

03 December 2025



Title	PLANNING APPLICATION REPORT
Ward	Thames Ward
Planning Application Reference:	PL/25/1191 Full planning permission
Site Address:	Land at Meadow Road, Reading
Proposed Development	Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping. Departure from the Development Plan - the following application does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated
Applicant	CBRE Investment Management
Report author	Catrin Davies
Deadline:	25/11/2025
Recommendation	<p><u>Refuse</u> planning permission for the following reasons:</p> <p>1. The proposal would result in the provision of major employment-generating floorspace within a site allocated for housing in the Local Plan. The proposal would result in a non-conforming use on an allocated housing site which would be an inefficient use of the site and contrary to the wider strategic aims of the Local Plan. The proposed use would exacerbate the existing imbalance which exists between residential sites and employment-generating floorspace in the Borough and fail to mitigate the additional harm of not providing housing (including affordable housing) on the allocated housing site or through other off-site mitigation. For these reasons including the failure to maintain the necessary supply of housing, the proposal is contrary to policies CC1 (Presumption in Favour of Sustainable Development), EM1 (Provision of Employment), EM2 (Location of Employment Development), WR3b (Other Sites For Development in West Reading and Tilehurst: Ross Road and Part of Meadow Road) and H3 (Affordable Housing) of the Reading Borough Local Plan (2019) and paragraphs 8, 12, 56, 61, 64, and 66 of the National Planning Policy Framework (December 2024).</p> <p>2. It has not been demonstrated that there are not reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding as such it has not been</p>

	<p>proven a site with a lower risk of flooding cannot accommodate the proposal. The proposal has not demonstrated it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding or reduce flood risk both on- and off-site. The proposal has not incorporated a suitable SuDS scheme which is 'landscape-led' and connects into the on-site green networks as such the proposal has failed to demonstrated that it has adequately adapted to the impacts of climate change. The proposal has therefore failed to demonstrate that it will not increase flood risk, contrary to Policy EN18 (Flooding and Sustainable Drainage Systems) of the Reading Borough Local Plan (2019), and paragraphs 170, 173-5, and 181 of the National Planning Policy Framework (2024).</p> <ol style="list-style-type: none"> 3. Due to the proposal's layout which offers no suitable separation distance or suitable buffer to the site edges, combined with the significant scale, mass and bulk of the proposed building, the proposal is considered to be visually dominant and overbearing on neighbouring properties, harming the outlooks to these houses and their gardens. In addition, the application has failed to demonstrate the proposal would not result in unacceptable harm from noise, vehicle movements and artificial lighting to the amenities of neighbouring residential properties and gardens. The development is therefore considered to have a detrimental impact on the living environment of surrounding existing residential properties, contrary to policies CC8 (Safeguarding Amenity), EN16 (Pollution and Water Resources) of the Reading Borough Local Plan (2019) and paragraphs 187 and 198 of the National Planning Policy Framework (2024). 4. The design and layout would present large commercial/industrial-looking, poor-quality buildings to the street on Meadow Road, and the significant scale, largely blank elevations, height and lack of lay-off of the proposed buildings produces an incongruous design which will be harmful to the street scene. The proposal does not therefore maintain or enhance the character and appearance of the area and has not had due regard for its location adjacent to a residential area resulting in a poor juxtaposition of building forms, contrary to the development pattern of the area and the residential properties to the south of Meadow Road. As such, the proposal is contrary to Policy CC7 (Design and the Public Realm) of the Reading Borough Local Plan (2019) and paragraphs 135, 136, 137 and 139 of the National Planning Policy Framework (2024). 5. The majority of the proposal site would be given over either to hard-surfacing or coverage by large-scale industrial buildings with very little space to allow for landscaping. Furthermore, the application has failed to demonstrate the proposed tree coverage and soft landscaping shown are able of being implemented. As such it is not considered the proposal is capable of suitably improving the level of tree coverage within the site in order to mitigate the development, provide opportunities for biodiversity, contribute to measures to reduce carbon emissions or adapt to climate change through
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	<p>a suitable SUDS system. The proposal is therefore unsuitable in terms of mitigating the visual and environmental harm of the development, contrary to policies EN12 (Biodiversity and the Green Network), EN14 (Trees, Hedges and Woodlands) and EN18 (Flooding and Drainage) of the Reading Borough Local Plan 2019 and paragraphs 8, 135, 136, 182 and 187 of the National Planning Policy Framework (2024).</p> <p>6. The development has not been designed to achieve the BREEAM 'Excellent' standard (or an equivalent) for the entirety of the development. Further, the design of the development does not take suitable opportunities to design for resilience to climate change, including through solar shading, landscaping and water run-off. Accordingly, the development fails to produce a design which is appropriate in terms of responsible energy use, design/layout and use of natural resources, contrary to policies CC2 (Sustainable Design and Construction) and CC3 (Adaptation to Climate Change) of the Reading Borough Local Plan (2019), the Council's SPD, 'Sustainable Design and Construction' (2019) and paragraphs 161 and 166 of the National Planning Policy Framework (2024).</p> <p>7. The application would provide ancillary office space on first floor mezzanine areas with no lift or other form of access to assist disabled people. The development would not therefore provide equality of access to disabled staff or visitors in accessing the development's facilities. The development would therefore fail to address the needs of all in society, contrary to Policy CC7 (Design and the Public Realm) of the Reading Borough Local Plan (2019) and paragraphs 96, 117 and the Glossary of the National Planning Policy Framework (2024).</p> <p>8. In the absence of a legal agreement to secure a s106 legal agreement for the necessary improvements towards construction and operational phase employment and skills plans and highways improvements via s278 of the Highways Act (including necessary Traffic Regulations Order(s)), the proposal fails to mitigate its impact on labour and skills and on the transport network and is therefore contrary to policies CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019), the Council's adopted SPDs: Employment, Skills and Training (2013) and Planning Obligations under Section 106 (2015) and paragraphs 56, 115 and 116 of the National Planning Policy Framework (2024).</p>
Informatives	<ol style="list-style-type: none"> Plans considered and refused Positive and proactive requirement A s106 legal agreement for securing an employment and skills plan and the necessary works to the Public Highway under s278 of the Highways Act would otherwise have been required if approving planning permission

Executive summary

This application seeks full planning permission for the demolition of existing buildings and the construction of approximately 4,300 sqm of new employment floorspace across 11 units in a range of sizes, with associated access, parking, and landscaping at land north of Meadow Road and east of Milford Road, Reading.

The site is split between the Core Employment Area (west) and land allocated for residential development under Policy WR3b (east). The proposal represents a departure from the Development Plan, introducing employment uses on land designated for housing.

The site lies at the edge of the Core Employment Area where industrial and commercial units meet residential uses. The site also lies within a Flood Zone.

The proposal results in a land use which conflicts with employment use on housing-allocated land (Policy WR3b) and outside the A33 corridor/Core Employment Area (Policy EM2). The application has not demonstrated adequate SUDS provisions and not demonstrated the proposal will not increase flood risk elsewhere contrary to Policy EN18 of the Local Plan. The proposal has not had due regard for the wider site context in which it resides and is therefore considered to be harmful to neighbouring amenities and the street scene. Insufficient information has been provided in relation to trees and soft landscaping, and it has not been demonstrated that these can be successfully implemented. On the basis that the application is contrary to the development plans, there are various other shortcomings of the scheme and no other material considerations to outweigh these harms, the application proposal is therefore recommended to you for refusal.

1. Introduction and site description

- 1.1. The application site is an L-shaped parcel of land and relates to land to the north of Meadow Road and east of Milford Road with a site area of 0.89ha. The site currently accommodates two existing employment buildings, building 1 has a floor area of 2,180 sq.m and building 2 has a floor area of 1,205 sq.m
- 1.2. The eastern half of the site includes a large area of hardstanding, with two storey commercial units sited along the northern boundary, including eight roller shutter doors for goods vehicles. The site is currently occupied by Rocco Brands Group Limited (Unit 1), an online greetings card supplier, Phantom Brewing Co. Limited unit 2 and 3), and Green Metro Coaches Limited a bus depot operating on the hardstanding area and Talbot House. Access to the eastern half of the site is provided via an existing vehicular access via Ross Road.
- 1.3. The western half of the site comprises a series of 2 storey commercial units (and ancillary uses) with narrow brick planter landscaping beds along the western edge. These commercial units remain in active use and are sited within the Core Employment Area. Access to the western half of the site is gained via Meadow Road.
- 1.4. The north and east boundaries of the site abut the ends of residential gardens serving two storey terraced dwellings to Denbeigh Place and Addison Road, including Denbeigh Play Area to the north. To the south, the site abuts Meadow Road, beyond which lies the recently completed Bellway residential development for 96 dwellings and associated car parking, public realm and landscaping (ref. 171814), now known as Printers Road (on the Former Cox & Wyman printers site) . To the west of the site is Milford Road and other warehousing and buildings with employment uses beyond.
- 1.5. The site previously included a third industrial building in the east corner of the site which was demolished under prior approval demolition consent ref. 200054. This building provided a further 2,400sq.m of employment floorspace. Prior to demolition of the third building, the entire site provided a total building footprint of approximately 5,500sq.m.

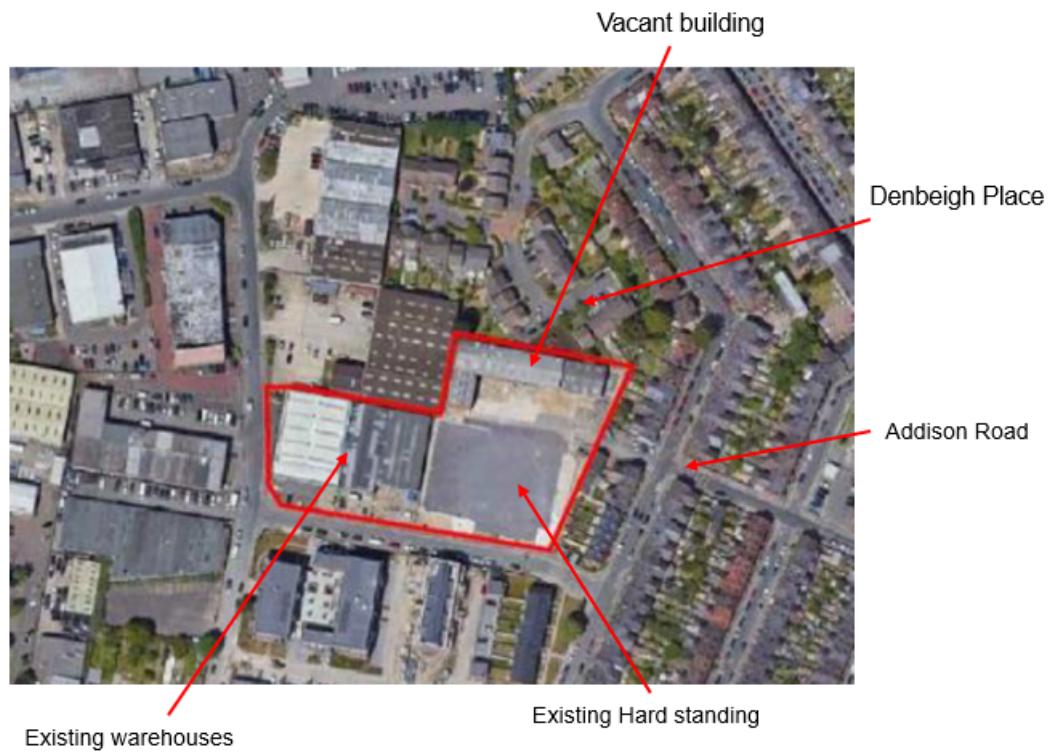


Figure 1: Aerial View



Figure 2: Land allocation



Figure 3: Flood Risk map

Site constraints:

- Air Quality Management Area (AQMA)
- Area of potentially contaminated land
- Western side and southerly strip are within Flood Zone 2
- Western side within a core employment area (Richfield Avenue)
- The eastern part of the site is entirely allocated for residential development under Policy WR3b (2 Ross Road & Part of Meadow Road), see extract below:

WR3b 2 ROSS ROAD & PART OF MEADOW ROAD

Development for residential.

Development should:

- *Take account of access restrictions on surrounding streets and ensure that residential access is generally separated from accesses to commercial areas;*
- *Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;*
- *Ensure appropriate separation or buffers between residential and industrial areas, to improve the relationship between the two uses in the local area;*
- *Address air quality impacts on residential use;*
- *Address noise impacts on residential use;*
- *Address any contamination on site;*
- *Ensure appropriate back-to-back separation from existing residential;*
- *Take account of the potential impact on water infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and*
- *Address flood risk issues arising from a Flood Risk Assessment.*

Site size: 0.6 ha 39-60 dwellings

2. The Proposal

2.1. Full planning application is sought for the demolition of existing and construction of 11 employment units for flexible uses within Classes E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping.

2.2. The proposals comprise the demolition of the existing buildings and structures and the construction of approximately 4,300sqm of employment floorspace across 4 buildings and broken into 11 individual units, ranging from 659 sq.m to 1756 sq.m. The buildings would vary in height from 8.9m to 10.5m in ridge height. Some of the proposed buildings would have lower ridge heights and these would be sited on the eastern parcel of the site, adjacent to the residential areas, with larger buildings sited on the west of the site, fronting Milford Road within the Core Employment Area.

2.3. Vehicular access to Units 1-9 is proposed to be maintained via Meadow Road to the south of the site, with an internal access road providing direct access to these units.

2.4. Units 10-11 are proposed to be accessed via Milford Road to the west of the site, fronting the existing Core Employment Area.

2.5. The existing access point to the east of the site via Ross Road, will remain as an emergency access to site.

2.6. 40 car parking spaces are proposed including 11 accessible bays, (one for each proposed unit), with cycle spaces and 11 Electric Vehicle charging points.



Figure 4: Proposed Site plan

2.7. *Submitted plans:*

Site Location Plan 11677-PL001

Existing Site Plan 11677-PL002

Existing Floor Plans Building 1 11677-PL003

Existing Floor Plans Building 2 11677-PL004

Existing Elevations Building 1 11677-PL005

Existing Elevations Building 2 11677-PL006

Proposed Site Plan 11677-PL010

Proposed Floor Plans Units 1-3 11677-PL011

Proposed Floor Plans Units 4-7 11677-PL012
Proposed Floor Plans Units 8-9 11677-PL013
Proposed Floor Plans Units 10-11 11677-PL014
Proposed Elevations Units 1-3 11677-PL015
Proposed Elevations Units 4-7 11677-PL016
Proposed Elevations Units 8-9 11677-PL017
Proposed Elevations Units 10-11 11677-PL018
Proposed Roof Plans Units 1-3 11677-PL019
Proposed Roof Plans Units 4-7 11677-PL020
Proposed Roof Plans Units 8-9 11677-PL021
Proposed Roof Plans Units 10-11 11677-PL022
Street Scenes 11677-PL023
Proposed SW Landscape GA Sheet 1 of 2 11677-PL030
Proposed SW Landscape GA Sheet 2 of 2 11677-PL031
Proposed HW Landscape GA 11677-PL032
Landscape Section 11677-PL033

Other application supporting documents:

Archaeological desk based assessment prepared by RPS dated June 2025
Design and Access Statement prepared by PRC dated July 2025
Air Quality Assessment prepared by Quantum Air dated 2 July 2025
Preliminary Ecological Appraisal prepared by Phlorum dated November 2024
Biodiversity Net Gain Assessment prepared by Phlorum dated July 2025
Energy Statement prepared by SB Partnerships dated 17th July 2025
External Lighting Proposals prepared by SB Partnerships dated 08th July 2025
Economic Benefits Statement prepared by Turley dated July 2025
Transport Statement prepared by Stunt Consulting Ltd dated 20 June 2025
Travel Plan prepared by Stunt Consulting Ltd dated June 2025
Daylight and sunlight report prepared by Right of Light Consulting dated 4 June 2025
Planning Statement prepared by Turley dated August 2025
Statement of Community Engagement dated Turley dated August 2025
Viability Assessment prepared by PRS dated 23rd July 2025
Contamination Report prepared by Jomas dated 18 June 2025
Flood Risk Assessment & Drainage Strategy Report prepared by Baynham Meikle Partnership Limited dated 30/06/2025
Flood Risk Assessment Sequential Assessment prepared by Turley dated July 2025
Sustainability Assessment prepared by Verte sustainability dated 2025

The application is being referred to your meeting as it is in the Major category and at your 5 November 2025 meeting, you agreed to consider the application, given the level of public objections to the proposals.

A CIL form has been submitted with the application and the proposal is not CIL liable.

3. Planning history

- 3.1. 200054: Application for prior notification of proposed demolition. Approved March 2020.
- 3.2. 211761: Erection of a new perimeter fencing and sliding gate on the southern boundary, installation of new permeable hardstanding (above existing concrete hardstanding) and kerbing within the curtilage of industrial premises and installation of the proposed French drain to perimeter, catch pit and petrol interceptor and associated works in connection with existing car parking and storage use. Approved December 2021.

4. Consultations (summarised)

4.1. Statutory:

Lead Local Flood Authority

Objects. The drainage design has not taken account of Local Plan Policy EN18 which requires the drainage scheme to be 'landscape-led' and connect into the green networks, the proposal has not demonstrated it can attenuate local flooding.

RBC Highways

No objection subject to conditions and securing a legal agreement in relation to the works necessary within the highway.

Environment Agency

Awaiting a response. Any response received will be reported to the committee meeting.

4.2. Non-Statutory:

RBC Environmental Protection

Objects. Insufficient information has been received that the proposed employment uses would not result in harm relating to noise and over spill of light.

RBC Planning (Natural Environment Team)

Objects. The proposal landscape plans do not coordinate with the Suds scheme proposed and insufficient information has been provided that the is sufficient soil depth for the proposed trees. The proposal does not offer substantial tree coverage.

RBC Ecology

No objections subject to conditions.

Thames Water

No objection subject to conditions.

Berkshire Archaeology

No objection

RBC Waste Operations

No comments received but any response received will be reported in the committee meeting.

Reading's Economy & Destination Agency Consultations REDA

No comments received but any response received will be reported in the committee meeting.

Southern Gas Networks

No comments received but any response received will be reported to your meeting.

4.3. Public consultation:

The planning site notice was displayed at the site on 12/09/2025 and left in place for a minimum of 21 days (until 28th October 2025). A press advert was also published in the local paper and eight objections were received, raising the following issues:

- Does not accord with planning policy
- Allocated for housing
- Impact on neighbouring residential amenities
- Phantom Brewery should be able to continue post development. *Comment: The LPA would have no control of ensuring that the individual occupiers such as the brewery would be retained as part of the new development, were planning permission to be granted.*
- Highways concerns
- No buffer zone
- Hours of operation could impact residential amenities
- Insufficient parking
- Environmental Health Impacts
- Highway concerns regarding the security gates
- Impact on the road surface

5. Legal context

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).

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).

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

NPPF December 2024

2. Achieving sustainable development
3. Plan-making
4. Decision-making
5. Delivering a sufficient supply of homes
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

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC3: Adaptation to Climate Change

CC4: Decentralised Energy
CC6: Accessibility and the Intensity of Development
CC7: Design and the Public Realm
CC8: Safeguarding Amenity
CC9: Securing Infrastructure
EN2: Areas of Archaeological Significance
EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland
EN15: Air Quality
EN16: Pollution and Water Resources
EN18: Flooding and Sustainable Drainage Systems
EM1: Provision of Employment
EM2: Location of New Employment Development
EM3: Loss of Employment Land
EM4: Maintaining a Variety of Premises
H1: Provision of Housing
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
OU1: New and Existing Community Facilities
WR3b: Other Sites for Development in West Reading and Tilehurst.

Supplementary Planning Documents (SPD)

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

Local Plan Partial Update

The current 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 update of the Local Plan was published on 6th November 2024.

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. Officer advice in respect of 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’

The Local Plan Partial Update was submitted to the Secretary of State on 9th May 2025. Submission marks the beginning of a process of public examination led by an independent Inspector. Due to the stage of examination, the draft Local Plan can be afforded limited weight.

Any proposed amendments to these policies which are considered materially relevant to this application will be referenced within the report.

6. Appraisal

6.1. The main considerations are:

- Land use principles

- Flood risk
- Neighbouring Amenities
- Design Considerations
- Trees and Landscaping
- Ecology/biodiversity
- Sustainability
- Highways
- Other Matters

Land Use Principles

6.2. The western section of the application site lies within the Richfield Avenue Core Employment Area as stated within Policy EM2 of the local plan with the eastern section of the site allocated for residential development under Policy WR3b (2 Ross Road & Part of Meadow Road) of the adopted Local Plan.

6.3. The proposal would result in 4,293 sq.m of employment floorspace, with Policy EM4 (maintaining a variety of premises) stating “A range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range”. The proposal offers a variety of unit sizes and a flexibility in terms of their lawful uses which is a benefit of the scheme.

6.4. Policy EM3 (Loss of Employment Land) requires that the overall level of employment land within the Core Employment Area should be maintained, and that loss of such land is not permitted. Within the Core employment Area, the existing building (building 1 on plans) has a floor area of 3,656 sq.m with the proposed building within the area having a floorspace of 2806 sq.m this would be a loss of 850 sq.m of employment floorspace within the Core Employment Area contrary to policy EM3.

6.5. Policy EM2 states that, “major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas” and while the western section of the site is within the Core Employment Area the eastern section of the site is not and therefore the proposal conflicts with Policy EM2.

6.6. It is acknowledged that smaller-scale industrial and warehouse uses may be appropriate in other areas, however this development is not considered to be small-scale in nature (this is a Major industrial redevelopment) so should be located only within the core employment area or the A33 corridor in accordance with the policy. The proposal does not accord with Policy EM2 and employment use within the eastern section of the site is not supported.

6.7. The eastern section of the site is entirely allocated for residential development under Policy WR3b ('2 Ross Road & Part of Meadow Road') of the Local Plan. The proposed employment uses on this part of the site would also therefore be a departure from the type of development sought to be provided within this part of the Borough. Accordingly, the application was advertised as a departure from the Local Plan.

6.8. Policy WR3b remains unchanged as part of the ongoing Local Plan update, albeit the indicative number of dwellings to be provided on the site has been increased from 39-60 to 41-61. This proposed increase thereby increases the site allocation's importance in contributing towards the dwelling targets for the Borough. The RBC Planning Policy Manager advises that the site was allocated for residential development given its transitional location between the edge of the Core Employment Area to the west and terraced residential dwellings to the east and was part of a strategic releasing of the previous part of the Core Employment Area for housing, where considered most acceptable. The Cardiff Road/Richfield Avenue area is very mixed industrial and residential in nature which creates a juxtaposition nature which has an impact in terms of residential amenities and design. The Local Plan seeks to lessen such situations, however, the proposal would be perpetuating industrial near to/adjacent to residential and continuing non-conforming uses in this location is not considered suitable or acceptable in terms of residential amenity and design (further discussion in the sections below)

6.9. The information submitted in support of the application proposals acknowledges the clear conflict of the proposals with Policy WR3b. The supporting information references paragraph 127 of the NPPF (December 2024) which states that:

“127. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area”.

6.10. As discussed above, Policy WR3b has been reviewed as part of the ongoing local plan update (the Partial Review) and is proposed to remain unchanged, apart from the alteration to increase the indicative number dwellings the site is allocated for. Comments received as a result of the local plan update consultation are currently being reviewed ahead of submission of the draft update to the Secretary of State and this includes representations on this allocation. However, based upon available information and noting a number of nearby sites, including that on the opposite side of Meadow Road (ref. 171814 Printers Road) and that abutting the eastern boundary of the site on Addison Road (ref. 130882) have recently been developed for residential uses the Local Planning Authority does not consider that there to be **no** reasonable prospect of this part of the application site coming forward for the residential use allocated with the adopted Local Plan within the plan period (up to 2036) and therefore parts a) and b) of paragraph 127 are not considered to be relevant considerations.

6.11. The application has been supported by a financial viability assessment, but this assessment is considered largely irrelevant to the consideration of this application. The eastern section of the application site has been allocated for housing within the local plan and the ongoing Local Plan partial update and as such, the proposal is in conflict with Policy WR3b. It is acknowledged the landowner has stated within the Regulation 19 consultation of the Council’s Local Plan Review that they do not wish to bring the land forward for housing; however, land ownership is subject to change and is not usually a relevant planning consideration. The fact that the landowner has stated they do not wish to bring the land forward for housing does not mean the site has **no** reasonable prospect of coming forward for housing as stated above, as land ownership is often subject to change. As such and with this in mind, while the viability assessment concludes that a residential development would not be viable/appropriate for the current landowner, the assessment has not taken into consideration other developers who could take over the site for residential development and make the scheme viable. Please note that the viability assessment has not been reviewed by the Council’s viability assessors (the Valuation Section) due to it being considered irrelevant (the personal circumstances of the current owner are not a relevant material planning consideration).

6.12. It is also important to acknowledge that at the time of writing, the Council can no longer demonstrate a five year housing land supply, which further supports the need for housing to be delivered by allocated sites such as this.

6.13. In terms of employment use, the emerging Local Plan Review notes at paragraph 4.3.5 that, “There is scope to accommodate the full level of need within Reading Borough”, this is in reference to employment need meaning it is considered that the employment need can be met within the plan period. The planning statement submitted with this application disagrees with the conclusion. Officers consider that based on the evidence available that the situation has not changed and if anything, the situation as set out in the current Local Plan is worsening. There is not an over-riding need for employment land, and as such proposing employment-generating floorspace at the expense of provision of

residential dwellings does not “carry substantial weight in the decision making process” as the applicant’s planning statement suggestions.

- 6.14. In summary, the application proposal would produce a range of strategic policy concerns, as summarised below:
- 6.15. Firstly it would further the current imbalance between housing and employment uses in the Borough, as explained in paragraphs 4.3.5 and 4.3.6 of the Local Plan. At the moment, the current Local Plan achieves its planned need for employment floorspace, but falls short in terms of delivering housing (dwellings). Further, the need to supply housing in the Borough is increasing in the emerging Local Plan as there is currently an under-delivery in terms of the NPPF Standard Method (997 dwellings per year) and neither the current nor the emerging Local Plan are going to achieve that. (The Planning Policy Manager advises that there is no conflict with Policy H1, as Policy H1 is essentially out of date.)
- 6.16. Secondly, in exacerbating this imbalance, the proposal is not proposing to mitigate its additional harm, which as explained in Policy EM1 would need to be additional dwellings (e.g. being provided in another site as a surrogate/related site). Further, the issue of not providing dwellings also means not providing affordable dwellings as Policy H3 requires affordable dwellings as part of open-market housing proposals, so this is an added harm and opportunity lost and a conflict with the affordable housing policy (Policy H3).
- 6.17. The proposal there provides a ‘double-hit’ of harm. The allocation is necessary to seek to mitigate an existing imbalance and the Plan explains why. The proposal not only takes away the opportunity of the plan’s aims, but then causes its own issues which are not addressed either. The reasons for refusal therefore cover these various aspects of harm.
- 6.18. The planning statement references what the applicant describes as their ‘fallback position’. It is acknowledged that there is an employment use which exists at the site however the majority of the eastern part of the site has been cleared to slab level (under prior approval demolition consent ref. 200054) and is free from built development, therefore any erection of buildings in connection with the employment use would require planning permission and this would be assessed under the same policies as this application. In summary on this point, whilst the applicant is correct to assert that an industrial use at the site remains lawful (for instance for uses such as open storage) the erection of buildings or other commercial structures would still require planning permission and the starting point would be the Development Plan including the site allocation policy.
- 6.19. Overall, the proposal, insofar as it proposes an employment development on the part of the application site allocated for residential is considered to conflict with various policies of the local plan and the application site is not an appropriate location for proposed employment development, most notably given the clear and significant conflicts with policies EM2 and WR3b within the eastern part of the site, where the harm caused includes the opportunity of not providing much-needed housing units, a need which persists in the Borough.

Flood Risk

- 6.20. As shown in the plan extract above, part of the application site lies within Flood Zone 2 (a medium probability of flooding). The proposal would result in built footprint within the Flood Zone and as such the flooding sequential test is required to be considered. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. Local Plan Policy EN18: Flooding and Sustainable Drainage Systems states that new development will be guided to areas of lowest flood risk from all sources of flooding through the application of the sequential test. In order to pass the sequential test, it must be demonstrated that there are no alternative sites within the borough capable of accommodating the development, within an area of lower flood risk. It should be noted that the allocation site has effectively passed the sequential test for residential, that having

been examined as part of the SFRA (Strategic Flood Risk Assessment) as part of the Local Plan supporting evidence, allowing the allocation to be confirmed in the adopted Local Plan.

- 6.21. The planning application has been supported by a sequential test, however this has discounted sites which are 10% smaller and 10% larger than the application site. The sequential test has not adequately demonstrated the rationale behind these exclusions.
- 6.22. The sequential Test notes one appeal site APP/Z3635/W/24/3342657 in which this was considered to be an acceptable approach, but each planning application is assessed on its own merits and as such that appeal is not considered to be directly comparable to this application's situation. Therefore, it has not been clearly demonstrated that there are no other reasonable available sites. In addition, within the application site itself, it has not been demonstrated that new development has been steered to areas with the lowest risk of flooding given buildings with a larger footprint are sited within the western section of the site which is within the flood zone, rather than these being sited outside the flood zone within the site.
- 6.23. Notwithstanding the above, the proposal also needs to comply with Policy EN18 and paragraph 181 of the NPPF which requires a site-specific flood risk assessment. The NPPF states this needs to demonstrate that (a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; (b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; (c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; (d) any residual risk can be safely managed; and (e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan'.
- 6.24. The proposal seeks to reduce surface water run-off to below the existing brownfield rate by way of attenuation tanks and storage within permeable paved areas. However, the drainage design has not taken account of the latest LLFA advice/legislation, which requires the drainage scheme to be 'landscape-led' and connect into the green networks. The proposal fails to connect into any of the landscape features across the site as such the proposal would necessitate a fundamental redesign in order to meet the requirements. In addition to this, the submitted details have not demonstrate the proposal can adequately attenuate localised flooding. It is considered that the submitted Sustainable Drainage Strategy has failed to demonstrate its acceptability in terms of sustainable drainage and attenuating localised flooding.
- 6.25. Paragraph 27 of the Flood Risk and Coastal Change section of National PPG (Planning Practice Guidance) states that, "In applying paragraph 175 [which refers to the sequential test] a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied ". As discussed above the proposal has not demonstrated the proposal will not increase flood risk elsewhere as such the sequential test is required.
- 6.26. The proposal results in significant amount of hardstanding at the site with the parking provisions proposed this result in a significant amount of impermeable surfacing which is unaided by the insufficient amount of soft landscaping with natural drainage. This matter will be discussed fully later as it connects to design and sustainability, but it is considered a scheme which results in a significant amount of hardstanding with insufficient soft landscaping is not an efficient use of space, especially on a site which has been allocated for housing.
- 6.27. The proposal has not demonstrated suitability in terms of the sequential test, that workers at the or residents in the surrounding area would remain safe from current and future

flood risk, or adequately mitigated the on-site flooding harm, and has failed to comply with Policy EN18 of the Local Plan and paragraph 181 of the NPPF.

Neighbouring Amenities

6.28. Policy CC8 states, "Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting

6.29. In terms of impact on neighbour amenity, the northern, eastern and southern boundaries of the site are the most sensitive which are shared within adjacent modest-scale terraced residential dwellings on Addison Road and Denbeigh Place and new residential dwellings on the opposite side of Meadow Road on Printers Road.

6.30. The proposal would result in built form on the northern boundary adjacent to Denbeigh Place and eastern boundary adjacent to Addison Road and would directly abut terrace housing. The proposed industrial units numbered 1-3 and 4-7 have a significant mass, bulk and scale. Units 1-3 have a length of 40m, width of 18m (at their greatest) and a height of 9m with units 4-7 having a length of 62m and width of 13m and a height of 8.9m. While these buildings contain several units they are contained in two substantial buildings, the built form is significant due to the proposed layout resulting in no meaningful separation distance to the boundaries of the adjacent terraced houses. It is considered that the proposal would be visually dominant and overbearing on the adjacent residential dwellings and in many cases, their gardens too. This situation would not be mitigated by the proposed landscaping scheme which provides no buffer zone to these properties. The overall impression from these neighbouring properties would be visual harm to the outlook of the houses and a significant reduction in the usefulness and enjoyment of their gardens, in many cases, in particular those to the north of the proposal.



Figure 5: Illustrations

6.31. Policy EN16 states, "Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution... Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution..... 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". These matters are also echoed by Policy CC8.

6.32. RBC Environmental Protection have been consulted and object due to insufficient information regarding noise and lighting. The submitted noise assessment predicts noise levels above that acceptable to dwelling receptors, insufficient information has been provided to demonstrate that the noise can be satisfactorily mitigated and therefore there is a potential that this could be harmful to the amenities of the adjoining residential dwellings. It is also unclear if operating hours would need to be conditioned due to unacceptable noise levels, or indeed, if conditions would be suitable. Furthermore, insufficient information has been provided for the LPA to adequately assess whether the proposed lighting scheme is likely to adversely impact the amenities of residents. It is considered due to the nature of the proposal, there is potential for light spill from the industrial units which could adversely affect residential amenity.

6.33. The contamination report concludes that further investigation and remediation is required due to contaminants present, it is considered that contamination works are required, and this could be secured via a condition, and RBC Environmental Protection agree.

6.34. The proposal has been supported by a daylight sunlight assessment and the results show that the proposed development amounts to a degree of obstruction to daylight to identified windows numbered 299 at 10 Cox Terrace and windows 307, 321, 324 & 325 at 11 to 17 Meadow Road; however these are already adversely affected by projecting wing(s) and/or overhang/balcony/ies. Windows 311 and 312 at 11 to 17 Meadow Road would not meet the relevant BRE (Building Research Establishment) requirements for the Daylight Distribution test. The report concludes that all gardens and open spaces tested meet the BRE recommendations. Overall, in terms of daylight it is considered the proposal would not result in material planning harm as it would not have a greater impact than the existing.

6.35. Due to the proposed layout, scale, height, mass and bulk of the proposed buildings on the northern and eastern boundaries, the proposal is considered to have an overbearing impact on the adjacent residential dwellings which would be harmful to their amenities. In addition, the application has failed to demonstrate the proposal would not result in harm from noise and external lighting which is contrary to policies CC8 and EN16 of the local plan. This should form an additional refusal reason.

Design Considerations

6.36. Policy CC7 states that, "All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:

- Layout: urban structure and urban grain;
- Landscape;
- Density and mix;
- Scale: height and massing; and
- Architectural detail and materials"

6.37. Paragraph 135 of the NPPF states that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment.

- 6.38. The existing buildings on site which are proposed to be demolished are not considered to be of any special architectural or historic merit and their loss is of itself considered to be acceptable.
- 6.39. In isolation (not beyond the site boundary of the application site itself) the proposal represents a layout and density which would be comparable to that of other employment sites within the core employment area to the west with the scale of buildings and architectural design which would be otherwise generally be suitable within an industrial site setting (however other issues such as the ability to secure meaningful landscaping are an issue and discussed in this report below). Policy CC7 requires proposals to be, “..of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located” and as such to be considered to comply with the policy, sites cannot be considered in isolation but within the wider context in which they are located.
- 6.40. As discussed above, the western section of the application site is within the core employment area but the eastern section is adjacent to residential development. The application site lies within at the end of the core employment area where the employment use meets residential. The proposal would thus result in built footprint adjacent to the northern and eastern boundary with no meaningful separation distance or visual buffer to the adjacent residential areas, which would result in a layout and landscaping which does not accord with the pattern of development of the adjacent residential area, creating an incongruous form of development due to the significant size of the buildings meaning there would be a degree of visual dominance in the street scene and a stark visual contrast to the modest terraced properties.
- 6.41. A concerning aspect of the design would be the streetscene impact on Meadow Road, although the supporting material does not appear to show this view.
- 6.42. The enlarged extract from the applicant's DAS is shown below:



Figure 6: illustration

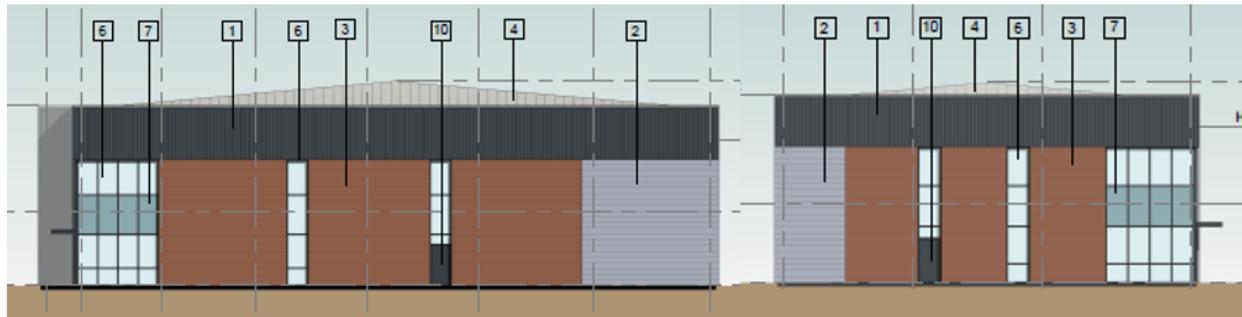


Figure 7: South elevation proposed units 8-9 and 10-11

- 6.43. As can be seen from the above, the proposal would produce large, and almost completely blank frontages facing Meadow Road which is now wholly residential on its south side. This is not an acceptable design response even for the part of the site which is within the Core Employment Area. The visual shows very bulky, largely blank and unrelieved commercial buildings of an industrial nature, with very little in the way of relief to the streetscene, which would be harmful to Meadow Road. The narrow, tall, glazed portions which turn the corner of the buildings and the narrow area allowed for trees will do little to mitigate the visual impact of these industrial buildings or offer any animation to the residential properties opposite.
- 6.44. The architecture proposed is described in the applicant's DAS as essentially contemporary industrial, with a predominance of metal sheet cladding, aluminium doors and windows and brick-slip panelled areas. Roofing materials would appear to be metal also, with tall soffits to encircle the very low-angled roofs. Officers do not consider that controlling the materials would assist greatly in diffusing the harmful visual impacts of these large, inappropriate buildings.
- 6.45. In design terms, the proposal has not had due regard for the wider street context in which it is proposed. The site lies at the end of the core employment area where there is a strikingly different street context, where the industrial street views meet residential street views. The proposal does not maintain or enhance the character and appearance of the area of Reading in which it is located, conflicting with Policy CC7.
- 6.46. Policy CC7 also requires proposal to "Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all". The floor plans for units 8-9 and 10-11 show a first-floor level for office, tearoom, toilet and shower there is no lift access to this level as such those which a disability would not be able to access these ancillary facilities which is contrary to policy CC7.

Trees and landscaping

- 6.47. Policy EN14 (Trees, Hedges and Woodlands) states that "New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained"
- 6.48. The Planning (Natural Environment) Team have been consulted and have objected to the proposal as the application fails to demonstrate the acceptability and feasibility of the landscaping indicated. The site currently lacks any landscaping hence its redevelopment offers the opportunity to provide landscaping, including tree planting, to improve this hard-surfaced site. Overall, 51 trees are proposed which is viewed as a positive aspect of the scheme, however these do not follow the 30:20:10 rule i.e. no more than 30% from any one family, no more than 20% from any one genus and no more than 10% of any one species. In addition, the proposed tree coverage is considered insufficient as the proposal

includes narrow singular trees and does not offer any canopy species where there appears to be space to do so. Furthermore, several trees are located within small landscape beds / strips and the application has failed to demonstrate appropriate soil volume provision has been provided. Additionally as discussed within the flooding section of this report the drainage strategy does not appear to link up to the planting areas or tree pits, coordination between proposed landscaping and all services and demonstration of mutual inclusivity is required to ensure that the level of tree planting currently shown is actually feasible.

6.49. Overall, due to a combination of the layout and built form cramping various parts of the site, the landscaping of the site would be comparatively poor and insubstantial and fail to successfully mitigate the visual harm of these proposed buildings, or successfully 'green' the development. For the above reasons the proposal conflicts with policies CC7 and EN14 of the local plan.

Ecology and biodiversity

6.50. Policy EN12 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'.

6.51. The applicant has submitted a BNG report plus an accompanying BNG metric calculation that concludes that the development will lead to a net gain in habitat units (0.88 equivalent to over 44000%) and a similarly large increase in linear habitat units. Enhancements include a number of new trees, native and non-native hedge planting, and modified grassland mostly located along the boundaries of the site.

6.52. The DAS includes the following statement that the landscape strategy aims are: "To attract the existing wildlife by providing the ecological enhancement in form of bat, bird boxes and loggers for the site," However, it is not clear from the submitted landscaping plans where the above features will be located, and in any case, an insufficient number of both bird and bat boxes are proposed.

6.53. As discussed within the above section, from the information submitted it is not been demonstrated that the proposed trees and other habitats are capable of being implemented this is due to insufficient information regarding soil volume and well as discrepancies between the landscaping scheme and the SUDS scheme as such it is considered that it can not be demonstrated that there would be a net gain in BNG which would be contrary to policy EN12 of the Local Plan.

Biodiversity Net Gain

6.54. BNG is a matrix-led system which aims to quantify the creation or improvement of natural habitats on development sites. These mandatory requirements were introduced under Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Consequently, the applicant must deliver a BNG of 10% for the development, meaning that the development will result in a net increase or better-quality natural habitat.

6.55. Unless a relevant exemption applies, every grant of planning permitted will be deemed to have been granted subject to a pre-commencement condition requiring the submission of a biodiversity gain plan.

6.56. This development is considered to be a minor development which is below the de minimis threshold meaning development which: i) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and ii) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric). The development is therefore exempt from the mandatory BNG requirements.

Sustainability

6.57. Policy CC2 (Sustainable design and construction) requires all development to demonstrate efficient use of resources (energy, water, materials) taking account of the

effects of climate change with all major non-residential developments or conversions to residential required to meet the most up-to-date BREEAM 'Excellent' standards, where possible. Policy CC3 (adaptation to climate change) goes further, seeking additional measures to be incorporated into developments including: new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements, demonstrate how they have been designed to maximise resistance and resilience to climate change, use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions and all development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures

- 6.58. Policy CC4 also seeks to ensure development of the scale proposed demonstrates how consideration has been given to securing energy from decentralised energy sources or include decentralised energy (subject to feasibility/viability), including linking into nearby sources.
- 6.59. The Sustainable Design and Construction SPD explains the planning requirements regarding energy, climate change, water management and waste reduction as stated within the sustainability policies with the local plan. The SPD states "A two pronged approach will be required. Firstly, applicants will be expected to demonstrate how their landscaping plan has taken into consideration the impacts of climate change with regards to their species selection, location of planting and in terms of the management of the landscaping. Secondly, applicants should ensure that trees and landscaping play a role in helping to mitigate the impacts of climate change through integration of planting within SuDS provision as opposed to a separate provision"
- 6.60. The submission includes a Sustainability strategy which states that the estimated CO2 emission savings on site are more than 100% compared to the previous structure, using renewable and/or low-carbon energy generation sources, including highly efficient heating, cooling and a mix of natural (warehouse) and mechanical ventilation systems (for the ancillary offices) with the use of efficient building fabric, high performance glazing, natural daylight and LED lighting in the warehouse, office and reception areas. In addition, the proposal includes renewable energy measures such as PV panels and use of efficient heat pumps. While these are welcomed within the scheme it is noted that Units 1-7 (the smaller units on the eastern side of the site) are set to have BREEAM rating of Very Good and not Excellent. In addition, as discussed elsewhere within this report, the proposed landscaping and tree coverage is considered inadequate, and the proposal has not demonstrated surface water runoff will be effectively managed at the site and has not incorporated an acceptable Suds scheme as such the scheme is not considered to comply with Policy CC2 and CC3 of the Reading Local Plan or the Sustainable Design and Construction SPD. Overall, it is not considered that the proposal has demonstrated suitability in terms of producing a suitably sustainable development and this should form a reason for refusal.
- 6.61. It is important to acknowledge that the proposal would create new build development and is not refurbishing or upgrading existing built form as such it is considered that all the buildings should meet the BREEAM excellent rating and the proposal should incorporate an acceptable sustainability scheme given the entire site is to be developed so there is opportunity for this to be incorporated.

Highways Considerations

- 6.62. Policy TR3 (Access, Traffic and Highway Related Matters) states, "In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment".

6.63. RBC Highways have been consulted and raise no objection to the application subject to several conditions and securing a legal agreement for the security gate. Access to the site will be retained from Meadow Road on the southern side of the application site and a new point of access from Milford Road on its western side. Raised bollards are located at the southern end of Milford Road and the eastern end of Meadow Road to prevent any through traffic from the industrial area to the residential areas.

6.64. Units 1-9 would be served from a new bellmouth access from Meadow Road. Swept Path Analysis (SPA) of the proposed site access and internal site layout has been undertaken. The Swept Path Analysis has been undertaken for articulated vehicles (measuring up to 16.5m) entering and exiting the site from the new access point on Meadow Road onto external road network. However, it is anticipated that Units 1-9 are more likely be served by smaller goods vehicles. All on street parking bays have been marked on the site plan and included within the SPA to ensure there is no conflict with articulated vehicles entering and exiting the site.

6.65. Units 10-11 would be served from an altered access and forecourt area adjacent to Milford Road. The access from Milford Road has been reduced to 10m in line with the Council's design guidance and a Swept Path Analysis has been undertaken for articulated vehicles (measuring up to 16.5m) entering and exiting the site from the new access point on Milford Road. Footways have been provided connecting to the existing footway network. Only units 10 and 11 will require larger vehicles to reverse into the site, all other units will be accessed from Meadow Road whereby drivers can turn within the site. This arrangement is considered acceptable as Milford Road is wider and predominately serves the other industrial units so this type of traffic will not be unfamiliar..

6.66. A new security gate and fence would be located on the eastern boundary which will be locked at all times except for emergency access.

6.67. Policy TR5 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 Council's Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. The site is located in Zone 2, Primary Core Area, which directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading.

6.68. Given that the application seeks a flexible permission, the proposals would provide a total of 40 car parking spaces (including 11 disabled car parking spaces) to provide a degree of flexibility to reflect different trip-generating characteristics of the proposed occupier(s). The proposed parking provision is acceptable to the Highway Authority. A total of 11 dual EV charging points would be provided (enabling 22 vehicles to charge). Suitable cycle parking is not shown on the plans, and it is unclear if the site is capable of providing these without alterations to the soft-landing provisions or indeed if the site can accommodate refuse provisions.

6.69. The proposals comprise a number of small units with a range between 165 – 882sq.m (GIA) with the office element of the units ancillary to the primary industrial uses. A net change exercise has been undertaken which concludes the proposal would not generate significantly more trips than the consented employment use at the site.

6.70. In terms of purely highways design aspects, the proposal is not considered to unduly impact highway safety, with appropriate provisions of parking and cycle spaces. The proposal would accord with policies TR3 and TR5 of the Reading Location Plan and the SPD.

Other Matters

6.71. In terms of Air quality, the air quality assessment concludes that additional traffic generated does not meet the threshold for further assessment therefore nothing further is required, the proposal would comply with policy EN15 of the Local Plan.

- 6.72. In terms of letters of representation received many of the comments have been addressed within the report.
- 6.73. It is important to acknowledge that while the proposal could be fundamentally redesigned to incorporate an appropriate suds and landscaping scheme. These matters would not overcome the conflict with policies EM2 and WR3b of the local plan.

7. Equality implications

- 7.1. 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.
- 7.2. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. The floor plans for units 8-9 and 10-11 show a first-floor level for office, tearoom, toilet and shower there is no lift access to this level as such those which a disability would not be able to access these ancillary facilities which is contradictory to the act and policy CC7 of the local development plan.

8. Conclusion

When applying the planning balance, the benefits of the scheme are considered to be:

- The construction of new employment floorspace
- The proposal contains a mix of units of varying sizes and flexible uses

The harm caused from the proposed development are:

- It has not been demonstrated the proposal would not increase flooding elsewhere
- The proposal has not incorporated a suitable Suds scheme
- Major employment floorspace outside the A33 and Core employment Area
- Employment space on a site allocated for housing
- Impact on neighbouring amenity and incongruous design
- The submissions fails to demonstrate the acceptability and feasibility of the landscaping indicated.
- The proposal has not incorporated suitable sustainability requirements.

It is not considered that the harm caused from the proposed development are outweighed by the benefits of the scheme. Accordingly, the application is recommended for refusal for the reasons as set out in the Recommendation box above.



ILLUSTRATIVE 3D VISUAL OF THE SITE FROM THE SOUTH EAST



ILLUSTRATIVE 3D VIEW OF THE SITE LOOKING FROM THE SOUTH WEST



ILLUSTRATIVE 3D VIEW OF UNITS 10 & 11 FROM MILFORD ROAD