



Planning Statement



On behalf of:
Industrials REIT

In respect of:
Rose Kiln Court
Rose Kiln Lane
Reading
RG2 0BY

Date:
February 2022

Reference:
MA/IND/001-4/R001

1.0 Executive Summary

- 1.1 This Planning Statement has been prepared by Aylward Town Planning Ltd (ATP) on behalf of our client; Industrials REIT in support of a planning application submitted by them as landowner to meet the requirements of future opportunities to deliver modern multi-let industrial units to meet the needs of ingoing tenants for employment use.
- 1.2 The application site comprises an area of tired employment buildings and underused land. This includes a vacant office building and associated structures, with the land to the south being given over to extensive parking. The building had been designed in the early 1990s to allow for a range of uses and sub-division, but it has been in sole occupation by Thames Water until their recent decision to relocate at the end of their lease.
- 1.3 Through this application, it is intended that the proposed development will deliver new employment opportunities on this long-established site whilst helping to attract further investment into the Reading area.
- 1.4 The proposals will help to create approximately 115 additional full-time jobs. Although not all the work opportunities can be expected to be felt within the immediate local community, the proposals will increase the level of employment in the area. The proposals will result in a boost of around £4.8m to the local economy per annum as a result of the new jobs created and safeguarded and additional business rates payable on the units.
- 1.5 The NPPF supports economic development such as these proposals, stating that '*significant weight should be place on the need to support economic growth through the planning system*'.

2.0 Background

Site Location and Description

- 2.1 The application site is located in Reading's urban area, circa 750m south-west of the town centre. This is a long-established employment site with residential uses to the north. Uses to the south and west are commercial in character and the eastern boundary is formed by the A33 which is a major highway. The existing office building on the site is vacant and can be characterised as being underused land with need for investment.
- 2.2 The site covers 0.64 hectares and consists of a two-storey office building towards the north-eastern edge as well as parking, hardstanding, plant and landscaping.

Existing Uses

- 2.3 The application site comprises an area of tired employment buildings and underused land. This includes a vacant office building and associated structures, with the land to the south being given over to extensive parking. The building had been designed in the early 1990s to allow for a range of uses and sub-division, but it has been in sole occupation by Thames Water until their recent decision to relocate at the end of their lease.
- 2.4 Thames Water held the entire building (3420m²) for a considerable period but it has recently fallen vacant as the tenant has decided to relocate. The building is laid out to adjoin the western boundary with parking and access to its south.



- 2.5 In addition to the main office building, there are associated structures including an emergency generator and air handling equipment. By consequence of the office use, the extent of parking is considerable.
- 2.6 The site has an existing access onto Rose Kiln Court taken from the south-western corner of the site. The western boundary is formed by the A33 and the eastern boundary is largely

governed by a watercourse (Holy Brook). Land to the south has been in established employment use and the land to the north (beyond the watercourse) is comprised of a small development of family housing that would appear of a similar age to the commercial developments to the west of the A33.



Locality

- 2.7 The principle of commercial development in this location is already established and the employment use is recognised through the designation as an existing employment area.
- 2.8 The application site forms part of a well-established employment corridor south of the town centre and laid either side of the A33. In particular, there are a number of larger format commercial plots to the west of the A33 (including retailing, general employment and office uses) that have their primary access from Rose Kiln Lane.
- 2.9 The western boundary of the site is former by a group of established trees, immediately adjoining a watercourse (Holy Brook). The majority of these trees have been afforded TPO status and the Brook is recognised as providing considerable habitat value.

Relevant Planning History

- 2.10 It is understood from review of the desktop study that the site has had long-established employment use including a brickworks and then general industrial use from the 1950s that became vacant during the 1970s. The site was then cleared as part of the preparatory works to construct the A33 in the early 1990s and then came forward as a development site.
- 2.11 The site was then constructed pursuant to a consent from the early 1990s, and was then latterly occupied by Thames Water by 1995.

2.12 Application activity during their occupation was limited, largely focused on minor operational plant such as an emergency generator, air handling equipment and signage.

2.13 Following Industrials REIT acquisition and the tenant's decision to relocate, several applications have been submitted and approved in connection with the conversion of the existing building and its lawful use for residential apartments. These are summarised below:

211138/OPA

2.14 Conversion of office building from Class B1(a) to Class C3, comprising 38 residential units – Prior Approval Given 01/09/21

211148/OPA

2.15 Conversion of office building from Class B1(a) to Class C3, comprising 34 residential units – Prior Approval Given 03/09/21

211617/NMA

2.16 Alterations to fenestration of conversion approved under 211138/OPA – approved.

211618/NMA

2.17 Alterations to fenestration of conversion approved under prior approval. Approved.

211148/OPA

2.18 Removal of fire doors. Approved.

2.19 A pre-application enquiry was also submitted in 2021 (211026/PRE) that considered the opportunity for new build apartment development alongside the conversion of the existing offices through the Prior Approval. This suggested a strong officer preference for the site to be retained for employment uses.

3.0 Planning Policy Framework

3.1 This section identifies the key policy framework from the Development Plan, national policy and other local level guidance. These represent material considerations to be afforded weight in the s38(6) planning balance exercise.

3.2 The key Development Plan document re these proposals is the 2019 Reading Local Plan.

Reading Borough Local Plan

3.3 The Reading Borough Local Plan is the underpinning planning framework for guiding development for an extended period (up to 2036). For this proposal, the key policies comprise:

- Policy CC2
- Policy CC5
- Policy EM2
- Policy EM4

3.4 Policies CC2 and CC5 are key components of the Council's Plan-led strategy to tackle the Climate Emergency and include obligations on developers to deliver new schemes that seek to minimise carbon demand in construction and operation. Policy CC2 places an obligation on developers of major employment development to demonstrate compliance with BREEAM Very Good and CC5 seeks to ensure that waste generation is minimised.

3.5 This is clarified through the detailed wording of Policy CC5 and then through cross-reference to the 2011 Sustainable Design and Construction SPD. Policy CC5 states:

"Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting."

3.6 Policy EM2 (Location of new Employment Development) sets out that office developments would be typically directed to the main town centre or the A3 corridor and that other major employment uses would be directed to the A33 corridor or identified Core Employment Areas. This policy is positively worded in and provides a framework designed to support new employment development along the A33 corridor.

3.7 Policy EM4 (Maintaining a Variety of Premises) is expressly concerned with the need to provide flexible employment space that is responsive to meet the needs of new and growing

businesses. It expressly supports proposals that would look to redevelop older employment buildings to provide more flexible employment floorspace.

- 3.8 We note accompanying text at paragraphs 4.3.17 and 4.3.18 that state:

"In order to ensure a healthy and balanced local economy, we need to make sure that a variety of sizes and types of employment premises are available. This variety of premises should be widened, including seeking more modern and flexible employment space in the designated industrial areas, as well as flexible office buildings in the centre and elsewhere that can easily be subdivided to provide spaces for small and growing businesses. Development should not therefore reduce the range of sites and space available, and this applies in all locations, not merely the Core Employment Areas..."

"Adequate space for small-and medium-sized enterprises should be maintained, in order to ensure the future prosperity of Reading's economy. There is a need for the continued development of start-up/incubator and grow-on space in the Borough, and opportunities to provide this will be sought...planning can ensure that enough small units are available to be capable of acting as start-up space...Move-on accommodation is more difficult to define, particularly in terms of space, but a reduction in the range of units of 150 – 500 sq m should only occur where it is demonstrated that there is a surplus of such space."

NPPF

- 3.9 Though not part of the statutory Development Plan, national planning policy is an important material consideration and the NPPF may supersede earlier adopted local documents where these conflict with guidance set out within the NPPF.

- 3.10 The NPPF clearly recognises the need to support sustainable economic development and gives great positive weight to these objectives. Employment proposals that encourage local employment opportunities, promote higher skilled jobs and/or allow for existing businesses to expand will be supported.

- 3.11 NPPF Paragraph 81 states that planning policies and decisions should help create conditions that businesses can invest, expand and adapt. This paragraph also states:

"...Significant weight should be placed on the need to support economic growth and productivity, taking account both local business needs and wider opportunities for development..."

- 3.12 The NPPF is based on a presumption in favour of sustainable development, as clarified at paragraph 11. It confirms that where the Development Plan is silent or relevant policies are out of date, planning permission should be granted unless:

- *"Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
- *Specific policies in this framework indicate development should be restricted".*

Other Guidance

Employment Skills and Training SPD

- 3.13 This SPD was adopted in April 2013 and pre-dates the Local Plan but is cross-referenced in policy EM1 so it remains a material consideration.
- 3.14 The SPD has been designed to provide clarity and guidance in terms of how developers should contribute to employment initiatives, to enhance opportunities for the local workforce.

Sustainable Design and Construction SPD

- 3.15 This SPD was adopted in December 2019 and is cross-referenced in Local Plan policy.
- 3.16 The SPD sets out the Council's commitment to producing sustainable buildings and the interpretation of the policy framework in these regards.

4.0 Development Proposals

- 4.1 The development proposal seeks full planning permission to redevelop an area of existing tired buildings and other land to provide modern format flexible employment units. These are designed to meet multi-let employment requirements from light industry and general industry through to logistics.



- 4.2 These proposals deliver the opportunity for economic development on this established site for a scheme which reflects market signals. Early engagement with market advisers has resulted in a scheme that is deliverable and maximises opportunity for early investment. This will ensure the delivery of 11 units across 2 blocks for flexible employment uses including B2/B8 and light industry (Class E g iii). Site access will utilise the existing junction.
- 4.3 The scheme delivers two blocks of built form each of which provide flexible accommodation over two floors. The site covers 0.64 hectares and following clearance it will support 11 units with an aggregate 4080m² floorspace for mixed commercial uses. In addition to these buildings, the development will provide for a substation, parking, landscaping and other associated works.
- 4.4 These new units would range from 256m² – 526m² individually, delivering flexible employment floorspace with space available for turning and parking. By consequence of the clearance of the existing 3420m² building, the net additional floorspace will be 660m². Details of parking layout and provision in terms of cycle and EV parking will meet and exceed applicable local standards.

- 4.5 Whilst the scheme delivers additional floorspace and investment, this is entirely consistent with the historic use of the site and represents a positive use of an accessible brownfield site in the urban area. It is also clear that the new facilities will be a qualitative improvement both in terms of the buildings themselves but also through better facilities for staff including cycle shelters and other amenities where feasible.
- 4.6 Full details of the proposal with regard to use, amount, layout, scale, appearance, and access are set out in the accompanying Design and Access Statement. The proposals can however be summarised and broken down as follows:
- 11 no. employment units;
 - Units ranging from 256m² – 526m²;
 - Overall floorspace of 4080m²;
 - 76 parking spaces including accessible provision, plus cycle parking;
 - Space for turning movements and deliveries by commercial vehicles;
 - No adverse impact on protected trees; and
 - Other associated works.
- 4.7 Careful consideration has been given to the siting of proposed units and uses, servicing arrangements and car parking. This has sought to minimise adverse impact in terms of noise nuisance or light spillage to protect residential amenity.
- 4.8 The scheme proposes economic development and the siting of the new buildings create greater separation from residential uses and provides valuable screening to the A33. The new build provides better quality accommodation more likely to sustain considerable employment, whilst providing the screening function.
- 4.9 The proposed layout provides a range of small and mid-format units well aligned to market requirements. The scheme is designed to maximise flexibility to reflect occupier requirements, both by way of internal sub-division and also the potential to use the large first floor aperture for either glazing or direct shuttered access.
- 4.1 Early focus on providing high quality adaptable units provides the opportunity for early occupation and greater contribution to the local economy. Sustainable economic development aligns directly with planning objectives.
- 4.2 Industrials REIT has also sought to ensure that opportunity has been taken to select sustainable materials minimise energy use and support renewable technologies. The scheme provides cycle parking and infrastructure for EV charging.

5.0 Assessment of Development

- 5.1 This chapter assesses the proposal's compliance with relevant Development Plan policy and should be read alongside the accompanying drawings.
- 5.2 The building which currently occupies the Rose Kiln Court site is tired and poorly aligned to current market requirements. Feasibility work in regard to its reconfiguration for economic development uses suggest that the works needed would be of significant cost and would still render the accommodation compromised and it would be still sub-optimal in terms of occupier investment decision-making.
- 5.3 At the same time, it does appear clear that the site would be attractive if it could accommodate modern hybrid units to meet a range of existing and emerging requirements. In summary, the building has moved beyond its economic life and needs to be replaced to respond to strong latent demand for good quality space in this location.
- 5.4 The site has been in employment use since the 1950s and has supported general industry and then the current building which was delivered in the early 1990s. The building was designed to incorporate opportunities for sub-division and a range of typologies but was actually taken into single occupier use for office accommodation. The approval shows a design philosophy that supported flexible employment uses alongside a reality that it has been in use for offices with a considerable parking demand and large parking area to the south of the building.
- 5.5 The development proposes modern format flexible employment units designed to meet multi-let employment demand for light industry and general industry through to logistics.
- 5.6 Whilst the scheme delivers additional floorspace and investment, this is of similar magnitude to what has been delivered on the site in the past and what would be consistent with its Development Plan designation. It also represents a positive use of an accessible brownfield site in the urban area. Given the proximity of other uses in the urban area, the scheme has had regard to amenity considerations which is reflected in the scheme design.
- 5.7 Given the above, the following are considered relevant in the assessment of the scheme:
- The Principle of Development;
 - Amenity Implications;
 - Transport Implications;
 - Regeneration; and
 - Other Matters

The Principle of Development

- 5.8 The subject site is previously developed land within the urban area which has established use for employment purposes, most recently as an office for Thames Water. The principle of commercial development in this location is established.
- 5.9 Whilst it is not specifically identified as a Core Employment Area it is noted implicitly at Policy EM2 through its location along the A33 corridor which supports employment use in this location. In the scenario that this proposal sought to redevelop the office building and use the site for residential uses, the EM3 framework would seek to resist that approach other than through reference to a criteria-led demonstration that the site could not support employment uses moving forward. By implication, the policy framework is seeking to support and safeguard employment uses in this location.
- 5.10 These proposals will ensure the delivery of 11 units (which range from 256m² – 526m² individually) across 2 blocks for flexible employment uses including B2/B8 and light industry (Class E g iii). These new units provide 4080m² flexible employment floorspace with parking facilities meeting applicable local standards. By consequence of the clearance of the existing 3420m² building, the net additional floorspace will be 660m².
- 5.11 Whilst that is self-evidently an increase, in contextual terms it is of similar magnitude to the current office building, We understand the industrial use of the site (prior to construction of the A33) was more significant in terms of built form and quantum of employment supported.
- 5.12 In essence, there have been employment generating approvals in this locality since the 1950s and what is being proposed now is no fundamental change in character from the existing and the post-war period. The building proposed for clearance and replacement is not capable of economic repair- it needs to be replaced and there is strong market demand for good quality space which is what the applicant is proposing.
- 5.13 The proposal will deliver highly lettable modern format flexible employment units. Flexibility is provided by way of the type of users that can be supported (from light industry and general industry through to logistics) and unit typology. The scheme delivers 11 units with appropriate parking facilities, representing a qualitative improvement in terms of the built form and better facilities for staff including cycle shelters and other amenities.
- 5.14 The scheme provides a step-change where it provides for 11 units whereas the existing is now geared for a single occupier. This reflects market requirements and directly aligns with paragraphs 4.3.17 and 4.3.18 from the Local Plan as extracted below:

"In order to ensure a healthy and balanced local economy, we need to make sure that a variety of sizes and types of employment premises are available. This variety of premises should be widened, including seeking more modern and flexible employment space in the designated industrial areas, as well as flexible office buildings in the centre and elsewhere that can easily be subdivided to provide spaces for small and growing businesses. Development should not therefore reduce the range of sites and space available, and this applies in all locations, not merely the Core Employment Areas..."

"Adequate space for small-and medium-sized enterprises should be maintained, in order to ensure the future prosperity of Reading's economy. There is a need for the continued development of start-up/incubator and grow-on space in the Borough, and opportunities to provide this will be sought...planning can ensure that enough small units are available to be capable of acting as start-up space...Move-on accommodation is more difficult to define, particularly in terms of space, but a reduction in the range of units of 150 – 500 sq m should only occur where it is demonstrated that there is a surplus of such space."

- 5.15 The proposal provides direct and strong positive contribution to the aims of Policy EM2 as set out by the accompanying text extracted above.

Amenity Implications

- 5.16 The application site is within the urban area and has been used for employment purposes for at least seventy years. It has the benefit of a Local Plan policy framework which supports its use for (what were) B1/B2/B8 purposes and the intensification of such sites is actively supported by the policy framework.
- 5.17 It is noted that the existing building is located close to the northern boundary, which is also proximate to the nearest residential receptors. Another key consideration is highway noise consequent from proximity to the A33 corridor and associated adverse air quality that reflects that corridor.
- 5.18 The layout of buildings on the site means that the eastern boundary (against the A33) is largely absent of built form and as such the siting of new build akin to the existing would mean that it would be impeded in terms of noise climate and air quality.
- 5.19 The scheme design has sought to marry the need to deliver new employment floorspace with the opportunity to site these new buildings against these boundaries through which the scheme secures greater enclosure and the new built form can function to screen intervening views from the A33 and any acoustic transfer.
- 5.20 Through informal pre-application dialogue we are aware that the demonstration of an appropriate acoustic environment and consideration of air quality will be deemed as key issues which needs to be explored and justified accordingly. Given this, the applicant commissioned

acoustic advice to establish whether the proposed buildings and uses would result in an acceptable noise environment for relevant residential receptors.

- 5.21 The acoustic assessment tests worst case (which in respect of operational noise would be B2 industrial use) and concludes that no acoustic mitigation measures will be required to provide an acceptable noise environment for B1-B8 purposes and no justification for hours controls.
- 5.22 The Air Quality Assessment recognises the reduction in road traffic levels associated with the development will represent a decrease from the former and approved office use of the site. It is also noted that there will be some change in terms of the types of traffic associated with the new use, and that having regard to that the change in AADT flows from the site falls below the threshold of material where it would be necessary to complete further and more detailed analysis before consideration of mitigation measures.
- 5.23 Nevertheless, the scheme is already providing a range of measures to support non-car modes as well as low carbon transport choices (cycle parking and EV parking). By taking forward positive measures in the scenario where no mitigation was needed, it is straightforward to conclude that air quality presents no impediment to approval.
- 5.24 The air quality assessment confirms that by consequence of the fact that the scheme will result in a reduction in traffic and proposes no sensitive uses then it will create no adverse impact in terms of air quality.
- 5.25 We also confirm that the scheme will have external lighting but this will be sensitively designed and the isolux analysis will demonstrate that this will not result in spillage beyond the boundary that would impede the development.

Transport Implications

- 5.26 The application site has been found to be highly accessible and acceptable in transport terms. The application is accompanied by a transport statement which confirm that there could be no clear evidence of any significant adverse impact upon the operation of the highway network that would warrant refusal.
- 5.27 It is also the case that the site is well located on a key route close to other employment premises and in the urban area. It is a highly accessible site and there would be no credible basis to cite transport credentials or to seek mitigations as they would be unnecessary.

Regeneration

- 5.28 The regeneration and economic benefits of the proposals are considered here. For ease, these have been split into the following sub-sections and are considered in turn below;
- Economic/work benefits;
 - Local finance considerations; and,
 - Health Related Benefits

Economic/Work Benefits

- 5.29 The proposals will help to support the aims of the Local Plan and NPPF through the creation of new economic development and new employment opportunities within the proposed employment units. The scheme replaces existing buildings which are in poor condition and do not represent a credible long-term opportunity to sustain employment here.
- 5.30 Employment generation is largely dependent upon occupier business models but it is commonplace for such proposals to estimate regenerative potential by reference to benchmarked figures for job density. Job density for uses B1/B8 vary significantly but we adopt a mid-point which is 1 full-time job per 35 sq m of floorspace created, partly given the hybrid nature of the uses that are envisaged. We project that the development will sustain around 115 new permanent full-time jobs for the local area.
- 5.31 We do recognise that there are existing buildings but none of these are in occupation. However, the existing floorspace is in poor condition and it is unlikely to be lettable and will be cleared through this scheme. We estimate the net additional jobs created will be 115 jobs full-time equivalent (estimated 170 workers with a mix of full and part-time posts).
- 5.32 The analysis applies further caution by not applying the positive multiplier effects which will be had given the supportive role to the local construction industry. In addition to this, the proposed development will also help to deliver a number of temporary construction jobs.
- 5.33 Although not all work opportunities can be expected to be felt in the immediate community, the proposals will increase local employment. In addition to the principal uses, there will also be opportunities created in service and support roles (maintenance, cleaning and security) which secures a mix of available employment opportunities through the scheme.
- 5.34 As such, the proposed development, through its ability to create new jobs and attract new businesses to the area will help to deliver the objectives of achieving economic growth as supported by the NPPF.
- 5.35 The NPPF provides precise support for development that can deliver economic growth stating

that 'significant weight should be place on the need to support economic growth through the planning system'.

Local Finance Considerations

Temporary Employment Creation

- 5.36 Figures for construction-related employment are benchmarked against contract value, typically inclusive of fit-out costs. Relying on Scottish Enterprise guidance, the average cost for capital schemes to deliver one 12 month equivalent construction job is £75,000. This has been peer-reviewed by One North East and academic Review and is seen to be cautious – as such this represents a robust approach.
- 5.37 The construction value of the development is comprised of site clearance, the new buildings, engineering works and fit-out. The contract works value has been estimated by Stenprop's advisors (inclusive of tenant fit-out) at £5m. The upward trend in contract prices is noted so there is clear potential that the contract value could be higher thus adding in further caution.
- 5.38 In terms of the above construction value this would equate to an opportunity to generate 67 net additional construction jobs (FTE for 12 month continuous period).
- 5.39 In monetary terms, the direct economic effect of these newly created permanent jobs can be calculated by reference to the type of employment as the average earnings varies by sector and by region. Through analysis the net additional local effects owing to wage benefits are estimated to be £3.14m during an assumed 12 month construction period.
- 5.40 In terms of the construction period, the calculation is:

<u>Aggregate net additional jobs</u>	x	<u>Average earnings (South East - Construction)¹</u>
67	x	£46,811
	=	<u>£3.14m</u> Total net additional local effects

Permanent Employment Creation

- 5.41 This next section assesses the value of the outputs set out within a previous sub-section. As the development will create 115 full time job opportunities, we calculate an estimated value that this will bring for the local economy. It is important to note that this does not include a calculation for multiplier benefits which will arise (typical figure used is a 21% multiplier).

<u>Additional jobs</u>	x	<u>Average annual FTE earnings (South East)²</u>
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¹ Source: 2021 Annual Survey of Hours and Earnings (ASHE) Table 5.7a Annual pay - For 'Construction of Buildings' South East.

² Source: 2021 Annual Survey of Hours and Earnings (ASHE) Table 5.7a Annual pay - For 'All Production Industries' South East

$$\begin{array}{rcl}
 115 & \times & £39,438 \\
 & = & \underline{£4.54m} \text{ Total net additional local effects p.a}
 \end{array}$$

Business Rates Income

5.42 The proposed development will create new commercial floorspace through the retail use and these will be liable to business rates. The following calculates the rates payable for this floorspace calculated based on the rateable value of similar commercial uses in the area. It should be noted that the following rates are those that are payable to the Council by the occupiers of the existing units on the basis of a unit area charge basis and the 2021/22 49.9% small business multiplier rate.

5.43 Rateable values vary by type but for the purposes of this exercise we assume that the floorspace is split broadly 33/33/33 between warehousing, offices and industrial use.

Use	Floorspace m ²	Assumed Rate payable per m ²	Rates payable
Warehouse Uses	1360	£64.87	£88,223
Office Uses	1360	£74.85	£101,796
Industrial Uses	1360	£59.98	£81,573
Total	4,080		£271,592

5.44 As set out in the table above, the subsequent occupation of these units will bring in excess of £0.27m boost to the economy per annum through the generation of business rates.

Permanent Economic Boost

5.45 Overall, taking into account the business rates and the local employment creation, the proposed development will have a boost of around £4.81m to the local economy per annum.

Health Related Benefits

5.46 Increased employment opportunities have been found to bring significant benefits to the health of the local community. The Government White Paper highlights how increasing employment levels has a direct positive impact on health as a result of higher income levels.

5.47 The proposals create increased employment opportunities, leading to income growth and access to health care. This provides strong contribution to corporate and planning objectives.

Other Matters

5.48 The sections above addressed the key points which pertain to the development proposal. The following section addresses residual matters relevant to the planning balance judgment.

Flood Risk

- 5.49 The application is accompanied by a drainage assessment which clarifies the proposed approach in terms of surface water drainage which includes appropriate attenuation. By accepting controls in regard to surface water drainage, it is straightforward to conclude that flood risk and drainage present no impediment to approval.

Ground Conditions

- 5.50 The application is accompanied by both a phase 1 and phase 2 ground conditions report, which establishes the current ground conditions and clarifies the proposed approach in terms of construction and any mitigation measures that could be required.

Archaeology

- 5.51 The Proposals Map suggests that part of the site falls into an area of Archaeological Significance albeit it tends to align with the areas of existing built form and is avoided by the proposed new building. Given the nature of site works undertaken for the existing development and the proposed new scheme, it appears very unlikely that the site would support any substantive architectural remains. Even if that were to be the case, the siting of the new building should suggest that the potential for impacting any residual sub-surface assets is negligible.
- 5.52 Nevertheless, if the Council did conclude that investigations were required then the applicant would be agreed to provide these to discharge any appropriately worded pre-commencement planning condition that could be required.

Protected Trees

- 5.53 The application is accompanied by a tree survey of the site and those on the boundary with Holy Brook. The submission also includes an arboricultural impact assessment that clarifies that through the siting of the new build and general design approach there is no requirement to consider works to those protected trees and thus no harm will arise.

Protected Species

- 5.54 The application is accompanied by a Preliminary Ecological Appraisal and additional survey material in connection with protected species. This demonstrates that there is no substantive habitat potential on the main body of the site and that areas of interest are restricted to the Holy Brook and its banking which lie outside the site. By the siting of the new build, there is no requirement to complete works to the Holy Brook boundary and thus no harm will arise.

Energy

- 5.55 The applicant has commissioned a Zero Carbon Feasibility Study. These documents assess the energy demand from the scheme and establish the potential for mitigation through energy-efficient construction and operation (including air tightness and energy efficiency) and the use of zero carbon technologies where feasible.
- 5.56 Whilst the existing unit is effectively obsolete, the scheme provides high-spec units to deliver strong environmental performance including renewable technologies.
- 5.57 In addition to the targeted BREEAM 2018 Very Good Rating and increased fabric insulation measures that have been adopted to comply with Policy CC2, by installing PV panels as part of the base build works this goes beyond the minimum planning requirements and provides a strong approach that minimises net carbon demand and embraces low-carbon technologies.

Engagement

- 5.58 The applicant did enter into a formal pre-application process with the Council, in relation to a different form of development. Whilst we have not expressly engaged re this scheme, the feedback received on the alternate proposal made abundantly clear that the Council did want the site to remain in active use and that economic development uses were much preferred.
- 5.59 The applicant team is grateful to officers for their time through which we have discussed the types of use and scale of development that could be supported and received advice in terms of points which would require detailed justification to assist the determination process.
- 5.60 The applicant also intends to notify and engage with elected members so that they are aware of the emerging proposal and the key points pertaining to the development, as well as encouraging them to provide their input to the developer team. Information pertaining to the circulation and content of this information can be disclosed to the Council upon request.

6.0 Conclusion

- 6.1 The subject site is previously developed land within the urban area which has established use for employment purposes. The principle of commercial development in this location is established and this is reflected in the Local Plan approach which supports employment use of this type in this location and a strong planning framework to safeguard it from loss.
- 6.2 The building on the Rose Kiln Court site which is proposed for clearance and replacement is not capable of economic repair- this needs to be replaced and there is strong market demand for good quality energy-efficient space which is what we are proposing.
- 6.3 The proposal will deliver highly lettable modern format flexible employment units with strong environmental performance. Flexibility is provided by the type of users that can be supported (from light industry and general industry through to logistics) and unit typology. The scheme delivers 11 units with appropriate parking facilities, with facilities for staff including cycle shelters and other amenities where feasible.
- 6.4 The proposed layout provides a range of small and mid-format units. The scheme is designed to maximise flexibility to reflect occupier requirements, both by way of internal sub-division and the potential to use the large first floor aperture for glazing or direct shuttered access.
- 6.5 Early focus on providing high quality adaptable units provides the opportunity for early occupation and greater contribution to the local economy. Sustainable economic development aligns directly with planning objectives.
- 6.6 This assessment has shown that the proposed use results in no material conflict with any Development Plan policy requirements. In addition, there are no conflicts arising in terms of other planning objectives related to flood risk or transport matters.
- 6.7 Paragraph 11 of the NPPF is based on a presumption in favour of sustainable development and confirms that planning permission should be granted unless:
- *"Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
 - *Specific policies in this framework indicate development should be restricted".*
- 6.8 There is no evidence to suggest that the proposal would conflict with any requirements of the NPPF, and as such in the light of paragraph 11 it should be supported. Paragraph 8 then moves to create a degree of urgency in terms of the deliverability of development which is sustainable confirming that these types of development should be approved 'without delay'.