



Statement of Community Involvement



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/R004

1.0 Executive Summary

- 1.1 This Statement of Community Involvement (SCI) has been prepared by Aylward Town Planning Ltd (ATP) to summarise the stakeholder consultation that has taken place and that which is planned, and how this exercise has influenced the development proposals.
- 1.2 This SCI is submitted 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.
- 1.3 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.
- 1.4 The applicant did enter into a formal pre-application process with the Council consistent with the advice of the SCI. However, that engagement was had in connection with a different residential-led scheme rather than this. Nevertheless, clear advice was received in terms of the type of development that would be likely to be supported in policy terms and this clearly favoured uses of this type.
- 1.5 We are grateful to officers for their time prior to submission through which we have discussed the proposed development, the form of application and received advice in terms of points which would require more detailed justification to assist the determination process.

2.0 Policy Context

- 2.1 This Statement of Community Involvement has been prepared in accordance with the provisions of the NPPF and Reading's Statement of Community Involvement published in March 2014.
- 2.2 The Localism Act and the NPPF set out advice from Central Government on, amongst other things consultation requirements in associated with major development. The NPPF states that more effective community involvement is a key element of the Government's planning reforms and this is best achieved when stakeholders are engaged in the development process from an early stage. This will enable concerns to be assessed at an early stage.
- 2.3 The National Planning Policy Framework places importance on community engagement in the development of Local Plans:
'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'
- 2.4 The Council's Statement of Community Involvement (SCI) has been published consequent to the first iteration of the NPPF albeit shortly prior to the enactment of the Localism Act (adopted April 2014). Nevertheless it is concluded to be consistent with the approach promoted through national guidance. It includes a section relating to pre-application consultation on major planning applications.
- 2.5 The SCI includes advice within Section 7 that pertains to the consultation (both that which is necessary and that which is encouraged) relating to planning applications. The form of consultation suggested is tailored to the type and magnitude of proposal, which includes recommendation of the use of formal pre-application engagement for larger schemes.
- 2.6 The SCI confirms that the Council welcomes and encourages pre-application discussions between applicants and other stakeholders and refers to a formal pre-application process which can positively shape a subsequent determination process for planning applications. However, the SCI also confirms that there is no statutory requirement for applicants to undertake their own consultation.
- 2.7 The SCI makes suggestions within Section 7 as to the form of the consultation encouraged but also as to how this process should be referenced in the application submission. It then makes commentary about intensive engagement (such as the Planning for Real approach) for

strategic developments and this is described in detail within the extended bulleted advice at and following paragraph 7.5.

- 2.8 The Council's SCI advises as follows through paragraph 7.3 the types of development that would warrant more significant consultation as is then set out in detail at paragraph 7.5:

The following categories of development are considered to be sensitive or of a significant scale. If a development falls within any of the following categories, applicants are strongly advised to follow the guidance in this section:

- *Development exceeding the following thresholds:*
 - *Housing: a net increase of more than 50 units;*
 - *Retail or leisure: a net increase in floorspace of 2,500m²;*
 - *Office: a net increase of 2,500 m²;*
 - *Other employment: development with similar levels of employment to 2,500m² office floorspace;*
 - *Mixed uses: developments which would have equivalent total levels of development to those listed above, e.g. a net increase of 25 units together with 1,250 sq m of offices;*
 - *Other uses: a net increase of 5,000m².*
- *Development which would not be in accordance with the development plan;*
- *Development proposed on playing fields owned by a local authority or used by an educational institution;*
- *Development proposed on more than 5 ha of greenfield land;*
- *Schedule 1 and 2 developments as defined by the Environmental Impact Assessment Regulations;*
- *Developments involving the loss of allotments; and*
- *Any other proposals that are judged by the planning case officer to be particularly sensitive or of significant interest to the wider local community.*

- 2.9 As set out in Section 1, the applicant did enter into a formal pre-application process with the Council consistent with the advice of the SCI. The applicant team is grateful to officers for their time and engagement prior to submission through which we have discussed the forms of development that would be deemed acceptable in principle, as well as advice in terms of points which would require more detailed justification to assist the determination process.

3.0 Consultation

- 3.1 The Council's SCI provides strong encouragement of the benefits of undertaking pre-application engagement for all parties concerned with the development process.
- 3.2 However, whilst the SCI is not express about this matter, the reality is that there is no statutory requirement for applicants to undertake their own consultation. The only statutory obligations fall upon local planning authorities to consult with stakeholders, other than in very limited circumstances as set out in statute.
- 3.3 This report considers the potential for consultation in addition to that which will be undertaken by the Council's approved notification procedure. This takes into account the statutory requirements for the publicity of planning applications as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2010 as amended. This includes notices being placed at the application site and in the local press. It is current practice to use the Reading Chronicle for such notices, although consideration will be given on a case by case basis to the appropriate consultation process. Site and press notices will provide a minimum 21 days for response.

Prior Engagement

- 3.4 The applicant committed to securing formal advice from Council officers in regard to the form and prospects for new development before submission.
- 3.5 Whilst the focus of that discussion was about a potential re-use of the site to support residential homes, the most valuable component of this engagement was to clarify the forms of development that would be acceptable in planning policy terms. This evidently favoured economic development uses and consideration was also had in terms of intensity of use and high-level dialogue in terms of massing and siting.
- 3.6 The engagement with officers has been welcome as it has provided the opportunity for interaction to develop our proposal in regard to the types of use and arrive at the proposed site layout plan. Beyond the principles of preference for employment uses, the key comment arising (in terms of the need for clarification or revisions) was to ensure good acoustic design and to demonstrate that potential noise nuisance had been considered and properly mitigated for neighbour properties.

2014 SCI- Paragraph 7.5 Framework

- 3.7 The Council's SCI sets out advice that encourages developers to take opportunities to engage

and secure meaningful feedback. It also sets out screening criteria where it is suggested that more substantial engagement should ideally be taken forward for schemes that would be reasonably concluded as either sensitive or of significant scale, nevertheless confirming that this is not obligatory.

3.8 In the context of these screening criteria, those which pertain to sensitivity are extracted below and we confirm that none of these are applicable in this instance.

- *Development which would not be in accordance with the development plan;*
- *Development proposed on playing fields owned by local authority or used by educational institution;*
- *Development proposed on more than 5 ha of greenfield land;*
- *Schedule 1 and 2 developments as defined by the EIA Regulations; and*
- *Developments involving the loss of allotments.*

3.9 In the context of the residual screening criteria which pertain to significance, we extract those below which could pertain to employment development and then consider whether any of these are applicable in this instance.

- *Development exceeding the following thresholds:*
 - *Office: a net increase of 2,500 m²;*
 - *Other employment: development with similar levels of employment to 2,500m² office floorspace;*
 - *Other uses: a net increase of 5,000m².*

3.10 The scheme provides 4080m² of commercial floorspace, which represents a net increase of 660m² from the existing. It is clear that the step-change from the existing to the proposal falls well below the thresholds set out in the Council's SCI where very detailed engagement would be recommended.

3.11 It is self-evident that the Council's adopted framework that would seek very intensive engagement for significant and sensitive proposals would not be engaged by this scheme.

Prior Notification

3.12 The applicant 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.

Statutory Engagement

3.13 It should be recognised that the above points are all in addition to the engagement and consultation which is required (of the local planning authority) upon submission of the

planning application in due course. The applicant looks forward to working positively with the local planning authority and relevant stakeholders in order that the scheme can be positively determined and to accelerate the delivery of this sustainable economic development scheme.

Summary

- 3.14 It should be recognised that the consultation process is ongoing and that it will exceed statutory requirements and will include:
- Council's statutory consultation;
 - Pre-application engagement with planning officers;
 - Pre-submission notification to elected members;
 - Full suite of planning documentation for submission;
 - Responses to comments made; and
 - Presentation and decision at Committee as necessary.

Response to Feedback

- 3.15 This process is ongoing. We have had initial engagement with planning officers who have highlighted the need for the submission to consider acoustic harm and to provide mitigation where this is justifiable and necessary. This advice was welcome.
- 3.16 The applicant team had already commissioned acoustic advice and has undertaken site-based surveys of this actively used employment site to ascertain whether the proposed development would justify the need for any mitigation measures over and above the benefits arising from the new build which will deliver better acoustic screening at the site boundaries.

4.0 Conclusion

- 4.1 It is considered that the form of development falls well below a threshold where the extent of engagement suggested at paragraph 7.5 of the SCI would apply.
- 4.2 It is recognised that the view of the key stakeholders (the local community, local Ward Councillors, affected businesses, planning officers, other agencies) are important, and this has certainly been influential in respect of the form of the proposals submitted for detailed planning consent.
- 4.3 The consultation exercise undertaken is ongoing, and it is considered that it will meet the requirements of the NPPF and Reading Council's Statement of Community Involvement.