

Logicor Park, Rose Kiln Lane, Reading
Planning Statement

Redwood (Light Industrial) Propco Sarl UK
May 2023

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1.0 Introduction

Overview

- 1.1 This planning statement has been prepared by tor&co on behalf of Redwood (Light Industrial) Propco Sarl UK in support of the redevelopment of the site at Rose Kiln Court (Logicor Park), Rose Kiln Lane, Reading RG2 0BY.
- 1.2 For clarity, the formal description of development is as follows:

Demolition of the existing Class E(g)(i) (Office) building and the construction of three buildings for Class E(g)(iii) (Industrial Processes) / Class B2 (General Industrial) / Class B8 (Storage or Distribution) uses, including the provision of a new substation, parking, landscaping, and associated works.

The Applicant

- 1.3 Redwood (Light Industrial) Propco Sarl UK (the 'applicant') are a limited company under the care of Logicor. Logicor is a leading European owner, manager, and developer of logistics real estate. Covering 18 countries their portfolio provides 13.7 million square metres of warehouse / industrial space. Within the United Kingdom, Logicor is one of the largest owners of industrial, distribution and logistics warehouses with a diverse portfolio of properties.
- 1.4 The majority of the company's assets are in the Midlands Golden Triangle as well as in prime locations around Greater London, the Northwest, Yorkshire, the Southwest and East, and Scotland Central Belt.
- 1.5 Their logistics warehouses are typically large-scale distribution centres and range in size from 80,000sqft to over 1,000,000sqft (24,384sqm to 30,480sqm). Whilst in addition to the large-scale distribution units, Logicor also provide a wide range of smaller industrial units across the country which range in size from 500sqft to 50,000sqft (152sqm to 15,240sqm).

Rose Kiln Court

- 1.6 The site currently comprises of Rose Kiln Court, a vacant commercial office building (Use Class E(g)(i)), formerly occupied by Thames Water and is situated off Rose Kiln Lane. It is located approximately 1.45km south of Reading town centre and benefits from ease of access onto the A33, the primary route connecting the town with the M4 to the south.

Application Fee

- 1.7 The application fee payable is based on the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended):

Where more than 75sqm (GEA) but no more than 3,750sqm of floorspace (GEA) is proposed the fee is calculated as £462 for each 75sqm of part thereof.

$3,488\text{sqm} / 75\text{sqm} = 46.51$ (rounded to 47) therefore
 $47 \times £462 = £21,714.00$ payable

Environmental Impact Assessment Screening

- 1.8 Considering the nature of the proposed development, consideration should be given as to whether the proposals constitute EIA development, as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations').
- 1.9 It is contended that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in combination with other developments. With the implementation of a suitable design, alongside mitigation and avoidance measures and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal does not constitute EIA Development under the EIA Regulations.
- 1.10 A formal Screening Opinion to confirm the above, in that an EIA isn't required, is requested from Reading Council.

2.0 Statement of Consultation

Consultation

- 2.1 The Council's Statement of Community Involvement (SCI) encourages pre-application engagement. However, there is no statutory obligation for applicants to undertake such consultation prior to submission of an application. The Council's SCI sets out advice that encourages developers to take opportunities to engage and secure meaningful feedback. It also sets out criteria where it is suggested that more substantial engagement should ideally be undertaken for schemes that would be reasonably concluded as either sensitive or are of a significant scale.
- 2.2 The screening criteria within the SCI provides an indication of what is classed as a sensitive or significant scheme. The proposal accords with the development plan; relates to the reuse of brownfield land and is not a development which is subject to the EIA regulations. It is therefore not considered to be a 'sensitive' scheme. The proposal also falls below the development threshold of a 'significant' scheme.
- 2.3 Given the above, it was considered that undertaking additional community consultation wasn't, in this case, required nor would it be beneficial over and above the standard consultation which will take place as part of the consideration of the planning application.

Previous Application

- 2.4 The application site was previously the subject of a similar application submitted by Industrials REIT. The application (Ref: 220255) proposed the demolition of the existing Rose Kiln Court office building and the erection of two new buildings consisting of 11 units. Class E(g)(iii) (Light Industrial), Class B2 (General Industrial) and Class B8 (Storage or Distribution) uses were proposed.
- 2.5 The application was submitted on 22 February 2022, but subsequently withdrawn on 20 July 2022 following the site's acquisition by the applicant.
- 2.6 Since the withdrawal, the applicant has been preparing an alternative proposal which seeks to utilise the site, reduce the level of parking, and provide a size and form of units which would be more appropriate to the rental market.
- 2.7 It is also considered that due to the established employment land use of the site via Rose Kiln Court as a commercial office building, the proposed industrial redevelopment will retain the site as employment in its use. As such, the scheme will retain its previous land use in principle.
- 2.8 Following liaison with Aylward Planning it was understood that the previous, now withdrawn, scheme was being considered favourably by the Local Planning Authority with the only outstanding issue to be resolved being the overprovision of car parking. Whilst a revised layout plan was produced, with reduced parking provision, this was never submitted due to the application being withdrawn.

Informal Consultation

- 2.9 Given the progress of the previous application, formal pre-application was not pursued although dialogue with the Case Officer (Matthew Burns) assigned to the withdrawn scheme was instigated via email on the 15 March 2023. A covering letter, indicative site, floor, and elevation plans were submitted. However, the response received dated the 22 March 2023 noted that a formal pre-application submission should be made.
- 2.10 Due to the location of the adjacent watercourse (Holy Brook), dialogue was instigated with the Environment Agency via email on the 15 March 2003. This included the submission of a Preliminary Opinion Request Form, covering letter, indicative site, floor, and elevation plans. Despite an automated acknowledgement response being received and a reply within 20 working days being noted no formal response has been received.

Post Submission

- 2.11 During the consideration of the application, should the Local Planning Authority deem it to be required, the applicants are willing to notify and engage with elected members so that they are aware of the proposal and the key elements relating to the scheme and its benefits.
- 2.12 The applicant looks forward to working positively with the Local Planning Authority and relevant stakeholders in order that the scheme can be positively determined and delivering this sustainable economic development.

3.0 The Application Site

Context

- 3.1 Rose Kiln Court is in south Reading and is situated approximately 1.45km to the south of the town centre, in the Coley area of the town.



Figure 3.1 – Site Location Plan

- 3.2 The application site is in a strategic and accessible position, adjacent to the A33 which comprises of a major arterial route between Reading town centre to the north and the M4 to the south. Within the corridor is a range of land uses, which includes Reading Link Retail Park to the west, which consists of large units such as Matalan and Home Bargains, as well as standalone units such as Porcelanosa and Topps Tiles. To the east, on the opposite side of the A33 to the site, there are a range of car dealerships and workshops including Hyundai, Skoda, and Volkswagen. Some of this area is allocated by local policy for redevelopment to housing.
- 3.3 To the north, beyond the Holy Brook and the dense vegetation associated with it, are residential dwellings which are located on Laud Close. There are also dwellings on Admirals Close, in proximity to the site, on the north-eastern side of Rose Kiln Lane. To the south is Cadogan House, which were offices but have recently been converted into residential apartments.
- 3.4 Access to the application site is from Rose Kiln Lane, with bus stops located directly adjacent to the site's access. These provides direct bus service routes into Reading town centre and to the railway station, which in turn provides wider access into London and the region.

Application Site Details

- 3.5 The application site, as identified in Figure 3.2, covers 0.69 hectares, and consists of a single vacant office building, Rose Kiln Court, which was formerly occupied by Thames Water. The building has a gross floor area of circa. 3,252sqm. Rose Kiln Court is a two storey (ground and first floor) brick building built in the 1980s-1990s and is characterised by a dominant low-profile hip-gable roof. More widely, the site is laid to significant areas of hard standing which provided large amounts of parking (136 on-site car parking spaces).



Figure 3.2:
Site Location Plan

- 3.6 Whilst the application site is mostly laid to block-paved hardstanding, there is some vegetation, such as trees and shrubs, along the eastern boundary of the site, adjacent to the A33. A pedestrian footway follows the eastern boundary of the site. The western boundary treatment of site comprises of a partial mix of metal railing and wooden fence boards. A dense mix of trees and shrub also runs along the western boundary which links with the vegetation associated with the Holy Brook to the north of the site.

- 3.7 To the south application site is Cadogan House, a former commercial building constructed in a similar style to Rose Kiln Court. The building has since been converted to residential uses and the site is separated from the application site by a hedgerow. Cadogan House and the application site share a vehicle access point from Rose Kiln Lane.
- 3.8 There is existing vehicular access at the south-western corner of the site, which is shared with Cadogan House. A dedicated pedestrian entrance by way of a pedestrian gate allows access onto the footway along Rose Kiln Lane.

Planning History - Application Site

- 3.9 The planning history of the application site itself is summarised below:
- 220255: Clearance of the site and erection of two blocks for employment (employment B2 / B8 and light industrial Eg(iii)) use
Withdrawn 20 July 2022
 - 211148: Prior notification for the change of use of 2 floors from B1a (office) to 34 C3 dwellinghouses
Prior approval issued 3 September 2021
 - 211138: Prior notification for the change of use of 2 floors from B1a (office) to 38 C3 dwellinghouses
Prior approval issued 1 September 2021
- 3.10 There has been limited planning activity on the application site since Rose Kiln Court was built and occupied as an office building. The prior approvals for the conversion of the building were never implemented.

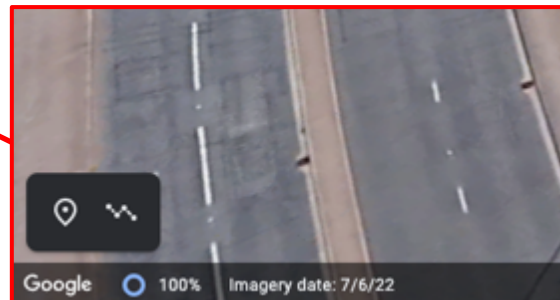
Planning History - Cadogan House

- 3.11 There is relevant planning history covering the adjacent site, this includes:
- 210388: Prior notification for the change of use of building B1a (office) to 24 C3 dwellinghouses, without complying with flood risk assessment condition attached to prior approval ref 182166.
Prior approval issued 7 May 2021
 - 182166: Prior notification for the change of use of the building from B1(a) office to 24 C3 dwelling houses
Prior approval issued 28 January 2019
 - 181643: Prior notification for the change of use of the building B1(a) office to 39 C3 dwelling houses.
Prior approval issued 9 November 2018
 - 172277: Prior notification for the change of use of 2 floors from B1a (office) to 19 C3 dwellinghouses.
Prior approval issued 8 March 2018
 - 161640: Prior notification for the change of use of 2 floors from B1a (office) to 19 C3 dwellinghouses.
Prior approval refusal issued 20 October 2016

- 95037: Erection of two storey office (Use Class B1) building with car parking and landscaping.
Planning permitted 30 June 1995
- 3.12 It is questioned whether the development allowed via the prior notification issued on the 28 January 2019 (Ref: 182166) was ever completed within timescale required by Condition 1 (i.e. within 3 years / by 28 January 2022), as work on site appeared to be continuing beyond this period, as evidenced by the below Google Aerial image (Figure 3.3) taken on the 07/06/2022.
- 3.13 Notwithstanding this, it is understood that Cadogan House has been converted into residential use, with apartments currently being advertised as 'for sale'.



Figure 3.3
Google Aerial Image of
Cadogan House



4.0 Development Proposal

- 4.1 The proposal seeks to redevelop the site through the demolition of Rose Kiln Court and the development of three industrial buildings consisting of eight independent units.

Development Overview

- 4.2 As the site is currently vacant, the application, which proposes the provision of three new industrial buildings, represents a more efficient use that can appropriately respond to market requirements and occupier demands. Although the application will see the loss of an unused office building, the development ensures the employment uses will.
- 4.3 As shown in Figure 4.1, the new units will be arranged to make best use of the site whilst also responding to constraints and land uses within the site's immediate context.

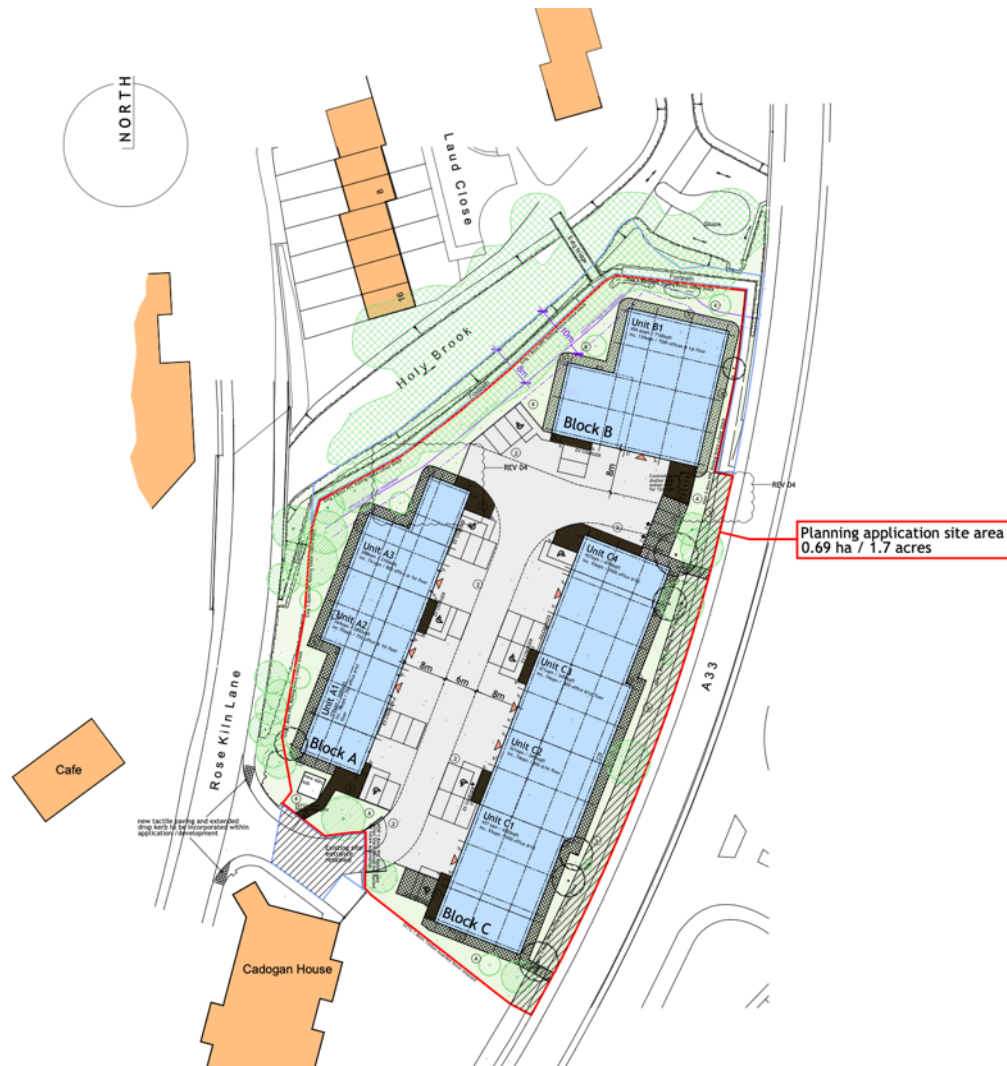


Figure 4.1: Proposed Site Layout

Floor Area and Use

- 4.4 Rose Kiln Court, the existing commercial building to be demolished has a floor area of circa. 3,252sqm. This floorspace will be replaced by a new light commercial development which will comprise of a total GIA of 3,006 sqm (32,350sqft). An overview of the proposed floor areas of the new buildings and their comprising units is below:

	Unit A1	Unit A2	Unit A3		Total
Block A	279sqm	264sqm	288sqm		831sqm
	3,000sqft	2,850sqft	3,100sqft		9,953sqft

	Unit B1				Total
Block B	659sqm				659sqm
	7,100sqft				7,100sqft

	Unit C1	Unit C2	Unit C3	Unit C4	Total
Block C	437sqm	321sqm	321sqm	437sqm	1,516sqm
	4,700sqft	3,450sqft	3,450sqft	4,700sqft	16,300sqft

- 4.5 Each individual unit will consist of a primary industrial / warehouse area on the ground floor, with ancillary office space on a mezzanine / first floor.
- 4.6 It is proposed that the units will provide flexible accommodation comprising the potential for industrial processes (Class E(g)(iii) - formerly Class B1c); general industrial (Class B2) and storage and distributions (Class B8) uses.

Layout, Design and Scale

- 4.7 The proposed eight units are to be constructed within three buildings. Responding to the form and shape of the site the units are arranged in two buildings (Blocks A and C) parallel to the western and eastern boundaries of the site with a single building (Block B) located adjacent to the northern boundary with Holy Brook.
- 4.8 The layout also responds to some of the site's constraints, which includes a stormwater drain which passes through the site from the north-east to the south-west. This will be relocated with an appropriate easement to each side of the drain required for access and maintenance.
- 4.9 Following the natural boundaries of the site and to provide the stormwater drain easement, the layout of the proposal forms a loose courtyard, which will focus the activity of the site internally, visually, and acoustically shielding the site from the site's immediate context. This also maintains greater security for the occupiers of the units, with easier and more comprehensive surveillance of yards and parking areas.
- 4.10 The proposal will establish an overall net gain in the footprint of employment space following the demolition of Rose Kiln Court. Whilst the scale of development will be greater than the current arrangement, the provision of three separate building will help moderate the perception of scale.

- 4.11 The buildings have been designed to respect their surroundings, with their height and form taking into account Cadogan House and the residential properties in Laud Close. The buildings would have a mono pitch roof, as shown in Figure 4.2, with the highest point being internal into the site, into the courtyard area. Whilst overall similar height to the surrounding properties this form would provide a lower roofline towards the two roads to the east and west.



Figure 4.2 – Block C South Elevation

Figure 4.3 – Block C West
(Courtyard) Elevation



- 4.12 The proposed buildings, as per the example elevation in Figure 4.3, would be clad using vertically laid profiled cladding in grey (RAL 9006), with feature horizontally laid profiled cladding in blue (RAL 5003) to demarcate the points between the different units and the entrances.
- 4.13 Around the pedestrian entrance doors, the main corner windows, and to the rear (road) elevations horizontally laid microrib composite cladding in anthracite (RAL 7016) would be installed to provide further feature points and provide relief and interest.
- 4.14 An indicative Computer-Generated Image of the proposed courtyard area is provided in Figure 4.4.



Figure 4.4 – Courtyard Indicative Image

- 4.15 Block C, as the largest of the proposed buildings and the most prominent in relation to the A33, has been specifically designed so that the rear elevation of the building has a step in its elevation. This together with the façade treatment including change in materials and colour and the positioning of corner windows at first floor level will provide visual interest whilst also breaking-up the perceived mass of the elevation.

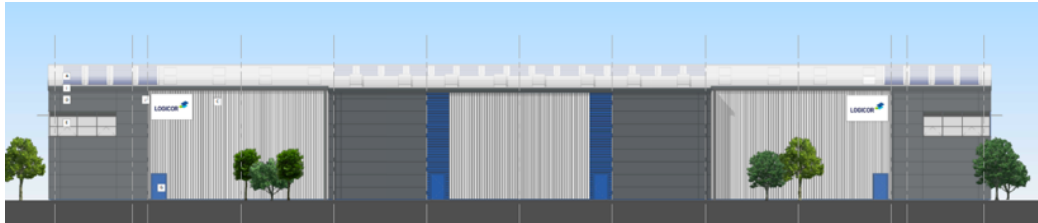


Figure 4.5 – Block C East (Road) Elevation

Access and Parking

- 4.16 Access into the site will be retained via the existing entrance from Rose Kiln Lane, as shown in Figure 4.5. This access point does not need to be altered and is appropriate to accommodate ingress and egress by private vehicles and vans which will regularly access the site. Should Heavy Good Vehicles (HGVs) need to enter or exit the site, the access facilitates their requirements. However, given the nature of the units proposed it is not anticipated that HGVs will regularly need to access Logicor Park.

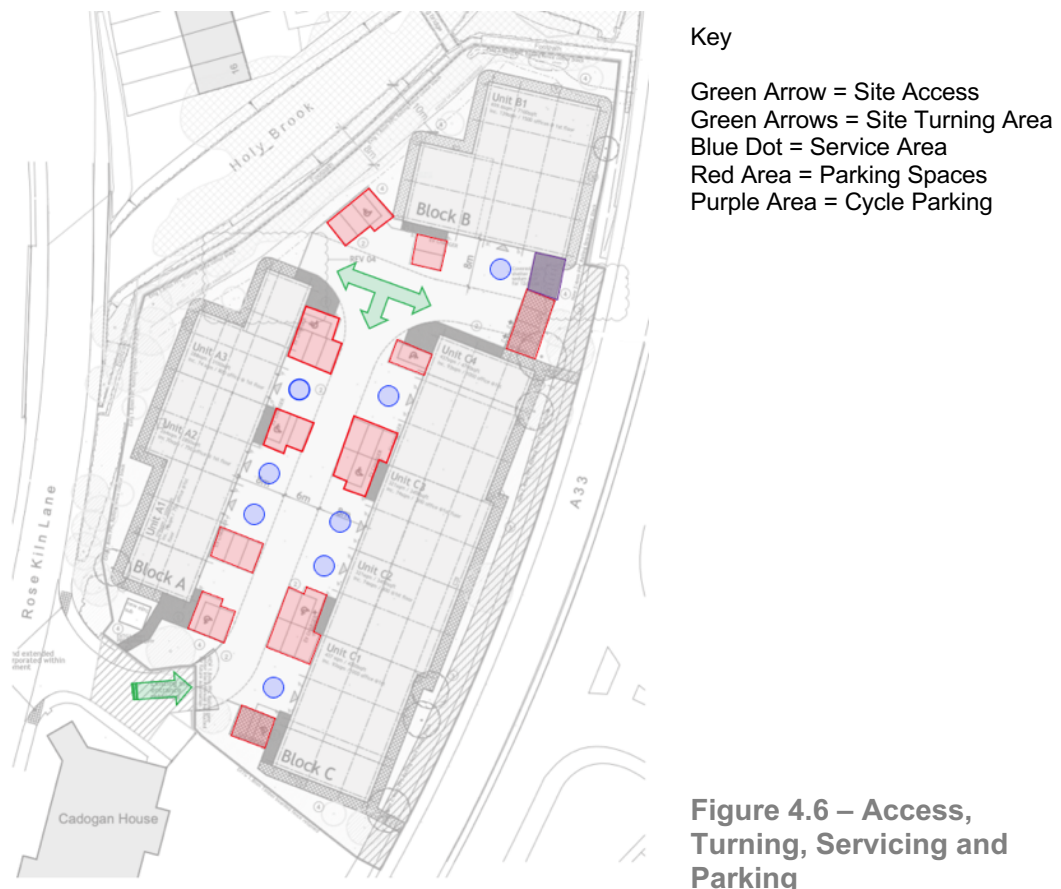


Figure 4.6 – Access, Turning, Servicing and Parking

- 4.17 Although the site access will continue to be shared with Cadogan House, it is not considered that this will result in conflict due the material decrease in trips from the site in comparison to its previous use as Rose Kiln Court.
- 4.18 The internal layout provides sufficient space to allow for an appropriate turning-head for large vehicles and HGVs, as indicated in Figure 4.6. With the site layout arrangements developed to minimises potential conflicts between vehicles, as well as for pedestrians entering / exiting the proposed units.
- 4.19 As noted previously, the scheme layout has been designed to provide a loose courtyard area which includes a dedicated service yard for each unit and parking for the use of employees and visitors, as well as loading bays for larger vehicles and HGVs, as indicated in Figure 4.6.
- 4.20 A total of 33 car parking spaces are proposed to be provided, consisting of 17 standard parking spaces for employees and customers, together with 8 disabled spaces and 8 spaces for electric vehicles. A total of 12 covered spaces for bicycles will be provided.

Landscaping and Ecology

- 4.21 The existing site is laid to extensive hardstanding, with no substantial areas of landscaping provided. A small area of shrubs and trees straddles the site boundary at its south-western corner, adjacent to the north of the site entrance, whilst a low hedgerow delineates the site from Cadogan House. A small number of trees are located along the eastern and western boundaries.
- 4.22 Although in theory the application site has limited opportunity to deliver further landscaping, the scheme includes provision for substantial landscape enhancement through the reinforcement of the existing landscaping through the provision of additional landscaping. These enhancements will also substantially improve the ecological conditions of the site and its immediate context, with a biodiversity net unit gain of +0.17 area units (net % change of 13.75%) and +0.41 linear units (net % change of 1,481.96%).
- 4.23 The layout of the proposed scheme also makes suitable provision in its response to adjacent constraints. This primarily includes set-back from the Holy Brook in the north, where Blocks A and B have been set-back at least 10m. This is to reduce any potential encroachment of built form into the watercourse's environment, which has high ecological and habitat value.
- 4.24 Trees that fall within western site boundary will be retained. These will be complemented by new structural planting and landscaping to soften the boundary edge with Rose Kiln Lane, thereby ensuring that the visual aspect of the street-scene is maintained.

Drainage, Noise and Air Quality

- 4.25 Drainage, Noise and Air Quality have all been considered as part of the formation of the scheme / application. Appropriate assessments / reports are therefore submitted as part of the application.

- 4.26 The surface water drainage is currently drained into the Holy Brook. As shown in Figure 4.7, it is proposed that this position will continue, utilising the existing outfall. However, a Hydrobrake (or similar) flow control device is proposed to restrict the discharge rate, with storage provided under the site.

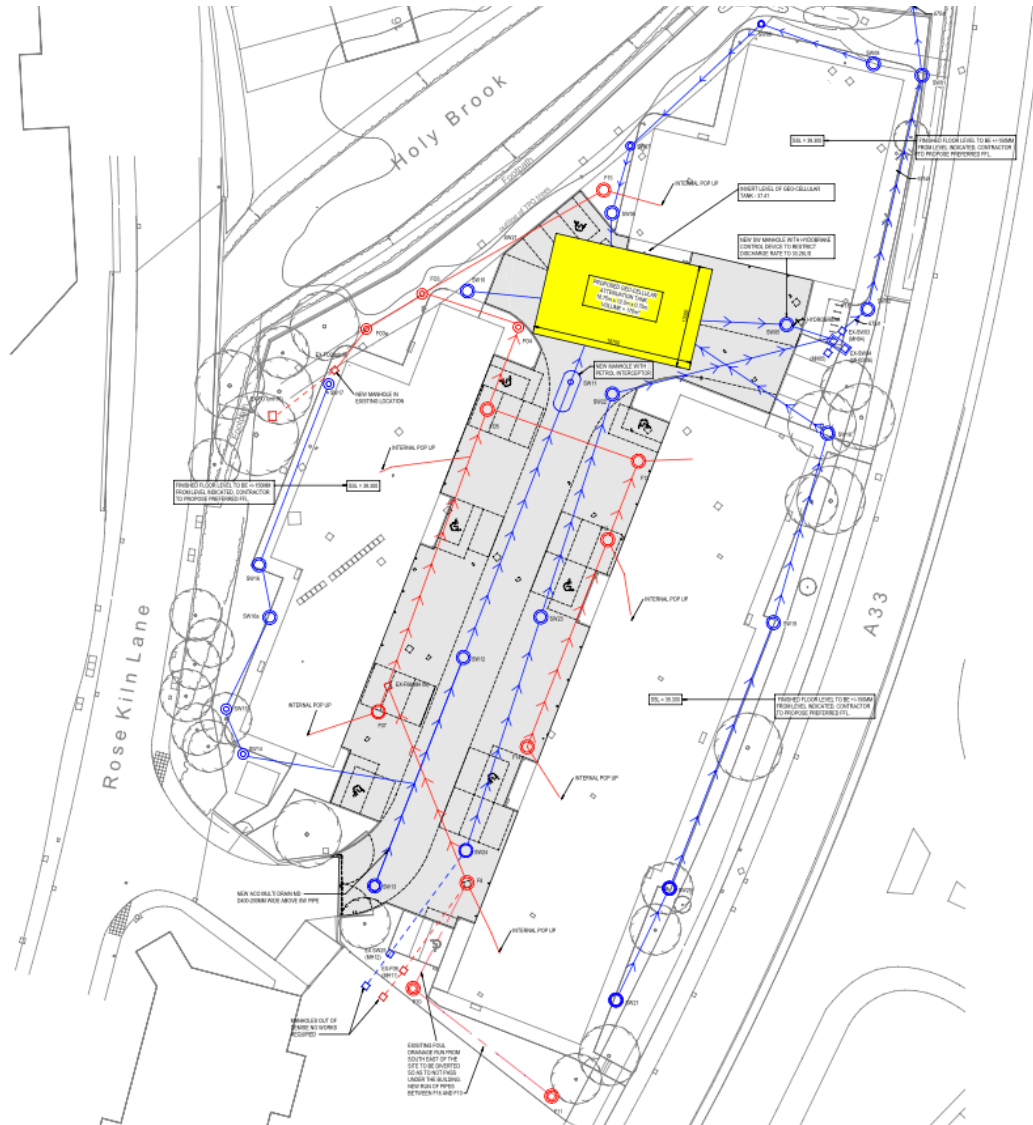


Figure 4.7 – Proposed Indicative Drainage Scheme

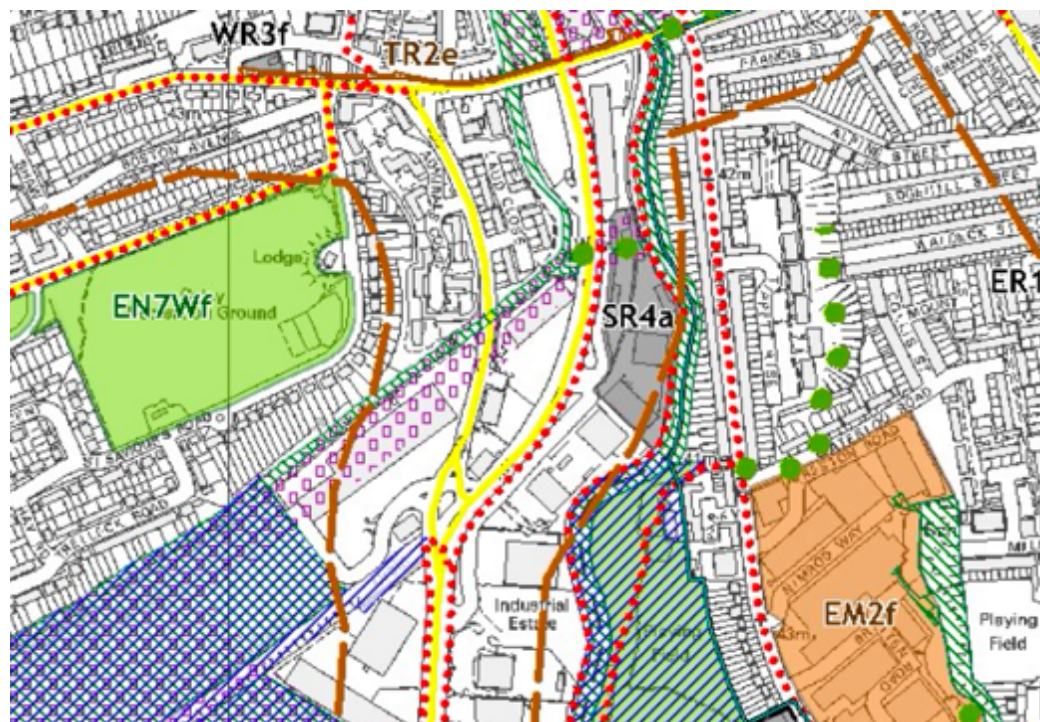
- 4.27 It is proposed that foul flows are discharged as per the existing situation via a private sewer system.
- 4.28 The Noise and Air Quality reports demonstrate that the proposed development will accord with policy and will not lead to an unacceptable risk / impact. No specific mitigation measures are proposed for air quality, whilst only the use of Unit C1 is proposed to be restricted.
- 4.29 Noise levels from fixed plant should not exceed the levels set out in the Noise Impact Assessment, whilst at Unit C1, any night-time loading and unloading activities should take place internally, with doors closed for the duration of the activity.

5.0 Planning Policy Context

- 5.1 Section (2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that a planning application be considered against the adopted development plan, unless material considerations indicate otherwise.
- 5.2 At a national level, the National Planning Policy Framework (NPPF) 2021 and the Planning Practice Guidance (PPG) establishes the fundamental provisions of the planning system in England.
- 5.3 At a local level the development plan comprises of the Reading Local Plan.

Local Planning Policy – Reading Local Plan

- 5.4 The Reading Local Plan was adopted in November 2019 and covers the Plan period to 2036. It contains the spatial strategy which identifies specific areas and locations of Reading to accommodate certain types and amounts of development. Figure 5.1 provides an extract of the Local Plan Proposals Map.



KEY

	Area of archaeological potential (policy EN2)		Area of identified biodiversity interest* (see policy EN12)
	Classified Highway Network* (see policy TR3)		Air Quality Management Area* (see policy EN15)
	Cycle Routes* (see policy TR4)		Site identified for development or change (policies CR11-14, SR1-4, WR1-3, CA1, ER1)

Figure 5.1:
Reading Local Plan – Proposals Map

- 5.5 **Policy EM1 (Provision of Employment Development)** establishes that 53,000-112,000sqm of office space and 148,000sqm of industrial / warehouse space will be delivered in Reading over the Plan period to meet the identified employment need for the Borough. Whilst **Policy EM2 (Location of New Employment Development)** directs where new employment should be developed in Reading. It establishes the most appropriate locations for new employment development, which includes central Reading, along the A33 corridor or in designated Core Employment Areas.
- 5.6 **Policy EM4 (Maintaining a Variety of Premises)** supports the retention of existing employment premises, and that any loss of smaller units should be offset with new provision. The policy resists the loss of smaller units to all locations in Reading and not just in the designated Core Employment Areas.
- 5.7 **Policy CC2 (Sustainable Design and Construction)** requires development to demonstrate environmental sustainability through reduction in energy and use of resources. It requires all non-residential major development to achieve BREEAM Excellent. Whilst **Policy CC3 (Adaption to Climate Change)** establishes that all development must demonstrate resilience and adoption to the risks of climate change, with **Policy L5 (Climate Change)** recognising that development should mitigate and reduce its impact on climate change factors, such as pollution and maximise its sustainability through improved environmental performance of buildings, lower carbon emissions and renewable / decentralised energy generation.
- 5.8 **Policy CC4 (Decentralised Energy)** obligates proposals to of a certain size (greater than 20 dwellings or 1,000sqm of floorspace) to show consideration of connection to a decentralised / district energy source. **Policy CC5 (Waste Minimisation and Storage)** asserts the need for proposals to demonstrate a reduction in the generation of waste through the construction process as well as the life of a development.
- 5.9 **Policy CC7 (Design and Public Realm)** asserts the need for development proposals to maintain and enhance the built character and form of the area of Reading within which it is located. This includes layout, density and mix, scale, and materiality. Whilst **Policy L7 (Design)** notes that development must be appropriate in its context; make best use of opportunities to improve the character and quality of an area; enhance the street scene or character of an area be appropriately addressing scale, density, height, massing, layout and elevation treatment and hard and soft landscaping.
- 5.10 **Policy CC8 (Safeguarding Amenity)** requires development to not adversely or detrimentally harm the amenity of neighbouring land uses through impacts to considerations such as privacy, sunlight, noise, and smell.
- 5.11 **Policy EN2 (Areas of Archaeological Significance)** establishes the requirement for applications to consider archaeological potential value, particularly in locations that are considered to have a particular high risk of the presence of assets (Areas of Archaeological Significance).
- 5.12 **Policy EN11 (Waterspaces)** ensures proposals respond appropriately to watercourses and water bodies, such as ensuring appropriate relationships, promoting biodiversity, and improve their overall quality.

- 5.13 **Policy EN12 (Biodiversity and the Green Network)** seeks to ensure that proposals maintain and enhance the environment through recognition of designated and non-designated Green Networks. Developments should where possible ensure connection to, and promotion, of the Green Network. Developments must ensure biodiversity net gain in accordance with DEFRA's guidance.
- 5.14 **Policy TR1 (Achieving the Transport Strategy)** requires developments to demonstrate how they will contribute towards achieving the Council's Local Transport Plan, specifically in how it will promote sustainable transport modes. **Policy TR3 (Access, Traffic and Highway-Related Matters)** notes that support will not be given to proposals that will harm highway safety or result in the generation of an unacceptable vehicle movement numbers that would otherwise compromise the highway network.
- 5.15 **Policy TR4 (Cycle Routes and Facilities)** requires development proposals to use opportunities to connect to the cycle network and promote the use of cycles, whilst **Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)** seeks to balance the need to provide adequate no-site car parking and electric vehicle charging whilst also promoting other modes of transport which are more sustainable and healthier.
- 5.16 **Policy L4 (Sustainable Transport and Accessibility)** states that the Council will promote the development and maintenance of a sustainable integrated transport network that is accessible and offers a choice of modes of travel to all sectors. Proposals include safeguarding networks and routes; promoting cycling and walking; restricting car parking and requiring Travel Plans.

Supplementary Planning Documents

- 5.17 In addition to the Reading Local Plan, there are several Supplementary Planning Documents (SPDs) which provide further guidance and are a material consideration in the planning balance.
- 5.18 **Sustainable Design and Construction SPD (2019)** establishes further guidance on how new development can meet the highest of sustainable standards. This includes achieving energy efficiency, water management, climate change adaptability, and waste reduction.
- 5.19 **Revised Parking Standards and Design SPD (2011)** establishes parking requirements for developments on a spatial and development-type basis.
- 5.20 **Planning Obligations under 106 SPD (2015)** outlines how the Council will require financial contributions by way of planning obligations through Section 106 and how contributions will be calculated and towards what area of infrastructure. The **Employment, Skills, and Training SPD (2013)** establishes how proposals can contribute directly and indirectly to the provision of new jobs and apprenticeships in the Borough.

National Planning Policy Framework

- 5.21 The National Planning Policy Framework (NPPF) was updated in July 2021 and is a material consideration. It establishes the purposes of the planning system in contributing towards achieving sustainable development, which comprises of three fundamental objectives: economic sustainability, social sustainability, and environmental sustainability.
- 5.22 **Paragraph 11** sets out that for decision taking, the presumption means: *“approving development proposals that accord with an up-to-date development plan without delay”*.
- 5.23 **Paragraph 38** outlines the need for Local Planning Authorities to approach the consideration of planning applications for development proposals in a *“positive and creative way.”*
- 5.24 **Section 6 (Building a Strong, Competitive Economy)** is particularly pertinent given the site established commercial / light industrial use and the proposed commercially led redevelopment. Paragraph 81 attaches significant weight on the need to support economic growth and productivity whilst Paragraph 82 requires planning policies to set out economic strategies and to identify/designate strategic sites and locations for employment/economic development.
- 5.25 **Section 9 (Promoting Sustainable Transport)** encourages the need to secure strategies that reduce car dependency, with reference to employment travel and requires proposals to outline and mitigate for potential impacts on transport networks. Paragraph 110 asserts that schemes should include appropriate parking provision.
- 5.26 **Section 12 (Achieving Well-Designed Places)** outlines how all development and its design contribute towards sustainable development, this includes amenity of occupants and neighbours.
- 5.27 **Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change)** establishes the approach in reducing impact to the environment and achieving climate resilient development. Paragraphs 159-169 provide the basis in how developments should be considered against issues relating to flooding. It outlines the application of the sequential and exception tests in relation to development proposals within locations of high flood risk, with reference to the classification of use types and their vulnerability to flooding as contained at Annex 3. The tests are designed to direct development away from locations at the highest flood risk through the submission of an assessment which demonstrates the suitability, viability, and availability of alternative locations at a lower flood risk.

6.0 Policy and Technical Considerations

Principle of Development

- 6.1 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development that accords with the development plan.
- 6.2 **Economic:** The adopted Reading Local Plan (2019) establishes through Policy EM1 (Provision of Employment Development), the need for the Borough Council to deliver 148,000sqm of new industrial / warehouse space over the Plan period, whilst also balancing the need to maintain a diverse range of employment types and premises. The Local Plan also maintains the need to resist the loss of viable employment land and premises that could otherwise contribute towards the growth of the local economy as per Policy EM4 (Maintaining a Variety of Premises). The proposal, in providing an employment use, would therefore retain the existing employment site. This may otherwise be lost to residential, particularly given the ability to convert offices to residential via permitted development rights.
- 6.3 The proposal seeks to make best use of a site that is currently vacant and does not positively contribute towards the productivity or vitality of the economy of Reading. Given the location, form, and internal layout of the existing building it does not meet the modern standards expected of such offices. As a result, the building would require significant modification to upgrade it.
- 6.4 The proposal also demonstrates an efficient use of land, which the NPPF stresses as a consideration in achieving sustainable development.
- 6.5 The Reading Local Plan through Policy EM29 (Location of New Employment Development) recognises that the A33 corridor is a suitable and appropriate for employment development. The proposal will implement a rationalisation and enhancement of the site for employment use which will contribute towards the reinforcement of the A33 corridor as a strong economic location.
- 6.6 The development is expected to deliver employment opportunities, both directly through jobs created on site, and indirectly through the creation of additional expenditure in the local economy. Additionally, employment opportunities will be created in the engineering and construction trades during the site demolition and construction phases.
- 6.7 The proposed development will therefore provide for employment uses and will deliver the sustainable economic objectives of the NPPF and the Local Plan.
- 6.8 **Social:** The proposal will complement the existing and future development of the area, with a high-quality employment development providing jobs for residents of Reading. The site is closely connected to the strategic highway network (the A33) as well as via sustainable methods including walking, cycling and public transport. It also benefits from being in close proximity to residential areas, such as Coley and to Reading town centre.

- 6.9 **Environmental:** The proposal will be environmentally sustainable. The scheme design will include ecological and biodiversity enhancements, primarily through improvements to existing / adjacent habitats, whilst flooding, noise and air quality will overall remain unaffected by the proposal. Rose Kiln Court, which is built to poor sustainability standards, will be replaced by buildings which will use modern and superior insulation, energy efficient lighting systems and minimise water consumption, with the buildings design to BREEAM 'excellent' standards.
- 6.10 In addition, dedicated electric vehicle charging spaces, and cycle spaces will be provided to encourage alternative vehicles to single occupancy combustion engine cars.
- 6.11 Overall, the scheme is in accordance with the provisions of sustainable development of the NPPF and is in principle compliant with the requirements of the local development plan, particularly policies including Policy EM1 (Provision of Employment Land) and Policy EM2 (Location of New Employment Development).

Site Layout, Scale and Appearance

- 6.12 A topographical survey of the site and buildings to be demolished has been undertaken by Greenhatch Group. This, together with information in relation to which and where utilities cross the site and the sites immediate environment has informed the layout of the proposed scheme, as shown in Figure 6.1.

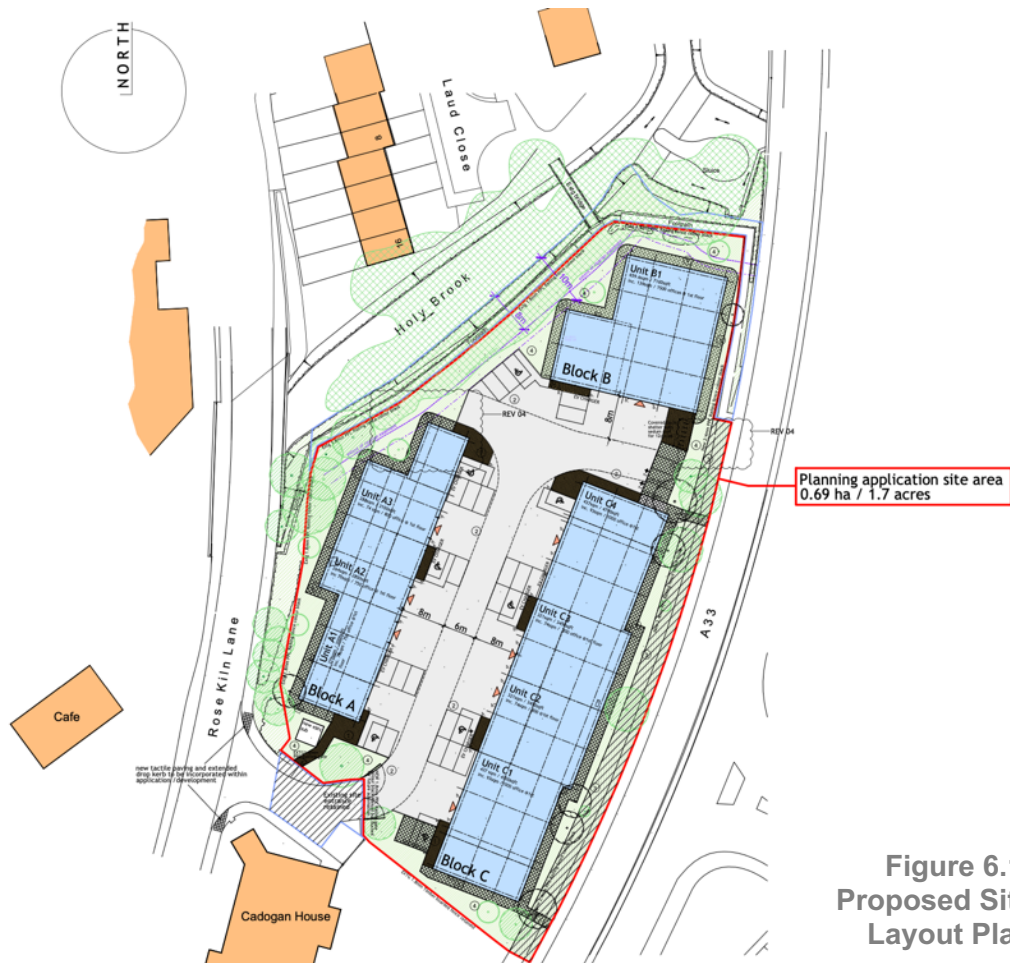


Figure 6.1:
Proposed Site
Layout Plan

- 6.13 The requirement to provide a stormwater drain across the site, alongside the retention of the existing access into the site at its south-western corner have in part informed the layout design. The sites layout has been formed to reflect the characteristics of the site's surroundings, its use, and its neighbours, whilst also seeking to maximising the developable land, unlike the existing site which is primarily laid to car parking.
- 6.14 Arranged around a loose central "courtyard" area the design has carefully considered the site's immediate context and the relationship of the proposed blocks with neighbouring land uses.
- 6.15 Block B, which comprises of a single large unit (Unit B1), is located at the northern end of the site, whilst Block A is located adjacent to the western boundary of the site, and comprises of three units (Units A1, A2 and A3). Both units are located adjacent to the Holy Brook and, as shown in Figure 6.2, have been located to provide appropriate offsets between the main built edge and the top of the bank of the watercourse. This ensures that the required 8m riparian easement and 10m buffer from the brook to the built development is provided.
- 6.16 Not only is this in accordance with Policy EN11 (Waterspaces), as no development is proposed within the 10m buffer, and the Environment Agency's requirements, but it is a substantial improvement over the existing situation where circa 37.5m² of the existing building is located within the 10m buffer.

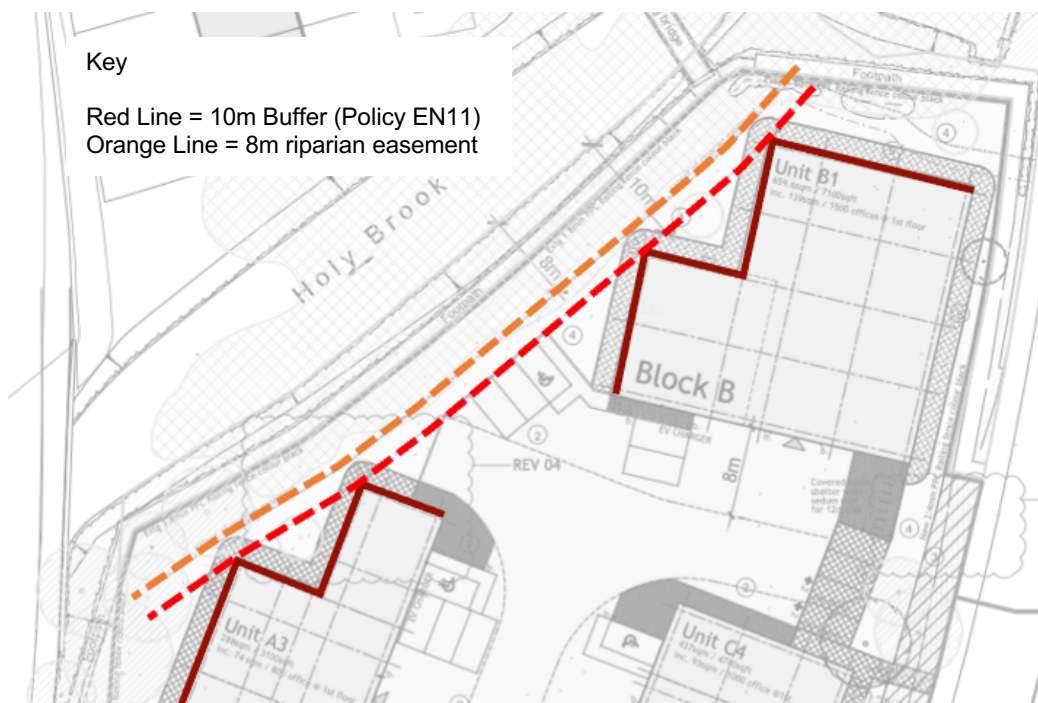


Figure 6.2 – Block C East (Road) Elevation

- 6.17 Block C is the proposed building with the largest footprint and will comprise of four independent units (Units C1, C2, C3 and C4). As the largest of the proposed buildings the rear elevation of the building has been designed with a step in its elevation. This together with the façade treatment and corner windows at first floor levels will provide visual interest and to break-up the elevation which will be visible from the A33, as shown in Figure 6.3.

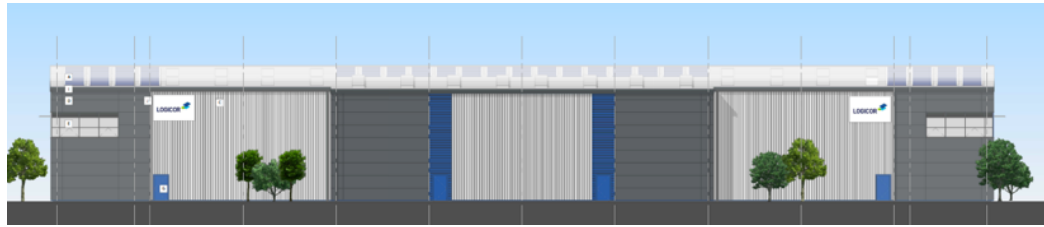


Figure 6.3 – Block C East (Road) Elevation

- 6.18 The proposed blocks have been designed to respond to modern requirements for such light industrial / warehouse buildings and reflect future tenant needs. The footprint of the buildings has been considered to strike a balance between appropriate scale of development and the need the efficient use of the site.
- 6.19 The proposed massing and scale of the new units is in keeping with the surrounding area and reflects current arrangement of Rose Kiln Court and Cadogan House to the south. As demonstrated in Figure 6.4 the proposed scale of the new units on the site are not a significant increase in scale when compared to the existing office building on the site, Rose Kiln Court. This is particularly important given that residential properties are located on Laud Close to the north of Block B and Cadogan House lies to the south of Block C.

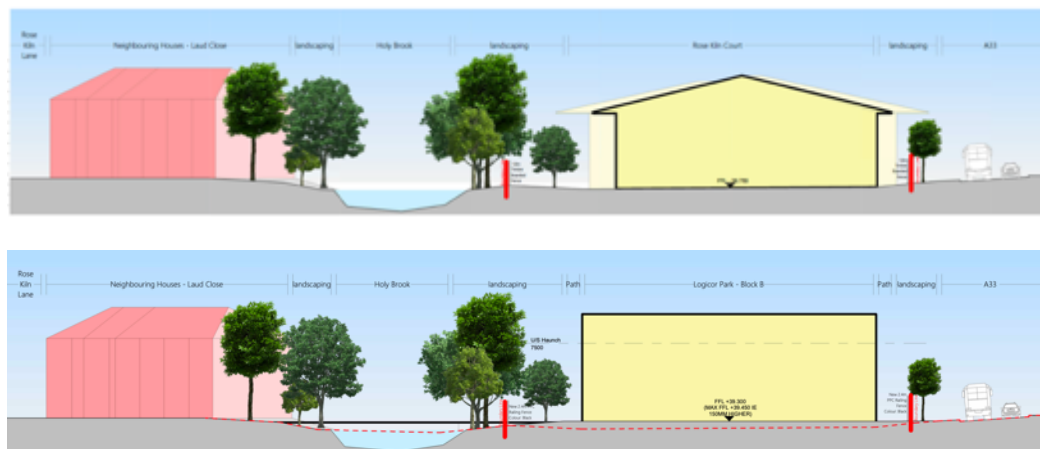


Figure 6.4: Existing and Proposed Site Cross Sections

- 6.20 The proposed elevations, as seen in Figure 6.5 will be clad using modern materials with the form and colours of cladding designed to be functional and long-lasting. They will deliver a high-quality finish that will ensure longevity and not degrade over time.



Figure 6.5: Proposed Elevation (Block A)

- 6.21 The proposed orientation of the buildings and use of different cladding materials and complementary colours, including feature elements, all aid to enhance the appearance of the buildings whilst helping break up the potentially perceived mass of Blocks A and C.
- 6.22 The site layout and proposed design of the new buildings reflects a sustainable and appropriate approach to a modern, light-industrial / warehouse scheme. The proposal is in accordance with Policy CC7 (Design and Public Realm) of the Local Plan.
- 6.23 More details of the layout and design of the scheme is included within the submitted Design and Access Statement prepared by Webb Grey architects.

Access, Car Parking and Highway Safety

- 6.24 The vehicular access to the site will be from the existing access point from Rose Kiln Lane, at the south-western corner of the site. This will remain unaltered. The Transport Statement, prepared by Mayer Brown, establishes that given the significant size of the bell-mouth shaped junction, there is sufficient capacity to accommodate movements associated with both the application site and Cadogan House, which shares the access point.
- 6.25 Swept path analysis has been undertaken to demonstrate that vehicles light good vehicles, which will be the primarily used vehicle, can access all the units and their associated forecourts. Whilst an articulated (16.5m) Heavy Goods Vehicle can, if required, access and leave the site in a forward gear by using the turning head in front of Block B. The location of which is in Figure 6.4.



- 6.26 The scheme, as shown in Figure 6.6, will deliver a total of 33 car parking spaces, including 8 disabled spaces and 8 for Electric Vehicles; and 12 covered spaces for cycles. Given the proposed size of the units reducing the parking provision to a lower, fully policy compliant, level would be unviable as each unit would have minimal spaces available for staff and visitors. This is in reasonable accordance the Reading Borough Council parking standards, which provide maximum standards, identifying that 25 spaces should be provided, with 3 of those for disabled users.
- 6.27 Regarding electric vehicle charging facilities, the Revised Parking Standards and Design SPD states that the introduction of Electric Vehicle charging points will be encouraged, where appropriate, with no specific numbers being noted. To maximise the sustainability of the site, 24% of the spaces will have access to electric vehicle charging facilities.
- 6.28 The Transport Statement identifies that proposed use of the site will establish a material decrease in the number of movements in comparison to the previous commercial office use of the site. This is demonstrated by the significant decrease in site parking provision, which reduces the number of spaces from 136 to 33. Consequently, the development will establish a material betterment to the conditions of the local highway network.
- 6.29 In addition, the site is in a sustainable location and is accessible via public transport, which will reduce the need and reliance on private car to access the site. A Travel Plan has been prepared by Mayer Brown and is submitted as part of the application. This establishes the measures that will be implemented to promote more sustainable modes of travel and to discourage single occupancy car journeys. By doing so, the Plan will reduce traffic impacts on the local highway network and achieve a scheme that can benefit from healthier and more sustainable travel opportunities.
- 6.30 Consequently, it should be recognised that the scheme accords with the provisions of local policy, specifically development plan Policies TR3 (Access, Traffic and Highway-Related Matter), TR4 (Cycle Routes and Facilities) and TR5 (Car and Cycle Parking and Electric Vehicle Charing) of the Local Plan.

Flood Risk and Drainage

- 6.31 Delta Simons have prepared a Flood Risk Assessment and Drainage Strategy to demonstrate how the proposed development will not result in inappropriate harm to flood risk, on and off-site. Whilst Waterman have prepared a Proposed Surface Water and Foul Water Drainage Strategy, which is submitted for consideration as part of the application package.
- 6.32 The Flood Risk Assessment recognises that the site is not specifically vulnerable to fluvial flood risk, as conferred by the Environment Agency designation of Flood Risk Zone 1, as shown in Figure 6.7. The proposed development is therefore not considered to be at risk of fluvial flooding.

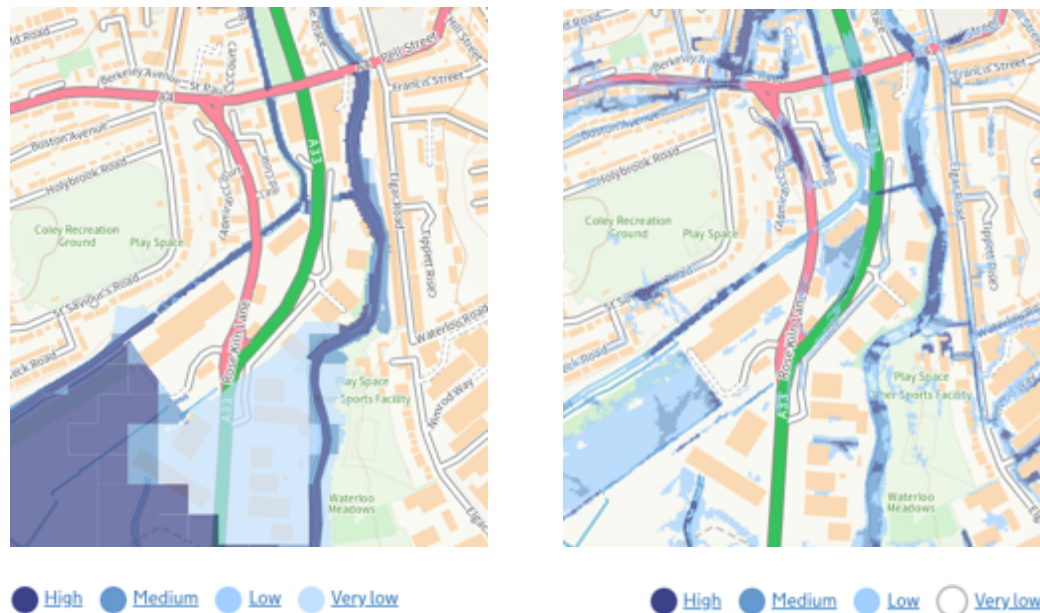


Figure 6.7 – Extent of Flooding River and Sea / Surface Water

- 6.33 Whilst the EA's surface water flood map identifies areas of ponding during the 1% Annual Exceedance Probability (AEP) event, the Flood Risk Assessment notes that mapped flood depths would remain below 300 mm.
- 6.34 The drainage strategy, which will implement a rainwater collection and attenuation system, will be able to adequately manage surface water during a 1 in 100 years, plus 35% climate change event. With the Flood Risk Assessment identifying that no significant ponding of surface water is anticipated. Notwithstanding this, to ensure best practice and maximum mitigation the assessment recommends built floor levels to be 150mm above ground levels.
- 6.35 The Drainage Strategy considers that the proposal represents a betterment in terms of the management of surface water and its drainage from the site. As the proposal will result in a decrease in hardstanding area, the drainage strategy is able to achieve a 30% lower discharge rate of surface water from the existing brownfield 1 in 2 year rate. The strategy will also be able to store storm water during 1 in 100 year plus 35% climate change events.
- 6.36 Surface water collected on site will be discharged to the Holy Brook at a maximum rate of 30.83l/s, which is achievable via on-site storage of rainwater. It is proposed that foul flows are discharged as per the existing situation via the private sewer system.
- 6.37 The proposal represents an acceptable approach to the management of flood risk and that a suitable Sustainable Urban Drainage System is achievable on site. This is in accordance with Policies CC3 (Adaption to Climate Change) and EN18 (Flooding and Drainage) of the Local Plan.

Air Quality and Noise

- 6.38 The site is in the Reading Air Quality Management Area and therefore is subject to controls to minimise NO_x and particulate emissions. To demonstrate that the proposal will not result in inappropriate impacts on the air quality of the management area, Delta Simons have produced an Air Quality Constraints and Opportunities Appraisal Statement, whilst Savills have produced a Construction Management Plan (CMP), which is also submitted as part of this application.
- 6.39 The appraisal establishes that residual impacts arising from the construction process can be adequately mitigated through best practice and routine management measures. This will reduce particulate and dust emissions from the site during the implementation phase of the development and so will not have any significant effects on the local environment.
- 6.40 The Appraisal recognises that the operational phase of the development will have negligible impact on local air quality conditions of nearby receptors. Furthermore, as the proposal will result in an overall net reduction in the number of traffic and vehicular movements from the site in comparison to its previous use.
- 6.41 The residual effect on air quality is judged to be not significant, in line with EPUK and IAQM assessment criteria and to that end the proposals are therefore in accordance with Policy EN15 (Air Quality) of the Local Plan.
- 6.42 Delta Simons have also undertaken a Noise Impact Assessment which has validated and expanded upon previous noise surveys made on the site (which informed the since withdrawn previous application for the site's redevelopment).
- 6.43 This identifies that the operation of the proposed scheme will generally not exceed the background noise environment levels and therefore not result in new levels of noise which would otherwise potentially harm the amenity of neighbouring premises. The Assessment recognises that the operation of proposed Unit C1, due to nature of deliveries and external activities generally expected of light industrial uses, would give rise to levels of noise that could impact the residents at Cadogan House.
- 6.44 Whilst the noise assessment establishes that the nature of these noises would not be constant, they would however be perceptible above the background acoustic environment during the night when the passing traffic on the A33 is and thus background noise level is reduced. The Assessment therefore advises that for Unit C1 (only) any night-time loading and unloading activities should take place internally, with doors closed for the duration of the activity.
- 6.45 Restricting external operations at Unit C1 during the night and the noise level from fixed plant, would ensure that noise levels from the proposal would be negligible. Both proposals are easily implementable and are items which can be conditioned as part of any planning permission.
- 6.46 It is therefore considered that the proposal is in accordance with Policy CC8 (Safeguarding Amenity) of the Local Plan.

Landscaping and Ecology

- 6.47 The proposal seeks to deliver enhanced soft landscaping over the existing site arrangement which is characterised by significant areas of hardstanding. As such, enhancements will deliver ecological benefits and visually soften the development.
- 6.48 An arboriculture assessment has been undertaken by Delta Simons. It identifies a range of trees on the site, assesses their condition and establish recommendations to facilitate retention of the trees as part of the site layout.
- 6.49 It establishes that most of the existing trees on the site are Category B, which attributes them with moderate value and that their retention is desirable. One single tree (T15) located towards the north-eastern part of the site, was classed as Category C, moderate value.
- 6.50 Although the scheme will seek to retain as many trees as practicably possible, with some requiring pruning, some will need to be removed. No trees which are the subject of the Tree Preservation Order are proposed to be removed. Whilst their loss is unavoidable to facilitate the site's redevelopment, the landscaping scheme seeks to replace these removed trees, alongside enhanced native shrub planting.



- 6.51 The site is unfortunately extremely constrained by underground services and infrastructure. Existing areas of trees, notably in the north around the Holy Brook will be reinforced and trees will be retained along the boundaries where possible with new trees planted to the west and southern boundaries.
- 6.52 Notwithstanding the underground constraints, a total of 6 No. new trees are proposed to be planted, as identified in Figure 6.8.
- 6.53 The planting of 6 No. new trees will offset the loss of existing trees and contribute towards the uplift in the ecological value of the site, in accordance with Policy EN14 (Trees, Hedges and Woodland) of the Local Plan.
- 6.54 The landscape proposals, formed by TGP Landscape Architects, identify that the margins of the site beyond the primary development area will be seeded as wildflower grassland. Whilst around the edge of the proposed buildings amenity grass will be planted in an no dig ecoblock system to provide support whilst providing for ease of use and allowing ad hoc emergency / maintenance access, when required.
- 6.55 Policy EN11 of the Local Plan defines development as including the “... *laying of non-permeable surfaces...*”. Given that the proposed access path is grass and thus permeable (and would be formed using a no dig construction method), the proposed footpath is therefore not development. The proposal therefore complies with Policy EN11 and is an acceptable element within the natural or semi-natural habitat 10m buffer.
- 6.56 The south-western boundary with Rose Kiln Lane and the north-eastern corner of the site will be planted with a new hedgerow, with the existing hedgerow to the south being retained.
- 6.57 A River Condition Assessment has been undertaken by Surry Wildlife Trust, with the physical survey undertaken on the 8 November 2023. The Assessment scored the section of Holy Brook adjacent to the Site to be of ‘fairly poor’ condition and makes recommendations to improve the overall area. Some of the identified measures are located downstream / falling outside the site boundary, whilst works to the channel itself aren’t appropriate and aren’t required because of the development proposed – i.e. they aren’t necessary, proportionate, or relevant to the development being proposed.
- 6.58 However, other measures including the creation of native soft landscaping, which has been incorporated into the proposed landscape design; and selected tree management (pollarding or coppicing) of the trees immediately adjacent to the site boundary are considered appropriate.
- 6.59 The removal of litter / material from the channel and banks, and removal of buddleia / round leaf dogwood (considered invasive species) adjacent to the site boundary (from the footbridge to the north-east corner of the Site to the Rose Kiln Lane bridge) are also deemed reasonable.
- 6.60 Tree management would encourage a greater range of species in the channel and on the bank top / face whilst the removal of litter / material and removal of invasive species would promote diversity of other flora.

- 6.61 Due to the watercourse and its banks falling outside the ownership of the applicant, and the presence of a Tree Preservation Order, any such improvement measures and the mechanism for their application could be conditioned and would need to be determined with the relevant authorities.
- 6.62 The development proposal maximises all opportunities to deliver areas of soft landscaping, significantly enhancing the level of soft landscaping over the existing site. A Landscape and Ecology Management Plan has also been produced by Delta Simons detailing how long-term enhancement objective can be achieved.
- 6.63 As such, it should be noted that the scheme complies with local planning policy, specifically Policy CC7 (Design and the Public Realm) of the Local Plan.
- 6.64 To ensure that the scheme delivers mitigation and ecological enhancements, a Preliminary Ecological Assessment (PEA) has been undertaken by Delta Simons to identify opportunities to achieve improvement to the ecological value of the site. The assessment identifies that the existing site does not benefit from significant habitat or other ecological features of note. Due to the time of year a bat survey hasn't been able to be undertaken, but has been scheduled and will be submitted in due course for consideration.
- 6.65 The proposed landscaping scheme will implement enhancements in accordance with the recommendations of the PEA. This includes retention of trees, replacement trees and provision of new native shrub and planting mixes throughout the site. Provision of eco-block edging around the proposed blocks also minimises "sealed surface" environments.
- 6.66 The PEA recognises the significance of the woodland and vegetation associated with the Holy Brook located to the north of the site. The landscaping scheme will deliver and direct new native planting towards this habitat area, therefore enhancing it ecologically. The schemes design also includes appropriate offset from this area, to minimise any encroachment into the habitat, whilst the lighting strategy has been designed to reduce light-spill which could otherwise harm habitat use by bats and birds.
- 6.67 To demonstrate how the ecological and improvement measures, delivered via the proposed landscaping scheme, will provide a material enhancement to the value of the site, a Biodiversity Net Gain Assessment has been undertaken by Delta Simons. The Biodiversity Assessment and Metric are both submitted as part of the application.
- 6.68 The Assessment establishes that through the proposed mitigation and improvements, a biodiversity net unit gain of +0.17 area units (net % change of 13.75%) and +0.41 linear units (net % change of 1,481.96%).
- 6.69 The scheme has explored opportunities to improve the natural features of the site as far as possible, maintaining a sensitive response to the adjacent ecological asset, Holy Brook. A measurable net ecological and biodiversity gain will be provided and thus the proposal is in accordance with Policy EN12 (Biodiversity and the Green Network) of the Local Plan.

Lighting

- 6.70 The submitted Lighting Strategy Report, produced by Light 360, establishes the approach taken by the scheme in delivering a system of lighting that can achieve an appropriate sense of security and safety, as well as responding to site limitations and sensitive neighbouring land uses.
- 6.71 The strategy incorporates a lighting arrangement that simply and effectively harmonises with the proposed design of the new units, but also provides adequate functionality to ensure the site's safe and efficient operation.
- 6.72 The lighting strategy includes higher levels of lighting within the central area of the site, to maintain safe circulation of pedestrian and vehicles whilst including sensitive security lighting for deterrence and wayfinding.
- 6.73 Most significantly, the strategy responds to sensitive receptors that are adjacent to the site. This includes Holy Brook to the north, which is an established area of high habitat and ecological value. The design ensures that there is absolute minimum light-spill into this area (<1 lux), as shown in Figure 6.6. Thus guarding against potential impacts to the habitat and ecological value of the area and the properties to the north of the Holy Brook on Laud Close.
- 6.74 In the south, the lighting strategy has been designed to ensure that although sufficient levels of security lighting are achieved (15 – 20 lux). As shown in Figure 6.9 it will be arranged so that light spill will be minimised as to avoid harm to the amenity of Cadogan House.

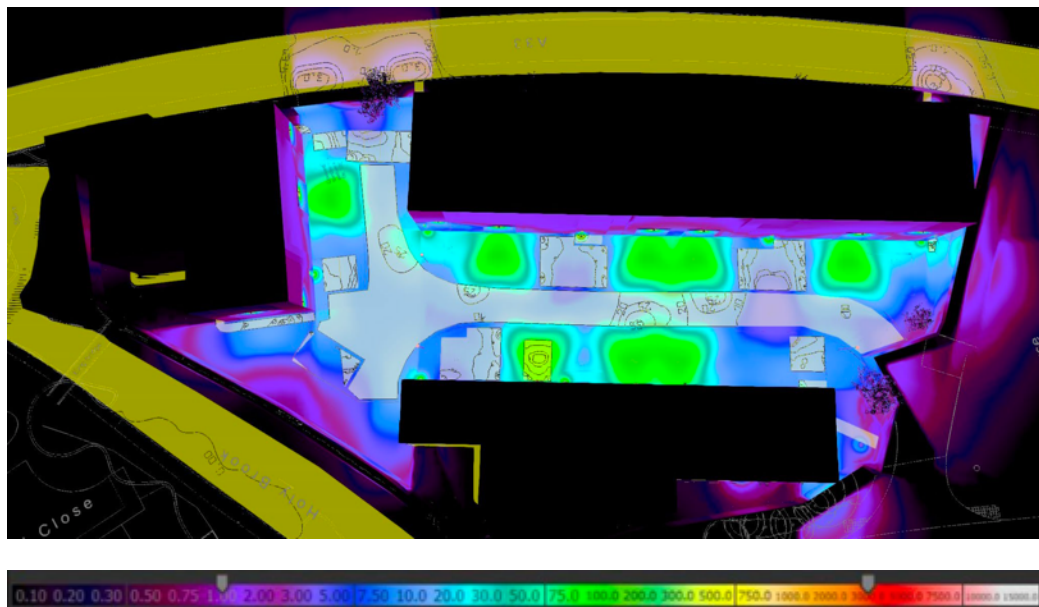


Figure 6.9 – Preliminary Lighting Calculation

- 6.75 The lighting strategy of the proposal complies with the requires of local Policies CC7 (Design and the Public Realm), CC8 (Safeguarding Amenity) and EN12 (Biodiversity and the Green Network) of the Local Plan.

Utilities and Sustainability

- 6.76 To identify utilities at the site, a survey was undertaken by Midland Surveys.
- 6.77 The existing stormwater drain which enters the site from the north-east and exits the site to the south-west will be relocated through the site, with an appropriate easement provided to maintain adequate access for survey and maintenance. Whilst the existing electricity substation which is located towards the southwest corner of the site will be relocated to facilitate the construction of Block A.
- 6.78 The survey has also been utilised by Savills to produce a Utilities Report which establishes recommendations to ensure utilities are appropriately managed through the construction phase of the proposal.
- 6.79 Other utilities have been identified such as medium pressure gas supply as well as domestic water supply. Their management have been included within the submitted utility report which establishes how construction contractors must liaise with utility suppliers to maintain their integrity and future connection following completion of works. It is therefore considered that the proposal will adequately manage considerations relating to utilities and is in general accordance with local planning policy provisions.
- 6.80 An Energy Efficiency Statement, produced by MYA Consultancy Services, has been submitted as part of the application and is accompanied by Sustainability Statement produced by Carbon Climate Certified.
- 6.81 Sustainable design aspirations were prioritised from the earliest design stages to minimise impact in environmental terms on the surrounding area and wider community, also meeting national and local policies in climate change, energy and recognised environmental accreditation schemes including BREEAM.
- 6.82 The Energy Efficiency Statement demonstrates elements of the scheme which can contribute towards achieving significant levels of energy efficiency. It identifies numerous opportunities in achieving efficiencies on energy use and consumption by the proposed development. This includes provision of high performing materials and glazing treatments of the new units themselves and energy efficient lighting systems. Roof-mounted photo-voltaic cells will also be implemented to generate on-site electricity. This will drastically reduce energy consumption and avoid the need for a natural gas connection, thereby reducing carbon emissions further.
- 6.83 The proposed energy strategy demonstrates the delivery of a 109.5% reduction in regulated carbon emissions and a regulated energy reduction of 117.9%, thereby demonstrating not only a route to compliance to Part L 2021, but a significant saving beyond this. The scheme also shows a 43.4% reduction in the combined heating and cooling demands of the buildings.
- 6.84 The Sustainability Statement identifies that the BREEAM Pre-Assessment provided within the statement concludes a BREEAM credit score of 75.54% and a BREEAM rating of 'Excellent'.

- 6.85 Consequently, the proposal is in accordance with local Policies CC2 (Sustainable Design and Construction), CC3 (Adaption to Climate Change) and CC4 (Decentralised Energy) of the Local Plan.

Archaeology

- 6.86 The site partially falls within the Reading Local Plan “Area of Archaeological Potential” designation, which covers the very northern part of the site which is closest to the Holy Brook. This indicates that the area contains possible archaeological assets relating to the Holy Brook and River Kennet as locations of notable historic human activity.
- 6.87 To ascertain the significance of this designation, Delta Simons have produced an Archaeological Assessment to ascertain potential constraints and requisite mitigations. The assessment acknowledges that the site has been developed several times over the 20th century, which will have removed areas of land surface and introduced new ground surfaces. However, due to the site’s position between the Holy Brook and the River Kennet, there is potential of evidence of pre-historic human activity as well as remains of Roman activity.
- 6.88 Notwithstanding this, the assessment identifies that the alluvial deposits on the site are unlikely to allow significant disturbance of any potential organic material and given that the proposal does not seek to implement deep excavations beyond drainage and foundations, harm to potential assets is negligible. Consequently, the assessment recommends that no further work is required.
- 6.89 The proposal will not result harm to the site’s archaeological value or potential and as such, complies with the provisions of local planning policy, particularly those contained within Policy EN2 (Areas of Archaeological Significance) of the Local Plan.

Geo-Environment and Unexploded Ordnance

- 6.90 To ensure that the proposal is not subject to unacceptable ground instability and potential contamination issues, a geo-environmental assessment has been undertaken by Delta Simons.
- 6.91 The assessment has not identified concerns regarding ground stability. However, it recommends that to avoid weight-bearing loads directly to the ground, piles should be used to ensure that weight is borne to concrete beams, or frame.
- 6.92 The report does not identify significant contamination that would pose risk to human health. Whilst the assessment identifies ground gas considerations, it also provides appropriate and proportionate actions to reduce and mitigate this risk. Furthermore, it recommends that a Remediation Strategy is prepared to satisfy planning conditions and to manage those unpredictable risks that are associated with broken-ground construction work.
- 6.93 Consequently, the proposal directly accords with the provisions of Policy EN16 (Pollution and Water Resources) of the Local Plan.

- 6.94 To establish the risk of potential unexploded ordnance on the site, a preliminary risk assessment has been conducted by Impartial Assessment. This establishes that the site has a low risk of encountering unexploded ordnance as the area around the site, as well as Reading in general, was not subject to bombing during the Second World War and was not used by the British military at any time. Furthermore, as the site has been developed at least twice since the end of the war, this reduces further the potential risk of unexploded ordnance.

Community Infrastructure Levy (CIL)

- 6.95 According to the council's adopted CIL charging schedule (January 2015), the proposed development is not liable to pay CIL. Not only is the site outside the Centre Core and Reading Central Area charging zones but Class E(g)(iii) (Industrial Processes), Class B2 (General Industrial) and Class B8 (Storage or Distribution) uses aren't liable for a charge within the wider borough area.

7.0 Conclusion

- 7.1 The application proposal at Rose Kiln Lane (Logicor Park), Reading seeks to enhance / redevelop under-used and currently vacant office building into a modern and efficient light industrial / warehouse site. The proposal seeks to rationalise the existing site and introduce a more efficient use that will make the best use of the land available and will materially contribute towards the local economy.
- 7.2 The units would provide industrial processes; general industrial and storage & distribution uses covering Class E(g)(iii) (formerly Class B1c), Class B2 and Class B8 uses.
- 7.3 This Statement, application document and the accompanying supporting Technical Reports demonstrate that the proposal is appropriate for the site and wider area. The planning application has taken into careful account the material considerations relevant to the proposal including its physical location and planning policy context.
- 7.4 The redevelopment of the site won't result in adverse impacts to the amenity of the area, nor amount to inappropriate or harmful development to the wider area. None of the elements of the development proposal will introduce new, or harmful activity on the site that would otherwise be inappropriate or would result in harm to the local highway infrastructure or the amenity of neighbouring properties.
- 7.5 The principle of the scheme should be supported given the alignment and accordance of the proposal with local and national planning policy. Where the planning balance is applied, it is shown that the planning application will result in no harm but contribute towards sustainable economic growth and the maintenance of the site as a source of local employment opportunities.
- 7.6 Pursuant to s.38(6) Planning and Compulsory Purchase Act (2004) determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 7.7 This Planning Statement and application sets out how the proposals generally comply with the adopted Reading Local Plan and that when relevant material considerations have been considered why it should be approved without delay as sustainable development, in accordance with Paragraph 11 of the National Planning Policy Framework (NPPF).

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May 2023
Updated November 2023

