

06 December 2023



Reading
Borough Council
Working better with you

Title	PLANNING APPLICATION REPORT
Ward	Whitley
Planning Application Reference:	230953/FUL
Site Address:	Brunel Retail Park, Rose Kiln Lane, Reading
Proposed Development	Amalgamation and change of use of Units 7, 8, 9, 10 and 11 from Class E to Class B8; installation of mezzanine floorspace; associated external works including reconfiguration of car park and cycle parking and landscaping works.
Applicant	MCTGF Trustee 1 Ltd & MCTGF Trustee 2 Ltd
Report author	Alison Amoah - Principal Planning Officer
Deadline:	Original deadline 6 th October 2023, but an extension of time has been agreed with the applicant until 8 th December 2023
Recommendation	GRANT full planning permission.
Conditions	To Include: <ol style="list-style-type: none">1. Time Limit 3 years2. Approved Plans3. Compliance condition relating to materials as on approved plans4. Pre-occupation provision of all energy measures set out in the Sustainability and Energy Statement hereby approved.5. Pre-occupation photovoltaic array details to be submitted and approved.6. Pre-commencement submission and approval of a Sustainable Drainage Strategy.7. Pre-occupation provision of Sustainable Drainage Strategy.8. Compliance condition relating to restricting the use to B8 self-storage only (and no other use within the B8 Use Class).

	<ol style="list-style-type: none"> 9. Pre-occupation provision of approved vehicle parking. 10. Pre-occupation provision of approved vehicle access. 11. Pre-occupation provision of approved cycle parking. 12. Pre-occupation EVCP (electric vehicle charging points) layout and detailed specification to be submitted and approved. 13. Pre-commencement (including demolition) demolition and construction method statement (including Transport and EP based requirements) to be submitted and approved. 14. Compliance condition relating to hours of demolition/construction works (0800-1800hrs Mondays to Fridays and 0800-1300hrs Saturdays, and not at any time on Sundays and Bank or Statutory Holidays) 15. Compliance condition relating to no burning of materials or green waste on site. 16. Pre-commencement submission of a contamination assessment including land gas. 17. Pre-commencement submission and approval of a remediation strategy. 18. Pre-occupation submission and approval of a remediation validation report. 19. Compliance condition relating to discovery of any unidentified contaminated land. 20. No mechanical plant to be installed unless a noise assessment and mitigation scheme has been submitted and approved. 21. Pre-occupation provision of approved landscaping scheme. 22. Compliance condition relating to adherence to the approved Tree Report 23. Compliance condition that no vegetation clearance shall take place during the bird nesting season. 24. No external lighting to be installed, unless details, including how any lighting will not adversely impact wildlife, have been submitted and approved. <p>All pre-commencement conditions have been agreed with the Applicant.</p>
<p>Informatives</p>	<p>To include:</p> <ol style="list-style-type: none"> 1. Terms 2. Building Regulations approval required 3. Damage to the highway

	<ol style="list-style-type: none">4. Works affecting highways5. Pre-commencement conditions6. Complaints about construction7. Community Infrastructure Levy8. Positive and Proactive Statement
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1. EXECUTIVE SUMMARY

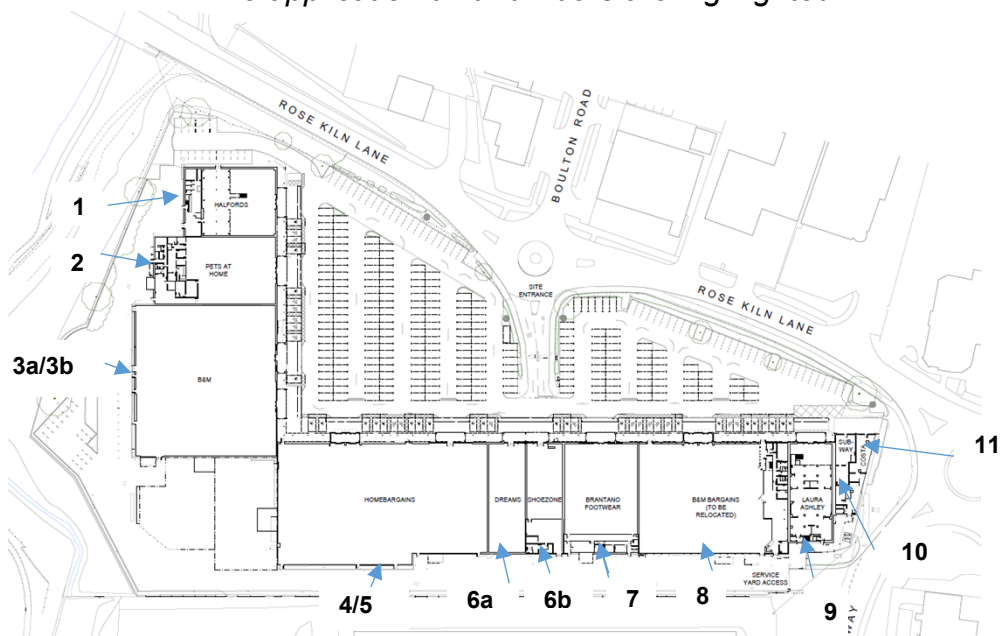
- 1.1 The proposal is recommended for approval subject to the conditions set out above.
- 1.2 The proposal relates to part of Brunel Retail Park, and is to amalgamate Units 7-11, which, apart from Unit 11 are currently vacant, to enable their commercial use for B8 self-storage, which would be a use suitable within this wider commercial area. The proposed B8 storage use would have no unacceptable impact on neighbouring properties and would have no adverse transport impacts, which would conflict with the use of the remaining retail units. There are no significant detrimental effects of the proposal, and it is considered that it accords with adopted policies and is recommended to you for approval.

2. INTRODUCTION

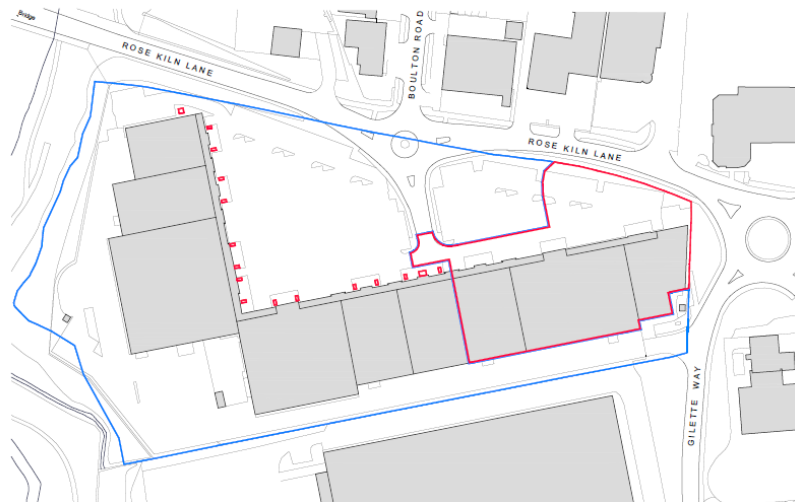
- 2.1 Brunel Retail Park is an established retail park of 3.5 hectares on Rose Kiln Lane, located to the east of the A33. The overall Retail Park currently has 14,755sqm of gross internal floorspace (including mezzanine) and is comprised of a total of 13 no. units with units occupied by Halfords (Unit 1), Pets at Home (Unit 2), B&M (Units 3a&3b), Home Bargains (Units 4&5), Dreams (Unit 6a), and Costa (Unit 11) and the remaining 5 no. units being vacant (see below plan). It is accessed via Rose Kiln Lane, via a 4-arm roundabout junction with a total of 451 car parking spaces to the front, a service area to the rear, the latter accessed from Gillette Way to the south-east. Immediately to the north and south is a mix of industrial units, and to the east, the Morrisons superstore. To the south-west is the Kennet Island residential area with the closest residential receptors approximately 200m to the south-west on Greenham Avenue.

Unit number	Old Number as referenced in earlier permissions	Unit as	Occupier	Ground Floorspace	Mezzanine Floorspace
1	11		Halfords	701	341
2	10		Pets at Home	935	
3a	8/9		Relocated B&M	1,202	
3b	8/9		Relocated B&M	1,212	600
4	6/7		Home Bargains	1,868	1,538
5	5		Home Bargains	931	
6a	4		Vacant	467	339
6b	4		Vacant	459	
7	3		Vacant	937	
8	1/2		Vacant (formerly B&M)	1,897	275
9	1/2		Vacant (formerly Laura Ashley)	460	354
10	N/A		Vacant (formerly Subway)	94	
11	N/A		Costa Coffee	165	
			Floorspace	11,328	3,447

The application unit numbers are highlighted



Brunel Retail Park Occupiers



Site Location Plan



Photographs of the application site as existing (TPO tree – right image)

- 2.2 The application site comprises Units 7,8, 9, 10 and 11 and currently measures 0.65ha and includes 4,182sqm GIA at ground floor and 659sqm at mezzanine level. The schedule of floorspace is as above.
- 2.3 The Brunel Retail Park was originally granted planning permission for A1 non-food retail units retail (now under Class E) in 1994 with conditions limiting the goods which could be sold, limiting the number of units selling clothing and footwear, and the range of minimum size of units, applied at the time for the purpose of protecting retail centres and the Reading Centre.
- 2.4 Since that time there have been a number of planning permissions granted, including: extensions; new units; variation of conditions to vary the range of goods which could be sold form specific units and the

number of units selling specific goods; new mezzanines; and amalgamation of units.

2.5 In 2021 two permissions were granted to provide flexible options for the ongoing use of the retail park. 201853 was a phased permission to allow for complete redevelopment of the Retail Park for 2 no. industrial units and 201842 for the continued use of the western end of the existing Retail Park (Units 1-6a) in the event that only Phase 1 (1 industrial unit) were built. The latter permission includes greater flexibility, with conditions to allow the following uses (within Class E):

- 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).

2.6 That permission also includes conditions widening the range of goods which could be sold from any retail units (within Class E (a), but also some restrictions on the number of retained units which could sell specific goods. These permissions have not been implemented to date.

2.7 Following these permissions two further permissions were granted in 2022 which have facilitated the letting of Units 4 and 5 to Home Bargains (220145/FUL) and B&M to relocate to a bigger unit (Units 3a & 3b – 220110/NMA). These permissions dealt with the occupiers' requirements in terms of user restrictions and allowing a wider range of goods.

2.8 The application site includes an area of contaminated land (Policy EN16); is just to the 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 EM2e). 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.

2.9 The application is a 'major' development (a change of use over 1,000 sq.m.) and, therefore, referred to the Planning Applications Committee.

3 PROPOSAL

- 3.1 The applicant has undertaken a review of future occupation options for Units 7, 8, 9, 10 and 11, all of which are vacant apart from Unit 11, which is currently occupied by Costa. The submitted Planning Statement explains that there has been interest from self-storage operators (Class B8) and this application is seeking permission to facilitate this use. It would involve amalgamating these 5 units, including a mezzanine of up to 3,725sqm and some minimal external changes as summarised as following:

Northwest (front) Elevation

- Spandrel infill behind entrance doors;
- 2 no. roller shutter doors; and
- New single means of escape door with side panel.

Southeast (rear) Elevation

- New single means of escape door with side panel
- New aluminium window; and
- Existing double service doors removed and infilled with cladding to match.

East (side) Elevation

- New aluminium window; and
- Existing cladding removed and replaced with new shopfront and integrated door and glazed spandrel panels.

- 3.2 The proposed scheme would also involve the reconfiguration of the existing car and cycle parking, and this would result in the reduction of the number of car parking spaces of the overall Retail Park from 396 to 372. The B8 self-storage unit would have 13 no. spaces. The total number of cycle parking spaces would be reduced to 38 no. for the rest of the Retail Park and would be redistributed across the site (as can be seen on the location plan above). The proposal site would have 16 no. cycle spaces.
- 3.3 The amalgamated unit would be accessed via the existing roundabout from Rose Kiln Lane and there would be an amended layout to the front of the unit for HGV access. The parking and delivery vehicles up to 7.5 tonne would be to the front and would be enclosed by fencing and accessible via proposed vehicular and pedestrian gates. HGV access would be from the rear. Servicing for the remaining retail units would continue as per the existing arrangements.
- 3.4 One tree to the northern boundary would require removal along with a small length of hedging. Six new trees are proposed around the site along with shrub and hedge planting.

3.5 This proposal is an alternative strategy to an application being considered, and pending determination (ref: 231142), which seeks to amalgamate units 6b-9 and extend the range of goods which could be sold.

3.6 Submitted Plans and Documentation:

- Drawing no: 2418-LP01-C, dated 6/4/23 – Site Location Plan, received 10th July 2023
- Drawing no: 2418-X01-D - Site Plan as Existing received 23rd September 2023
- Drawing no: 2418-X02-B, dated 6/4/23 – Ground Floor Plan as Existing, received 10th July 2023
- Drawing no: 2418-X03-A, dated 3/4/23 – First Floor Plans as Existing, received 10th July 2023
- Drawing no: 2418-X04-A, dated 6/4/23 - Elevations as Existing, received 10th July 2023
- Drawing no: 2418-P01 – E, dated 6/4/23 – Site Plan as Proposed, received 9th October 2023
- Drawing no: 2418-P02 – E, dated 6/4/23 – Ground Floor Plan as Proposed, received 9th October 2023
- Drawing no: 2418-P03 – A, dated 6/4/23 – First Floor Plan as Proposed, received 14th August 2023
- Drawing no: 2418-P05 – A, dated 14/6/23 – Roof Plan as Proposed, received 10th July 2023
- Drawing no: 2418-P04 – B, dated 6/4/23 – Elevations as Proposed, received 10th July 2023
- Drawing no: A6103-03 Rev C – Landscaping Scheme, received 17th October 2023
- Drawing no: BRN-HDR-XX-XX-DR-C-102301 Rev P01 – Drainage Layout Within the Red Boundary, received 20th November 2023
- Drawing no: BRN-HDR-XX-XX-DR-C-102302 Rev P01 – Drainage Layout and Overall Existing Network, received 20th November 2023
- Planning Statement, within letter dated 7th July prepared by Quod, received 10th July 2023
- Sustainability and Energy Statement Including a BREEAM Scoping Review Rev B, dated 20/6/23, prepared by Envision, received 10th July 2023
- Letter from Envision, 'Clarifications to Sustainability and Energy Statement Incorporating a BREEAM Scoping Review , Brunel Retail Park', dated and received 24th November 2023

- Tree Survey Report [including and AIA and AMS] Rev A, dated 29/6/23, Report ref: A6103, prepared by Encon Associates, received 10th July 2023
- Transport Statement, prepared by TPP Consulting, received 10th July 2023
- Travel Plan, prepared by TPP Consulting, received 10th July 2023
- Technical Note: Drainage Statement, Ref: TN002, dated September 2023, prepared by HDR, received 28th September 2023
- Biodiversity Net Gain Report, Ref: 9352.BNGReport.vf, dated October 2023, prepared by Ecology Solutions, received 5th October 2023
- Biodiversity Metric Calculation 4.0, received 5th October 2023
- Response to Comments Raised by Highways in Relation to Planning Application 23/0953, by TTP Consulting, received 9th October 2023

3.7 Community Infrastructure levy (CIL):

In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form with the submission. The development would not be CIL liable as the new build element would be less than 100 sq.m. gross internal floor area.

4 **PLANNING HISTORY**

The following includes some of the main decisions at the Retail Park.

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

04/01113/FUL (041089)– Extension to Unit 8 [*as previously numbered*] 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 14th December 2004

11/00431/FUL (110118)– Minor alterations to elevations and internal works to create two new units and reconfiguration of car park – Approved 12th May 2011 [*N.B. Units 3A and 3B as now numbered*]

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 3rd 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 94/0443/FD– Approved 5th 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 18th 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 – 18th March 2014

201842/FUL - 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 – Approved 15th July 2021

201853/FUL - 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 – Approved 15th July 2021

220110/NMA - Minor amendment to conditions 12 & 14 of planning permission 131106 to change the range of goods being sold in units 3A, 3B and 7 (formerly Units 8/9 and 3 respectively) – Agreed 7th September 2022

220145/FUL – Continued use of Units 4 and 5 within use class E(a) – Approved 25th July 2022 – *this included extending the range of goods which could be sold including: food and drink, household goods, toys and games, health and beauty products including medicines and baby products.*

231142/FUL - Continued use of Units 6b, 7, 8, 9 in Class E(a), installation of sprinkler tank, pump house and trolley bay, reconfiguration of car parking area and associated works (amended) – Pending determination – *N.B. This represents an alternative strategy for part of the Retail Park.*

5 CONSULTATIONS

5.1 RBC Transport – The original comments were as follows with areas to address in italics. Further information was subsequently amended to respond to the matters raised and is set out in paragraph 5.24 below:

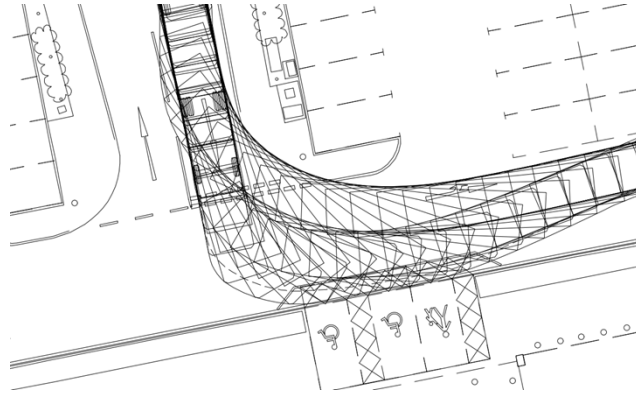
- 5.2 The units are currently vacant apart from Unit 11 which is occupied by Costa Coffee. To the east is the remainder of the Retail Park (i.e. Units 1, 2, 3a, 3b, 4, 5 and 6) is now fully occupied.
- 5.3 Access to the customer car park is taken from Rose Kiln Lane via a 4-arm roundabout junction, with access to the service yard taken via a priority-controlled junction on Gillette Way. There is currently parking for up to approximately 396 vehicles, split each side of the principal access way.
- 5.4 The surrounding area is predominantly commercial in nature with a large warehouse to the south, a Morrisons supermarket with petrol filling station to the east and predominantly industrial units to the north and north-east. The River Kennet runs in a broadly north-south orientation to the west of the Park, with the closest residential properties (at Kennet Island) located southwest of the aforementioned warehouse.
- 5.5 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.

Development Proposals

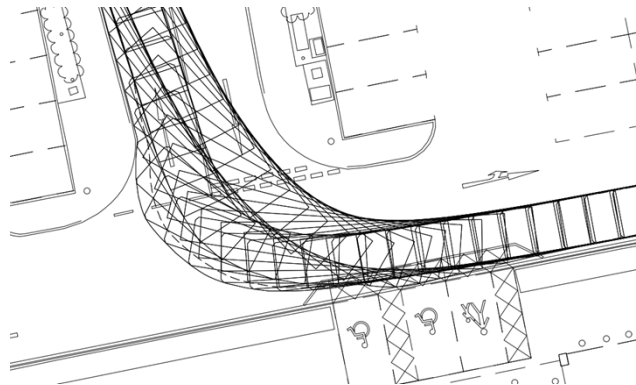
- 5.6 Units 7 to 11 which are the subject of this application currently have a combined gross floor area of 4,175sqm. The proposals would result in the loss of 4,175sqm of retail floorspace to be replaced by 6,879sqm of Class B8 Self-Storage floorspace including the installation of an additional mezzanine level.

Vehicle Access Arrangements

- 5.7 The amalgamated unit will be accessed via the existing access arrangement via Rose Kiln Lane.
- 5.8 The Transport Statement states that the proposed layout will facilitate HGV access to the front of the self-storage unit via the car park, however, it is stated that relatively few HGV deliveries are expected.
- 5.9 Tracking diagrams have been submitted demonstrating a 16.5m HGV entering the site via Rose Kiln Lane and navigating the internal road network. However, the tracking diagrams do indicate that a delivery vehicle would come into conflict with the kerb radii on the junction within the site and requires the full width of the internal road to make the manoeuvre. *Therefore, an updated tracking drawing should be provided confirming that this manoeuvre can take place without any conflicts occurring.*



- 5.10 The image below illustrates a 16.5m HGV exiting the site. It demonstrates that articulated vehicles exiting the site overruns the entry land requiring vehicles entering the retail park to stop and wait on the approach into the site. Typically, the type of vehicles associated with the proposed self-storage land use would be Light Goods Vehicles (LGVs) or domestic vehicles, therefore, the frequency of conflict occurring would be low. *However, the applicant is requested to address these points and quantify the number of HGV vehicle movements (anticipated).*



- 5.11 Servicing for the existing retail units at the wider retail park will be as per the existing arrangement and undertaken from the rear service yard via a priority-controlled junction on Gillette Way. *Given that servicing facilities already exist from the service yard, it would seem appropriate that HGV vehicles servicing the self-storage unit could undertake these activities from the rear as per the existing arrangements. This would eliminate the need for HGV vehicles to enter the retail park from the customer entrance off Rose Kiln Lane and reduce potential conflict at the junctions. The applicant is requested to address this point.*

Parking

- 5.12 Policy TR5 of the Reading Borough Local Plan 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, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site.

- 5.13 The site is located within the Zone 3, the Secondary Core Area and the required parking standards are as follows;
- Non-Food Retail: a maximum of 1 space per 30sqm GFA;
 - Class B8: a maximum of 1 space per 150sqm GFA.
- 5.14 There are currently a total of 396 parking spaces within the retail park including 367 spaces in the car park and 29 spaces in the service yard. The provision includes 26 disabled spaces and 18 reserved for parents with small children.
- 5.15 The proposals include a reconfiguration of the car park to the east of the access road which results in a loss of 24 parking spaces reducing the overall number of spaces to 372 of which 330 are for retail customers and 29 in the service yard. The provision includes 19 reserved for disabled badge holders and 16 for parents with small children. Based on 10,580 sqm of retained retail floor area, the proposed parking provision for the retail element is acceptable.
- 5.16 *The proposed self-storage unit will have a total of 13no. car parking space equating to a ratio of 1 space per 500sqm which is below the Council's adopted Parking standards for B8 use. Justification or user evidence is therefore requested to demonstrate that the proposed parking provision for the proposed B8 self storage use is acceptable and will meet the needs to of the development as this has not been provided within the Transport statement.*
- 5.17 In terms of cycle parking, the total level of cycle parking provision at the wider site will be reduced to 38no. spaces and redistributed around the Retail Park. A total of 16 no. cycle spaces are proposed at the front of the unit, in two locations.
- 5.18 *The Council's Policy stipulates that a provision of 10% of parking should be in the form of electric charging bays. Revised drawings are therefore required illustrating the provision of 2 EV charging bays for the self-storage facility.*

Trip Generation

- 5.19 The potential change in number of trips associated has been estimated based on trip rate information from the TRICS database, with 4,175sqm

of Retail floorspace being replaced by 6,879sqm of Self Storage floorspace.

- 5.20 The Transport Statement concludes that the proposals would typically result in fewer trips to / from the retail park when compared to the existing permitted use.
- 5.21 However, it is noted that the application has been assessed on the basis of B8 warehousing (self-storage) use. As self-storage use does not generate the same level of vehicle trips, HGV movements, on-site employment and demand for staff parking within a typical B8 warehousing commercial use, *the assessment undertaken is only acceptable from a transport perspective (subject to the points highlighted above) if planning approval is restricted to B8 (self-storage) use only.*
- 5.22 *If the applicant is seeking unrestricted B8 Use Class approval, then the Transport Statement would need to assess the development from a “worst-case” scenario and further assessments will need to be undertaken. Clarification is therefore sought on this point.*

Summary

- 5.23 In summary, the applicant is requested to address the points highlighted above before determining this application. Clarification is sought to determine whether planning permission is sought only for the amalgamation and change of use of Units 7, 8, 9, 10 and 11 for self-storage purposes or whether the applicant is seeking an unrestricted B8 use class approval.
- 5.24 **Planning Officer note:** Further to amended information received from the applicant, including: Agreement to a condition restricting the unit to B8 self-storage; Amended tracking information and increased kerb radii; Further information re parking levels; and an amended plan to show two EVCP, the Transport Officer confirmed that the scheme would be acceptable. This would be subject to the inclusion of conditions with respect to: restricting the use to B8 self-storage only, the provision of the approved parking, vehicle access and cycle parking pre-occupation; the submission and approval of the EVCP layout and specification and implementation pre-occupation, and pre-commencement construction method statement (CMS).
- 5.25 Ecology Adviser – No objection subject to conditions that no vegetation clearance should be undertaken outside of the bird nesting season, landscaping details to be submitted and approved and that no external lighting should be installed without prior approval.

- 5.26 RBC Environmental Protection – No objection subject to conditions for the submission and approval of a noise assessment and mitigation scheme if mechanical plant were to be installed, submission and approval of a construction method statement, limitation of construction hours, pre-commencement submission of a Phase 1 contamination assessment, and to monitor the site for any unidentified contamination.
- 5.27 RBC Natural Environment (Trees) – Following initial comments from the Natural Environment (Trees) Officer, the applicant submitted a Biodiversity Net Gain (BNG) Assessment and an amended landscape plan. The Tree Officer confirmed that they have no objection subject to conditions to secure development in accordance with the Tree Survey Report and the approved Landscape Scheme.
- 5.28 RBC SUDS Manager (Local Lead Flood Authority – LLFA) - I have reviewed the attached and in principle I am happy that the proposed scheme will result in a benefit given that the lined permeable paving areas, albeit limited in area, will slow down the flow of surface water into the drainage system. However, it is noted that the submitted drawing only refers to the new parking area whereas the application red line extends to the west and therefore the drainage network contained within the whole red line should be illustrated. The LLFA would also need a drawing illustrating the existing drainage network for the site to ensure this proposal does not have a detrimental impact on wider drainage.
- 5.29 **Planning Officer Note:** Further to the submission of plans to show the drainage strategy for the site area and the overall drainage network the SUDS Officer confirmed acceptability of the proposed scheme subject to conditions requiring the approval of a Sustainable Drainage Strategy and the pre-occupation implementation of the approved strategy.
- 5.30 Thames Water – No response received.

Public

- 5.31 The following properties were notified of the application by letter:
- Morrisons Petrol Station
 - Gillette Industries Limited, Gillette Way
 - Trade Team Limited, Gillette Way
 - Octagon Motor CO., Rose Kiln Lane
 - Jemca, Rose Kiln Lane
 - Lex reading, Rose Kilne Lane
 - Lex Toyota, Rose Kilne Lane
 - Winterstoke Tyres, Rose Kiln Lane
 - Kwikfit, Rose Kiln Lane

- MVF, Rose Kiln Lane

Site notices were displayed on 16th August 2023.

5.32 No comments have been received.

6. RELEVANT PLANNING POLICY AND GUIDANCE

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) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

6.2 For this Local Planning Authority the development plan is the Reading Borough Local Plan (November 2019). The relevant national / local policies / guidance are:

National Planning Policy Framework (2023). The following chapters are the most relevant (others apply to a lesser extent):

- 2. Achieving Sustainable Development
- 4. Decision-making
- 6. Building a Strong Competitive Economy
- 8. Promoting Healthy and Safe Communities
- 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 Historic Environment

National Planning Policy Guidance (2014 onwards)

Reading Borough Local Plan (November 2019). The relevant policies are:

- 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
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
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
RL1: Network and Hierarchy of Centres
RL2: Scale and Location of Retail, Leisure and Culture Development
RL5: Impact of Main Town Centre Uses
SR2: Land North of Manor Farm Road Major Opportunity Area

Relevant Supplementary Planning Documents (SPD) are:

- Employment Skills and Training SPD (2013)
- Revised Parking Standards and Design SPD (2011)
- Sustainable Design and Construction SPD (2019)

Other relevant documents:

- Reading Borough Council Tree strategy (2021)

7. APPRAISAL

The main matters to be considered are:

- Land use principles
- Transport/ Parking
- Environmental Matters
- Flood Risk & Drainage
- Natural Environment
- Design Considerations and Effect on Character
- Sustainability
- Equalities impact

Land use principles

- 7.1 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development that reflects the presumption in favour of sustainable development, which lies at the heart of national policy (NPPF).
- 7.2 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. This would be through the construction period and bringing the vacant units back into effective use.
- 7.3 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.
- 7.4 Policy EM1 sets out the quantum of new office and industrial/ warehouse development over the Plan period. Policy EM2 identifies the relevant locations for such employment, including industrial and storage and distribution and that these should be in the A33 corridor or in the Core Employment Area. The site is located just to the east of the A33 and falls within the defined ‘Corridor’ and commercial area, and located immediately opposite the Core Employment Area EM2e: North of Basingstoke Road and, therefore, in terms of its specific location is considered to be acceptable in principle. It should also be noted that the principle of a wider B8 (Storage and Distribution) use has been accepted through the approval of planning permission 201853 (July 2021).
- 7.5 The proposal also includes 437 sq.m. ancillary offices and as these would be ancillary to the B8 self-storage use then it is considered that the requirement for a retail sequential test to assess impacts on existing retail centres (in accordance with Para. 86 of NPPF) does not apply in this case.
- 7.6 Officers consider that the proposal would provide a flexible approach to delivering a viable development for the site. It is considered that a B8 storage use option would be acceptable in principle, according with the

NPPF's principles of making effective use of land and the Local Plan's employment policies, including contributing towards warehouse/ industrial floorspace by 2036. It would create some additional local employment opportunities (during the construction phase). The ongoing use would create some employment opportunities, which would be an improvement over the current vacant units.

- 7.7 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.
- 7.8 Alongside this application is application reference 231142 (to be determined under delegated powers) for an almost identical part of the Retail Park. That proposal would be to retain Units 6b-9 and extend the range of goods which could be sold, in order to accommodate the operator, The Range (housewares retailer). The two applications would create flexibility for the site, with the developer/operator being able to choose to implement either option, but not both.

Transport/Parking

- 7.9 Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway related matters), and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development.
- 7.10 A Transport Statement (TS) has been submitted, which considers the potential highway implications arising from the proposed additional mezzanine which the scheme includes as the applicant states that this is likely to be required by any self-storage occupier taking the unit. The assessment has, therefore, assumed a total floorspace of the unit of up to 6,842sqm (3,566 sqm at ground floor level as existing and 3,275 sqm proposed at mezzanine level).
- 7.11 Using the TRICS database system, the TS identifies that based on B8 self-storage there would be fewer vehicle movements than the existing retail units.
- 7.12 As the applicant has agreed to a restricted B8 self-storage use the Transport Officer has confirmed that the layout with HGV movements to the front and the overall car parking provision of 13 spaces for the proposed unit, which is below standard, would be acceptable. Notwithstanding that from a transport perspective it has been demonstrated that HGV movements would be possible to the front, officers consider that in terms of pedestrian safety, in particular, that

HGVs to the front would not be acceptable. The applicant has agreed to submit an amended plan to show an alternative layout to the front, to restrict access for larger vehicles and this will be reported in an update report.

- 7.13 The Transport Officer has confirmed that the reduced parking level for the remaining retail units, a reduction from 397 to 372, based on 10,580sqm of retained retail space, would be sufficient for the continued operation of the Retail Park. The total level of cycle parking, although reduced across the wider site, would include for 16 no. spaces for the proposed self-storage and is considered to be acceptable.
- 7.14 Subject to a condition restricting the use to self-storage and not wider B8 use and other conditions relating to the pre-occupation provision of vehicle access, parking, and EV spaces, and the submission and approval of a Construction Method Statement, the scheme would be acceptable and would accord with Policy TR1, TR3, TR4 and TR5 of the Reading Local Plan (2019).

Environmental Matters

- 7.15 Noise – Policy CC8 (Safeguarding Amenity) and EN16 (Pollution and Water Resources) require development to not cause a significant detrimental impact to the living environment of existing or new residential properties. The nearest residential dwellings are within Kennet Island, approximately 85m from the nearest point of the Retail Park, i.e. the western end. In previous comments from Environmental Protection Officer (EPO) it has been confirmed that there are often complaints from residents regarding existing commercial premises, in terms of noise and disturbance created by operational activities at the Retail Park. As the proposal would include fewer HGV units compared to fully occupied retail units, the EPO has confirmed that no mitigation measures would be required, however, a condition is included in the event that mechanical equipment were to be required.
- 7.16 Air Quality – Policy EN15 states that “*Development should have regard to the need to improve air quality and reduce the effects of poor air quality.*”. As there would be fewer traffic movements than the existing use (if fully occupied) there would be a slight improvement to air quality.
- 7.17 Contaminated land – 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.”

- 7.18 A Phase 1 desk-based study was submitted and assessed as part of the previous application for two new B8 units (ref: 201853) and the study identified that a further land gas risk assessment would be required to ensure that risks to future occupiers would be minimised and remediated. The EPO has confirmed that the scheme would be acceptable with the inclusion of conditions for pre-commencement submission of a contaminated land assessment, the submission and approval of a remediation scheme (if required) and implementation and verification of the remediation scheme and a compliance condition relating to discovery of any unidentified contaminated land.

Flood Risk & Drainage

- 7.19 Local Plan Policy EN18 (Flooding and Sustainable Drainage Systems) states, *“Development will be directed to areas at lowest risk of flooding in the first instance...”* and *“Wherever possible, development should be designed to reduce flood risk, both on- and off-site. All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards.....Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.”*
- 7.20 The majority of the overall Retail Park is within Flood Risk Zone 1 (at the lowest risk of flooding) including the application site. A small area of the western part of the overall Retail Park is in Flood Risk 2 (Medium risk).
- 7.21 The submitted Drainage Strategy states that it is proposed to utilise the existing surface water network which would be improved with some additional permeable surfaces to parking spaces (not general servicing area). The surface water runoff from the proposed car park will be collected by permeable pavement and channel drains, conveyed by a gravity network and freely discharged directly into the existing surface water sewer. The proposed network will be designed to ensure zero flooding above ground for the 1:30 year storm, and no flooding of buildings or off-site areas for the 1:100 year plus climate change event.
- 7.22 The SUDs Officer has confirmed that subject to conditions for the pre-commencement submission of approval of a Sustainable Drainage Strategy and the pre-occupation implementation of the approved strategy that the scheme is acceptable and accords with Policy EN18.

Natural Environment

- 7.23 Policy EN12 (Biodiversity and the Green Network) seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable. Policy EN14 (Trees, Hedges and Woodland) 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. Policy CC7 (Design and the Public Realm) sets out that good design should incorporate appropriate landscaping.
- 7.24 The site currently has landscaped areas to the Rose Kiln and Gillette Way frontages, which includes a protected Plane tree.
- 7.25 The submission includes a Tree Survey Report which confirms that the proposed scheme would include the removal of one Alder tree and some hedgerow, to facilitate the proposed scheme, and the protection of retained trees during construction. The submitted landscaping scheme includes 6 no. new trees along with new hedge and shrub planting.
- 7.26 A Biodiversity Net Gain Assessment was also submitted further to consultation comments and confirms that there would be a BNG increase of 49.32% from the proposed scheme, when calculated in accordance with the Biodiversity Metric 4.0.
- 7.27 The Natural Environment (Tree) Officer raised some minor issues with the initial submission and further to an amended Landscaping Scheme and submitted Biodiversity Net Gain Assessment, confirmed that the overall scheme would be acceptable and has recommended conditions for pre-occupation provision of the approved landscaping scheme and adherence to the approved Tree Report.
- 7.28 The Ecologist advised that the submitted ecology report for the previous planning application 201853 concluded that there are unlikely to be any adverse impacts on protected species or priority habitats as a result of the development. The site is unlikely to have changed significantly since then. However, as trees and vegetation are likely to be used by nesting birds, they are recommending the inclusion of a condition, included within the recommendation above, to ensure that vegetation clearance would be undertaken outside the bird nesting season (March - August inclusive).

Existing Elevations



Proposed Elevations

Sustainability

- 7.33 The overarching sustainability policy, Policy CC2 requires proposals for new development to reduce the consumption of resources and materials and includes that *“All major non-residential developments [including refurbishment] meet the most up-to-date BREEAM ‘Excellent’ standards, where possible”*. 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.”* The supporting SPD recognises that *“applications for change of use may fall to be considered as refurbishment depending on the level of internal alterations. The appropriate approach to sustainability will be considered on a case-by-case basis. Requirements...are subject to caveats in the relevant policies (CC2 ...) around viability and achievability.”*
- 7.34 Policy CC3: Adaptation to Climate Change, requires that *“all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.”*
- 7.35 Policy CC4: Decentralised Energy also requires development to demonstrate how consideration has been given to securing energy for the development from decentralised sources. 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.

- 7.36 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 7.37 A Sustainability and Energy Statement has been submitted which includes a BREEAM Scoping Note and a Sustainability Checklist (using that from Appendix 1 of the Sustainable Design and Construction SPD).
- 7.38 In order to meet RBC policy requirements, the proposal for a non-residential refurbishment scheme would need to demonstrate BREEAM Excellent or at the least 50% Very Good and 50% Excellent rating. This would be assessed against the BREEAM Refurbishment and Fit Out Standards 2014 (RFO).
- 7.39 The submitted Statement sets out to demonstrate that from a technical standpoint the RFO Standards should not be formally applied. The scope of the applicant's work would be to facilitate the change of use through minor alterations to the external areas, and the envelope and the building structure would be wholly retained. As the applicant would only make minimal interventions in the existing building, including closing up certain existing shop openings and glazing, introducing decorative graphics and the installation of new roller shutter doors and means of escape doors, the applicant's sustainability specialist has advised that these works would not meet "*the thresholds of a Part 11 BREEAM Assessment.*"
- 7.40 As a BREEAM Assessment involves an evidenced based assessment of the design and physical installation of building measures which align with BREEAM technical standards it involves the collation of information available from the design team and contractor. A 4-part BREEAM Assessment would consider elements outside of the control of the applicant and, therefore, it is not possible for this to be completed by the applicant as it would require the evidence of the actual, not illustrative, design and installation of fit out works, in order to complete. The physical measures associated with a tenant's installation would not be available for this speculative development until a tenant were on board and had designed and completed their works. It would be very complex to discharge a BREEAM condition which required tenant input on this basis. It should be noted that the BREEAM RFO has been structured into 4 specifically to enable the focus on the scope of works proposed and, therefore, assessable. The approach presented is consistent with similar principles for approved schemes that RBC has agreed – e.g. House of Fraser Oracle (191841/FUL) and the Broad Street Shopping

¹ Fabric and Structure; Parts 2, 3 and 4 of BREEAM relate to: Core Services; Local Services & Interior Design respectively.

Mall (190099/FUL) which followed similar principles, whereby the BREEAM assessment was to focus on the Applicant's works alone.

7.41 Officers accept that a formal BREEAM assessment is not possible in this case, however, whilst a formal BREEAM Assessment is not proposed, the Sustainability Statement includes a BREEAM Scoping Review in Appendix 1. This includes assessment of the shell works to demonstrate which elements of BREEAM, undertaken against Part 1 only of the BREEAM RFO, the proposed scheme would therefore align with. A set of measures are then proposed, which would form the basis of a compliance condition and would be in lieu of undertaking a formal BREEAM assessment. A further letter from the Sustainability specialist explains that these measures would align with a BREEAM Very Good rating. These measures are set out as follows:

- Commission a sustainability specialist through the further stages of project design to establish targets and monitor progress in line with the requirements of the BREEAM Framework Man 01.
- Require the main contractor to adopt environmental management principles as recognised by BREEAM Man 03, including monitoring energy and water usage throughout the build and compare the results monthly against targets.
- Register the site with the considerate constructor's scheme (CCS) and achieve good practice standards, ensuring a minimum overall score of 37 out of 45 - The CCS is a voluntary awards programme which involves the main contractor registering the scheme and undergoing audits by a third party against the CCS Standards. A score of 37 is equivalent to 'Very Good' levels of performance.
- Undertake a thermographic survey to assess insulation continuity and repair any significant defects in the existing fabric before handing the building over to the future operator.
- Design all lighting within the scope of the applicants works in line with the relevant CIBSE SSL design codes for LUX and uniformity. Ensure that all lighting is LED and energy efficient in line with current best practices in the non-domestic compliance guide.
- Conduct a durability review and explore options to protect the building from physical damage to include an assessment of the need for physical protection measures to the external areas, including bollards, knee rails and heavy duty doors and implementing the findings in full in line with BREEAM credit Mat 05.
- Conducting a pre refurbishment audit to consider what materials of the existing unit can be removed and recycled, with the objective to promote resource efficiency. The assessment will be conducted by an independent third party to examine the quantity of elements to be

removed from the site (Tonnes), options for on-site reuse and options for offsite reprocessing to ensure that a minimum target of 95% diversion from landfill is achieved in line with the requirements of BREEAM credit Wst 01.

- Ensure that any external lighting which requires repositioning, or replacement is fitted with energy efficient lamps which is controlled via time clock and / or daylight sensors.
- Install a 28.9 KWP PV array on the roof of the building in accordance with the Energy Statement Table 4.7.
- Procure all timber legally and sustainably, in accordance with a sustainable procurement plan.
- Procure materials which have verified Environmental Product Declarations and achieve 36% of the points available in the Mat 03 calculation.

7.42 With respect to energy, however, the Statement does include a whole building energy approach and a proposed energy strategy related to all stages of the refurbishment, including those that the applicant would not be involved in. An applicant is permitted to make assumptions based on a set of published conventions which represent worst case performance levels. The predictive assessment considers the energy performance of the building before and after the change of use based on illustrative fit out specifications for a self-storage operator. Within the Statement it is identified that “*a conservative approach has been taken to the assessment, assuming that the fit out will align with current worst case Building Regulations standards only.*” The proposed 153sqm of PV panels would result in an overall reduction of 42.99% in CO2 emissions, which would equate to a BREEAM Excellent rating for energy efficiency², which is a key policy consideration under Policy CC2. The installation and use of this level of PV is included within the measures to be secured through condition.

7.43 The Statement also clarifies that “*the reuse of the existing building would typically have a lower life-cycle impact in comparison to redevelopment, from the perspective of embodied carbon, waste minimisation and resource depletion.*”

7.44 Officers accept that the proposed scheme and the measures identified within the submitted Sustainability and Energy Statement would demonstrate improvements to the building from a sustainability perspective and would be sufficient to meet sustainability policy requirements within the Local Plan and SPD, subject to conditions requiring the provision of the measures set out in the Sustainability and

² BREEAM ENE01 – Reduction of Energy Use and Carbon Emissions - Achieving 12 out of possible 15 credits

Energy Statement hereby approved, and the submission and approval of further details of the proposed PV.

Equalities Impact

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

8 CONCLUSION

- 8.1 The proposal would result in repurposing existing retail space for a change of use to B8 self-storage 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 by 2036, as set out in RBLP Policy EN1, and the delivery of economic development supported by the NPPF. It would also meet local economic objectives by providing a storage site and would bring vacant units back into use.
- 8.2 In accordance with the NPPF it would result in sustainable development, utilising previously developed land in a sustainable location.
- 8.3 The proposal would provide additional greening of the site with a net gain in tree planting and improvement to sustainable drainage, and the refurbished building, with the inclusion of PV on the roof, would be set to achieve around 43% savings in annual carbon dioxide emissions.
- 8.4 It is considered that the scheme would address all material matters and that there would be no significant detrimental effects resulting. The application is recommended for approval, subject to the recommended conditions.

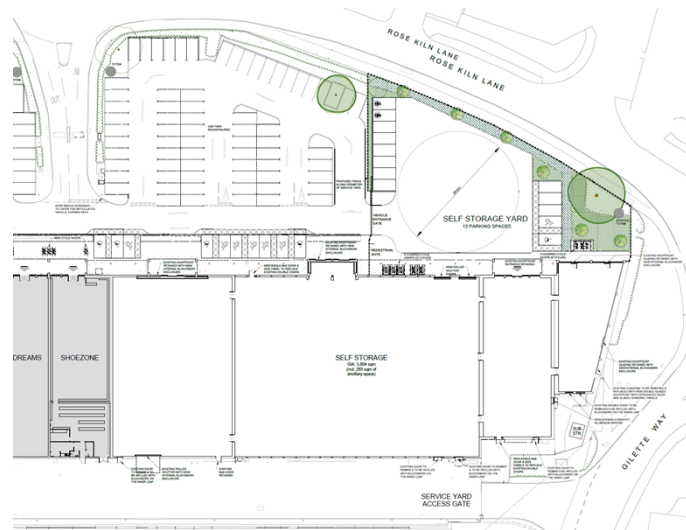
Case Officer: Alison Amoah

Proposed Plans shown below:

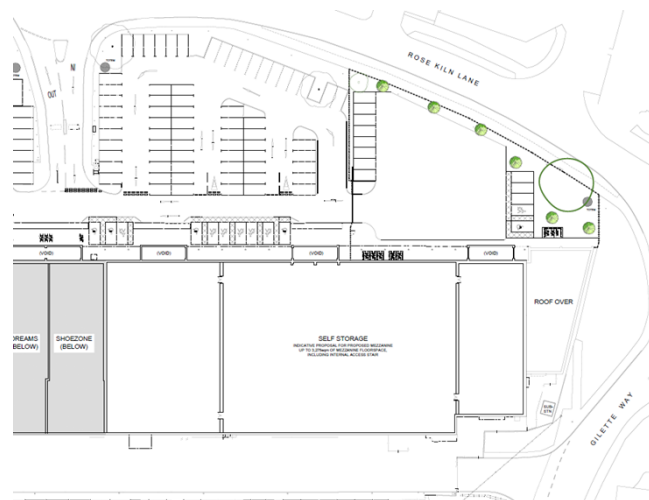
Proposed Site Plan



Proposed Ground Floor Plan



Proposed First Floor Plan



N.B. Proposed mezzanine – indicative – mezzanine does not require planning permission in itself

Proposed Roof Plan



Proposed Elevations and Section

