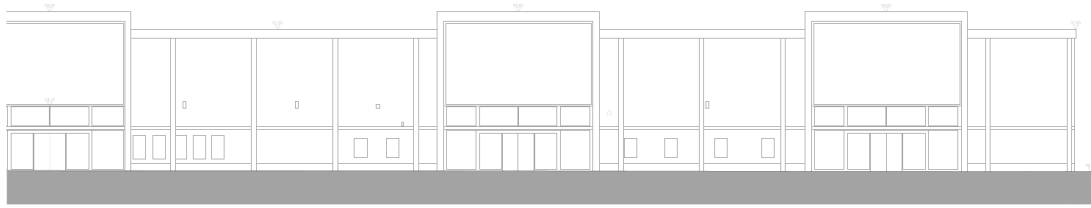
#### Unit B



### Retained Retail - East Elevation

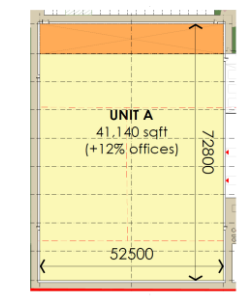


## Retained Retail - North Elevation

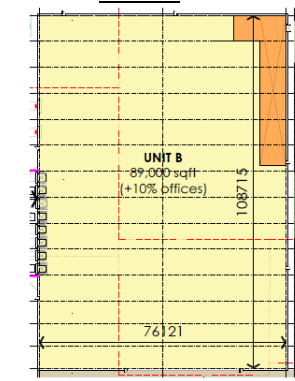


## Proposed Floor Plans

### Unit A

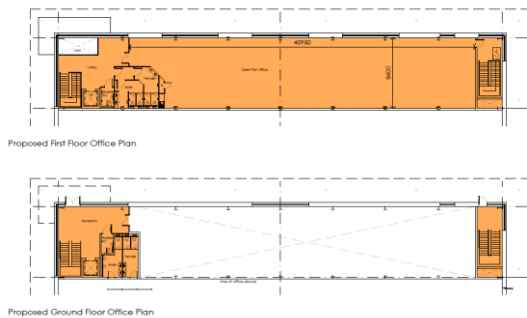


### Unit B



### Unit A

#### Office Space ground & first floors



Proposed First Floor Office Plan

### Unit B

#### Ground, first & second floors



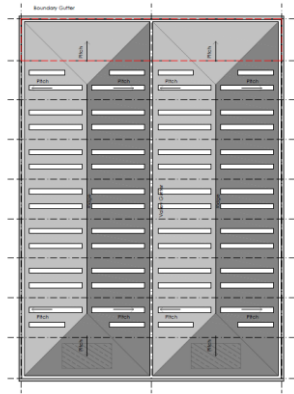
Proposed First Floor Office Plan

Proposed Ground Floor Office Plan

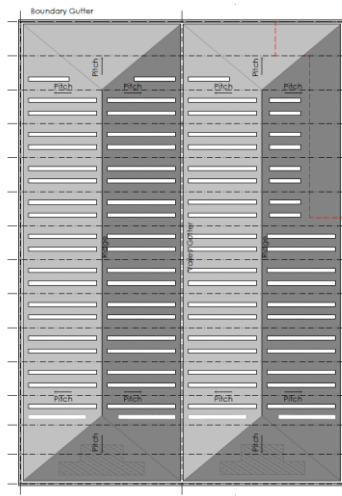


## Roof Plan

### Unit A

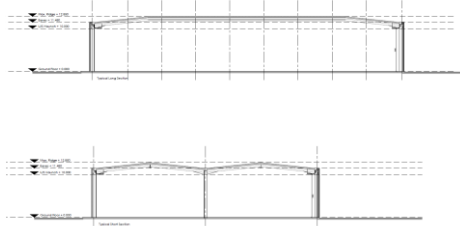


### Unit B

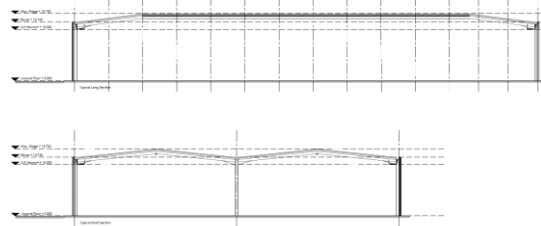


## Proposed Sections

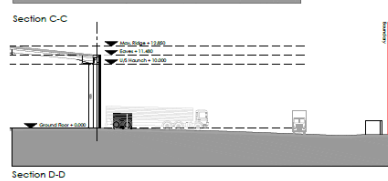
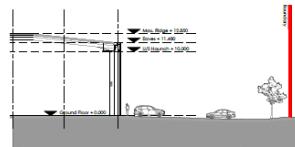
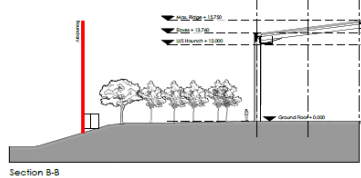
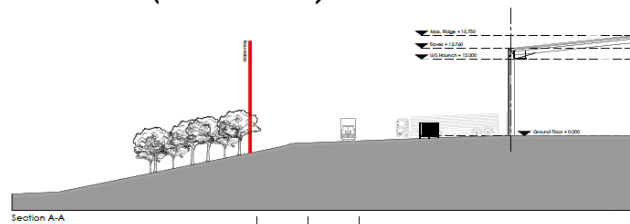
### Unit A



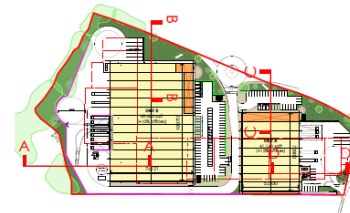
### Unit B



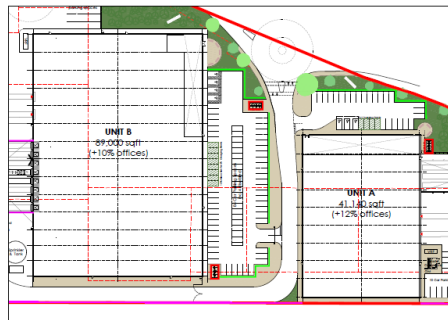
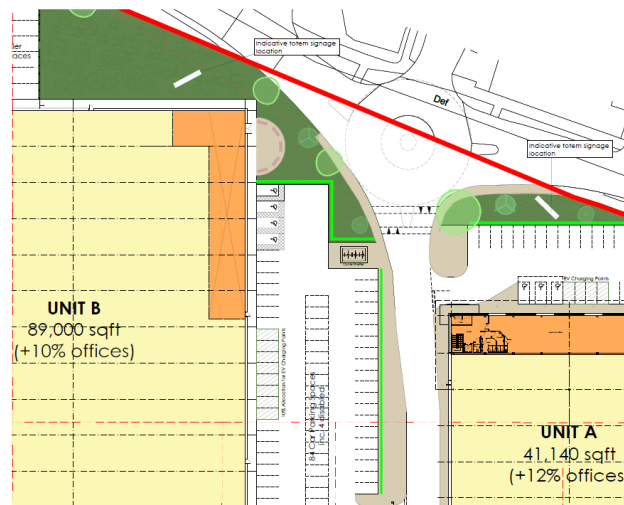
## Proposed Sections (Boundaries)



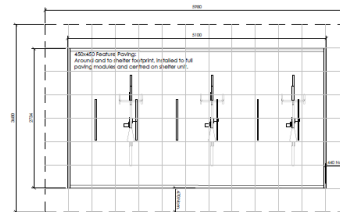
Reference plan @ NTS



## Indicative Totem Signage Locations



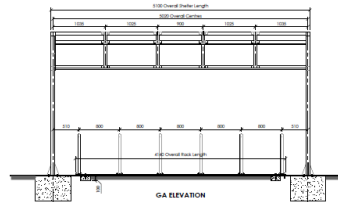
Cycle Shelter Location Plan NTS



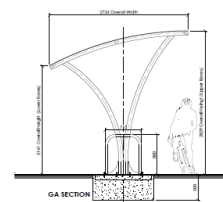
Typical Layout Plan 1:50



Photograph Showing Design of  
Proposed Cycle Shelter



Elevation 1:50



Section 1:50

## CGIs



Aerial view East of the combined new development proposals



View North along internal road towards Rose Kiln lane roundabout