

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EDINBURGH
GLASGOW
KINGS HILL
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON



bartonwillmore.co.uk
9th Floor
Bank House
8 Cherry Street
Birmingham
B2 5AL
T/ 0121 711 5151

Jonathan Markwell
Planning Section
Directorate for Economic Growth and Neighbourhood Services
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU.

34051/A3/CT/EP/bc

31st May 2023

Dear Mr Markwell,

BENNET COURT, READING

RESPONSE TO CONSULTEE COMMENTS RECEIVED AS PART OF FULL PLANNING APPLICATION (REFERENCE: 221936)

On behalf of our Client, DV5 Coltham (Reading) Ltd, we write to provide a response to consultee comments received (up to 19th April 2023) as part of the Full Planning Application (Ref. 221936) for the Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g) (iii), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works, at Bennet Court, Reading (the 'Site' hereafter).

BACKGROUND

A Full Planning Application was submitted to Reading Borough Council and validated on 8th February 2023 (Ref. 221936).

PROPOSED DEVELOPMENT

The Full Planning Application comprises:

'Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.'

UPDATED INFORMATION

Alongside this letter, we provide updated packs to support the development proposals, addressing consultee comments received to date. The following has been submitted to accompany this letter:

- Drawing (Reference: J32-6748-PS-004) including tactile paving and dropped kerbs to address Highway's comments received.
- Updated Site Plan (Reference: 22-024-PL-03F) to reflect the updated Biodiversity Net Gain calculations.
- Updated BNG Calculation and Ecological Appraisal Report including completed Bat Survey.
- Updated Landscape Strategy (Reference: 8085.ASP3.LSP.C)

- Accompanying response including drainage calculations from Nolan Associates.
- Drainage CCTV Survey.

RESPONSE TO CONSULTEE COMMENTS RECEIVED

Environmental Health

Environmental Health comments were received on 14th February 2023 (**Appendix 1**), and states that the contaminated land assessment concludes that there is an area of contaminants above the relevant guideline value and further details will be required in the form of a remediation strategy, accompanied by suggested condition wording.

However, the applicant's specialist consultant (Delta Simons) has advised that where contamination was identified on the site, it is localised and limited to one location (DS102), in an area of existing soft landscaping in the north of the Site. Based upon the proposed site layout, the area of identified exceedances are likely located beneath the proposed building footprint and thus, covered by the floor slab, therefore severing any pollutant linkage.

In addition, if part of the identified area extends to the north of the proposed building footprint, within the area of soft landscaping, Section 9.4.1 of the GI Report outlines that a clean cover system is to be utilised to break any existing pollutant linkage. Furthermore, Appendix H (Construction and Verification of Clean Cover Systems) provides a detailed breakdown of clean cover systems and their verification to be protective of potential end-users. As a result, this level of information should be considered appropriate to mitigate any risks posed by the localised exceedances identified, thus a Remediation Strategy not necessary given the context of the site, proposed development and nature of the contaminants.

Furthermore, reducing the risk to construction works during redevelopment of the Site should be considered through safe working practices, the use of standard operating procedures and PPE. A 'Hotspot Protocol' should also be put into place in the case of encountering any previously unidentified contamination.

In conclusion, based upon the above, we feel the suggested conditions (CO4 and CO5) are not justified contrary to paragraph 56 of the NPPF and thus not required, therefore we request the EHO to review the suggested conditions, based on the information provided above. The proposed is considered to be in accordance with Policy EN16 (Pollution and Water Resources) of the Reading Local Plan, as a result of the location of contaminant and the proposed site layout building footprint, severing any pollutant linkage.

Transport Development Control

Transport comments were received on 17th March 2023 (**Appendix 2**), it is acknowledged that the principle of development and impact of the scheme is accepted, and will not have a material impact on the operation or safety of the highway. However, the only comment raised was in relation to the provision of tactile paving and dropped kerbs at the site access.

To ensure that two HGVs can still pass one another at the site access (one waits whilst one accesses), the form of the junction has not changed from that previously submitted but tactile paving and drop kerbs have been shown on the revised drawing to help facilitate pedestrian movements across the access. This has been provided in line with the current pedestrian footway along Bennet Road and is consistent with adjacent accesses within the vicinity of the site. This is shown on the accompanying drawing (**Drawing J32-6748-PS-004**).

In conclusion, the amended drawing, making provision for tactile paving and kerbs for pedestrian movement, is in compliance with Policy TR3 (Access, Traffic and Highway-Related Matters), whereby the proposal is not detrimental to the safety of users of the transport network, including pedestrians and cyclists.

LLFA

Comments were received from the Lead Local Flood Authority on 27th March 2023 (**Appendix 3**), Nolan's have provided a response accompanying this letter (Nolan Associates: Bennet Court, Reading LLFA Response.)

Point 1 – Discharge Rates

The LLFA have sought clarification for the greenfield run off rate, the existing brownfield run off rate and the run off rate as a result of the development. Nolan's have confirmed that the existing brownfield run off rate is 86.25l/s, whilst the Qbar (greenfield run off rate) is 0.3ls, and the proposed development would result in a run off rate of 5l/s. Therefore, this would result in a reduction of 81.25l/s as a result of the proposed development, demonstrating that the proposal results in a significantly reduced run off rate from the site.

Policy EN18 (Flooding and Sustainable Drainage Systems) states that 'run off rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.' The above demonstrates that the scheme has taken into account and considered where possible the greenfield conditions, and clearly illustrates a vast reduction, thus betterment, than the existing conditions of the site.

Point 2 – CCTV Drainage Confirmation

Nolan's have purchased the sewer record to confirm the sewer locations within Bennet Road, and the CCTV survey has been completed, which is appended to this submission.

Point 3 – Swales/ponds/basins

Whilst the LLFA have set out that the building line is set back at least 9m, this is incorrect. The distance from the proposed office element to the boundary is 5.39m, and from the footway to the boundary is 3.8m. As such, given the levels, available space and requirement for a 1:4 batter to the slopes of a swale/pond, the possibility of installing a swale/pond to the front of the site has been discounted.

Point 4 – Maximise ecological benefits

The proposed development has incorporated SUDs where possible, in terms of permeable paving. In addition, the existing trees to remain will drain as at present. Nolan's have advised that they would not propose to discharge water away from the existing green network, as a result of the benefit provided to the green network.

Consequently, Policy EN18 (Flooding and Sustainable Drainage Systems) states that 'wherever possible, SUDs provision should maximise ecological benefits, link to the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees.' The proposal has incorporated SUDs provision, where possible, and has ensured discharge of water away from the existing green network does not occur. Furthermore, tree planting and landscaping has been incorporated within the design of the site and is set out within the Landscape Strategy.

Natural Environment

Comments were received from Natural Environment on 22nd March 2023 (**Appendix 4**) that were in relation to the removal of the trees fronting Bennet Court and Biodiversity Net Gain, including the calculation in relation to the existing tree cover, the proposed options and the concept of off-site mitigation.

When Coltham took ownership of the Site, the trees along the frontage of Bennet Road had been removed, therefore the associated tree works referred to within the comments had occurred prior to our client's ownership. It can only be assumed that these trees were removed as part of the previous ownership's ongoing management of the Site and therefore it would be inappropriate to consider their loss a 'purposeful' reduction of the Site's ecological value. Coltham's Biodiversity Net Gain assessment has therefore been completed based on the baseline present when it took ownership of the site and from the point at which the scheme design process began.

In addition, accompanying market advice as set out at **Appendix 5**, from JLL and Logix identifies a need for Grade A (new build) and Grade B (refurbished) space for industrial/warehouse space, with the demand profile being for larger buildings, that have a high level of ESG provision, including electric car charging points and PV solar panels. Furthermore, occupiers are taking Energy Performance and BREEAM Standards much more into account when considering location. The existing buildings at Bennet Court are concluded by JLL and Logix as inappropriate in terms of both function and form, which is further demonstrated by the short term nature of the leases in place, the market evidence stating *'there is no demand for this type of outdated office accommodation.'*

The Local Plan sets out 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 (our emphasis). The Policy sets out that in exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it's demonstrated that the impacts cannot be 1) avoided, 2) mitigated or 3) compensated on-site, then new development will provide off-site compensation to ensure there is no net loss.

In this instance, given the specific circumstances, the proposed meets with the mitigation hierarchy, however the below remains important to consider:

- The existing buildings, which lie within an employment area, are no longer suitable because:
 - The buildings are old and no longer suitable for modern employment needs, as per Logix and JLL's market advice. In addition, the market requires high standards of building in terms of sustainability credentials.
 - The area is more suited to industrial uses rather than offices.
- There is a reasonable fallback in the form of prior approval for the conversion to residential (which is not preferable in policy terms given the location and potential loss of employment).
- The proposed scheme would provide extensive benefits:
 - A modern building that is specifically designed to meet market requirements for the location
 - The proposed building has been designed to ensure minimisation of carbon, and is therefore designed to achieve BREEAM Outstanding and an EPC rating of 'A+' (an improvement on the current buildings)
 - The proposed development would have a positive, beneficial impact upon the existing strategic highway network, resulting in a reduction in 51 two-way journeys per day.
 - Maximisation of habitat and biodiversity within the Site, whilst still allowing for market requirements
- The ecological benefit of the existing Site is less than the proxy values contained displayed by Natural England's Biodiversity metric:
 - The metric is a proxy for measuring biodiversity, not an appropriate tool for measuring ecological value.
 - The onsite grasslands are considered to be of low ecological value due to the common and widespread sward that dominates it and its poor connectivity beyond the Site boundary.
 - The scheme includes a range of ecological enhancements that are not all captured within the metric appropriately.

Additional landscaping measures have been reviewed and incorporated across the site, to demonstrate an on-site net gain is achieved for both habitat and hedgerow units. Consequently, additional medium sized trees have been introduced along the Bennet Road frontage, the replacement of the grassland along the frontage element with the application of native-species rich seed (to provide greater botanical diversity than currently present), a green roof on the cycle storage facility and the introduction of a 23m long native hedgerow along the south-western boundary have been incorporated within the proposed layout, as shown on Updated Site Plan (Reference 22-024-PL-03F) and Updated Landscape Strategy (Reference 8085.ASP3.LSP.C). As a result, the proposed development accords with Policy EN12 (Biodiversity and Green Network), achieving an on-site biodiversity net gain of +7.95% habitat units and +2.67% hedgerow units.

Furthermore, whilst Policy EN14 (Trees, Hedges and Woodlands) states that individual trees, groups of trees, hedges and woodlands will be protected from damage, those trees that can be retained and incorporated within the layout, have been. However, the trees that were removed along Bennet Road frontage were removed prior to our client purchasing the site.

Ecology

Ecology comments were received on 28th February 2023 (**Appendix 6**), which set out the requirement for an additional Bat Survey and that the development would result in a Biodiversity Net Loss.

In addition, an updated Bat Survey has taken place by FPCR, which concluded no bat emergence (Bat Report, Bennet Court, Reading: May 2023).

The amended proposed layout achieves a biodiversity net gain of +7.95% habitat units and +2.67% hedgerow units, therefore complying with Policy EN12 (Biodiversity and the Green Network) which references 'a net gain for biodiversity *where possible*.'

Economy and Destination Agency

Comments were received on 16th March 2023 from Reading's Economy and Destination Agency, to which the consultee welcomed the continued use of the development site for commercial purposes and advised that due to the scale of the site, an Employment and Skills Plan would be required, under a Section 106 Agreement, to both the Construction and Employment phases, with the option of making a financial contribution.

Consequently, our client suggests the option to proceed on an either/or approach within the Section 106, in respect of the Employment and Skills Plan, or financial contribution for each phase, on the basis that both the construction contractor and end user is unknown, and is therefore difficult to determine the most suitable approach at present.

CONCLUSION

The above sets out a thorough response to the Consultee Comments received to date (as of 19th April 2023).

We trust that this letter addresses areas of concerns raised by all Officers and look forward to receiving a response. If it would be most appropriate to discuss this further at a meeting, we would be happy to do so. If any further information is required, please do not hesitate to contact me.

Yours sincerely,



Charlotte Thomas
Senior Planner

Appendix 1 – EHO Comments

To: Mr Jonathan Markwell Your Ref: 221936

From: Rebecca Moon - Environmental My Ref: EP /749967
Health Officer

Date consultation received: 09/02/2023 Date: 14 February 2023

Application Number: 221936

Premises Address: Bennet Court Bennet Road Reading

Application For: Demolition of existing buildings and erection of one industrial building for flexible processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or

Environmental Protection concerns

- Noise arising from development
- Air Quality impact - increased emissions
- Contaminated Land
- Construction and Demolition phase
- Bin storage - rats

Noise arising from development

I have reviewed the noise assessment and it demonstrates that there should not be a negative impact on amenity of nearby residents due to the noise from operation of the unit.

A noise limit has been proposed for any mechanical plant, although no specific plant has been proposed. As the risk is low with the residents being a considerable distance away, the following condition should be sufficient rather than requiring a noise assessment - however I am not sure if this is suitable as the appearance of the plant would need to approved?

➤ **N8 NOISE LEVELS OF PLANT/EQUIPMENT RESTRICTED**

The specific sound level of any plant/equipment (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise-sensitive facade shall be at least 10dB below the pre-existing background sound level, LA90,T [as stated in the noise assessment Air and Acoustics, Jan 23, ref 100601] when all plant/equipment (or any part of it) is in operation. The rating level, LAr,Tr (specific sound level plus any adjustment for the characteristic features of the sound) as measured at a point 1 metre external to the nearest noise-sensitive façade (habitable window of a dwelling) shall not exceed the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation.

REASON: To safeguard the amenities of the adjoining premises and the area generally, in accordance with Policy CC8 and EN17 of the Reading Borough Local Plan 2019.

Air Quality - Increased emissions

The assessment concludes that the impact of the development on air quality will not be significant enough to warrant further assessment or mitigation.

Contaminated Land

The contaminated land assessment concludes that there is an area of contaminants above the relevant guideline value, but that this could be mitigated by the addition of hardstanding or capping layer. Further details will be required in the form of a remediation strategy.

See recommended conditions below, these are required to ensure that future occupants are not put at undue risk from contamination.

Recommended conditions

➤ CO4 REMEDIATION SCHEME (TO BE SUBMITTED)

No development shall commence on site including demolition and any preparatory works until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and been approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, an appraisal of remedial options, and proposal of the preferred option(s), and a timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

REASON: These details are required due to insufficient information being contained within this submission and to ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

➤ CO5 REMEDIATION SCHEME (IMPLEMENT AND VERIFICATION)

The approved remediation scheme under Condition **INSERT** shall be implemented in accordance with the approved timetable of works. A validation report (that demonstrates the effectiveness of the remediation carried out) shall be submitted to and approved by the Local Planning Authority before construction above foundation level.

REASON: To ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

➤ **CO6 UNIDENTIFIED CONTAMINATION**

In the event that contamination is found at any time when carrying out the approved development not previously identified, development shall be halted on that part of the site the contamination reported in writing to the Local Planning Authority.

An assessment of the nature and extent of contamination shall be undertaken and where remediation is necessary a remediation scheme, together with a timetable for its implementation, shall be submitted in writing to the Local Planning Authority for its written approval.

The measures in the approved remediation scheme shall be implemented in accordance with the approved timetable. Halted works shall not be re-commenced until the measures identified in the approved remediation scheme have been completed and a validation report has been submitted to and been approved in writing by the Local Planning Authority.

REASON: To ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Recommended conditions

➤ **C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)**

No development shall commence on site, including any works of demolition, until a site specific Construction Method Statement has been submitted to and been approved in writing by the Local Planning Authority. The Statement shall provide for

- a) Required measures to control the emission of dust, dirt and other airborne pollutants during demolition and construction; [EP REQUIREMENT]
- b) Provisions to be made for the control of noise coming from the site during demolition and construction; [EP REQUIREMENT]
- c) Full details of pest control measures following any demolition required. Where necessary, capping of drains/sewers and baiting arrangements. [EP REQUIREMENT]

The measures within the approved Statement shall be adhered to throughout the demolition and construction period unless otherwise agreed in writing by the Local Planning Authority.

REASON: These details are required due to insufficient information being contained within this submission and in the interests of protecting the amenity of local land uses or neighbouring residents, the character of the area and highway safety in accordance with Policy CC8 and TR3 of the Reading Borough Local Plan 2019.

➤ **C1 HOURS OF CONSTRUCTION/DEMOLITION**

No construction, demolition or associated deliveries shall take place outside the hours of [0800hrs to 1800hrs] Mondays to Fridays, and [0800hrs to 1300hrs] on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior written approval from the Local Planning Authority.

REASON: In order to protect occupiers of nearby properties from unreasonable disturbance from works connected with implementing this permission in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

➤ **C4 NO BONFIRES**

No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development hereby approved shall be burnt on site.

REASON: In the interests of air quality, the amenity of neighbours, and to promote more sustainable approaches to waste management in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

If you have any queries please contact me.

Kind regards,

Rebecca Moon -
Senior Environmental Health Officer

Appendix 2 – Transport Comments

Memo

From: (e)Transport Development Control Floor 1 North Rear Civic Offices Bridge Street Reading RG1 2LU
To: Jonathan Markwell Jonathan.Markwell@reading.gov.uk
Date: 17 March 2023
Re: Consultation on Planning Application

Application Number: 221936

Application Type: Full Planning Approval

Address: Bennet Court Bennet Road Reading RG2 0QX

Proposal: Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.

Relevant Planning History

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

210320 - Change of use of building (Plot 1) from Class B1(a) (offices) to C3 (dwelling houses) to comprise 27 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) - Prior Approval Given 21st April 2021

The site lies within the Core Employment Area (Site Em2d) as defined within the Local Plan. The application consists of demolition of two existing buildings, and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works.

The Planning Statement indicates that the site has previously been occupied for B1(a) office use, however, some of the units are currently vacant. The site has two extant prior approval applications (listed above) for the change of use of both buildings from Class B1(a) to C3 comprising of 55 flats in total.

The site is located within Zone 3, Secondary Core Area, of the Council's adopted Parking Standards and Design SPD. The site is accessible via public transport with the closest bus stops located on the B3031 Basingstoke Road, around 300 metres away, which provide frequent services towards Reading Town Centre and Whitley Wood. The site is well strategically located with the main A33 located west of the site, providing wider access to the M4 and wider road network.

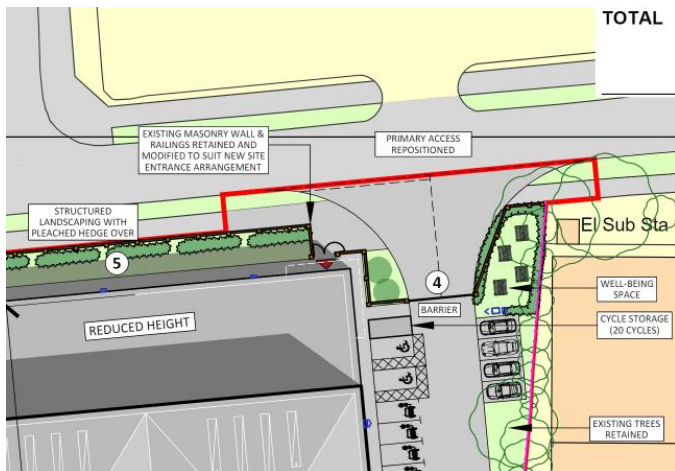
Access Arrangements

Vehicular access to the site is currently provided from Bennet Road via a priority junction arrangement. The access will be widened and slightly realigned to allow HGV access to the rear. The access will be increased to 7.3m wide with a 15m radii.

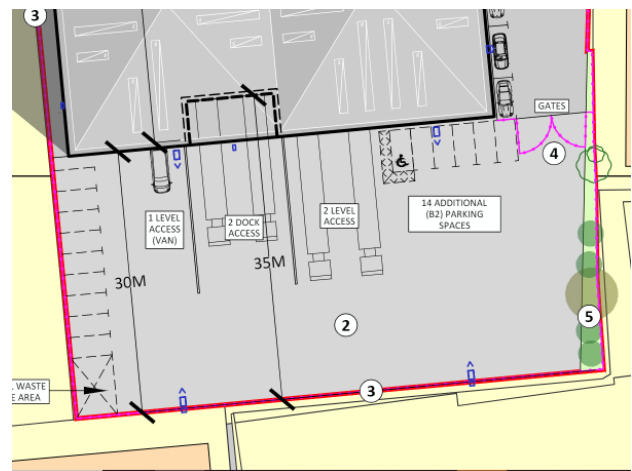
All servicing and deliveries will occur within the service yard at the rear of the site. The unit would provide 2 dock accesses, 2 level accesses (a total of 4 HGV) and 1 level access within the southern yard area. A vehicle tracking assessment has been undertaken for a Large Car (5.079m in length) and a Max Legal Articulated HGV (16.5m in length). The tracking diagrams demonstrate that all vehicles are able to enter and turn within the site, and leave in forward gear.

Dropped kerbs with the appropriate tactile paving should be provided and illustrated on the submitted plans. They should not be placed on curved sections of kerbing because this makes it difficult for blind or partially sighted people to orientate themselves before crossing. However, pedestrians can be intimidated by traffic on junctions with a large radius as it is likely to take them longer to cross the road particularly if they are elderly or disabled. Therefore, the applicant is requested to review the junction design to determine whether pedestrian improvements could be introduced at the junction. This may be in the form of a pedestrian refuge island or by reducing the radii on the left. Revised tracking drawing would need to be submitted for any revisions to the junction.

Proposed accesses arrangement - Bennet Road



HGV Parking/Loading Areas to the rear



Parking Provision

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 RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site.

Parking Standards have been reviewed for both B2 and B8 land uses as the end occupier is still to be determined. The site will provide 43no. parking spaces, of which 3no. would be designated as accessible car parking spaces and 4no. spaces would be available as active electric vehicle charging spaces with all remaining spaces being provided as passive spaces to allow them to be converted in the future. The proposed parking at the site meets the

requirements for the “worst case” scenario given the flexible industrial use proposed under this application.

The proposed car parking is to be located along the eastern boundary, with additional parking to be located within the service yard at the rear of the site.

A cycle parking facility is provided along the eastern boundary of the site with a capacity for 20 bicycles. I am unable to check that the proposed layout complies with the Council’s requirements, however, I am happy to cover this by amended plans or condition.

Traffic Generation

The site benefits from an extant B1(a) office use and 148 car parking spaces. In order to establish the existing traffic generation associated with the consented development, the TRICS database has been reviewed. This indicates that the existing site could generate 43 two-way trips in the AM peak and 44 two-way trips in the PM Peak.

The proposal is for a flexible industrial use under Use Class E (g)(iii). B2 units generally generate a higher number of trips than B8 units, therefore, the B2 industrial trips is accepted as a worst case scenario for the purposes of the assessment to establish the net traffic impact as a result of the proposed development.

A summary of the net traffic assessment has been undertaken and summarised in Table 6.1 within the Transport Statement. An extract is below.

Table 6.1 Peak Hour Nett Traffic Impact

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

The table above indicates that the proposed scheme would result in a reduction in vehicle trips in both the AM and PM peak although the proposed scheme would result in three additional HGV trips in the AM Peak period.

It should be noted that the extant permission provided a total of 148 car parking spaces, therefore, the proposed development represents a net reduction of 112 car parking spaces. This is because the B1(a) office use generates a higher demand for parking than the proposed uses within this application. Therefore, it is reasonable to assume that the proposed development would generate less vehicle movements throughout the course of the day.

The site is located within a Core Employment Area which are the main location for industrial and warehouse uses. A high proportion of the traffic using the road is commercial traffic ranging from light vans to articulated lorries. In view of this, the small increase in commercial vehicles in the AM Peak would not have a significant impact on the local highway network.

A framework Travel Plan has been submitted as a preliminary guide. The primary aim of the FTP is to minimise single occupancy car travel being made by staff or visitors travelling to and from the development. Section 4 sets out the Measures & Action Plan of the Travel Plan. A Travel Plan Coordinator should be appointed prior to the first occupation of the site and will be responsible for leading the implementation, monitoring and review of the Travel Plan. However, as the site occupiers are not yet known, a condition is required to ensure that a full travel plan is submitted within 6 months of occupation.

The applicant is requested to review the junction design to improve pedestrian movement along Bennet Road. Therefore, the applicant is requested to address the points above before determining this application.

Regards

Natalie Lucas

Transport Development Control Officer

Transport | Directorate for Economic Growth and Neighbourhood Services (DEGNS)

Appendix 3 – LLFA Comments

Comments on the SuDs drainage are as follows:

- It is proposed that the site will discharge to the public sewer at a greenfield runoff rate of 5l/s in accordance with the UK Suds website however, the applicant is required to fully calculate what that greenfield run off rate would be given that this would be different for each site. In addition to this the applicant would be required to calculate what the existing brownfield run off rate would be, both of these calculations would allow for the Flood Authority to confirm whether the proposal results in a reduced run off rate from the site.*
- The proposed SuDs layout can also not be formally agreed at this time given that the applicant has only assumed the location of the main sewer which may not be accurate. A detailed drainage design would therefore be required which would form part of a condition.*
- The applicant has specified that there is insufficient space in which to provide any swales / ponds / basins etc however the building line is currently set back at least 9m from the back edge of the footway and therefore this could have been considered as part of the initial design process but has not. In addition the drainage design should fully address the infiltration element of the hierarchy given the Geo-Environmental Assessment states the following:*

Given the generally cohesive nature of the shallow soils, the construction of soakaways is unlikely to be suitable however depending on the requirements of the Local Lead Flood Authority/ EA then in-situ soakaways tests and seasonal groundwater monitoring may be required to assess the viability of soakaway construction.

This would therefore confirm that some element of infiltration may be possible and requires further investigation.

- The proposal also does not address Policy EN14 or EN18 of the Reading Borough Local Plan which states the following:*

Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology.

This has not been included within the SuDs proposal with the green space, which is also being reduced in area across the site.

Given the above the Flood Authority are unable to agree to the proposed drainage scheme and further more detailed assessments are required.

Appendix 4 – Natural Environment Comments

Memo

To: Jon Markwell, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

Date: 20 March 2023

Re: Consultation on an Application

Application Number: 221936

Application Type: Full Planning Approval

Address: Bennet Court Bennet Road Reading RG2 0QX

Proposal: Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.

The site has been subject to previous applications and comment in 2020 (200598/FUL) and 2021 (211269/Pre-App); both responses confirming the importance of tree retention and planting and acknowledging that existing, established trees on the Bennet Road frontage provided high amenity value to the street scene. Previous proposals allowed for the retention of those important trees, showing that development did not preclude this.

I am aware that since we last commented all the trees on the frontage have been felled. It is extremely disappointing that someone/company has taken the decision to do that given the aims of our tree strategy, the loss of canopy cover and biodiversity that has resulted from felling and, of course, the total lack of necessity to fell given that redevelopment could be accommodated whilst retaining the trees (albeit not the scheme in hand). The soft landscape zone on the frontage is important, so regardless of felling, it has to be retained (and of suitable depth) for planting; hence the felling results in additional money having to be spent by the applicant on planting and maintenance, that could have been avoided. Ironically, the trees on the frontage can still be seen in the photo on p.5 of the DAS and on the Tree Constraints plan (under the plan layer).

With reference to **Site Layout Plan As Proposed 22-024-PL-03-D, Design & Access Statement 22-024-DAS-01A, Planning Statement dated January 2023** and **Arboricultural Impact Assessment dated December 2022 ref 11491_AIA.001 Rev C:**

6.35-6.48 of the Planning Statement indicates that to meet with EN12 & EN14, off-site mitigation will be required. This should be a last resort, with greening of the site offering the required net gain in the first instance and off-site mitigation accepted if the

development is acceptable and arguable in all other planning terms. [I would also suggest that if this were the tack that the applicant considered reasonable, it would perhaps of been beneficial to have proactively engaged with appropriate officers in the Council to determine if / where suitable tree planting could take place to benefit the area prior to submission and meet the off-site requirements, albeit this may have only been appropriate through a pre-app]

I note that within the Design Approach on P.12 of the **DAS**, it includes the aim of '*Minimisation of the visual impact of the development*', which I acknowledge is important given the extensive scale of the building. I would suggest that having removed the trees on the frontage, narrowed the landscape strip and provision of pleached trees, with their minimal canopy benefits, and no green wall or roof proposed, that this aim is not met. The matter of whether it is 'attractive' (as claimed on P.17) is of course subjective, but I would suggest that the development requires greater softening. The lack of green roof, given the large scale of the building, should be justified.

P. 21 of the **DAS** states: '*It is intended that the landscaping once matured will be of a suitable massing to give an attractive frontage and screening to both the unit and the external site boundaries*'. As no detail on the species or ultimately height that the pleached trees would be maintained at has been provided, screening has not been demonstrated. In any case, I would suggest that a set back (retaining existing) to allow for tall and wider canopy trees is required to provide adequate screening and softening, as well as contributing more appropriately to EN14 and Tree Strategy aims (and EN12).

The Landscape Strategy on P. 24 of the **DAS** states: '*The landscape design principles have been formulated to reflect the local design character and help provide a high-quality development appropriate to its built setting as well as tying in with the existing vegetation boundary structure around the site boundaries*'. I'm not clear what local design character has been identified, but the adjacent site (and this one until recently) has a landscape character of a suitable set back to allow for broadleaf trees of normal form, others of which are present sporadically along the road. I do not see that a formal landscape character of pleached trees is relevant, nor does it tie-in with the boundary vegetation. I consider that the landscape strategy description somewhat overrepresents what the site will deliver. Ultimately, it is a site where significant trees have been removed, further trees will be removed and the built form will increase – it is therefore difficult to appreciate how the site will deliver successful greening, particularly given the lack of detail on what the limited landscaping would consist of.

In terms of the sustainability aims claimed to have been established (p. 28 of the **DAS**), I would question 1) '*Meet the challenges of climate change and extreme weather conditions*' given the lack of canopy cover increase (compared to pre-felling), lack of green walls and lack of green roof; and 2) '*Conserve and enhance the natural environment*', which has not been demonstrated given the poor landscape / greening provision.

With reference to the **AIA**, 4.1.2 confirms tree removal to consist of '*five trees of individual distinction, the removal of four groups and two hedges and the partial removal of a boundary group, all of low quality*' – these are listed in Table 1. The removal involves all trees in G1, G4, G5 & G6 and partial removal of G3 plus two hedges (H1 and H2). No figures for the number of trees in each group is provided in the tree survey, hence there is no confirmation of how many trees are to be removed in total – this is required in order to demonstrate a net gain and to aid BNG discussions (these based on the 'before', at the

pre-felling level). G5 is the rear boundary vegetation hence the removal of this with no landscape mitigation provided in this location will result in no soft landscape screening.

In conclusion, the development fails to demonstrate adequate landscaping to mitigate tree loss and to soften the appearance of the significant building proposed. As such it is contrary to EN12, EN14, the RBC adopted Tree Strategy (2021). In addition, off-site mitigation has not been agreed which would be required prior to a decision.

If you intend to approve the application, conditions L2 (landscaping etc), L3 (boundary treatment), L7 (AMS) and securing of relevant details / monies for off-site planting will be required.

Appendix 5 – Market Evidence

PRIVATE & CONFIDENTIAL

Coltham Developments Ltd
10 Rathbone Place
London
W1T 1HP

24th May 2023

Dear Graeme

BENNET COURT, READING

As requested, JLL and Logix have been asked to comment on Bennet Court, and how it sits in the current property market in Reading and the surrounds.

Subject site:

Bennet Court is currently made up a mix of quasi office building which we believe were constructed in the 1980's. The buildings comprise a range of two storey offices and are of a layout / configuration and design that now has little occupier appeal. The building design is now dated and the units are not well insulated, and have low energy performance ratings with inefficient aging mechanical and electrical systems.

The lack of market appeal is demonstrated by the short term nature of the leases in place and low rental levels achieved compared with prime Reading office space.

Occupational market:

The occupational market has seen significant change over the last few years particularly since the start of COVID, and further change over the last 6-9 months.

Offices:

Since COVID, when working from home really commenced, there is still very much a trend of remote and flexible working. We are finding that this has resulted in occupiers looking to reduce the size of their office holding. Not only are occupiers looking to reduce the size of the holding but there are looking to invest in better quality accommodation with good local amenities and transport links. Staff well being is now considered one of the most important factors in deciding a new location.

There is no doubt that demand for offices has fallen considerably since the start of COVID while the current economic climate has also reduced the demand. Generally, it is fair to say that there is an over supply of similar offices along the M4 corridor in Reading and nearby traditional locations. This all supports the case that Bennet Court in its existing format is obsolescent.

Warehouses:

The biggest change over this time has been the type of property occupiers are now looking acquire. Occupiers are no longer willing to put up with sub standard poor energy efficient units - such as those at Bennet Court. 5 years ago, it was only the corporate companies that were insisting on high standards of ESG's and energy efficient buildings to satisfy shareholders. However, this has been changing over time and particularly over the last 6-9 months. The increase in energy prices and the more difficult economic climate has seen occupiers really question the type of property they want to occupy.

In this location, office space is inappropriate given the dependence on the car and the lack of amenity . It is a far more appropriate location for industrial buildings, for which there is significantly more demand. As with offices demand for industrial/ warehouse space is now focusing on New Grade A/ Grade B (refurbished) space, where the offering includes a high level of ESG provision to include car charging points and PV/ solar panels as a minimum. In addition, occupiers are looking more closely at the Energy Performance rating and in respect to new buildings environmental accreditation such as the level of BREEAM that the unit (s) are being built to.

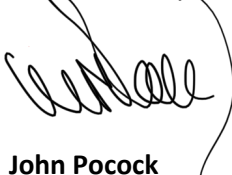
Supply:

In terms of industrial supply in Reading and the M4 corridor, this is at an all time low with all locations suffering from a lack of supply particularly in the South East. On the Slough Trading Estate, Segro currently have only one refurbished unit over 25,000 sq ft currently available, while there is also limited supply in nearby locations along the M4 in Wokingham, Maidenhead and Theale. In Reading, there is also an acute shortage of Grade A (new build) and B (refurbished).

With respect to Bennet Court, where the site is made up of 1980's style offices, it is our joint opinion that the buildings are now inappropriate both in terms of function and form. The occupational market has moved on and there is no demand for this type of outdated office accommodation. The location / market all suggests that the site should be redeveloped as industrial to support the current occupier demand being warehouse/ industrial properties in highly energy efficient buildings. Given the demand profile is for larger buildings and the location of the site a single industrial building design is considered the most appropriate redevelopment solution for the site.

I hope this covers what is required but please let us know if you require further detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Pocock', written over a thin, curved line that serves as a guide.

John Pocock
Partner

Logix Property LLP

John.pocock@logixproperty.com

M. 07766 072273

Appendix 6 – Ecology Comments

Memo

To: Jonathan Markwell

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 28 February 2023

Re: Application ref: 221563

Address: Bennet Court Bennet Road Reading RG2 0QX

Description: Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.

The application site is an area of land in a predominantly light industrial area of South Reading. It comprises two large two storey detached office buildings surrounded by hardstanding, hedges and some ornamental planting. It is proposed to demolish the existing buildings and remove ornamental shrubs, grassland, hedgerows and a line of trees, to allow the construction of a warehouse and offices with associated parking, hardstanding and soft landscaping.

An Ecology Report from FCPR has been submitted with the application. This includes a bat roost assessment of the two buildings which were assessed as having moderate suitability to host roosting bats. Two bat emergence/ re-entry surveys were carried out on consecutive days at the end of September (outside the bat survey season) and the report states “*it is considered that the buildings are unlikely to be used as a bat roost*” The report does not provide details of the surveyors who carried out the survey, start and end times, locations of surveyors, details of the weather conditions etc and has therefore not been produced in accordance with the Bat Conservation Trust’s bat Survey Guidelines.

Bat Conservation Trust’s Bat Survey Guidelines state that to determine the presence or absence of bats where the building has been assessed as having “moderate” suitability for use by roosting bats (as is the case here) two dusk emergence / pre-dawn re-entry bat surveys need to be carried out. Surveys need to be carried out between May and September, with at least one taking place in the optimum period of May to August (inclusive), and with at least one being a pre-dawn survey.

As such, at present there is insufficient information for the council to determine this application. A bat survey report, produced in accordance with the Bat Conservation Trust’s Bat Survey Guidelines will need to be submitted before this application can be determined or alternatively the application would need to be refused on the grounds that insufficient information has been provided to determine the likely impact of the proposals on bats. Further details are given below:

Planning policy and legislation

All species of bats receive special protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations), deliberately or recklessly to destroy or damage their

roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

If a bat roost will be affected by the works, a licence for development works affecting bats (i.e. for derogation from the provisions of the Habitat Regulations) will need to be obtained before works which could impact upon the roost can commence. This involves submitting a licence application to Natural England with a detailed mitigation plan informed by surveys undertaken in accordance with national guidelines.

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

In this case, since 1) the extent to which bats (which are a protected species) may be affected by the proposals has not been established, and 2) there appear to be no “exceptional circumstances”, the application would not be in accordance with the above planning policy.

Further survey requirements

The Bat Conservation Trust’s Bat Survey Guidelines state that to determine the presence or absence of bats where the building has been assessed as having “moderate” suitability for use by roosting bats (as is the case here) two dusk emergence / pre-dawn re-entry bat surveys need to be carried out. Surveys need to be carried out between May and September, with at least one taking place in the optimum period of May to August (inclusive), and with at least one being a pre-dawn survey.

Biodiversity Net gain

The development will lead a biodiversity net loss of -76.79%. The report states:

Options including the installation of a green roof on the building, retaining more of the existing grassland on the site, creating further areas of grassland on the site, and creating grassland in favour of introduced shrub planting were explored. However, it was concluded following these investigations that the proposed development does not have the capacity to result in a biodiversity net gain in terms of habitats.

Paragraph 180 of the NPPF (2021) states:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

And EN12 of the Reading local Plan which reads:

On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and

Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

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

A mitigation hierarchy approach, as set out in paragraph 118 of the NPPF, will be used to consider the loss of on-site biodiversity. In exceptional circumstances where the benefits of development outweigh the loss, and where the mitigation hierarchy has been followed, off-site compensation may be acceptable.

The proposals will lead to an outsize building and will lead to a large loss of biodiversity which, unless it could be demonstrated that there are no suitable alternatives, would not accord with the above policies. The council will need to decide whether the loss of biodiversity in this area of Reading is acceptable and if so, whether the loss of biodiversity will need to be addressed by off-site provision.