

06 September 2023



Reading
Borough Council
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Title	PLANNING APPLICATION REPORT
Ward	Whitley
Planning Application Reference:	221936/FUL
Site Address:	Bennet Court, Bennet Road, Reading, RG2 0QX
Proposed Development	Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.
Applicant	DV5 Coltham (Reading) Ltd
Report author	Jonathan Markwell, Principal Planning Officer
Deadline:	Originally 10/05/2023, but an extension of time has been agreed with the applicant until 27/09/2023
Recommendation	Delegate to the Assistant Director for Planning, Transport and Public Protection Services (AD PTPPS) to (i) GRANT full planning permission subject to the satisfactory completion of a Section 106 legal agreement or (ii) to REFUSE permission should the Section 106 legal agreement not be completed by the 27 th September 2023 (unless officers on behalf of the AD PTPPS agree to a later date for completion of the legal agreement).
S106 Terms	<p>Employment, Skills and Training - The production, implementation and monitoring of an Employment and Skills Plan (ESP) for the Construction and End User phases of the development. Or, in the event that the developer chooses not to provide the ESP(s) themselves at Construction or/and End User phases, financial contribution commuted sum(s) calculated using the SPD formula, will be secured in lieu of ESP(s).</p> <p>Off-site biodiversity compensation, comprising 8 medium sized trees elsewhere along Bennet Road, through a financial contribution of £12,546.</p>
Conditions	<ol style="list-style-type: none">1. Time Limit – 3 years2. Approved plans3. Pre-commencement, barring demolition works, details of all external materials to be submitted and approved.4. Compliance condition permitting Class E (g)(iii), Class B2 or Class B8 uses only.5. Compliance condition permitting no more than 4,308sqm (GIA) floorspace at the site.6. Compliance condition permitting no more than 15% of the total floorspace for ancillary office use.

	<ol style="list-style-type: none"> 7. Compliance condition restricting any further goods, materials, products, machinery or equipment being permanently stored externally at the site. 8. Pre-commencement, barring demolition, submission and approval of an interim BREEAM Certificate demonstrating a minimum BREEAM 'Excellent' rating 9. Pre-occupation submission and approval of a final BREEAM Certificate demonstrating a minimum BREEAM rating demonstrated in the previous condition. 10. Compliance condition for the development to be carried out in accordance with the energy measures achieved in the Energy Statement hereby approved. 11. Pre-occupation photovoltaic array details to be submitted and approved. 12. * Pre-commencement (including demolition) demolition and construction method statement (including Transport and EP based requirements). 13. Compliance condition for vehicle spaces to be provided prior to first use of the building. 14. Compliance condition for vehicular access to be provided prior to first use of the building. 15. Pre-occupation submission and approval of cycle parking space details. 16. Within 6 months of occupation submission and approval of a Travel Plan 17. Subsequent annual Travel Plans to be submitted and approved. 18. Pre-occupation submission and approval of EV charging point details. 19. Compliance condition restricting noise levels of any future plant/equipment 20. Unidentified contaminated land procedure 21. Compliance condition relating to hours of demolition/construction works 22. Compliance condition relating to no burning of materials or green waste on site 23. Pre-occupation submission and approval of measures to prevent pests and vermin accessing bin stores 24. Pre-commencement, barring demolition, Sustainable Drainage Strategy to be submitted and approved. Completion of approved strategy prior to first occupation and management/maintenance thereafter in accordance with an agreed plan. 25. Pre-commencement, barring the demolition works hereby approved, submission and approval of all hard and soft landscaping details, specifically including green roof details, and thereafter carried out in accordance with approved details in the first planting season following first occupation and replacement planting for first 5 years. 26. * Pre-commencement, including demolition and preparatory works, approval of an Arboricultural Method Statement and Tree Protection Plan and the development to be carried out in accordance with the approved details.
<p>Informatives</p>	<ol style="list-style-type: none"> 1. Positive and Proactive Statement 2. Damage to the highway 3. Works affecting highways 4. Section 106 Legal Agreement 5. Thames Water informative 6. Possible need for separate advertisement consent

	<ul style="list-style-type: none"> 7. Pre-commencement condition 8. Terms 9. Building Control 10. Complaints about construction 11. Encroachment 12. Community Infrastructure Levy
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1. Executive summary

1.1. Planning permission is sought for the redevelopment of the site for a single industrial building, for flexible industrial processes, general industrial or storage or distribution uses with ancillary offices. The continued use of an existing employment site, within a Core Employment Area, for alternative employment uses, is welcomed and supported. This is preferable to a residential use, which is possible owing to separate prior approvals at the site. A suitable standard of accommodation would be provided, increasing the employment floorspace at this brownfield site. The sustainability credentials of the proposals, targeting a BREEAM ‘Outstanding’ rating, is a particularly welcomed feature of the proposals. Through revisions during the course of the application, the on-site biodiversity enhancements have been maximised as far as reasonably possible, with off-site compensation also contributing to achieving an overall biodiversity net gain in excess of 10%. Accordingly, planning permission is recommended for approval subject to a legal agreement and conditions as set out above.

2. Introduction and site description

2.1. The application site is 0.76 hectares in size and roughly rectangular in shape. It is located on the south side of Bennet Road, opposite the junction with Commercial Road (to the north) and is known as Bennet Court. As existing, the site comprises two red-brick ‘r’ shaped office buildings, both two-storeys in height. The buildings are complemented by surface level car parking, a variety of soft landscaping around the perimeter of the site (including a series of trees on the eastern boundary – a group of street trees along Bennet Road existed until at least August 2021, before being removed prior to the submission of this application). The site is largely flat and access is solely possible from Bennet Road, with the remainder of the existing site enclosed by fencing. The red line site boundary, seen below in figure 1, includes part of the Bennet Road pavement and verge. Accordingly, the applicant has served notice of the application on the RBC Highways Section, who own this segment of the site.

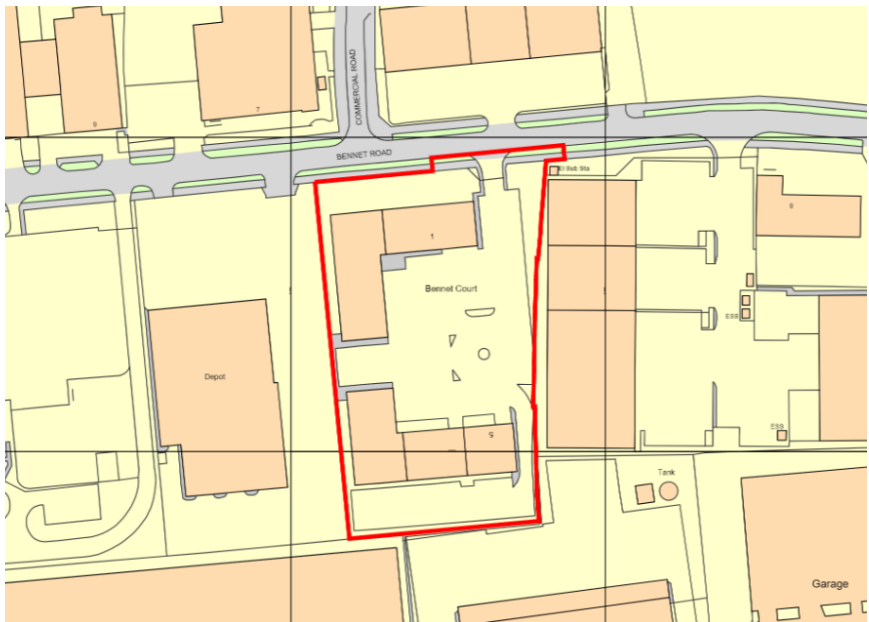


Figure 1 - Site Location Plan (not to scale)

2.2. At the time of the officer site visit on 01/03/2023 all of the existing offices were occupied, although the representative of the applicant advised these were on short-term lets and

the supporting statement describes elements of the buildings being occupied by 'meanwhile uses' (a building being utilised for a duration of time before it is turned into a more permanent end state). Occupation was as follows:

Plot 1 (northern most building)

- Unit 1 – occupied by Aura (tech-integrated workspace provider) (shown in the foreground in figure 2 below)
- Unit 2 – occupied by The Cowshed (charity collection and distribution centre of clothes and other essential items for anyone in need)

Plot 2 (southern most building)

- Unit 3 – occupied by Black Box Network Solutions (IT consultants)
- Unit 4 - occupied by Aura (tech-integrated workspace provider)
- Unit 5 – occupied by Press to Print (printing services)



Figure 2 - Site photograph from Bennet Road on 01/03/2023

- 2.3. The surrounding area is solely commercial in nature, as shown below in the aerial view at Figure 3. A variety of premises surrounding the site, such as a Select Environmental Services centre to the north, a series of occupiers within a large warehouse to the east, the Smith News publishing centre to the south (fronting onto Acre Road) and a Renault truck dealership to the west. The site is within the designated Bennet Road Core Employment Area, as per Policy designation EM2d (Location of New Employment Development – Bennet Road). The site is also identified as having potential to contain contaminated land and is within a smoke control zone. The site is located within the outer consultation zone associated with AWE Burghfield, as per Policy OU2 (Hazardous Installations). There is no requirement to consult the Office for Nuclear Regulation (ONR) as the proposed development is unlikely to lead to an increase of 500 people at the site. The application site is located within Flood Zone 1. There are no listed buildings or any heritage assets on site, with none in the immediate vicinity either. The site is also located outside of any designated conservation area.

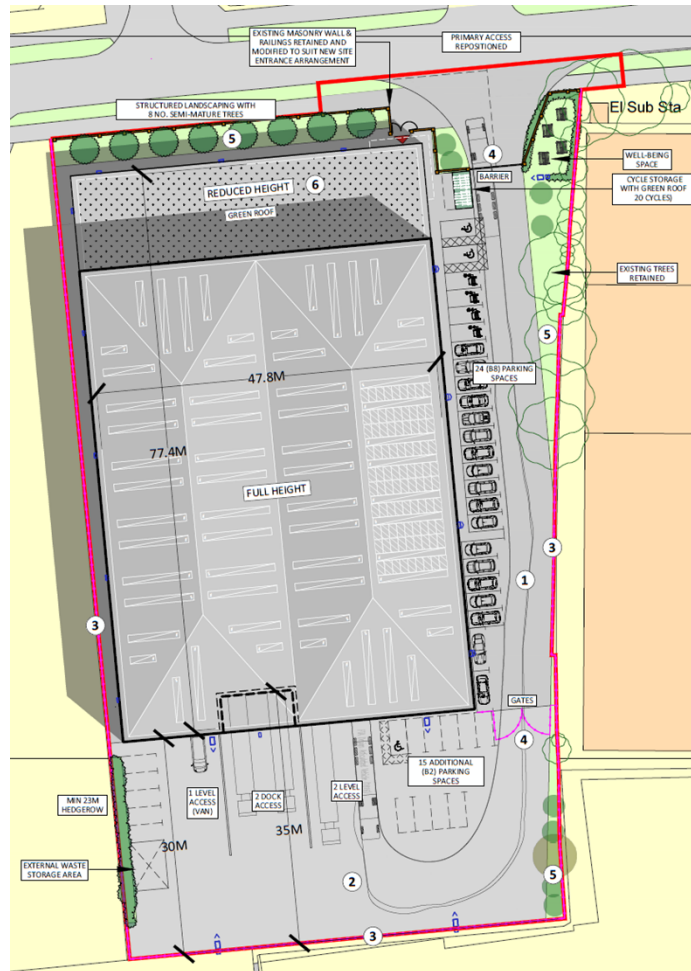


Figure 3 - Aerial view looking north

- 2.4. The site is located within the Secondary Core Area (Zone 3) of the Council's adopted Parking SPD. The site is accessible via public transport with the closest bus stops located on the B3031 Basingstoke Road, around 300 metres away, which provide frequent services towards Reading Town Centre and Whitley Wood. The site is strategically well located with the main A33 located west of the site, providing wider access to the M4, town centre and wider road network. Bennet Road is a cycle route in the Local Cycling and Walking Improvement Plan (LCWIP).
- 2.5. The application is being considered at Planning Applications Committee as it is a 'major' application (floorspace >1000sqm) which is recommended for approval by officers.

3. The proposal

- 3.1. Full planning permission is firstly sought for the demolition of both existing buildings at the site, as part of the redevelopment of the site to provide a single industrial building. Permission is flexibly sought for three possible uses, namely industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses. Please note that the Class E (g)(iii) use referenced was previously a Class B1(c) use, until this use was revoked in the September 2020 changes to the Use Classes Order. The proposed gross internal area of the building is 4,308sqm, representing an uplift of 388sqm in comparison with the specified existing floorspace of the two buildings at the site.



SCHEDULE OF EXTERNAL HARDSTANDING MATERIALS

- | | |
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| <p>① - MACADAM SURFACING
- THERMOPLASTIC PAINT LINING ETC.
- COLOUR - BLACK/GREY SELF COLOUR WITH LINING TO CONVENTION</p> <p>② - CONCRETE SURFACING
- COLOUR - LIGHT GREY SELF COLOUR</p> <p>③ - GENERALLY 2.4M HIGH PALADIN FENCE
- SURFACE COATED IN PROPRIETARY FINISH
- COLOUR - TBA</p> <p>④ - FABRICATED STEEL PEDESTRIAN/VEHICULAR GATES/CONTROL BARRIER</p> | <p>- FULL SPECIFICATION PAINT FINISH
- COLOUR - TBA</p> <p>⑤ - STRUCTURED LANDSCAPING
- SCHEME TO BE APPROVED BY LOCAL AUTHORITY
- PRIOR TO IMPLEMENTATION</p> <p>— DENOTES APPROXIMATE EXTENT OF PALADIN FENCING</p> <p>⬆ DENOTES APPROXIMATE LOCATION OF VARIOUS EXTERNAL LIGHTING EQUIPMENT - PLEASE REFER TO M&E DRAWING FOR SPECIALIST LAYOUT, HEIGHTS AND QUANTUM SCHEDULE</p> |
|--|--|

Figure 4 – Proposed Site Plan

3.2 The proposals also explicitly reference that an ancillary office component is included as part of the proposals, with this proposed to total 646sqm (15% of the total floorspace proposed), located at a proposed first floor (effectively a mezzanine level) at the northern (Bennet Road) end of the proposed building. This part of the proposed building is lower than the majority of the building, being 11.3m in height (6m and 3m floor to ceiling heights respectfully) and comprising a flat roof, which will comprise a green roof. The main building is 14.715m in height, with an internal haunch height of 12m and a gently sloping roof, with an area of photovoltaics proposed on the easternmost roof slope. In total, the building is 77.4m in length and 47.8m in width, with a 30m deep external service area to the south of the building, as shown in the proposed site plan above at Figure 4.

3.3 The proposals also include on-site vehicular parking towards the eastern and southern boundaries of the application site, with soft landscaping on the northern, eastern and part of the western borders. This is shown in part below at Figure 5 on a proposed aerial visualisation submitted by the applicant. The access off Bennet Road is proposed to be widened and remodelled, with a gated entrance point introduced, beyond which will be cycle parking, a well-being space for future employees and aforementioned vehicular

parking (39 car-parking spaces in total). Replacement boundary treatments around the eastern, southern and western perimeters of the site are also proposed in the form of 2.4m paladin fencing and external lighting is also proposed to serve the external areas.



Figure 5 – Applicant’s aerial visualisation of the proposed scheme looking south (please note this does not show the proposed green roof)

- 3.4 During the course of the application more information and revised plans have been submitted to address various comments raised by officers, in respect of ecology, trees and landscaping, transport and environmental protection based matters. Most substantially, the amount of proposed on-site soft landscaping has increased and a green roof has been incorporated in the flat roof area fronting Bennet Road and on the roof of the proposed cycle store. No element of the further/revised information was considered to be of a nature to warrant formal re-consultation being required to be undertaken.
- 3.5 In terms of the Reading Community Infrastructure Levy (CIL), the applicant has duly completed a CIL Liability form as part of the submission of this application. Whilst the proposal is chargeable owing to the floorspace involved, as per the RBC CIL Charging Schedule the charge would be £0 based on the uses proposed.
- 3.6 The following plans have been received (only the latest versions are referenced):

22-024-PL-01 Rev A – Site Location Plan
22-024-PL-07 – Typical Cycle Shelter Details
22-024-PL-08 - Typical Paladin Fence Details
As received 28/12/2022

22-024-PL-02 Rev B – Site Layout Plan – As Existing (Topographical Survey Based)
As received 11/01/2023

22-024-PL-11 – Street Scene – As Existing & As Proposed
22-024-PL-12 – Existing Floor Plans (to be demolished)
22-024-PL-13 – Existing Elevations (to be demolished)
22-024-PL-14 – Typical Double Leaf Gate Details
22-024-PL-15 – Typical Barrier Details
1870-ESC-00-ZZ-DR-E-2100 Rev P3 – External Lighting Layout
As received 27/01/2023

22-024-PL-03 Rev J – Site Layout Plan – As Proposed (OS Based)
22-024-PL-04 Rev D – Floor Plans & Roof Plan – As Proposed
22-024-PL-05 Rev F – Elevations & Sections – As Proposed
22-024-PL-06 Rev C – Site Sections

As received 28/07/2023

- 3.7 The following other documents and plans have been received (only the latest versions are referenced):

Application form

CIL form

As received 28/12/2022

Planning Statement by Barton Willmore, now Stantec Ref 34051/A3/MM/CT/EP/** REV P1c dated January 2023

Sk103 P2 HGV Tracking Terraced Scheme

44661_T Rev 2 - Topographical Survey

Drainage Strategy by Nolan Associates Ref 2022-124 dated November 2022

Noise Assessment Bennet Court, Reading by Air & Acoustic Consultants Ref 100601 Rev [00] dated 10/01/2023

Air Quality Assessment Bennet Court, Reading by Air & Acoustic Consultants Ref 100601 Rev [00] dated 10/01/2023

Sustainability Statement Bennet Court, Reading Coltham by Engineering Services Consultancy Ltd Ref 0374/ESC/00/ZZ/SP/M/0002/XX Rev P3 dated 06/01/2023

BREEAM Pre Assessment by Engineering Services Consultancy Ltd dated May 2022

Flood Risk Appraisal Bennet Court, Bennet Road Reading by Delta Simons Ref 22-0819.02 Issue 02 dated 08/06/2022

Transport Statement by Mode Transport Planning Ref 230109 326748 TS 001 Rev B Report No. 3

Framework Workplace Travel Plan by Mode Transport Planning Ref 230109 326748 TP 001 Rev B Report No. 3

Geo-environmental Assessment Bennet Court, Bennet Road Reading by Delta Simons Ref 22-0819.03/87565.544807 Issue 03 dated 21/12/2022

44661_UG Rev 2 – Utility Survey

Supporting letter from Barton Willmore, now Stantec Ref 34051/A3/MM/CT/EP/** dated 11/01/2023

As received 11/01/2023

22-024-PL-09 Rev B – CGI View – Aerial Photomontage

22-024-PL-10 Rev A – CGI View – Eye Level

Utilities Review Bennet Court, Reading Coltham by Engineering Services Consultancy Ltd Ref ESC/G/2022 Rev P4 dated 27/01/2023

Design and Access Statement by BHP Design Ref 22-024-DAS-01A

As received 27/01/2023

Energy Statement by Engineering Services Consultancy Ltd Ref ESC1870 Rev P1 dated 06/02/2023

As received 08/02/2023

Ecological Appraisal by FPCR Environment and Design Ltd Rev B, dated 23/05/2023

Bennet Court Reading LLFA Response by Nolan Associates Ref 2022-124 dated April 2023

Photographs x49 in respect of the LLFA Response

Letter from Barton Willmore now Stantec 'Bennet Court, Reading (reference: 221936)

Response to Ecology comments Ref 34051/A1/CT/EP/**, dated 31/05/2023

Letter from Barton Willmore now Stantec 'Response to Consultee comments received as part of full planning application (reference: 221936) Ref 34051/A3/CT/EP/bc, dated 31/05/2023

As received 01/06/2023

J32-6748-PS-002 Rev A – Access Tracking (Large Car & 16.5m HGV)

J32-6748-PS-004 – Proposed Site Access

Email from Barton Willmore now Stantec 'Bennet Court, Reading', dated and received 27/06/2023

Email from Barton Willmore now Stantec 'RE: Bennet Court, Reading', dated and received 28/06/2023

Letter from Logix Property LLP 'Bennett Court, Reading' dated and received 07/07/2023

Arboricultural Impact Assessment, incorporated the Tree Schedule and Constraints Plan by Aspect Arboriculture Ltd Ref 11491_AIA.001 Rev E, dated and received 11/07/2023

Biodiversity Metric 3.1 – Bennet Court Ref 11224 – 21.07.2023

Letter from fpcr 'BENNET COURT, READING – UPDATE BNG POSITION REV A' Ref 11224/OGJ/CAH1, dated 21/07/2023

As received 22/07/2023

8085/LSP Rev F – Bennet Court, Reading Landscape Strategy Plan

As received 28/07/2023

4. Planning history

Bennet Court, 10-12 Bennet Road

- 4.1 890477/FUL – Use of buildings for business purposes (Class B1). Permitted 20/03/1989.
- 4.2 940534/ADV - Provision of free-standing triangular GRP sign incorporating estate and tenants name. Advertisement consent granted 16/11/1994.
- 4.3 991283/ADV - Installation of one illuminated sign and one non-illuminated sign on either side of the entrance gates. Advertisement consent granted 29/08/2000.
- 4.4 992335/FUL - Erection of front boundary fence with access gates. Granted 13/01/2000.
- 4.5 200598/FUL - Recladding of existing commercial buildings, erection of two storey building to contain an 'amenity pod', re-arrangement of carparking layout and landscaping. Granted 24/09/2020.

1 Bennet Court

- 4.6 060056/ADV - Various advertisement signs for motorcycle retailer. Advertisement consent granted 12/12/2006.

2 Bennet Court

- 4.7 170236 - Replacement of roller shutter and access door with windows. Granted 07/04/2017.

2 & 4 Bennet Court

- 4.8 070012/FUL - Removal of existing roller shutter doors to ground floors and replacement with glazed doors and window units. Granted 30/04/2007.

5 Bennet Court

- 4.9 890916/ADV – Illuminated sign box with the word Norland in red vinyl on a white Perspex background. Advertisement consent granted 12/05/1989.
- 4.10 141804/FUL - Change of Use of ground floor from B1 and A1 to D1A for offices consulting and treatment rooms to provide services entailing counselling to clients in relation to reproductive health matters, ultra sound scanning, medical assessment including blood

and urine testing sexual health screening and procedures to regulate fertility both medical and under local anaesthetic. This use is to be personal to .p.a.s. and for the period of the lease. Withdrawn 16/12/2014.

Plot 1 Bennet Court (Units 1 & 2)

- 4.11 210320 - Change of use of building (Plot 1) from Class B1(a) (offices) to C3 (dwelling houses) to comprise 27 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended). Prior Approval Approved 19/04/2021.

Plot 2 Bennet Court (Units 3,4 & 5)

- 4.12 210306 - Change of use of building (Plot 2) from Class B1(a) (offices) to C3 (dwelling houses) to comprise 22 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended). Prior Approval Approved 19/04/2021.

5. Consultations

Statutory & Non-Statutory

1) RBC Transport

- 5.1.1 Considering access arrangements first, vehicular access to the site is currently provided from Bennet Road via a priority junction arrangement. The access will be widened and slightly realigned to allow HGV access within the site. The access will be increased to 7.3m wide with a 15m radii. During the course of the application tactile paving and dropped kerbs have been shown on a revised plan to facilitate pedestrian movements across the access, with the applicant suitably justifying that a pedestrian refuge island is not required in this instance. A compliance condition will ensure this access is provided prior to the first use of the proposed building.
- 5.1.2 All servicing and deliveries will occur within the service yard at the rear (southern end) of the site, as shown below in figure 6. The unit would provide 2 dock accesses, 2 level accesses (a total of 4 HGV) and 1 level access within the southern yard area. A vehicle tracking assessment has been undertaken for a Large Car and a 16.5m long articulated HGV. The tracking diagrams demonstrate that all vehicles are able to enter and turn within the site, and leave in forward gear.

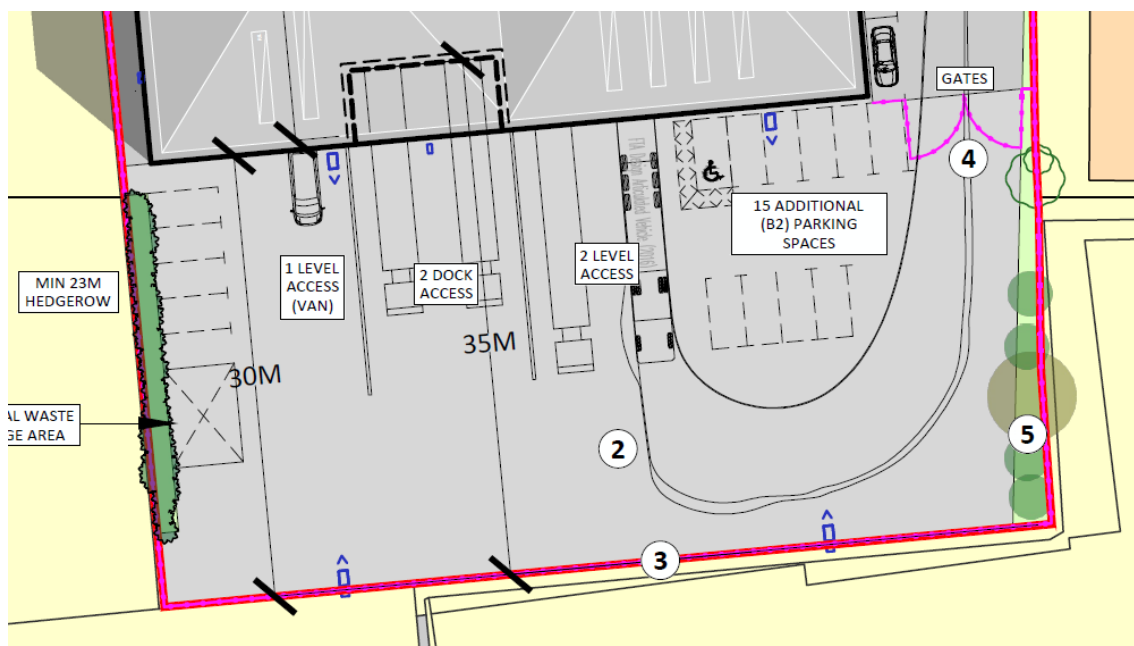


Figure 6 – HGV parking/loading areas to the rear of the site

- 5.1.3 In terms of parking, Policy TR5 (Care and Cycle Parking and Electric Vehicle Parking) states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Local parking standards are set out in the RBC Parking SPD, which takes into account the accessibility of the site. Parking Standards have been reviewed for both Class B2 and B8 land uses as the end occupier is still to be determined.
- 5.1.4 The proposed car parking is to be located along the eastern boundary, with additional parking to be located within the service yard at the rear of the site. The site will provide 39no. parking spaces, of which 3no. would be designated as accessible car parking spaces and 4no. spaces would be available as active electric vehicle (EV) charging spaces with all remaining spaces being provided as passive spaces to allow them to be converted in the future. The proposed parking at the site meets the requirements for the “worst case” scenario given the flexible industrial use proposed under this application. A compliance condition will ensure this parking is provided prior to the first use of the proposed building, with a separate condition specifically securing EV charging space details.
- 5.1.5 A cycle parking facility is provided close to the Bennet Road access point, with a stated capacity for 20 bicycles. This provision would be sufficient, but details of the precise layout have not been provided so will be secured via condition.
- 5.1.6 In respect of the traffic generation impacts of the proposed development, the site benefits from an extant Class E(g)(i) office use, with 148 existing car parking spaces. The TRICS database has established that the existing site could generate 43 two-way trips in the AM peak and 44 two-way trips in the PM Peak. Of the proposed uses, Class B2 units generally generate a higher number of trips than Class B8 or Class E (g)(iii) units. Therefore, the Class B2 industrial trip rates are accepted as a worst case scenario for the purposes of the assessment to establish the net traffic impact as a result of the proposed development.
- 5.1.7 A summary of the net traffic assessment has been undertaken and summarised in Table 6.1 within the Transport Statement. An extract is below in figure 7:

	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)		
	Arrive	Depart	Total	Arrive	Depart	Total
Current (all vehicles)	38	5	43	4	40	44
Proposed (all vehicles)	18	4	22	1	13	14
Vehicle Nett Trip Difference	-20	-1	-21	-3	-27	-30
Current (HGV)	0	0	0	0	0	0
Proposed (HGV)	2	1	3	0	0	0
Vehicle Nett Trip Difference	+2	+1	+3	+/-0	+/-0	+/-0

Figure 7 – Peak hour net traffic impact (Table 6.1 of the Transport Statement)

- 5.1.8 This indicates that the proposed scheme would result in a reduction in vehicle trips in both the AM and PM peak, although the proposed scheme would result in three additional HGV trips in the AM Peak period.
- 5.1.9 It should be noted that the existing site provides a total of 148 car parking spaces; therefore the proposed development represents a net reduction of 109 car parking spaces. Put simply, the existing office use generates a higher demand for parking than the proposed uses will. Therefore, it is reasonable to assume that the proposed development would generate less vehicle movements throughout the course of the day.

- 5.1.10 The site is located within a Core Employment Area, which are the main location for industrial and warehouse uses. A high proportion of the traffic using the road is commercial traffic, ranging from light vans to articulated lorries. In view of this, the small increase in commercial vehicles in the AM Peak would not have a significant impact on the local highway network.
- 5.1.11 A Framework Travel Plan (FTP) has been submitted as a preliminary guide. The primary aim of the FTP is to minimise single occupancy car travel being made by staff or visitors travelling to and from the development. Section 4 sets out the Measures & Action Plan of the Travel Plan. A Travel Plan Coordinator should be appointed prior to the first occupation of the site and will be responsible for leading the implementation, monitoring and review of the Travel Plan. However, as the site occupier(s) are not yet known, a condition is required to ensure that a full travel plan is submitted within 6 months of occupation, with a separate condition securing subsequent annual reviews.
- 5.1.12 In order to protect highway safety during the course of the implementation of the scheme, a demolition and construction method statement should be secured via condition. In overall terms the proposals are acceptable from a transport perspective, subject to a series of conditions referenced above.

2) RBC Environmental Protection (EP)

- 5.2.1 There are potential EP based concerns in relation to: noise arising from the development; increased emissions having an air quality impact; the demolition and construction phases; specific potential issues associated with rats within the bin storage areas. Each matter is therefore assessed below.
- 5.2.2 In terms of noise arising from the development, the submitted noise assessment demonstrates that there should not be a negative impact on amenity of the nearest residents due to the noise from operation of the unit. In terms of mechanical plant, although no specific plant has been proposed, a noise limit has been proposed for any future mechanical plant, which if proposed externally would require an application for planning permission in its own right. For the purposes of clarity, it is nevertheless considered reasonable to secure a condition stating any future plant/equipment shall be at least 10dB below the pre-existing background sound level, LA90,T, as stated in the noise assessment submitted.
- 5.2.3 The submitted air quality assessment is considered to be satisfactory in relation to the impact of the proposals on emissions, concluding that the impact of the development on air quality will not be significant enough to warrant further assessment or mitigation.
- 5.2.4 Turning to consider contaminated land, the submitted assessment concludes that there is an area of contaminants above the relevant guideline value. However, this can be mitigated by the addition of hardstanding or a capping layer. The submitted report includes a suitable remediation strategy, meaning no further details are required provided the assessment is included in the list of plans and documents the scheme must be carried out in accordance with. As such, the only specific contaminated land condition required is in instances whereby previously unidentified contamination is found during the development process.
- 5.2.5 With regard to the demolition and construction phases of development, dust, noise and pest control measures are recommended within the demolition and construction method statement condition suggested by Transport. Separate compliance-worded conditions are recommended too in terms of hours of working and there being no burning of materials on site, all to protect nearby amenity. Finally, in light of potential rodent issues, a condition will secure details to ensure the proposed bin stores are adequately pest-proof.

3) RBC Natural Environment

5.3.1 The original comments received raised a series of concerns with the proposals. This included the relatively recent felling of significant trees within the application site along the Bennet Road frontage, the proposed felling of further trees (totalling at least 19 trees, with the exact number unconfirmed as a number are in groups along the eastern boundary), the proposal seeking to provide off-site mitigation for biodiversity losses rather than providing greening on-site (as required in the first instance), and the overall lack of greening and softening proposed at the site. The originally proposed development was therefore considered to fail to demonstrate adequate landscaping to mitigate tree loss and to soften the appearance of the significant building proposed, contrary to Policies EN12 (Biodiversity and the Green Network), EN14 (Trees, Hedges and Woodlands) and the RBC adopted Tree Strategy.

5.3.2 The applicant considered this feedback and amended the proposals with the provision of additional on-site tree planting (proposing a total of 17 new trees, including semi-mature Fastigate Hornbeams on the frontage), hedge planting along the main frontage and rear western boundary, some wildflower grass mix, a green roof to the front portion of the building (which is positive and was included after further negotiation with the applicant) and to the roof of the cycle store too, and increasing the area of on-site greening through a decrease in the number of on-site parking spaces. This is detailed on an initial landscape strategy plan detailed below at figure 8. Whilst some concerns remain that landscaping has not been an integral part of the development design resulting in an overwhelmingly hard site with somewhat limited softening and greening, the principles of the on-site landscaping are considered to be as extensive as are going to be achieved on this site (bearing in mind other competing demands) and are considered, set within that context and with the off-site tree planting in Bennet Road to meet biodiversity net gain requirements (as discussed in GS Ecology comments below), to be acceptable and in accordance with the previously referenced policies. In particular, in conjunction with advice from GS Ecology and RBC Streetscene (see separate comments below), the provision of a financial contribution to secure off-site compensation through tree planting elsewhere along Bennet Road is supported and considered necessary from a Natural Environment perspective.



Figure 8 - Proposed landscape strategy plan

5.3.3 On the basis of the application being approved, this should be subject to a condition securing all proposed hard and soft landscaping details, including green roof details. Whilst some initial details are shown on the figure 8 above, as submitted at application stage, this is insufficient in detail in a number of respects and therefore more specific details will be secured via this condition. A separate pre-commencement condition will also secure a full arboricultural method statement and tree protection plan (and details of protective measures during demolition and construction works), to protect remaining trees of amenity value within and adjacent to the site. Whilst some details have been submitted at application stage, again the details submitted are lacking in some areas (as the submitted report itself acknowledges) and hence full details are required to be secured via condition.

4) GS Ecology (RBC Ecology consultants)

5.4.1 Considering the submitted ecology report first, initial concerns were raised with the bat survey information originally submitted. This facilitated the submission of a further bat emergence survey report in May 2023, which concludes that the buildings are not being used by roosting bats. The methodology for these reports, following the submission of more information during the application, is considered appropriate and, as such, bats are not a constraint on the development. For a building like this which is a large steel-clad commercial unit, it is unlikely that bird and bat boxes could be installed, and as such no condition for ecological enhancements beyond the green roofs and new trees (as discussed separately below) is recommended.

5.4.2 Moving onto biodiversity net gain (BNG) matters, significant concerns were raised with the originally submitted supporting information, which was assessed to lead to a biodiversity net loss of -76.79% (As per a Defra metric calculation). Concerns were subsequently also raised in respect of the methodology of the assessment, most prominently in respect of the non-inclusion of recently felled (stated by the applicant to be by the previous owner and prior to their ownership) trees, with GS Ecology considering the felled trees (1 London plane, 1 birch, 5 cherries and 2 ash trees - see Figure 9 below) should be used in the baseline calculation.

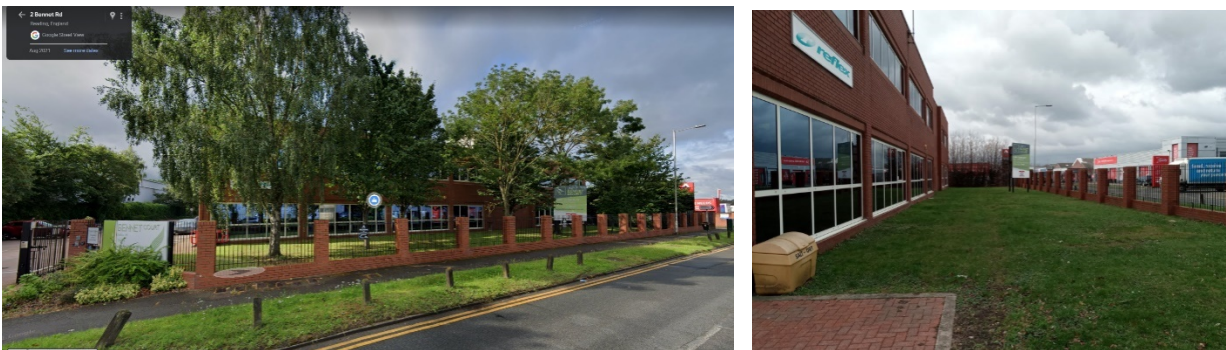


Figure 9 – Left: A Google streetview showing significant trees along the site frontage in August 2021; Right: These trees had been removed by the time of the officer site visit on 1st March 2023.

5.4.3 At the outset and during the course of the application, conflicts with Policy EN12 (Biodiversity and the Green Network) were identified by officers, where it is stated that:

*“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.*

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development”.

- 5.4.4 Conflicts with the corresponding components of the NPPF and future mandatory requirements of the Environment Act 2021 (from November 2023 for a minimum 10% BNG) were also identified, as well as the local policy context.
- 5.4.5 At the initial stages of the assessment of the application the applicant was actively seeking to provide off-site compensation, with a relative lack of on-site measures, but officers advised that the Policy EN12 hierarchy had not been sufficiently demonstrated and, moreover, advised that the impacts should be avoided, mitigated or compensated for on-site (in that order, in line with the hierarchy) prior to off-site compensation even being considered.
- 5.4.6 Following negotiations, the applicant has submitted an updated Technical Note and BNG calculation using the site before the trees along the frontage were felled as the baseline for the calculation. The applicant has also revised the scheme to maximise the number of on-site Habitat Units by increasing the number of trees planted within the application site and providing a biodiverse green roof on the front of the building. To offset the residual loss of units (0.64 Habitat Units) and to provide a net gain (a 10.52% net gain in habitat units), the applicant has agreed to fund the planting of 8 new street trees in nearby locations and their ongoing maintenance for 30 years.
- 5.4.7 Accordingly, it is advised that, although it would have been preferable if the existing trees along the frontage had been retained, this is a satisfactory outcome, as it would not be feasible to provide an on-site net gain within the context of the proposed scheme and the existing baseline. In particular, the proposals provide a net gain through a combination of on and off-site measures, providing new tree planting, wildlife friendly landscaping and have demonstrated that the impacts cannot be avoided, mitigated or compensated for on-site. Therefore, based on the overarching planning officer viewpoint that an exceptional circumstance where the need for development clearly outweighs the need to protect the value of the site has been evidenced, off-site compensation can be provided to ensure no net loss of biodiversity. Accordingly, the proposals are considered to comply with Policy EN12.
- 5.4.8 As such, it is recommended that the proposed 8 off-site trees (and their maintenance in perpetuity) are secured via a planning obligation and that full details of the landscaping plan and green roof are secured via planning conditions. With this obligation and condition secured the proposals are considered to be acceptable and policy compliant.

5) RBC Streetscene

- 5.5.1 In light of the comments from RBC Natural Environment and GS Ecology, input from RBC Streetscene has been received, in relation to the provision of off-site tree compensation to ensure a biodiversity net gain is achieved. It has been advised that there is scope for trees to be planted along the verges elsewhere on Bennet Road and this would be welcomed and encouraged to improve the streetscene. In terms of medium sized species, it is advised that these could either be Field Maples, Silver Birches or Pears. In terms of the exact number and location of the trees, this is still under discussion, but it is clarified that there is capacity and scope for at least 8 trees are being secured via s106 legal agreement in this instance. The cost of these trees, together with a 20% contingency in

case of failure and 30 year maintenance (as combination of a 3 year survey programme and actual maintenance) has been calculated to total £12,546 (including VAT).

6) RBC Lead Local Flood Authority (LLFA)

- 5.6.1 Initial comments received raised a series of requests for further information to enable the proposals to be assessed in full. This included, for example, the greenfield and brownfield run off rates (to ascertain whether the proposals result in a reduced run off rate) and whether ecological benefits had been maximised in the Sustainable Urban Drainage (SuDS) design.
- 5.6.2 The applicant submitted further and additional information to seek to address the original comments raised. This was duly assessed and it is considered that the proposed discharge runoff rate of 5 litres/second (l/s) is agreed as being a significant benefit (bearing in mind the existing brownfield run off rate of 86.25 l/s) and is therefore deemed acceptable in principle. More specifically in terms of the drainage strategy itself, it is considered that this will require some further refinement and details to be established and confirmed. This includes the need for more soakaway testing, as the submission by the applicant acknowledges, and future confirmation of the precise location of the existing main sewer at the site. However, in light of the reduced run off rate, officers are content that the full strategy can be secured via condition. The strategy will be approved prior to commencement, barring demolition works. The approved strategy will be completed prior to first occupation and will thereafter be managed and maintained in accordance with details approved as part of the future discharge of the condition. This will reduce the risk of flooding onsite or elsewhere, in accordance with Policy EN18 (Flooding and Sustainable Drainage Systems).

7) RBC Waste Services

- 5.7.1 No objection to the application.

8) Reading's Economy & Destination Agency (REDA) (formerly Reading UK CIC)

- 5.8.1 REDA is the Council's partner organisation for the delivery of economic development services, including employment and skills provision. REDA welcome the continued use of the development site for commercial purposes. It is hoped that maintaining this space for future business use, with all the employment opportunities this will bring, will create more jobs and training opportunities for residents - particularly in south Reading.
- 5.8.2 Due to the scale of the development (over 10,000 sq ft) it is considered that an Employment and Skills Plan (ESP) should be pursued under the S106 Legal Agreement, as outlined in the Supplementary Planning Document (SPD) adopted in April 2013. This ESP would apply to both the Construction and End Use phases. Alternatively, the applicant could make financial contributions in lieu of an ESP to deliver training and recruitment programmes which benefit local residents, as per the SPD guidance.

9) Thames Water

- 5.9.1 Considering waste comments first, based on the information submitted Thames Water has no objection on waste water network and sewage treatment works grounds. With regard to surface water drainage, providing the scheme follows the sequential approach to the disposal of surface water Thames Water would have no objection. If the scheme proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. An informative will advise the applicant of this, together with guidance about working close to Thames Water sewers. The scale of the proposed development doesn't materially affect the sewer network and as such Thames Water have no objection in this regard. Thames Water also advises the developer to liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach, before considering connection to the public sewer network.

5.9.2 Based on the information submitted Thames Water has no objection with regard to water network and water treatment infrastructure capacity matters, subject to an informative regarding minimum pressure levels.

10) RBC Building Control, RBC Sustainability, SGN (formerly Scotia Gas Networks) and SSE Power Distribution (formerly Scottish and Southern Energy)

5.10.1 No responses have been received from these consultees. If any responses are subsequently received they will be set out in any update report.

Public:

5.11.1 Notification letters were sent to nearby occupiers on 09/02/2023, expiring on 02/03/2023. Two site notices were erected on 01/03/2023, expiring on 22/03/2023. A press notice was published on 16/02/2023, expiring on 09/03/2023. No responses have been received.

6. Legal context

6.1. 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'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

6.2. In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

6.3. Accordingly, the latest NPPF and the following development plan policies and supplementary planning guidance are relevant:

NPPF 2021

2. Achieving sustainable development

4. Decision-making

6. Building a strong, competitive economy

9. Promoting sustainable transport

11. Making effective use of land

12. Achieving well-designed places

14. Meeting the challenge of climate change, flooding and coastal change

15. Conserving and enhancing the natural environment

National Planning Policy Guidance (2014 onwards)

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC3: Adaptation to Climate Change

CC4: Decentralised Energy

CC5: Waste Minimisation and Storage

CC6: Accessibility and the Intensity of Development

CC7: Design and the Public Realm

CC8: Safeguarding Amenity

CC9: Securing Infrastructure

EN12: Biodiversity and the Green Network

EN14: Trees, Hedges and Woodland

EN15: Air Quality

EN16: Pollution and Water Resources
EN17: Noise Generating Equipment
EN18: Flooding and Drainage
EM1: Provision of Employment Development
EM2: Location of New Employment Development
EM4: Maintaining a Variety of Premises
H7: Protecting the Existing Housing Stock
TR1: Achieving the Transport Strategy
TR3: Access, Traffic and Highway-Related Matters
TR4: Cycle Routes and Facilities
TR5: Car and Cycle Parking and Electric Vehicle Charging
OU2: Hazardous Installations
Chapter 6: South Reading

Reading Borough Council Supplementary Planning Documents
Topics

Employment, Skills and Training (2013)
Revised Parking Standards and Design (2011)
Planning Obligations under Section 106 (2015)
Sustainable Design and Construction (2019)

Other relevant documentation

Reading Borough Council Tree Strategy (March 2021)
Reading Biodiversity Action Plan (March 2021)
Local Cycling and Walking Improvement Plan 2020-2030 (LCWIP) (November 2019)

7. Appraisal

7.1. The main considerations are:

- i) Land use considerations
- ii) Demolition, scale, appearance and design
- iii) Quality of accommodation for future occupiers
- iv) Amenity for nearby occupiers
- v) Transport
- vi) Trees, landscaping and ecology
- vii) Sustainability, energy, flooding and SuDS
- viii) Other matters – S106 & Equality

i) Land use considerations

7.1.1 From a land use perspective, the proposal involves the redevelopment of an existing employment site for alternative employment uses. More specifically, the existing office (Class E (g)(i) - former Class B1 business) uses at the site would be replaced by flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses, alongside ancillary office accommodation. In practice, any of the Class E (g)(iii), Class B2) or Class B8 uses could lawfully operate at the site under this proposal, either as a sole use or as a combination of these uses within the space.

7.1.2 The proposed uses would positively contribute to the Policy EM1 (Provision of Employment Development) requirement to provide a net increase of 148,000sqm of industrial and/or warehouse space in the Borough over the plan period. According to information within the latest Annual Monitoring Report (2021/22 - published December 2022) this figure is not close to being reached yet, with the proposal therefore representing a welcome proposal in assisting meeting this long-term target. Furthermore, this space will be located within a Policy EM2 (Location of New Employment Development) compliant Core Employment Area location (Policy EM2d: Bennet Road), where this type of employment floorspace is specifically encouraged.

- 7.1.3 Whilst noting that the proposals will result in a loss of office floorspace (3,920sqm), this is offset by the increase in industrial and/or warehousing (4,308sqm) and an overall net increase in employment floorspace at the site (388sqm). Accordingly, this increases the overall amount of employment floorspace within this Core Employment Area location. In terms of Policy EM3 (Loss of Employment Land), the overall level of employment land is maintained in this proposal, as the policy requires.
- 7.1.4 For clarity it is considered necessary to specify via condition that only the specific uses proposed (Class E (g)(iii)), Class B2) or Class B8) are approved, with each considered acceptable in land use terms individually. Furthermore, a separate condition will permit only a maximum gross internal area floorspace of 4,308sqm at the site (as proposed). This ensures the suitable management of the floorspace at the site by the Local Planning Authority, preventing for example the future inclusion of a mezzanine floor which could significantly increase the floorspace and intensify the use (with potentially different transport implications for example), unless a separate application is submitted and considered appropriate in due course. In overall terms the proposals positively respond to the Local Plan employment policies by directing major employment development to a Core Employment Area and protecting employment land within such areas too.
- 7.1.5 The loss of existing office accommodation at the site is accepted on the basis of the acceptability of the proposed replacement employment uses noted above. Whilst mindful that Policy EM4 (Maintaining a Variety of Premises) states that proposals should maintain or enhance the range of types and sizes of units, and this proposal would result in the removal of five office units of varying size within two buildings, and replace this with a single unit (thereby reducing the range in quantitative terms), in this specific instance the compatibility of the proposed uses with this Core Employment Area is considered to outweigh the potential harmful impacts. It is also considered that there is ample scope/availability within the Borough for the specific existing office occupiers to relocate if desired within office accommodation of either an equal or higher standard.
- 7.1.6 It is also noted that the applicant has specified that the proposals incorporate some ancillary office accommodation. To clarify, this 646sqm area at first floor level of the building on the Bennet Road frontage elevation would not be a use or planning unit in itself (in this instance an office use under Class E(g)(i)), but instead be supplementary to the primary function of the flexible uses sought. The floorspace involved equates to 15% of the total floorspace. Such an arrangement is considered appropriate in this instance, with a condition specifying that no more than the 15% floorspace shall be permissible for ancillary office use, as greater proportions of ancillary office floorspace have not been assessed as part of the proposals (e.g. transport implications) and further amounts would question whether such floorspace could be considered to be ancillary.
- 7.1.7 The relevance of extant permissions for residential use are also required to be addressed at this juncture. As per the planning history section above (see paragraphs 4.11 and 4.12), prior approval was granted on 21st April 2021 for the conversion of the two existing buildings into a total of 49 flats (separate applications were submitted for each building). This is required to be completed by 21st April 2024 in order to comply with the conditions of the prior approval. At the time of the officer site visit on 1st March 2023 it appeared that the prior approvals had not commenced to be implemented, with neither of the pre-commencement conditions (both relating to contaminated land) satisfied either. This is referenced, as it is relevant that a residential scheme could be implemented at the site and it is therefore material in the consideration of this application.
- 7.1.8 The applicant's supporting planning statement advises in this regard that "*...the applicant seeks to retain an employment use on the Site. Notwithstanding this, the extant applications create a realistic fall-back position which forms a material consideration*".
- 7.1.9 It is considered that, whilst residential accommodation is a priority use within the development plan, in this particular instance an employment use is the preferred use in this location. The site is located within a designated Core Employment Area, with Policy

EM2 (Location of New Employment Development) specifying employment uses will be located in such areas. The policy continues by clarifying that non-employment uses which support the area's economic function (which residential accommodation arguably could) may be located in Core Employment Areas where they do not result in a loss of employment land. A residential use at the site would result in the loss of employment land, but this was not able to be assessed under the prior approval regime the residential proposal was considered against at the time. Given the site and surrounding area and policy context, officers consider that the proposed employment use is more compatible with the area, thereby downplaying any possible concerns about a potential 'loss' of 49 dwellings at the site (as per Policy H7 – Protecting the Existing Housing Stock), if this proposal were implemented rather than the residential prior approvals. Put another way, the exceptional circumstances referenced by Policy H7 apply if the proposals are considered within the context of separate yet to be implemented prior approvals for residential use at the site. It is also questionable whether Policy H7 is engaged at all, as housing at the site does not exist and therefore any 'loss' is more accurately described as 'potential loss' in this instance – the retention of the employment land use should be the clear priority.

ii) **Demolition, scale, appearance and design**

7.2.1 The officer site visit during the course of the application confirmed that the existing buildings are not considered to be of any specific historic or architectural merit to warrant their retention. Hence, providing the replacement building is considered appropriate in design terms (as discussed below), the principle of the demolition of the existing buildings is acceptable in design terms. In this instance the local area is not considered sensitive enough in design terms to warrant a condition preventing the demolition of the existing buildings until a contract is in place for the construction of the replacement building.

7.2.2 In terms of the replacement building, it is acknowledged that this will be of a more significant scale and mass than the existing buildings, covering a greater footprint on the site (comparing the existing at figure 1 with the proposed at figure 4 above), being set closer to the Bennet Road frontage (existing is set-back 10.5m from the site boundary, the proposed is set-back 4m) and being of greater height (8.7m as existing; a minimum of 11.1m, rising to 14.7m as proposed). However, whilst acknowledging these facts of the proposed scheme, the proposal on its own merits and set within the context of the surrounding area, is not considered harmful in its scale and massing. For example, the proposed height is intentionally reduced at the street frontage, meaning the overall height is only 2.4m greater than existing at this point, as shown in the section plan below in Figure 10. The overall height of the building is partly a function of the proposed uses, with sufficient floor-to-ceiling heights required for the building to be an attractive commercial option for potential future occupiers. The roof pitch, at 6-degrees, seeks to minimise the overall height.

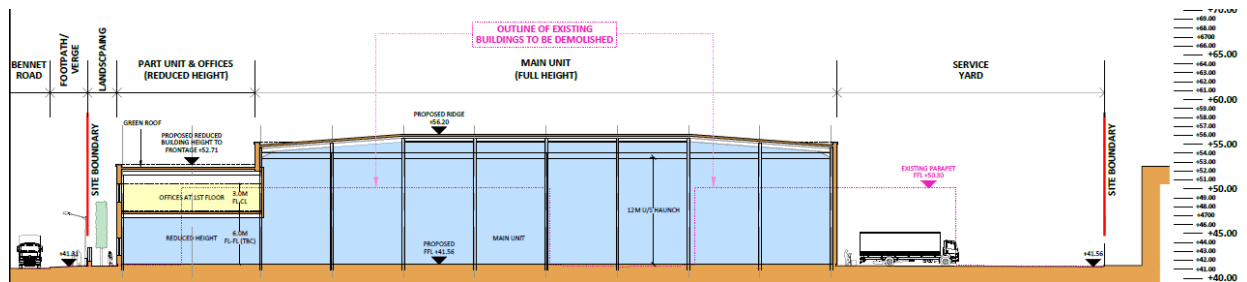


Figure 10 – Proposed north-south section plan, also showing the existing buildings

7.2.3 More specifically, when considered in streetscene terms (see Figure 11 below), the proposed scale and massing is not considered to overwhelm the plot or significantly dominate neighbouring buildings or have any readily detrimental impact. When considered within the context of the industrial/commercial surroundings it is considered

the proposal would complement and maintain the character of the area. The proposed streetscene elevation demonstrates that whilst the proposed scale and massing is greater than existing, it is not harmfully greater and, moreover, is suitable within the context of the application site and wider streetscene context. Accordingly, the scale and massing of the proposed development is considered to be acceptable.

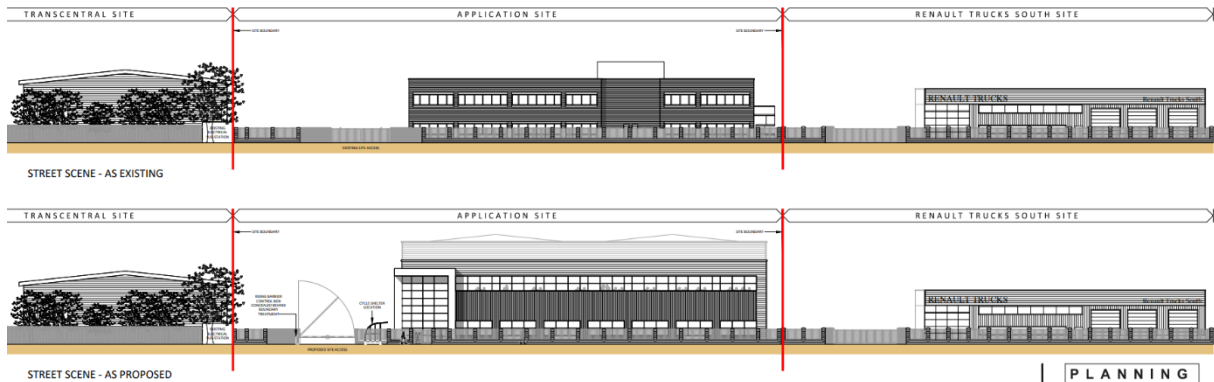


Figure 11 – Existing and proposed streetscene elevations along Bennet Road.

7.2.4 In terms of the detailed design, the supporting Design and Access Statement highlights that an intentionally simplistic design approach has been chosen, in order to align with market aspirations and therefore assist in the future attractiveness of the building for potential occupiers. Accordingly, a steel framed construction is proposed, with a combination of mid grey and light grey cladding proposed around the building. The inclusion of two separate shades of grey is welcomed in breaking up the massing, with this further assisted by the feature double height glazing around the entrance area. This is also framed by a green metal entrance band, which adds a degree of visual interest and provides legibility to the building (see the visualisation in Figure 12 below). Furthermore, along the Bennet Road frontage a series of aluminium framed windows are also proposed (aligning with the intended location of the ancillary office element). Accordingly, considering the proposed uses and character and design quality of the prevailing area, the proposed building would represent a welcome addition to the area, complying with Policy CC7 (Design and the Public Realm). To ensure that the proposed materials are of a suitable quality at the time of construction, a condition is recommended to secure further details and specifications of all facing materials.



Figure 12 – Visualisation of the proposed development from Bennet Road.

7.2.5 The submission also includes details of the proposed externally located cycle storage (a simple transparent shelter), boundary treatments (existing brick wall and railings along Bennet Road to be retained and modified – see Figure 13 below), complimented by utilitarian paladin mesh fencing around the remainder of the site boundary), an entrance barrier (of simple design - see Figure 12 above) and, further into the site, gates (utilitarian double leaf welded mesh 2.4m in height) details. These are considered to be fit-for-

purpose associated with the proposed uses and, within this context, are considered appropriate. The inclusion of such details at application stage is welcomed in preventing the need for such details to be secured via planning condition.

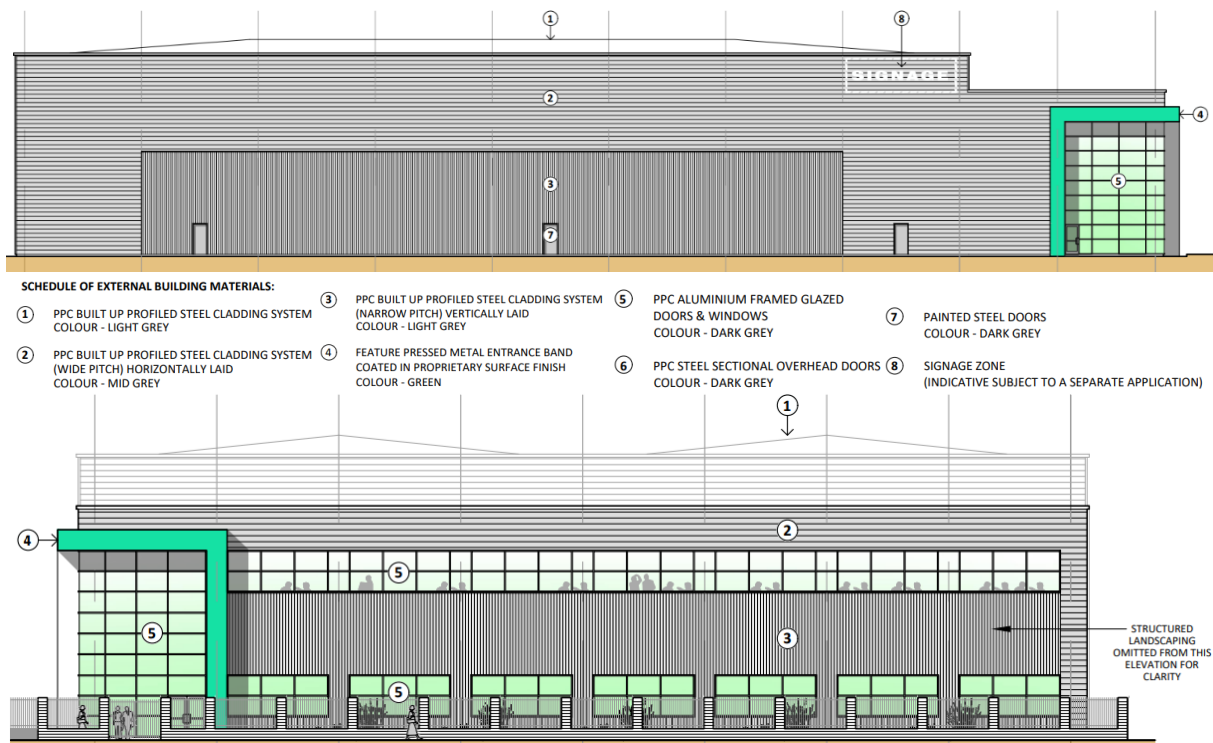


Figure 13 - The side (east) elevation and Bennet Road (north) elevations

7.2.6 It is noted that some of the plans submitted specify a 'signage zone' at high level on the proposed building (for example, see Figure 13 above). For clarity, no signage is sought or permitted as part of this application, with the applicant themselves noting this to be indicative at this stage. For the avoidance of doubt an informative is recommended to be added to the decision notice specifying that separate advertisement consent may be required for the erection of signage on the building, with no signage approved as part of this application. At that time the visual and aural amenity and public safety impacts would be considered.

7.2.7 Finally, for completeness, it is confirmed that there are no designated or undesignated heritage assets either within or close to the application site. Accordingly, there is no impact in this regard and the Council's various heritage based policies are not engaged.

iii) **Quality of accommodation for future occupiers**

7.3.1 The proposed building would provide a suitable quality of accommodation for future occupiers. The layout as shown (see Figure 14 below) includes ample and spacious accommodation for intended occupiers, with servicing facilities (for example, 3 level access doors, 2 dock access doors and vehicle parking for full heavy-goods vehicles) also helping make the space attractive for potential future occupiers.

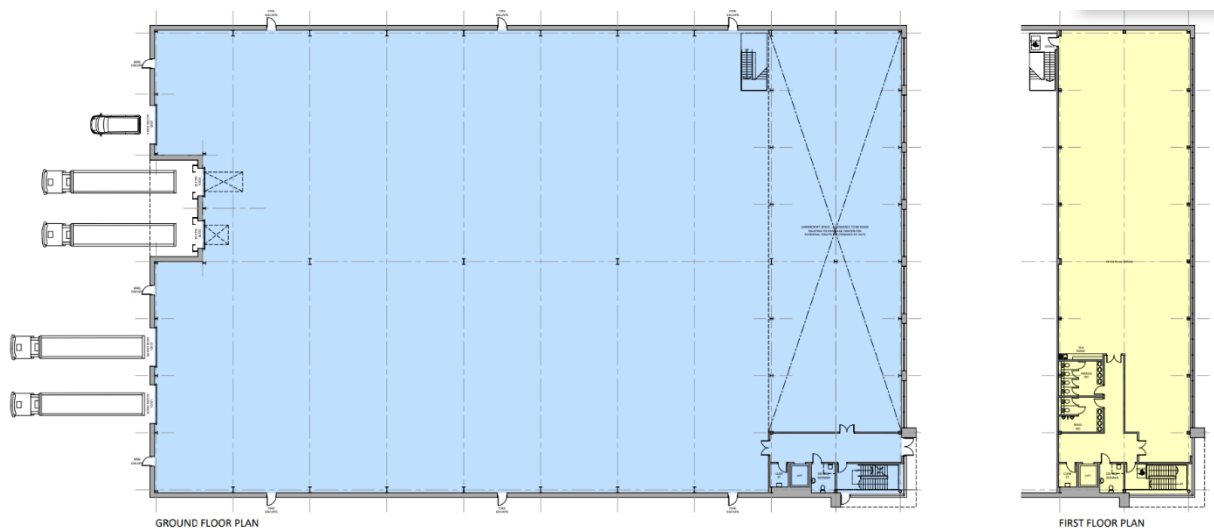


Figure 14 – Proposed ground and first floor levels

7.3.2 In addition, the on-site ancillary offices with vehicle and cycle parking, including wheelchair spaces, a well-being space, soft landscaping and security features such as gating and lighting, as discussed in other sections of this report, all add to the overall quality of accommodation proposed. From a utilities perspective, Thames Water has confirmed its satisfaction with the proposals (see section 5.9 above for details), subject to a recommended informative. Finally, the sustainability credentials of the proposals, as referenced in section 7(vii) below, also reaffirm the overall suitable quality of accommodation proposed.

iv) **Amenity for nearby occupiers**

7.4.1 The proposed commercial use at the site and in the surrounding area means that no adverse privacy and overlooking issues are anticipated. Along similar lines, although the proposed building is larger than the existing structures, the non-residential nature of the surrounding area means that matters such as sunlight, daylight, visual dominance, overbearing and outlook are not considered to be harmed in a detrimental manner to nearby occupiers. The building is not of a sufficient height for there to be any significant wind impacts.

7.4.2 In terms of noise and disturbance matters, also including vibrations, dust, fumes and smells, the conditions recommended by Environmental Protection (see section 5.2 above) are such that these impacts will be mitigated. This includes impacts during the demolition/construction stage, with the Transport (see section 5.1 above) and Environmental Protection based demolition and construction method statement condition being pertinent in that regard. For clarity, it would not be considered reasonable to restrict the hours of use at the site, owing to the prevailing non-residential character of the local area.

7.4.3 It is noted that a small external waste storage area is shown in the south-west rear corner of the site. This is considered a suitable location, away from the public realm. In relation to visual amenity and the character of the area, it is considered necessary for a condition to prevent any further permanent external storage of goods, products, machinery or equipment, other than with prior written agreement by the Local Planning Authority. This will protect the appearance of the area from the unmanaged use of external areas for storage, whilst also being for the benefit of nearby occupiers.

7.4.4 In terms of lighting, there is considered to be limited lightspill from the proposed building itself, owing to the glazing being limited to the reception area, ancillary office spaces and rooflights. Within the parking and servicing areas external lighting is also proposed, together with lighting around the perimeter of the building to assist security. The lighting layout and details provided at application stage suitably demonstrate that the external lighting will be fit-for purpose without leading to excessive lightspill to the neighbouring

sites or the public highway. With further regard to security, the replacement perimeter fencing proposed will also assist the future security of the neighbouring uses too. In overall terms no detrimental impacts on the amenity of neighbouring uses, as per Policy CC8 (Safeguarding Amenity), is envisaged from the proposed development.

v) **Transport**

7.5.1 Section 5.1 of this report provides an overview of the RBC Transport comments, which conclude that the proposals are acceptable subject to a number of conditions. In particular, it has been demonstrated that the proposed access arrangements are suitable for the proposed uses and that appropriate servicing and deliveries will be able to occur. The amount of on-site car parking will reduce from 148 to 39 spaces, with the proposed use generating fewer overall vehicle movements than the existing use. Although there would be three additional HGV trips in the AM Peak period, this would not have a significant impact on the local highway network given the Core Employment Area location. The on-site parking would include accessible and EV charging spaces, with 20 cycle spaces also proposed. A Travel Plan is also to be secured, with details of a demolition and construction method statement also provided in due course via condition. In summary, the proposals are therefore acceptable in transport terms, subject to the recommended conditions.

vi) **Trees, landscaping and ecology**

7.6.1 In these regards there are a number of interconnected considerations as part of the proposals. As such, the relevant specialist officers have worked closely together to ensure a joined-up approach has been taken, with officer comments and recommendations summarised at sections 5.3, 5.4 and 5.5 above. In particular, it is considered by officers to be disappointing that a number of trees along the frontage of the site were removed in the year prior to the submission of the application (the applicant states this was undertaken prior to them owning the site). In addition, the nature of the proposed development (in particular its required footprint for it to be suitable to a range of future potential occupiers), means that space for replacement soft landscaping has been challenging.

7.6.2 However, based on negotiations during the application, the on-site provision of greening and landscaping has been maximised as far as reasonably possible. The negotiated green roof on the front of the proposed building is a particularly welcomed addition as part of this. In terms of Biodiversity Net Gain (BNG), the relatively high existing baseline means achieving the required on-site net gain is considered to be extremely difficult in this specific instance. The applicant has also evidenced a number of inherent shortcomings with the metric and its application for urban sites such as this, which is acknowledged. During the course of the application the on-site measures have increased considerably and bearing in mind the justified need for the development (as per section 7i above) and the relatively low value of the site in itself in biodiversity terms, it is considered that this proposal does represent an exceptional circumstance within the meaning of Policy EN12 (Biodiversity and the Green Network).

7.6.3 Furthermore, the applicant has also sufficiently evidenced that the impacts cannot be avoided, mitigated or compensated for on-site (even with the inclusion of the various measures a net loss occurs), meaning off-site compensation can justifiably be engaged in this instance to achieve the required overall BNG. In this regard, the 8 medium sized trees proposed off-site elsewhere along Bennet Road, as secured via a S106 legal agreement financial contribution obligation totally £12,546, will in-turn ensure the scheme achieves a 10.52% BNG, thereby enabling the development to comply both with local policy EN12 and the still emerging mandatory national minimum 10% BNG requirement (effective from November 2023). As such, through a combination of on-site measures (details of which will be secured via condition) and off-site compensation, the proposals are considered to comply with Policies EN12 and also EN14 (Trees, Hedges

and Woodlands), with this also verified by the Council's specialist Natural Environment officer and Ecology consultant.

vii) **Sustainability, energy, flooding and SuDS**

- 7.7.1 Given the scale and nature of the proposals, a sustainability statement, incorporating a BREEAM new construction (NC) pre-assessment, has been submitted. As a major non-residential development, the proposals are required to meet BREEAM 'Excellent' standards. The submitted pre-assessment indicates that the proposals are targeting to exceed the required 'Excellent' standard, with an 'Outstanding' standard shown to be possible and targeted in this instance (a 90.18% rating is targeted based on the pre-assessment, exceeding the >85% excellent/outstanding threshold and significantly beyond the minimum 70% required to achieve the policy compliant excellent rating. 'Outstanding' is the highest standard possible and this indication by the applicant is therefore welcomed in both complying and exceeding the Policy CC2 (Sustainable Design and Construction) requirement. As such, should this come to fruition, as secured by the two separate conditions referenced within the Sustainability SPD, this would be a tangible planning benefit of the scheme.
- 7.7.2 More specifically, the first of the two conditions would secure an Interim BREEAM Certificate at final-design stage, with the second condition securing the submission of a Final BREEAM Certificate pre-occupation, demonstrating that the development has attained as a minimum the standard set out in the Interim BREEAM Certificate (the first condition). These conditions are necessary to ensure the development is carried out in accordance with sustainable building standards, adhering to both Policy CC2 (Sustainable Design and Construction) and the guidance within the Sustainable Design and Construction SPD. Whilst the submission has indicated that an 'Outstanding' rating is targeted in this instance, it would only be reasonable to require (through the wording of the first one of the two conditions) for a policy compliant 'Excellent' rating to be achieved. However, officers very much hope, based on the pre-assessment submitted at application stage, that the envisaged 'Outstanding' rating can be achieved in this instance.
- 7.7.3 The applicant has also submitted an Energy Strategy, which considers the inclusion of decentralised energy provision as Policy CC4 (Decentralised Energy) requires. The scheme incorporates the usual established methods to reduce energy demand (for example, improved air permeability and U values) and use (for example, intelligent lighting controls of LED lighting) at the proposed building before going onto explore the various decentralised energy options. In this instance, photovoltaics and air source heat pumps (ASHP) are considered to be the only feasible technologies, which is considered to be reasonable on the basis of the nature and location of these specific proposals. In terms of the photovoltaics, the report references a 175sqm array at roof level, with these shown indicatively on the roof plan submitted (see Figure 15 below). It is considered necessary for the full details and specifications of the photovoltaics to be secured via pre-occupation condition. Moreover, a separate compliance condition will also be secured, for the development to be carried out in accordance with the energy measures referenced in the Energy Statement documentation submitted.

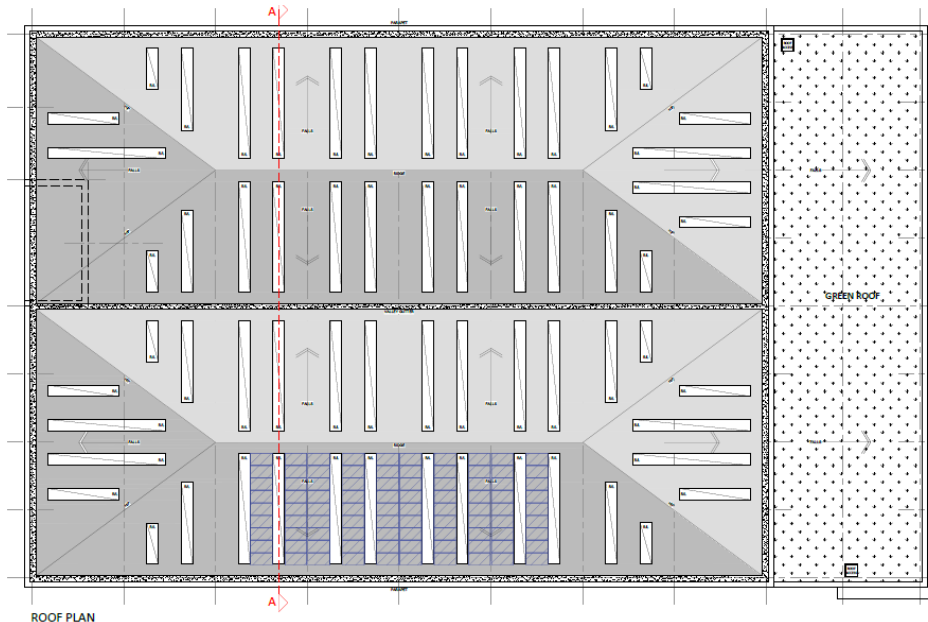


Figure 15 – Proposed roof plan showing the extent of proposed photovoltaics and green roof.

7.7.4 Moving on to consider flooding matters, while a formal flood risk assessment (FRA) was not a mandatory submission requirement (the size of the site is below 1ha and within Flood Zone 1), the applicant has included a flood risk appraisal for consideration, which provides background information regarding the site, without constituting a FRA. This concludes that the only baseline risk above a negligible or low level is in relation to surface water, where the risk level is low to moderate owing to on-site rainfall and through flow from Bennet Road. It is considered that the drainage strategy can assist in ensuring this risk level is minimised and the proposals are considered to comply with the flooding component of Policy EN18 (Flooding and Sustainable Drainage Systems).

7.7.5 With this in mind, the proposed SuDS strategy has been assessed by the LLFA, as per Section 5.6 above. The proposal is shown to significantly reduce the discharge run off rate at the site, but the final drainage will need to be secured via condition as there are presently some elements which are unconfirmed (e.g. soakaway testing and the precise location of the existing main sewer at the site). The LLFA are content in this instance for further details to be secured via condition.

viii) **Other matters**

7.8.1 Section 106 Legal Agreement - Given the nature of the proposals involving over 1000sqm of development, an Employment and Skills Plan (ESP) will be required, as per the REDA response at section 5.8 above. This relates to both the construction and end user stages of development, given the uses proposed. The applicant is seeking flexibility at this juncture as to whether this is secured as an actual ESP for the development itself, or as a financial contribution towards such plans elsewhere in the Borough. The applicant has explained this is owing to both the construction contractor and end user not presently being known, making it difficult to determine which is the more suitable approach. The flexible approach of securing either eventuality is agreed, as the SPD acknowledges that financial contributions are sought if a developer chooses not to provide an ESP themselves.

7.8.2 For information, if a financial contribution is subsequently secured at construction stage, this would be likely to total £10,770 (using the SPD formula of £2,500 x GIA of 4,308sqm / 1,000sqm). The end user financial contribution is a more complex calculation and would depend on which of the proposed flexible uses were to be implemented. If it were to be based on a Class B2 use the financial contribution would be likely to total £8,100 (using the SPD formula of 4,308sqm / average employee density of 119.67 x 50% [target % of jobs filled by Reading residents] x 30% [% without level 2 skills] x £1,500).

7.8.3 Pre-commencement conditions: the number of pre-commencement (any development, including demolition) has been limited, in line with national guidance. The detailed wording of the pre-commencement conditions, in relation to the Demolition and Construction Method Statement and the separate Arboricultural Method Statement and Tree Protection Plan have been sought to be agreed in writing with the agent of the applicant (on 21/08/2023), in line with the requirements of section 100ZA(5) of the Town and Country Planning Act.

7.8.4 It is considered that each of the obligations referred to within this report would comply with the National Planning Policy Framework and Community Infrastructure Levy (CIL) in that they would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development. These Heads of Terms have been agreed by the applicant and a S106 Legal Agreement is in the process of being prepared to secure these matters, as also summarised at the outset of this report.

8. Equality implications

8.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.2. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

9. Conclusion & planning balance

9.1 As with all applications considered by the Local Planning Authority, the application is required to be determined in accordance with the development plan unless material considerations indicate otherwise, as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.

9.2 Any harmful impacts of the proposed development are required to be weighed against the benefits in the context of national and local planning policies, as detailed in the appraisal above. Having gone through this process officers consider that harmful impacts, based on the assessment above, include:

- Reduction in variety of employment premises at the site.
- Increase in footprint of built development at the site, restricting opportunities for increasing on-site greening and soft landscaping at the site.

9.3 Turning to review the benefits of the proposals, it is considered that these include:

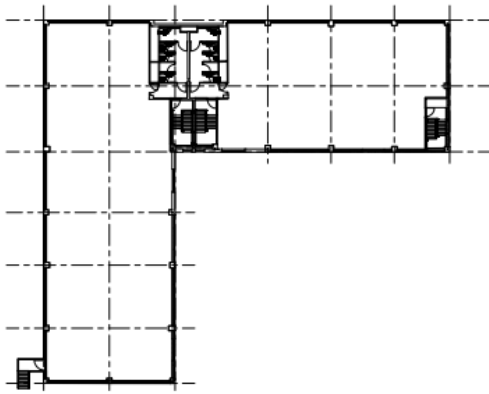
- The continued use of an existing employment site for alternative employment uses, rather than a less preferable residential use which is possible owing to separate prior approvals at the site.
- The overall net increase in employment floorspace at the site, improving the overall amount of employment floorspace within this Core Employment Area location.

- The suitable scale and massing of the proposed building within the context of Bennet Road, together with appropriate detailed design (full details to be secured via condition).
- The proposals providing a high standard of accommodation for potential future occupiers, without impacting negatively on the amenity of existing nearby occupiers.
- The proposals being suitable in all transport-related matters, including a significant reduction in on-site parking spaces.
- The sustainability credentials of the proposals are strongly supported. Furthermore, suitable decentralised energy measures are incorporated on site too.
- The provision of an Employment and Skills Plan, relating to both the construction and end user stages of development, as secured via S106 Legal Agreement.

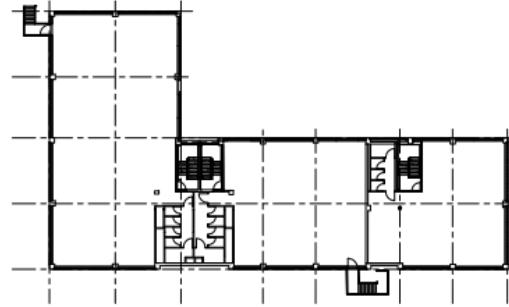
9.4 In reaching an overall conclusion on the proposals, when applying a suitable planning balance, it is considered by officers that the conflicts with the development plan are evidently outweighed by the above stated benefits of the proposals. In particular, redeveloping an existing brownfield employment site for industrial employment uses in this location aligns with relevant Local Plan policies, with the design of a suitable quality in the context of the uses proposed and the transport implications have been evidenced as being acceptable. Furthermore, various other technical credentials of the proposals have overwhelmingly been demonstrated to be in accordance with local policies too. Moreover, the proposals are considered to be acceptable within the context of national planning policies. Whilst acknowledging the shortfalls identified, these are considerably outweighed when applying a planning balance.

9.5 As such, full planning permission is recommended for approval, subject to the recommended conditions and completion of the S106 Legal Agreement.

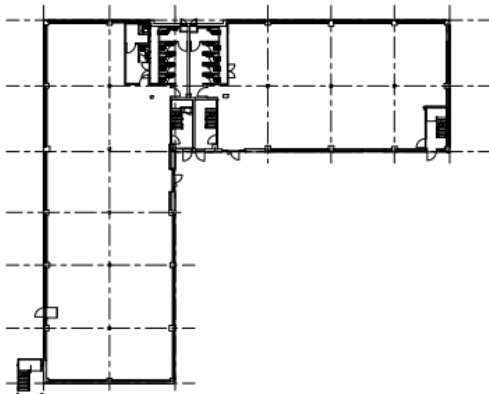
A selection of other plans submitted and photographs



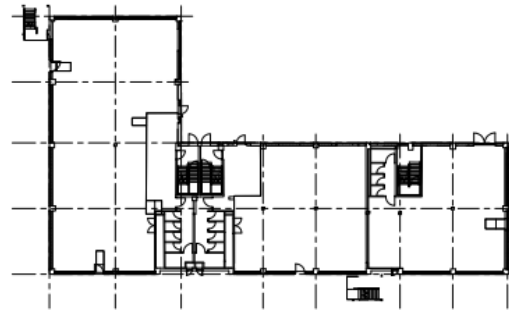
PLOT 1 - EXISTING FIRST FLOOR PLAN
(APPROX. 1,037 SQM / 11,162 SQFT)



PLOT 2 - EXISTING FIRST FLOOR PLAN
(APPROX. 948 SQM / 10,204 SQFT)



PLOT 1 - EXISTING GROUND FLOOR PLAN
(APPROX. 1,037 SQM / 11,162 SQFT)



PLOT 2 - EXISTING GROUND FLOOR PLAN
(APPROX. 948 SQM / 10,204 SQFT)

Existing floorplans (above) and elevations (below) – to be demolished.



PLOT 1 - EXISTING NORTH ELEVATION



PLOT 2 - EXISTING NORTH ELEVATION



PLOT 1 - EXISTING SOUTH ELEVATION



PLOT 2 - EXISTING SOUTH ELEVATION



PLOT 1 - EXISTING EAST ELEVATION



PLOT 2 - EXISTING EAST ELEVATION



PLOT 1 - EXISTING WEST ELEVATION



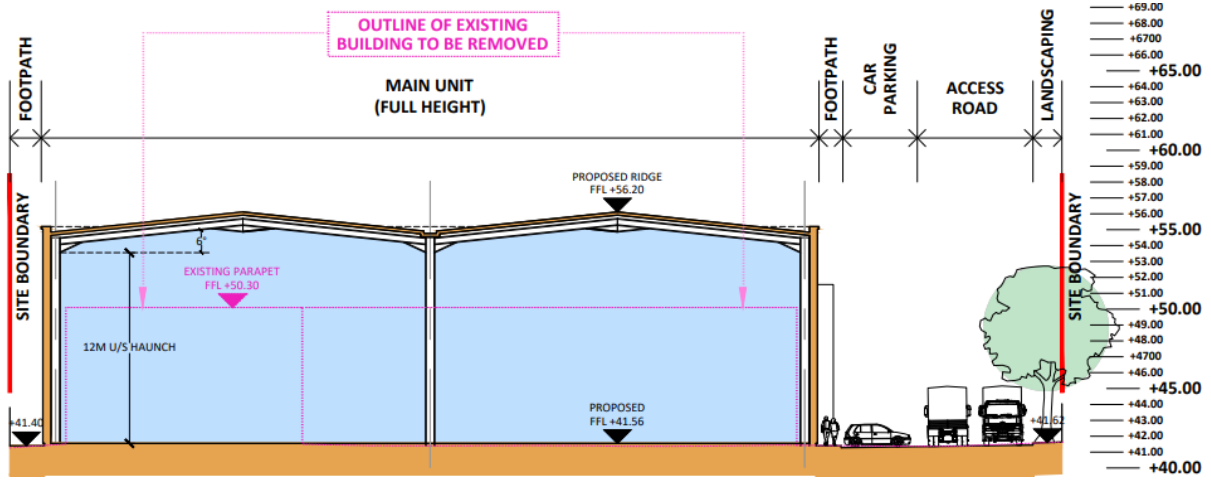
PLOT 2 - EXISTING WEST ELEVATION



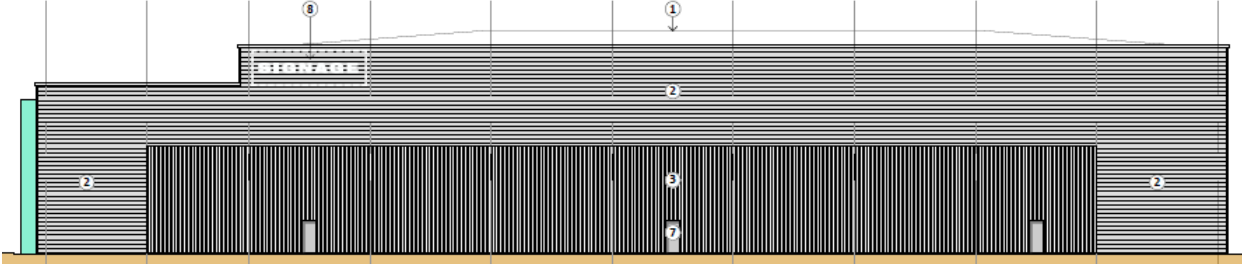
PLOT 1 - TYPICAL BUILDING SECTION



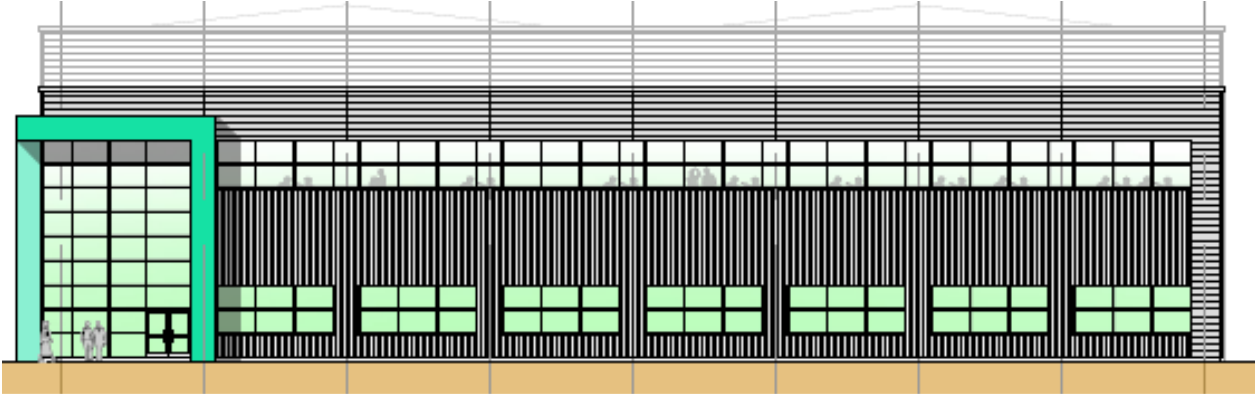
PLOT 2 - EXISTING EAST ELEVATION



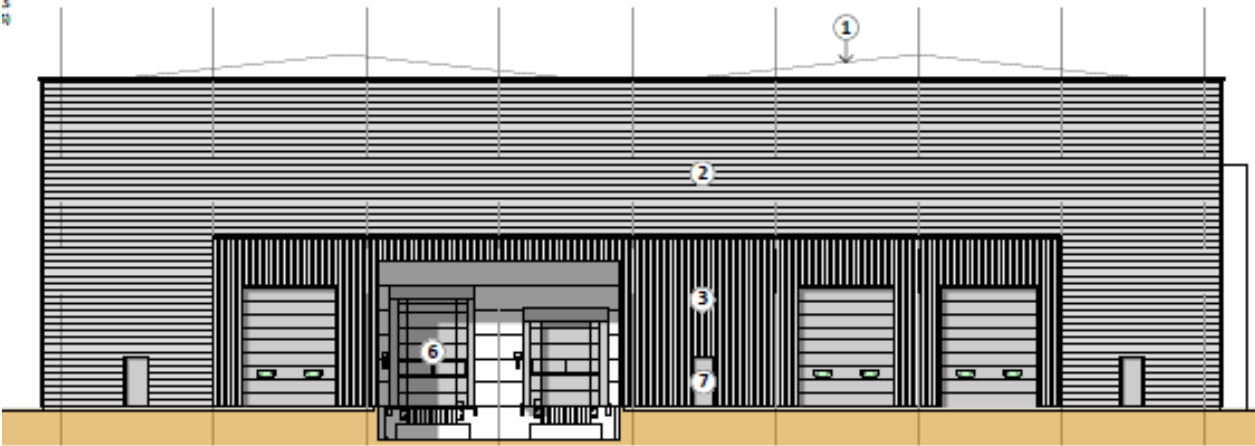
Proposed east-west section plan



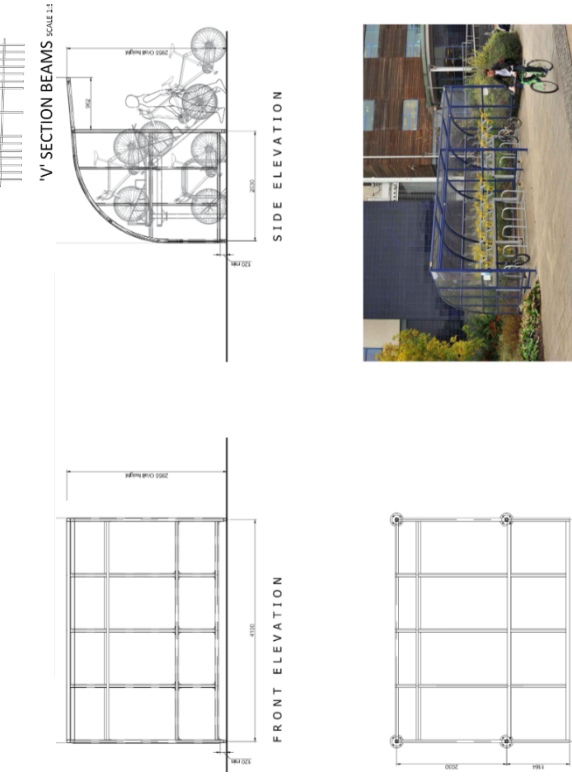
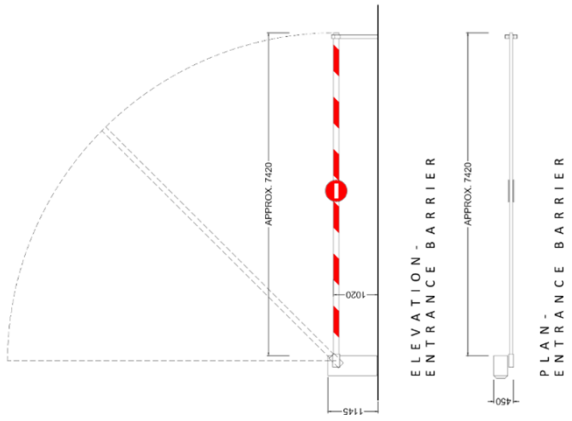
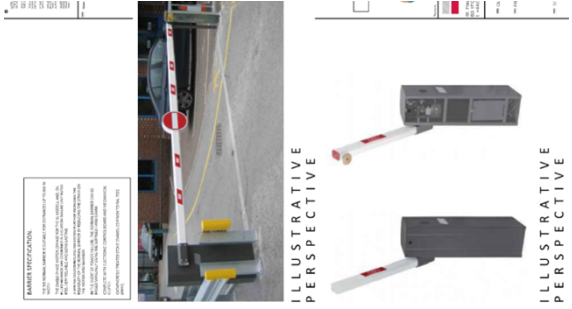
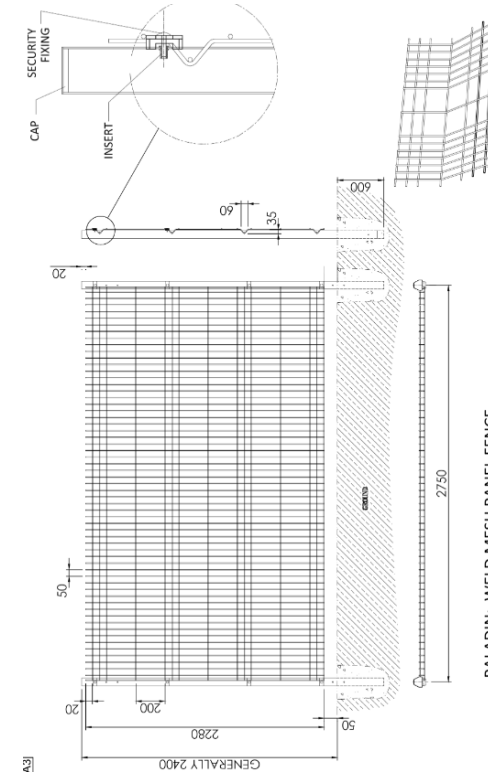
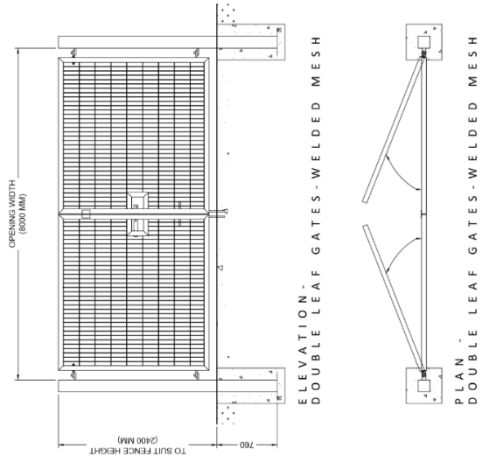
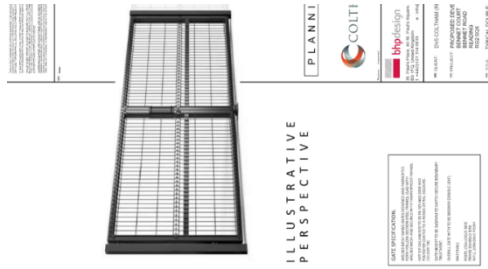
Proposed side (west) elevation



MAIN ELEVATION (NORTH) - BOUNDARY TREATMENT & LANDSCAPING OMITTED FOR CLARITY



REAR ELEVATION



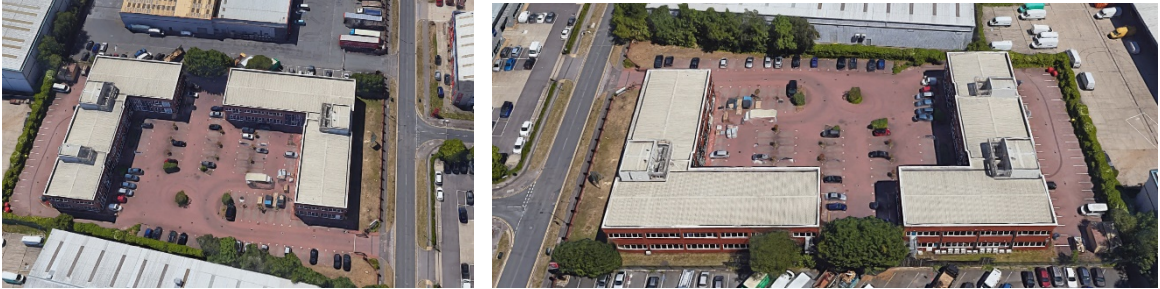
Details of the proposed entrance point gates, barriers and fencing have been submitted at the outset with this application to prevent the need for such details to be secured via condition in this instance. The external cycle parking storage area details have also been submitted for similar reasons.



Existing views of the application site building from the east (above) and west (below) within the streetscene along Bennet Road.



Aerial views of the site looking south (above) and west and east (below)





Above: Google Streetview image of the application site from August 2021, prior to the felling of trees within the application site along the Bennet Road frontage. Below: The existing context, subsequent to the removal of trees.



Below: Aerial view of the site looking south





Left: The existing buildings from close to the site entrance. Right: The existing southern site boundary, looking west.



Left: Looking north-west towards the inward elevations of the building fronting Bennet Road: Right: From within the existing southern building, looking north-east.



Above: Aerial view looking north. Below: Aerial view looking east.

