

25 June 2025



Title		Planning Application Report
Ward		Thames
Planning Application Reference		PL/25/0435
Site Address		146 Cardiff Road, Reading, RG1 8EW
Proposed Development		Change of use of Units 2, 3, and 4 from Storage and Distribution (Class B8) to a flexible use of Class B8, Research & Development (Class E(g)(ii)), and Light Industrial (Class E(g)(iii)).
Applicant		BBC Pension Trust Limited
Report Author		Matthew Harding
Deadline		Originally 15 May 2025. Extension of time agreed to 30 June 2025.
Recommendation		GRANT planning permission, subject to conditions.
S106 Terms		N/A
Conditions (those proposed to be amended shown in bold)		<ol style="list-style-type: none">1. TL1 std three-year time limit2. AP1 Approved Plans3. Parking (including EV spaces) in accordance with approved plan – prior to occupation4. Cycle parking plan5. Employment Skills Plan (as may be necessary, dependant on use(s) implemented)6. Energy Efficiency Enhancements / EPC rating improvement7. Use restriction (B8, E(g)(ii) & E(g)(iii))
Informatics		<ul style="list-style-type: none">– Positive and Proactive– Pre-commencement conditions– Highways– Building Regulations– CIL

1. Executive Summary

- 1.1 This application seeks planning permission for the change of use of the three separate units - Units 2, 3 and 4 from Storage and Distribution (Class B8) to a flexible use of Class B8, Research & Development (Class E(g)(ii)), and Light Industrial (Class E(g)(iii)) uses.
- 1.2 The total combined gross internal floor area across Units 2-4 exceeds 1,000 square metres (2,379 square metres) and has been considered as a minor development proposal for the purposes of the Town and Country Planning (Development Management Procedure) Order 2010, which defines major development to include:
 - a) *the winning and working of minerals or the use of land for mineral-working deposits;*
 - b) *waste development;*
 - c) *the provision of dwellinghouses where —*
 - i. *the number of dwellinghouses to be provided is 10 or more; or*
 - ii. *the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);*
 - d) ***the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or***
 - e) *development carried out on a site having an area of 1 hectare or more.*
- 1.3 Although the floor area of the building does exceed 1000 square metres, the development proposal is for a flexible use and not creating any additional floor space. Therefore, the proposal is not considered to be a major for the purposes of above definition. However, the Council's own scheme of delegation does not refer to the creation of floor area just to proposals that have a floor area in excess of 1000 square metres. Therefore, for the purposes of the Council's scheme of delegation this proposal is a major development and needs to be referred to the Planning Applications Committee for consideration and determination.
- 1.4 The application has been sought on the basis that the existing units are vacant and allowing for a more flexible / broader scope of the use of the units would provide opportunities to enhance the employment activities on the site. No external changes or physical development is proposed, except for a cycle unit (6 spaces) and four of the existing parking bays equipped with Electric Vehicle Charging (EVC) infrastructure.
- 1.5 The proposal has been considered against all the relevant policy considerations in respect of the change of use proposal, including but not limited to flood risk,

transportation, air quality, employment skills and sustainability, and officers have concluded the proposal is compliant with the development plan and all other relevant material planning considerations. The application is therefore recommended to the Planning Applications Committee for approval.

2. Introduction and Site Description

- 2.1 The application site is 3780 square metres / 0.378 hectares in area and located in a well-established industrial part of Reading, with a long history of manufacturing, with occupiers having included those in the aviation, printing, perforated metal sheeting, electro-chemical and extractor fan industries.
- 2.2 The application has been submitted with the objective of mitigating against the need for frequent change of use planning applications, with each new occupant, and provide greater flexibility for the use of the existing units (Units 2, 3 and 4) enabling them to accommodate a range of prospective tenants requiring either Class B8 or Class E use. As such the application seeks planning permission for flexible use of the site / Units 2-4 to include the existing lawful Storage and Distribution (Class B8) use, together with the additional uses comprising research and development (Class E (g) (ii)) and any industrial processes (Class E (g) (iii)). This is to support the ongoing commercial marketing programme to help ensure the units do not remain vacant for an extended period.





Figure 1: Existing building and vehicle entrance & exit (146 Cardiff Road) – Units 1-4

2.3 The application site is located on the corner of Cardiff Road and Richfield Avenue, within the Richfield Avenue Core Employment Area (Policy EM2(g)), in the western part of the Riverview Industrial Estate and to the northwest of Reading town centre. To the west of the site, running alongside Cow Lane is a designated Green Network (Policy EN12) (figure below).

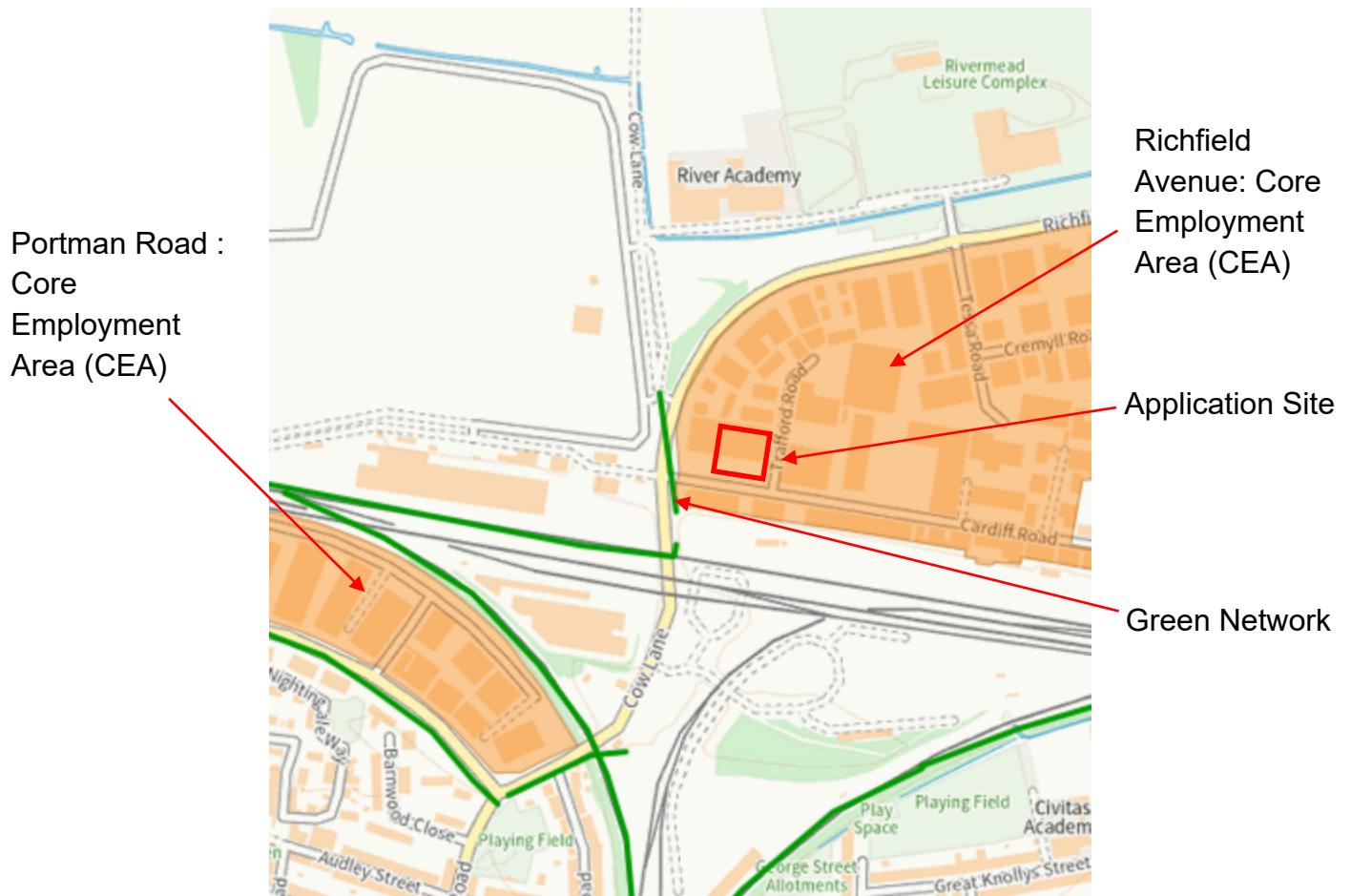
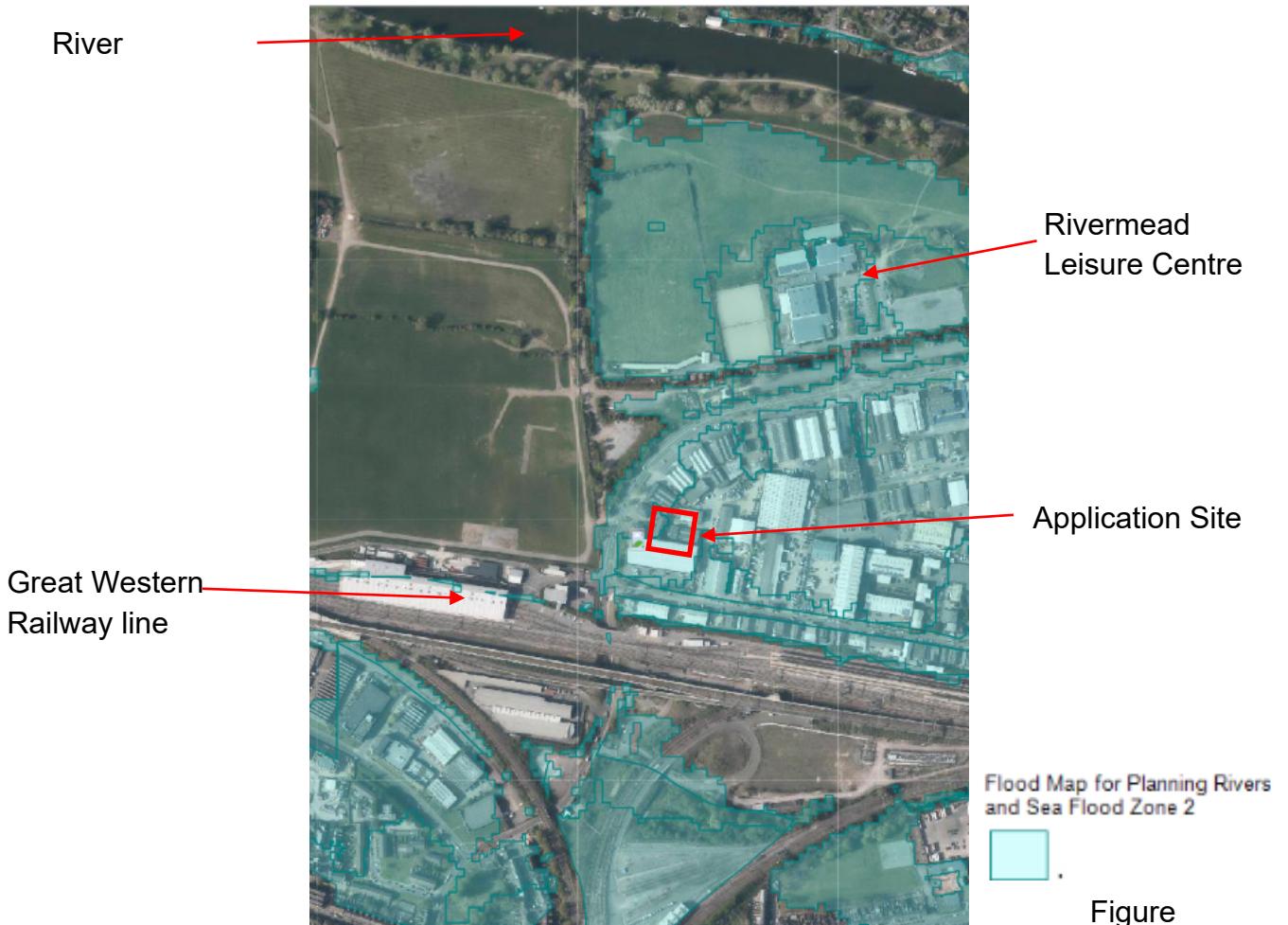


Figure 2: Green Network and Core Employment Areas

2.4 The area surrounding the site consists of predominately industrial and warehouse units. Some 60 metres to the south of the site is the Great Western Railway line. Riverview Academy secondary school and Rivermead Leisure Centre Park are some 500 metres to the north and the site is located approximately 600 metres south of the River Thames. The site is located within Flood Zone 2 (medium probability of flooding).



3: Site Location with Flood Zone 2 overlay

2.4 The existing building occupying site is set back and accessed off Cardiff Road, with parking to the front of the units. The building comprises of four self-contained units, however, only Units 2, 3 and 4 are subject to this application. Unit 1, which adjoins the application site to the west, is presently occupied by an electronics distribution company (Edmundson Electrical) in a storage and distribution use (Class B8). Each unit has their own main large vehicular roller and pedestrian entrance doors, with a modest ancillary office and store area at first floor level.

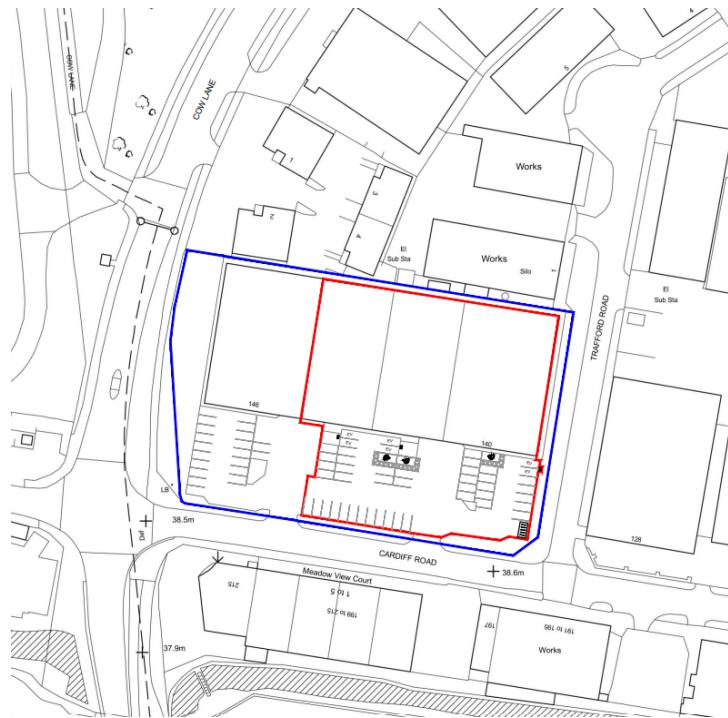


Figure 4: Site Location Plan

3. Proposal

3.1 This application seeks planning permission for the change of use of the three separate units - Units 2, 3 and 4 from Storage and Distribution (Class B8) to a flexible use of Class B8, Research & Development (Class E(g)(ii)), and Light Industrial (Class E(g)(iii)). The existing units are currently vacant and therefore the exact future use of the units is unknown. However, the applicant anticipates that in addition to the existing lawful storage and distribution use of the units, the expanded use of the units could include those in the electronics, aerospace, satellite, food preparation and vehicle repair industries.

3.2 There are no physical changes proposed to the building externally. The total Gross External Area (GEA) of all three units combined is 2,379 square metres. Units 2 and 3 each have a GEA of 713 square metres, while Unit 4 is slightly larger, with a GEA of 953 square metres. The applicant anticipates each unit will be leased individually.

3.3 The proposals will utilise the existing access to the south from Cardiff Road which involves retaining the existing parking spaces and arrangements, however, to accommodate new cycle parking and disabled parking provision, the proposals will result in the loss of five spaces. As such, the proposals involve a total of 49 parking spaces allocated to Units 2, 3 and 4 in total, with three proposed to be provided as disabled spaces and four equipped with Electric Vehicle Charging (EVC) infrastructure. A secure cycle parking shelter for 6 spaces is proposed to be provided the south-eastern corner of the Site.

- 3.4 All delivery and servicing vehicles will be accommodated on-site, with the existing arrangements currently accommodating articulated HGVs and no changes are proposed to the internal layout.
- 3.5 The Council's Community Infrastructure Levy (CIL) charging schedule came into effect on 1st April 2015, which is a charge on certain developments in the Borough with the money received used to support and manage the impacts of development by funding infrastructure that the Council, local community and neighbourhoods want. The Council's supporting guidance: *Community Infrastructure Levy Guidance for Applicants and Developers, February 2015* sets out developments liable and not liable to for CIL, with proposals that involves only change of use, conversion or subdivision, or creation of mezzanine floors to non-residential use not being CIL liable. In addition, the Council's supporting CIL charging schedule does not set out charges for development comprising of Research and Development and Industrial Process uses (Class E (g) (ii) & (iii)). The proposal is not CIL liable and is not chargeable development.

4. Planning History

- 4.1 The following applications are relevant to this proposal:

- 81/TP/741: Demolition and erection of new warehouses. Approved 25th September 1981.
- 82/TP/5: Demolition of existing retail unit. Erection of a building for Class III (Lt Ind.) Class IV (Gen Ind.) and Class X (Warehousing) uses, with parking and ancillary service areas. Approved 28th April 1982.
- 82/TP/552: Erection of a building for Class X warehouse and/ or Class III or IV industrial use, capable of sub-division into up to four individual units together with ancillary office, parking and service forecourt areas. Approved 18th October 1982.
- PL/11/0919 (11/01217/FUL): Application for the installation of new post, gates and 2.4m Paladin fences along east side of unit; installation of external plant on east elevation and addition of new windows, door and louvres on all elevations; and amendments to parking to include 2 disabled bays. Approved 14th October 2011.
- PL/14/0174 - Proposed new industrial roller shutter door to front elevation and new security shutter fitted to main entrance door. Existing car parking spaces to be re-configured to allow access to new roller shutter door. Approved 1st April 2014.

5. Consultations

RBC Environmental Protection (no objection)

5.1 The Council's Environmental Protection Team (Principal Environmental Health Officer) has reviewed the proposal and raised no objection and no conditions are recommended.

RBC Transport Development Control (no objection)

5.2 The Council's Transport Strategy Team have reviewed the proposal and have raised no transport objections to this proposal to introduce two further uses from the site (Units 2, 3 & 4), subject to conditions requiring the revised parking layout be implemented prior to any occupation of the site for the permitted uses, installation of the vehicle charging infrastructure and the submission of a plan and subsequent written agreement from the Council showing satisfactory parking for 10 cycle parking spaces.

RBC Planning (Natural Environment) Team (Tree Officer) (no objection)

5.3 The Council's Natural Environment Officer has reviewed the proposal and raised no objection, commenting the works to the car park are minor in nature, retaining the existing planting on site and the site is away from the existing Green Network to the west of the site.

Public Consultation

5.4 A site notice was displayed. No public comments or representations have been received to this revised proposal at the time of writing.

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 December 2024 (amended February 2025)

2. Achieving sustainable development
4. Decision-making

6. Building a strong, competitive economy
7. Ensuring the vitality of town centres
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 Practice 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
- 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
- EN18: Flooding and Drainage
- EM2: Location of New Employment Development (and EM2g Richfield Avenue)
- TR1 Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-Related Matters
- TR5: Car and Cycle Parking and Electric Vehicle Charging

Reading Borough Council Supplementary Planning Documents

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

- 6.4 The present version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024.
- 6.5 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning

judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

6.6 The Local Plan policies pertinent to these applications listed above is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be 'out of date'.

7. **Appraisal**

7.1 The main considerations for the determination of this application to add to further uses (Research and Development and Industrial Processes), associated cycle storage and revised on-site parking layout are considered to be:

- i. Principle of Development
- ii. Flood Risk
- iii. Transport
- iv. Employment and Skills Training
- v. Sustainability
- vi. Design, Character and Appearance of the Area
- vii. Neighbouring Amenity
- viii. Biodiversity Net Gain / Landscaping

Considerations / Assessment

- i. Principle of Development

7.2 The application site lies within the Core Employment Area (CEA), covered by Policy EM2 of the Reading Borough Local Plan 2019. This policy directs major employment uses, including industrial and storage and distribution, to be located in the A33 corridor or in the Core Employment Areas, which the application site is one (Richfield Avenue).

8.3 The proposal seeks to provide a broader range of employment opportunities / uses on the site, with the introduction of two additional use classes (Research and Development, and Industrial Processes – Class E (g) (ii) & (iii)), to the existing lawful storage and distribution use (Class B8) on the site. The permission would allow for a flexible use of the site allowing Units 2, 3 and 4 to switch between the three uses (Storage and Distribution, Research and Development and Industrial Processes). These types of flexible permissions last for a period of 10 years, after grant of planning permission, and once the 10 years have elapsed the last use of the site / building at this time become the permanent lawful use. This is controlled under permitted development rights

(Class V of Part 3 of Schedule 2) of the General Permitted Development (England) Order (2015).

8.4 As the proposal would retain the existing employment use (Class B8) and add to further employment uses, within an established and identified Core Employment Area, it is considered to be consistent with Policy EM2 by expanding employment opportunities within the Core Employment Area. As such, the principle of development is supported.

ii. Flood Risk

8.5 The application site lies within Flood Zone 2 (medium flood risk) and policy EN18: Flooding and Sustainable Drainage directs development to areas at lowest risk of flooding in the first instance and where development in areas of flood risk area considered to be necessary, development proposals are required to, wherever possible, be designed to reduce flood risk, both on and off-site.

8.6 In addition, owing to the change of use nature of this proposal, in-line with the provisions of the National Planning Policy Framework (NPPF) (December 2024) (paragraph 176), the proposed change of use is exempt from the Sequential and Exception Tests. However, there is a requirement for such proposals to provide a site-specific Flood Risk Assessment, which has been provided in connection with this application.

8.7 The submitted Flood Risk Assessment sets out how the site presently operates as a lawful Class B8 storage and distribution use within the Core Employment Area (CEA) within Flood Zone 2 (medium risk – 1 in 100-year flood probability) and that the entirety of the CEA appropriately falls within Flood Zone 2. Furthermore, the submitted Flood Risk Assessment states the proposed change of use would not increase the vulnerability of the site to flooding, as both the existing lawful storage and distribution use (Class B8) and proposed Research and Development (Class E (g) (ii)) and Industrial Processes (Class E (g) (iii)) and all classified as 'Less Vulnerable' for the purposes of considering flood risk. In addition, although the application site is within Flood Zone 2 it is not within 20 metres of a main river.

8.8 Therefore, owing to this classification and that the development would not result in any physical changes and enlargement to the existing building, the proposal is not considered to materially increase the flood risk to existing and future users of the site and those surrounding properties, over and above the existing situation. As such, the development proposal is considered to comply with Policy EN18 of the Reading Borough Local Plan and the advice contained within the NPPF.

iii. Transport

8.9 A Transport Statement has been submitted in support of this application and has been reviewed by the Council's Transport Strategy Team, in support of Policies TR1: Achieving the Transport Strategy, TR3: Access, Traffic and Highway-Related Matters and TR5: Car and Cycle Parking and Electric Vehicle Charging, together with the Council's supporting SPD: Revised Parking Standards and Design.

8.10 The Transport Statement sets out the likely trip generation as a result of the two proposed additional uses, advising the new uses would not have a detrimental impact on the existing highway network despite a minor increase in vehicle trips in the morning peak period and a decrease in vehicle trips in the afternoon/evening peak period, when compared to the existing use of the site (Storage and Distribution / Class B8).

8.11 In addition, the Transport Statement advises that there is a current overprovision of on-site parking (49 spaces) compared to the Council's adopted parking standards (Revised Parking Standards and Design SPD). Consequently, the proposal seeks to revise the on-site parking layout to provide three disabled parking spaces and six electric vehicle spaces to comply with the Council's parking requirements and accommodate future demand. Also, the proposal details the provision of 6 covered cycle parking spaces for staff and visitors.

8.12 From the Transport Strategy Officer's response, no objections are raised to the proposal on the basis of impact on the local highway network or on-site vehicle and parking provision, with two conditions recommended requiring the revised parking, electric car charging and cycle parking be carried out prior to the change of use and occupation of the building, and that a plan be provided demonstrating 10 cycle parking spaces can be satisfactorily provided on the site. This is an increase of four-cycle parking spaces above that shown and proposed by the applicant, with sufficient space available on the site to provide the additional four-cycle parking spaces.

8.13 Subject to the recommended conditions, the proposed development is not considered to have an adverse impact on the surrounding highway network and would provide on-site parking (cycle and vehicle) in accordance with the Council's adopted standards. Therefore, the proposed two additional uses within units 2, 3 and 4 are considered to comply with Policies TR1, TR3 and TR5 of the Reading Borough Local Plan, the advice contained within the NPPF and the Council's parking standards SPD.

iv. Employment and Skills Training

8.14 Policy EM2: Location of New Employment Development directs major employment uses to either the A33 corridor or one of the Borough's Core Employment Areas. Policy CC9 (Securing Infrastructure) states proposals for

development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of development will be provided through direct provision or financial contributions, with employment development to provide mitigation measures in line with impacts on labour, skills and transportation network. Also, the Council's Employment, Skills and Training SPD, supporting the economic development of the Borough, sets out certain skills training plan requirements for construction and end user development proposals, where the gross external floor area exceeds 1000 square metres.

- 8.15 This proposal is for a change of use of the existing building, with the combined floor area of units 2, 3 and 4 exceeding 1000 square metres (2,379 square metres). Therefore, the Council's Employment and Skills Training SPD either requires an end user Employment Skills Plan (ESP) to be provided by way of a legal agreement (s106) or condition or a financial contribution to allow and ESP to be undertaken on the development's behalf.
- 8.16 In response to this requirement the applicant has advised that the proposal seeks to address the underutilisation of the existing vacant units (Units 2-4), to improve on-site employment that is consistent with the aims of Policy E3: Loss of Employment Land of the Reading Borough Local Plan. The applicant also advises that whilst this proposal has been submitted by way of a single application with a combined floor area in excess of 1000 square metres the proposal could have been sought by way of individual applications for each unit with each having a floor area of less than 1000 square metres and not meeting the SPD ESP threshold. This point, together with the flexibility in occupation the additional uses would provide future occupants of the units, is noted by Officers, however, the application has been submitted as one application and shall be considered on this basis.
- 8.17 In addition, the applicant has advised that the ESP is not considered to be appropriate in this instance owing to the speculative nature of the application whereby the future occupiers are currently unknown, and it is possible that all three units may be occupied under the existing lawful use or individually. In such a scenario the applicant considers a financial contribution would not deliver meaningful or targeted outcomes aligned with the intent of the SPD.
- 8.18 On consideration of the applicant's comments and the Council's SPD requirements, which sets out obligations that will be sought from developers at the construction and end user phases of development, contributing towards a range of employment, skills and training measures. Generally, the SPD is applied to all developments. However, more discretion is applied to changes of use where there is no net increase in floor space and/or where some or all the floor space has been in continuous use for at least 6 months in the 12 months leading up to the submission of the planning application.

8.19 The application is for the change of use of the unit, with no additional floor space proposed and the unit was most recently in use by TP Link, which vacated the unit at the end of November / early December 2024. The proposed development does not include any construction phase development works and, owing to the speculative nature of the application, the end user is unknown, and the site has only been vacant for approximately 6 months. For these reasons, officers have discussed the requirement for an Employment and Skills Plan with Reading's Economy and Destination Agency (REDA) who agree that in the circumstances, there would not be a requirement for an Employment and Skills Plan. This is due the proposed development relating the change of use of the unit only and there being no known end user(s). As such, officers advise that it would not be appropriate to require an Employment and Skills Plan, and the proposed development is in accordance with the Employment, Skills and Training Supplementary Planning Document.

v. Sustainability

8.20 Policy CC2: Sustainable Design and Construction requires for new development and refurbishment of existing buildings to be designed efficiently and take account of the effects of climate change and to meet certain requirements. The policy sets out different requirements depending on whether the development is major or minor non-residential development. In this case, the proposal is a minor non-residential proposal (as set out above) with the following relevant requirement of Policy CC2:

- all minor non-residential developments to meet the most up-to-date BREEAM 'Very Good' standard as a minimum.

8.21 In response to this policy requirement, together with the supporting information as set out within the Council's SPD: Sustainable Design and Construction, the applicant has advised that due to the nature of the proposed change of use, with no external alterations being proposed, nor the creation of built development or an increase in floorspace, it would not be feasible to achieve a BREEAM rating of 'Very Good' for the development proposal. However, recognising the importance of achieving high sustainability standards and the objectives of Policy CC2 in delivering the highest possible sustainability standards against the development constraints, the applicant has advised a series of building improvements (outlined below) to improve the building Energy Performance Certificate (EPC) rating of D to B.

8.22 Improvements to be undertaken:

- Installation of LED Lighting;
- Removal of Gas Supplies and Boilers;
- Installation of Variable Refrigerant Flow (VRF) Heating/Cooling Systems (Electric systems); and

- Provision of Electric Vehicle Charging Points – Two EV charging points per unit will be installed.

8.23 These measures demonstrate a proactive approach to implementing sustainability measures and a strong commitment to meeting Policy CC2 within the limitations of the application and the absence of physical development works. Subject to a condition requiring the implementation of the above improvements, the proposed development is considered to accord with the purposes of Policy CC2 by improving the efficiency of existing buildings and taking account of the effects of climate change.

vi. Design, Character and Appearance of the Area

8.24 Policy CC7 (Design and the Public Realm) states that, *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*.

8.25 The proposal is to broaden the scope of the use of three of the existing four units (Units 2, 3 & 4), with the introduction of research and development and industrial processes uses to the existing lawful storage and distribution use. No physical external alterations are proposed to the building, with the only changes sought to the site, apart from the proposed additional uses, being new cycle parking provision (storage unit), disabled vehicle parking bay and vehicle charging infrastructure. This shall result in the loss of five existing car parking spaces on the site, discussed in greater detail in the transportation section below. However, from a design and character perspective, the development would see modest changes to the site and existing building.

8.26 The proposed uses would also not in themselves amount to any significant change in the character of the area by maintaining an employment use of the site. As such, the proposal is considered to maintain the design quality of the existing building that would maintain the character and appearance of the area in which it is located, in accordance with Policy CC7 of the Reading Borough Local Plan.

vii. Neighbouring Amenity

8.27 Policy CC8: Safeguarding Amenity seeks to ensure development will not cause a detrimental impact on the living environment of existing residential properties, in terms of various criteria, including privacy, noise and disturbance, vibration, dust and fumes, and smell amongst others. Those mentioned are considered the most pertinent to this proposal.

8.28 As previously stated, the site lies within one of the Borough's Core Employment Areas and is surrounded by numerous existing commercial units, two existing roads (Cardiff Road – south, and Richfield Avenue, west). The closest sensitive

residential properties lie some 350 metres to the east of the site further along Cardiff Road.

8.29 The Council's Principal Environmental Health Officer has reviewed the proposal and raised no objection to it, commenting that there are no residents nearby the site so the impact of the proposal would be limited particularly as the development does not seek to make any external changes (e.g mechanical plant). Officers would agree and consider the two additional uses sought of research and development and industrial processes would not cause a detrimental impact on the living environment of those existing residential properties in the wider area, in terms of noise and disturbance, vibration, smell, dust and fumes. Therefore, the proposal is considered to accord with Policy CC8 of the Reading Borough Local Plan.

viii. Biodiversity Net Gain / Landscaping

8.30 Policy EN12: Biodiversity and Green Network states 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 and Policy EN14: Tree, Hedges and Woodlands seeks to protect and retain trees, hedges and woodland from development proposals. In addition, the government national requirements for Biodiversity Net Gain require a minimum 10% gain, unless certain exceptions exist. One such exception is as follows:

8.31 A development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat
- 5 metres of on-site linear habitats such as hedgerows

8.32 The proposal is to add to further use classes to the existing lawful storage and distribution use of the site and units 2-4, with no physical enlargement of the building or external alterations. The development would not impact a priority habitat and would not impact on-site habitat in excess of 25 square metres or any linear habitat. Therefore, the proposal is exempt from the BNG requirements.

8.33 Policy EN12 relates to biodiversity and the Green Network, which as shown in figure 2 above, extends in roughly a north-south orientation along Cow Lane to the west of the application site. The proposal is for a change of use of the building, with no construction works and minor alterations to the carpark to add to further uses for the site and add disabled parking bays (x3) and electric vehicle charging bays (x6), together with a cycle shelter in the southeast corner of the site/car park. The proposal is not to extend, reconfigure or resurface the existing carpark.

8.34 The Council's Natural Environment Team have reviewed the proposal and advised that as the development proposal will not change the existing carpark

layout or existing landscaping within and surrounding the car park, which presently benefits from mature hedging and trees along the site frontage with Cardiff Road. As such, the proposal would not have any adverse impact on the nearby Green Network and the existing trees and hedges along the site frontage with Cardiff Road in accordance with Policies EN12 and EN14 of the Reading Borough Local Plan.

8.35 Lastly, owing to the change of use nature of this proposal it is not considered reasonable or practical for biodiversity enhancements of the site, which is constrained by the existing site size, physical boundaries with surrounding roads and location in an established industrial part of town.

9. Equality Implications

9.1 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.

9.2 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 application.

10. Conclusion and Planning Balance

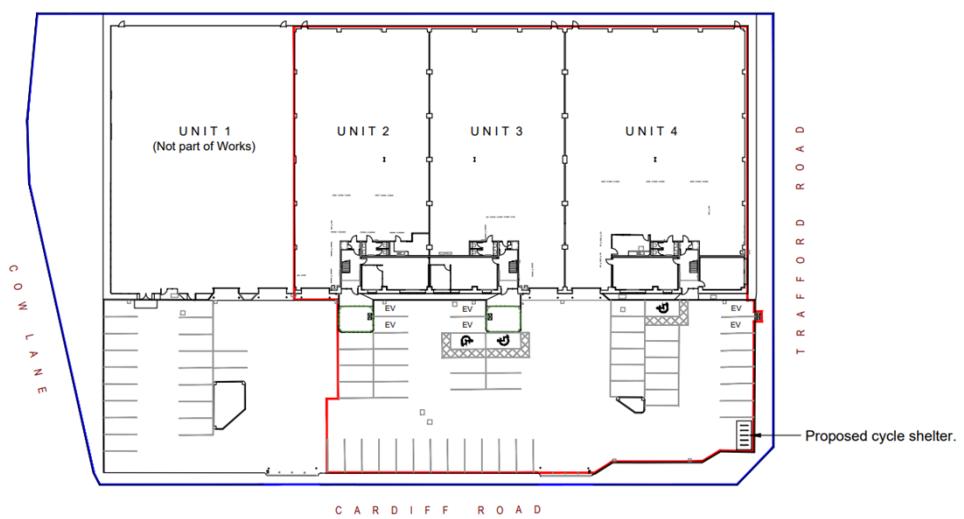
10.1 As confirmed at paragraph 7.1 above, planning applications are required to be considered against the development plan and material considerations, under section 38(6) of the Planning and Compulsory Purchase Act 2004, and conditions attached to the existing permission, with a particular focus on national and development plan policies, and other material considerations which may have changed significantly since the original grant of permission. This has been evidenced in the above assessment.

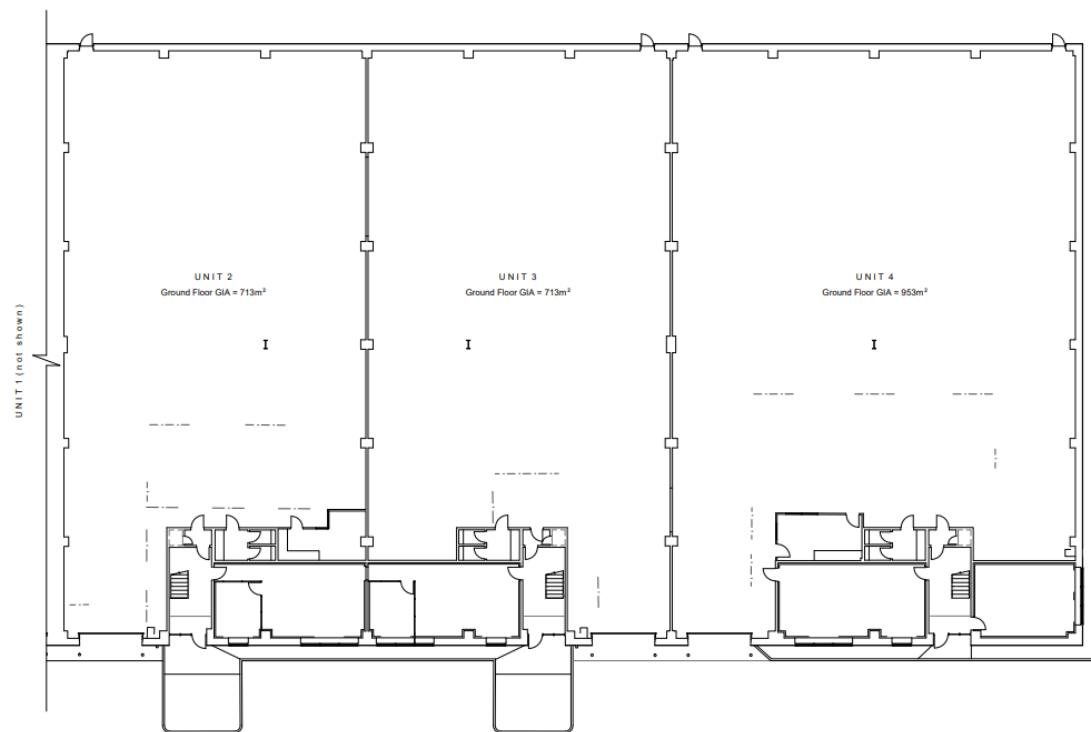
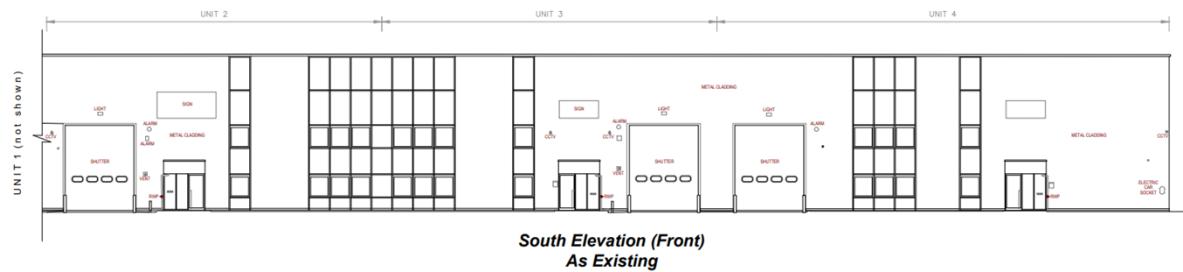
10.2 Any harmful impacts of the proposed development are required to be weighed against the benefits in the context of national and local planning policies, as detailed in the appraisal above. In this instance, expanding the existing uses on the site to include two further employment uses (Research and Development and Industrial Processes), in addition to the existing storage and distribution use, would provide greater flexibility for the use of the building and likely

improve the future occupation of the building keeping the building and its use in an employment use in-line with the objectives of Policy EM2 of the Reading Borough Local Plan.

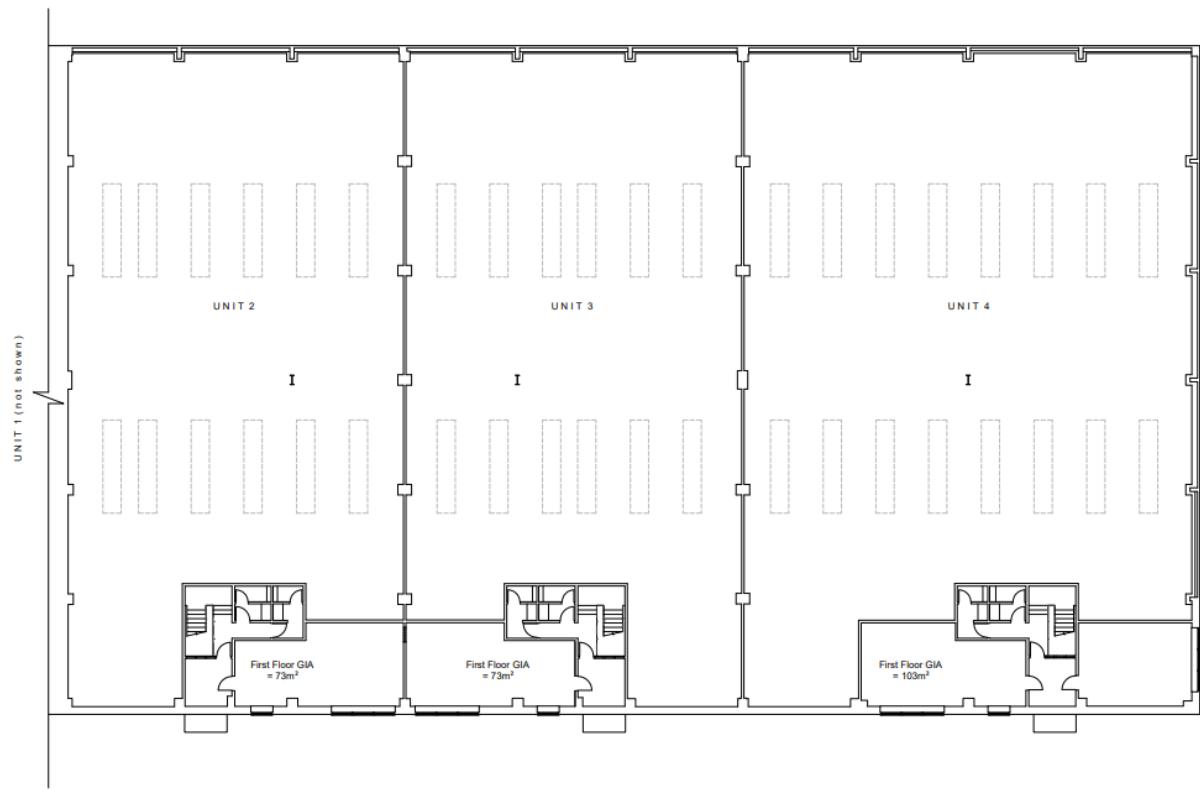
- 10.3 Furthermore, the development proposal is not considered to increase the risk of flooding to either the occupants of the building or surrounding buildings over and above the existing situation, would not have an adverse impact on the local highway network, nor result in an detrimental impact on the living conditions on any surrounding residential properties and conditions are recommended to secure an Employment Skills Plan and energy efficiency to the existing building. As such, the proposed additional use classes (Research and Development and Industrial Processes (Class E (g) (ii) & (iii)), in addition to the existing lawful storage and distribution (Class B8) use are considered to comply with the relevant policies of the Reading Borough Local Plan and supporting SPDs and the advice contained within the NPPF.
- 10.4 In reaching this conclusion it is considered that officers have applied a suitable planning balance of all material considerations. As such, this application is recommended for approval, subject to conditions.

Appendix 1 – Selected Plans





Ground Floor Plan
As Existing



***First Floor Plan
As Proposed***

Appendix 2 – Approved Plans and Documents

The following plans have been submitted for approval:

- Location Plan - JHP RS412-001
- Block Plan - JHP RS412-002
- Existing Ground Floor Plan– JHP RS412-003
- Existing First Floor Plan – JHP RS412-004
- Existing Roof Plan – JHP RS412-005
- Existing Elevations – JHP RS412-006
- Proposed Ground Floor Plan – JHP RS412-009
- Proposed First Floor Plan – JHP RS412-010

The following supporting documentation has been submitted for approval:

- Travel Plan Statement (reference: R-25-0002-TS-01A dated 11 March 2025), prepared by Evoke.
- Flood Risk Assessment (reference: 69831/01/DL/Ero dated 13 March 2025) prepared by Lichfields.