



Quod

Planning Statement

Brunel Retail Park, Rose
Kiln Lane, Reading

DECEMBER 2020

Q100647

Contents

1	Introduction	2
2	Site and Surrounding Context	6
3	Proposed Development	13
4	Planning Policy Context	16
5	Planning Assessment	21
6	Conclusion	28

Documents

1	Site Location Plan (Application 1)
2	Site Location Plan (Application 2)
3	Copy of Pre-Application Submission to Reading Borough Council (dated 20 th May 2020)
4	Copy of Reading Borough Council Pre-Application Response
5	Copy of Canals and River Trust Pre-Application Response
6	Biodiversity Net Gain Assessment Metric

1 Introduction

- 1.1 This Planning Statement has been prepared by Quod on behalf of MCTGF Trustee 1 Limited and MCTGF Trustee 2 Limited as Joint Trustees for the Mayfair Capital TGF Jersey Property Unit Trust (c/o Mayfair Capital Investment Management and Westmount Real Estate) (the 'Applicant') in support of two planning applications relating to the redevelopment of Brunel Retail Park on Rose Kiln Lane, Reading, RG2 0HS (the 'Site').
- 1.2 The first application (hereafter referred to as 'Application 1') seeks wholesale redevelopment of the site to provide 2no. modern industrial warehouse units (Unit A and Unit B), and the second application (hereafter referred to as 'Application 2') proposes the continued use of the existing retained floorspace within Class E, following consolidation of the Retail Park in the event that only the first phase of the proposed industrial scheme is implemented.
- 1.3 The UK retail sector is undergoing structural changes that have been exacerbated by the COVID-19 pandemic. Those changes are affecting all parts of the sector with many high-profile failures over the last 2 years that have led to surplus stock. There has also been extensive and well publicised use of Company Voluntary Arrangements (CVAs), with traditional out of centre retailers further reducing their store requirements given improvements in supply chain and multi-media retailing. The recent pandemic has acted as an accelerator to this rapidly changing sector, meaning that retail park owners are reviewing their options for out of centre sites including repurposing all or part for alternative uses. This is exactly the case with Brunel Retail Park.
- 1.4 As the retail sector continues to adapt to wider structural forces, the logistics market has been remarkably strong over the 9 months in particular, as many of the changes we have seen since the initial national lockdown - particularly the dramatic shift to online shopping - have favoured the industrial sector. The growth of e-commerce has seen a spike in demand during COVID-19 from 19% of retail spending to over 30%. Retailers have also been rapidly expanding their online platforms to adjust to this shift in activity. Another impact of the virus has shown the need for more contingency stock holding to increase resilience, which is expected to be further pronounced by Brexit as occupiers look to meet customer expectations for just in time deliveries, mitigating inevitable port delays. As such, demand for high quality, well located facilities is very strong and this is expected to continue with limited pipeline supply.
- 1.5 The interrelated but differing fortunes of the retail and logistics sectors underpin the planning strategy at Brunel Retail Park, namely, to repurpose all or part of the retail floorspace for much needed industrial warehousing stock. This is the premise for the two planning applications that are being advanced on behalf of the Applicant.
- 1.6 To ensure that the needs of the two sectors are met with adequate flexibility to adapt, the redevelopment proposals have the potential to be phased. Whether they are ultimately phased will depend on the commercial discussions with existing tenants across the retail park. If only part of the Retail Park is developed, only Unit A will be constructed. Full details of both applications including possible phasing are provided in section 3 of this Statement.

- 1.7 From the outset it should be highlighted that the planning application is advanced following positive pre-application discussions with Reading Borough Council (RBC); the scope of has been agreed and key planning issues have been identified which are comprehensively addressed in the submission.
- 1.8 It should be further highlighted that the redevelopment of the site will result in a significant reduction of out of centre retail floorspace. As a minimum, the total retail floorspace on site will reduce by 4,641 square metres, or by 14,775 square metres if both industrial phases are delivered. If only Unit A is implemented, to maximise the future letting of the retained retail floorspace, the second planning permission seeks consent for continued use of that floorspace within Class E.
- 1.9 The proposals present an opportunity to make more efficient use of land by providing one or two high-quality modern employment industrial units on a large previously developed site, which in turn will create a significant number of employment opportunities. The proposed redevelopment will result in extensive economic and social benefits as well as supporting the aims of the planning and economic policy at local and national level. These benefits include the creation of jobs and investment into the local economy.
- 1.10 These policy-compliant proposals will result in the creation of high-quality employment floorspace and it is proposed to satisfy an identified market need of the local area. To this end, the proposal will help achieve the Council's required industrial and / or warehouse floorspace of 148,000 square metres by 2036. The investment in the site will also deliver economic development which is strongly supported by the National Planning Policy Framework (NPPF) (2019).
- 1.11 This report has been prepared to assess the application proposals against the relevant provisions of the statutory Development Plan and other material considerations, particularly the NPPF. This Statement will demonstrate that planning permission should be granted without delay having applied the NPPF presumption in favour of sustainable development. It will demonstrate full development plan support for the principle and will also assess all relevant development management considerations, with appropriate mitigation set out where appropriate.
- 1.12 The remainder of this Statement is set out as follows:
- **Section 2 – Site and Surrounding Context**
 - **Section 3 – Proposed Development**
 - **Section 4 – Planning Policy Context**
 - **Section 5 – Planning Assessment**
 - **Section 6 – Summary and Conclusions.**
- 1.13 Finally, this Statement should be read alongside the following supporting reports and plan which accompany Application 1:
- Design and Access Statement, prepared by Fletcher-Rae Architects;

- Air Quality Assessment, prepared by WYG;
- Ecological Statement, prepared by Ecology Solutions;
- Energy Statement, prepared by Crookes Walker Consulting;
- External Lighting Report, prepared by Crookes Walker Consulting;
- External Lighting Plan (dwg. 1990-EX-6301-PL1);
- Flood Risk and Drainage Assessment, prepared by Bradbrook Consulting;
- Flood Risk Sequential Assessment, prepared by Quod;
- Landscaping Scheme, prepared by Encon Associates;
- Noise Assessment, prepared by WYG;
- Preliminary Risk Assessment, prepared by Delta Simons;
- Sustainability Statement and BREEAM Pre-Assessment, prepared by Envision;
- Transport Assessment, prepared by TTP;
- Tree Survey Report, prepared by Encon Associates;
- Existing Utilities Drawing (dwg. 1990-EX-9001-PL1);
- Gas Disconnections Drawing (dwg. 1990-EX-9002-PL1);
- Water Disconnections Drawing (dwg. 1990-EX-9003-PL1);
- BT Disconnections Drawing (dwg. 1990-EX-9004-PL1);
- Electricity Disconnections Drawing (dwg. 1990-EX-9005-PL1);
- Utilities Statement, prepared by Crookes Walker Consulting; and
- The following plans, prepared by Fletcher-Rae Architects;

Drawing Title	Drawing No.	Scale
Site Location Plan	19032 PL01	1:1250 @ A3
Existing Site Plan	19032 PL02	1:500 @ A1
Constraints Plan	19032 PL03	1:500 @ A1
Proposed Site Plan	19032 PL04	1:500 @ A1
Proposed Phasing Plan	19032 PL05	1:1000 @ A1
Proposed Site Sections	19032 PL06	1:200 @ A1
Unit B Proposed GA Plan	19032 PL11	1:200 @ A1
Unit B Proposed Roof Plan	19032 PL12	1:200 @ A1
Unit B Proposed GA Office Plan	19032 PL13	1:100 @ A0
Unit B Proposed Elevations	19032 PL14	1:200 @ A1
Unit B Proposed Sections	19032 PL15	1:200 @ A1
Unit A Proposed GA Plan	19032 PL21	1:200 @ A2

Unit A Proposed Roof Plan	19032 PL22	1:200 @ A2
Unit A Proposed GA Office Plan	19032 PL23	1:100 @ A1
Unit A Proposed Elevations	19032 PL24	1:200 @ A1
Unit A Proposed Sections	19032 PL25	1:200 @ A1
Proposed Cycle Shelters	19032 PL31	1:50 @ A3
Proposed Waste Compound Enclosures	19032 PL321	1:50 @ A3

2 Site and Surrounding Context

- 2.1 A Site Location Plan (dwg. 190320-PL01) is appended as **Document 1**. The Site is an established Retail Park located to the south of Reading town centre.
- 2.2 The Site is bound to the north, south and east by commercial properties. The River Kennet which runs in a broadly north-south orientation is located to the west of the Site and beyond that is the A33 which provides access to the M4. The closest residential receptors to the Site are located circa. 200 metres to the south west on Greenham Avenue.
- 2.3 The Site measures at 3.5 hectares and currently comprises 14,775 (Gross Internal Area) of retail floorspace at both ground floor and mezzanine level, in the form of 13no. retail units. A schedule of existing floor areas is provided below.

Unit Number	Existing Occupier	Ground Floor Area (GIA) (sqm)	Mezzanine Floor Area (sqm)
1	Halfords	701	341
2	Pets at Home	935	n/a
3a	Vacant	1202	n/a
3b	Next	1212	600
4	Go Outdoors (sold out of administration)	1868	1538
5	Vacant	931	n/a
6a	Dreams (sold out of administration)	467	339
6b	Shoe Zone	459	n/a
7	Vacant	937	n/a
8	B&M	1897	275
9	Laura Ashley (in administration)	460	354
10	Subway	94	n/a
11	Costa	165	n/a
Total		11,328	3,447
Total Floorspace		14,775	

- 2.4 The Retail Park has suffered from several long-term vacancies. It also occupied by several retailers who have been or still are in administration.

- 2.5 All of the Units at Brunel Retail Park operate under Class E including retail and café / restaurant.
- 2.6 The Site is accessed via Rose Kiln Lane, via a 4-arm roundabout junction. Access to the service yard to the rear of the Site is taken via a priority-controlled junction on Gillette Way. There is currently parking for up to approximately 451 vehicles, split each side of the principal access way. There is also designated staff car parking and additional retail external compounds.
- 2.7 According to the Environment Agency, the majority of the Site falls within Flood Zone 1, but a small part at the western boundary of the Site falls within Flood Zone 2. The River Kennet is located within circa. 40 metres of the Site. The River Kennet and the neighbouring Fobney Meadow are both allocated as part of a Major Landscape Feature. Kennet Island Nature Reserve is located to the south west of the Site, between the Site and the River Kennet.
- 2.8 Furthermore, the Site is partially within the Biodiversity Opportunity Area 50m buffer and partially within the Canal and Rivers Trust Planning Buffer.
- 2.9 The Site is not in a Conservation Area. There are no listed buildings or structures on or adjacent to the Site. There is a Tree Protection Order (TPO) on the eastern part of the site which protects 1 no. tree along the site frontage on Rose Kiln Lane. The TPO reference is 118/05.
- 2.10 The Site is located adjacent to an Air Quality Management Area (AQMA).

Relevant Planning History

- 2.11 There is extensive planning history at the Retail Park which is summarised below.
- 2.12 The Retail Park was constructed under permission 94/00442/FD, dated 23rd December 1994, for the following development.
- “Erection of a non-food retail warehouse (A1) with ancillary service area and car parking for 500 cars”.*
- 2.13 This ‘Baseline Permission’ was subject to 20 no. conditions which included various controls over the number of units and the sale of goods. Condition 13 concerns subdivision for example and states that this should not result in:
- More than 14no. separate non-food retail units;
 - Units measuring at less than 485 square metres;
 - More than 6 no. retail units measuring less than 900 square metres; or
 - More than 3 no. retail units measuring at less than 700 square metres.
- 2.14 Condition 12 and 14 limited what goods could be sold from the retail park, as follows.

All units shall not be used for the sale of goods other than DIY, furniture, home furnishings, floor coverings, electrical and photographic goods, automotive parts and accessories, cycles,

products for and including domestic pets, sports goods, leisure goods, clothing and footwear and ancillary items and for no other purpose within Class A1 of the Town and Country Planning (Use Classes) Order 1987.

No more than 3 retail units shall be used for the sale of clothing and footwear.

2.15 Whilst these restrictions relate to most units, there are wider permitted ranges of goods controlled by other permissions, as explained below.

2.16 In addition to those goods covered by conditions 12 and 14 of the Baseline Permission, Unit 2 can also be used for the sale of up to and including 15% of the gross floor area of as a pet care service including veterinary services is considered ancillary to the main retail use of the unit, following approval of application ref. 1000540.

2.17 Within Unit 3A (currently vacant), again in addition to those allowances in the Baseline Permission, there is also the permitted sale of:

- ambient food and drink from an area not exceeding 20% of the net sales area,
- household and health and beauty goods from an area not exceeding 20% of the net sales area,
- clothing and footwear from an area not exceeding 5% of the net sales area.

2.18 Unit 4 (Go Outdoors) is controlled by a separate goods restriction, following the grant of application ref. 170215. That permission also prevented subdivision. The goods restriction is as follows.

'Unit 4 shall not be used other than for the display and sale of DIY goods, furniture, home furnishings, floor coverings, electrical and photographic goods, automotive parts and accessories, cycles, products for and including domestic pets, and sport and leisure goods (which for the avoidance of doubt may include the display and sale of sports and leisure clothing and sports and leisure footwear provided that the display and sale of sports and leisure clothing and sports and leisure footwear does not exceed 50% of the net retail floorspace) and for no other purpose within Class A1 of the Town and Country Planning (Use Classes) Order 1987.'

2.19 Unit 8 (B&M) is also subject to further allowances:

'Within Unit 1-2 hereby permitted, the area of floorspace for the sale of food, drink and confectionary shall not exceed 100sqm and the area of floorspace for toiletries shall not exceed 80sqm.'

2.20 Unit 9 (Laura Ashley) is controlled by condition 10 of permission ref. 041089 which reads:

'The new floorspace hereby permitted shall not be used for the sale of goods other than DIY, furniture, home furnishings, floor coverings, electrical and photographic goods, automotive parts and accessories, cycles, products for and including domestic pets, sport, leisure goods, clothing and footwear and ancillary items and for no other purpose within Class A1 of the Town and Country Planning (Use Classes) Order 1987.'

2.21 And finally, Unit 10 (Subway) and Unit 11 (Costa) are controlled by condition 7 of application ref. 131743 which states:

'No part of the building hereby approved shall be used other than as café / restaurant, sandwich or coffee shop or other use serving food to visiting members of the public, and shall not be used for any other use falling within Class A1.'

2.22 There is no other planning history of relevance.

Pre-Application Discussions

2.23 Consistent with paragraphs 38 to 41 of the NPPF (2019), the Applicant has actively engaged with Officer's at RBC in a formal pre-application consultation.

2.24 This comprised submitting a pre-application meeting request, which was submitted to RBC on the 20th May 2020. The pre-application was given the reference 200715/PREAAP.

2.25 The submission outlined the nature of the proposed development, the broad approach to be taken to address relevant local and national policy and the scope of the planning documentation to be submitted alongside a future planning application. The submission was also supported by a Proposed Site Plan, Vision Document, Transport Scoping Note and Sustainability Overview. A copy of the full pre-application submission is appended as **Document 3**.

2.26 This was followed up by a meeting with Planning Officers from RBC on the 24th June 2020. Pre-application discussions with RBC focused on the principle of development; design and layout; and highways. It should be noted that the scheme discussed with RBC at the pre-application stage was for a single industrial unit. The scheme was revised following pre-application discussions and the relevant Planning Officer was made aware once these revisions had been finalised, although no further pre-application discussions took place.

2.27 In summary, the following was recommended by RBC. A response made on behalf of the Applicant follows the recommendations.

Principle

2.28 RBC stated that Policy EM2 identifies the relevant locations for commercial development and for major employment uses, including industrial and storage and distribution sites and that these should be located in the A33 Corridor or in the Core Employment Areas. RBC confirmed that the Site is located just to the east of the A33 and therefore falls within the defined "corridor" and is located opposite employment area EM2e: North of Basingstoke Road. As such, RBC confirmed that in terms of its specific location, the proposed development is considered to be acceptable in principle.

2.29 RBC did outline that the site is immediately north and adjacent to the site allocation SR2, which is a primarily residential area (between 680 and 1,020 dwellings) along with an extension to Whitley District Centre, school provision, open space and public realm improvements and small business units for mixed use including residential. As such, RBC requested that any

future development at the Site would have to be mindful of this and should not jeopardise the bringing forward of the allocated site.

- 2.30 *In line with Officer's comments regarding site allocation SR2, the scheme has been designed with the proposed residential development of the adjacent site in mind. In particular regard has been had to noise, air quality and other environment health issues, the details of which are outlined later in this Statement.*

Design & Landscaping

- 2.31 RBC confirmed that overall, it was considered that the proposed building would achieve a good balance between function and design and that the overall proposed layout works effectively within the constraints of the existing layout and form of the retail park, whilst achieving a satisfactory servicing area.
- 2.32 The RBC Natural Environment Officer highlighted the requirement to think carefully about landscaping, protection of the TPO tree, and any further opportunities for greening, including green roofs, which would also assist with the sustainability credentials of the application.
- 2.33 *In line with Officer's comments regarding landscaping and protection of trees, a landscaping scheme and Tree Survey Report has been submitted as part of this application. The final scheme has been designed with the TPO (ref. 118/05) and existing landscaped area to the west of the site in mind. The documents confirm that a total of 2 no. trees require removal to facilitate the redevelopment works, but further planting in the form of specimen tree planting, shrub planting and bulb planting is proposed in order to improve the visual appearance of the street scene and the site as a whole. Further details of this are outlined later in this Statement.*

Highways

- 2.34 RBC confirmed that, if a pedestrian access to Unit A were to be proposed on the southern side of the access onto Gillette Way, then the design of this access must be reviewed to provide suitable facilities for pedestrians.
- 2.35 *In line with Officer's comments, the proposed pedestrian access onto Gillette Way has been reviewed and improved. Further details of this are outlined later in this Statement and as part of the relevant accompanying Design and Highways documents.*
- 2.36 RBC noted that the vehicle entrance to Unit A is located approximately 9.5m from the roundabout junction which will result in conflicting movements in and around the roundabout, which the Highway Authority could not support. It was stated that in accordance with the Councils geometric design guide for access onto classified roads, an access would not be supported if it within 20m of the roundabout junction.
- 2.37 *The proposed access to the staff car park is approximately 13m from the roundabout, which although is less than requested by highways during the pre-application is considered acceptable. It is considered acceptable as the access would only serve 33 no. car parking spaces with all cars turning left in and as such no risk of queues forming. Furthermore, the proposed layout is no different and potentially an improvement when compared to a number of existing premises in the immediate vicinity, which includes parking almost immediately*

adjacent to the access at the Lexus and Toyota premises opposite, and a number of commercial properties along Gillette Way.

Sustainability

- 2.38 RBC confirmed that there would need to be adequate justification and detail presented as to why an “Excellent” BREEAM rating could not be achieved. It was outlined that the supporting text to Policy CC2 recognises that certain developments are less able to reach the excellent standards and therefore should meet BREEAM “very good” as a minimum, but, if this were the case, then clear reasons would need to be presented.
- 2.39 *In line with RBC’s comments, a Sustainability Statement and BREEAM pre-assessment accompanies this application which confirms that the proposed development complies with Policy CC2 and a high-quality and flexible industrial development has been designed to meet BREEAM “Excellent” standards. Further details of this are outlined later in this Statement.*

Environmental Matters

- 2.40 RBC stated that within Reading, there is strong justification for requiring the plant specific noise level to be at least 10dB below the measured background level.
- 2.41 *In line with RBC’s comments, a Noise Assessment has been undertaken which confirms that maximum noise levels are predicted to be 10 dB below existing night-time background noise. Furthermore, specific noise levels from HGV servicing at the proposed site are protected to be around or below background noise levels at all sensitive receptor locations during the daytime and night-periods. Further information on mitigation is included later in this Statement and in the accompanying Noise Assessment.*
- 2.42 RBC confirmed that the Site is located adjacent to a AQMA and as such an assessment or mitigation measures should be provided as part of the application. It was also requested that a Desktop Contamination Assessment is submitted as part of the application.
- 2.43 *In line with RBC’s request, an Air Quality Assessment and Desktop Contamination Assessment has been submitted as part of this application and is detailed later in this Statement.*

Ecology

- 2.44 RBC confirm that an Ecological Assessment (comprising an extended Phase 1 Habitat and Species Scoping Survey) would need to be submitted alongside the planning application.
- 2.45 *In line with RBC’s request, an Ecological Assessment has been submitted as part of this application and is detailed later in this Statement.*
- 2.46 A copy of RBC’s full pre-application response can be found at **Document 4**. Pre-application discussions have also taken place with the Canals and River Trust who confirmed they had no comments or objections. Confirmation of this is included as **Document 5**.

2.47 Consistent with Government policy and guidance, the Applicant has positively engaged with the local planning and highways authorities during a period of pre-application discussions. The feedback received has been taken on board, so the submission is robust in this respect.

3 Proposed Development

- 3.1 Two planning applications are advanced which anticipate a potential phasing of the proposed industrial units. They are interrelated in so far as Application 2 only becomes relevant is only Unit A of Application 1 is constructed. This may be for an indefinite period. Each application is described below.

Application 1

- 3.2 This application proposes the following description of development.

'Demolition of existing buildings; erection of 2no. buildings for use within Classes E(g)(iii), B2 and B8, along with access and servicing arrangements, car parking, landscaping and associated works.'

- 3.3 It is envisaged that the proposed development will be phased in the event that the Applicant wishes to only implement part of the scheme. Phase 1 comprises the erection of Unit A which measures at 4,281 square metres and Phase 2 comprises the erection of Unit B which measures at 9,095 square metres.
- 3.4 In view of the speculative nature of this development, it is essential that a flexible planning permission is secured so that the floorspace can be marketed widely. This includes a full range of Class E(g)(iii), B2 and B8 uses. Without this flexibility, the viability of the scheme will be undermined.

Unit A

- 3.5 Unit A is to be located at the eastern part of the Site. As outlined previously, it will measure at 4,281 square metres. The proposed ground floor will measure at 3,822 square metres and the proposed first floor office will measure at 459 square metres. The height of the proposed unit will be 10 metres to the underside of haunch; 11.48 metres to eaves; and 12.85 metres to portal roof ridge.
- 3.6 The ancillary office content will be arranged over 2 no. storeys with fenestration at first floor level but opportunity to retrofit windows at ground floor level, if required by a future tenant. At ground floor level, the reception and welfare area will give way to a tenant's future amenity fit out in an undercroft area.
- 3.7 Unit A will have two access points – from the existing principal roundabout on Rose Kiln Lane and from the existing service point on Gillette Way. The existing service yard access from Gillette Way will be modified to facilitate access to Unit A. It will be necessary to stop up a section of existing hight within the existing service yard road, with changes to the highway subject to a S278 Agreement, which will cover both the creation of the access for the staff car park and changes to the service yard access.

- 3.8 The Unit will have dedicated car parking, comprising of 31 no. standard car parking spaces and 2 no. disabled car parking spaces. 10% of all vehicle parking will be provided with active charging points for electric vehicles.
- 3.9 A dedicated service yard is proposed to the eastern side of Unit A and will have 3 no. dock doors and 2 no. drive through loading doors, as well as sufficient space for 4 no. trailer parking spaces and HGV manoeuvring. The service yard will be protected by paladin fencing, approximately 2.4 metres in height.

Unit B

- 3.10 Unit B is to be located at the western part of the Site. As outlined previously, it will measure at 9,095 square metres. The proposed ground floor will measure at 8,268 square metres and both the first and second floor offices will measure at 413 square metres, each. The height of the proposed unit will be 12 metres to the underside of haunch; 13.76 metres to eaves; and 15.75 metres (max.) to portal roof height.
- 3.11 The ancillary office content will be arranged over 3 no. storeys with fenestration at all levels. At ground floor level, the reception and welfare area will give way to the tenant's future amenity fit out in an undercroft area.
- 3.12 Unit B will be accessed via the existing principal roundabout on Rose Kiln Lane.
- 3.13 The Unit will have dedicated car parking, comprising of 80 no. standard car parking spaces and 4 no. disabled car parking spaces. 10% of all vehicle parking will be provided with active charging points for electric vehicles.
- 3.14 A dedicated service yard is proposed to the western side of Unit B, with 8 no. dock doors and 2 no. drive through doors. Access to the service yard can be taken from the existing service road to the south of the proposed unit. Additional space is provided in the service yard for 6 no. dedicated trailer parking spaces and manoeuvring for HGVs. The service yard will be protected by paladin fencing, approximately 2.4 metres in height.
- 3.15 The elevation treatment of both Unit A and B is deliberately fragmented in tonal greys with texture relief panels of varying sizes combined with a strong horizontal banding. The modular floor to ceiling glazing to offices and tonal cladding modules, transition around the unit to reduce perception of mass.
- 3.16 The top band of the building is in a light and recessive Hamlet colour, with horizontally built up cladding to minimise the perception of height. Where differences in building height occur, these will be taken up in this top band. The proposed external material selection is deliberately restrained and follows the principle colour scheme of the original retail park.
- 3.17 The proposed development has been designed to meet with BREEAM "Excellent" rating and obtain the requisite credits to achieve the mandatory excellent level under the Ene 01 criteria of BREEAM.
- 3.18 Both Unit A and B will incorporate a range of energy efficiency measures, including the following:

- Inclusion of a total of 300 square metres of roof mounted PV on Units A and B;
- Air source heat pumps to be incorporated to condition the ancillary office space;
- Incorporation of a SuDs strategy to achieve at least a 30% reduction in peak discharge rates in comparison with the existing regime;
- Incorporation of rainwater harvesting; and
- 10% of the car park to include electric vehicle charging points.

3.19 A total of 2 no. existing trees require removal to facilitate the redevelopment works. These trees are located at the northern boundary of the site, adjacent to Rose Kiln Lane. However a further 6 no. individual trees (including TPO reference. 118/05) and the woodland area to the west of the Site are to be retained and protected.

3.20 Furthermore, 15 no. new high quality specimen trees are proposed around the Site along with shrub planting and break-out spaces around the car park area, which will provide staff with a place to utilise during rest breaks.

3.21 A 4 metre high acoustic barrier is proposed within the service yard and along the southern and western boundary of the site, but this barrier is only required in the event that Unit B is used during night time hours (11pm to 7am). Its installation should therefore be secured by an appropriately worded planning condition.

Application 2

3.22 Planning permission is sought for:

“Continued use of the existing retained floorspace within Class E, following consolidation of the Retail Park”

3.23 The Site Location Plan – which relates only to the part of the retail park that is to be retained in the event that only Unit A of Application is constructed – appears at **Document 2**.

3.24 It is expected that the planning permission will be subject to a new set of flexible operative controls reflecting the reduced retail floorspace and the current flexibility across the scheme. Application 2 therefore looks to consolidate and maximise land use flexibility to ensure that the retained space can be successfully leased. We would welcome a discussion with Officers regarding an appropriate set of conditions during the course of determination.

4 Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Order Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.2 In this instance, the Development Plan consists of the Reading Borough Local Plan (2019). This document sets out RBC's planning policies for development up to 2036. Material considerations chiefly comprise the National Planning Policy Framework (NPPF) (2019), the supporting Planning Practice Guidance (PPG) and RBC's Employment Land Reviews.

Development Plan

Reading Borough Council Local Plan (2019)

- 4.3 The site is not allocated in the Reading Borough Council Local Plan.
- 4.4 **Policy CC1 ('Presumption in Favour of Sustainable Development')** states that a positive approach to considering proposals will be taken that reflects the presumption in favour of sustainable development contained in the NPPF. It also states that where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.
- 4.5 **Policy EM1 ('Provision of Employment Development')** states that provision will be made for a net increase of 53,000 – 112,000sqm of office floorspace and 148,000sqm of industrial and / or warehouse space in Reading Borough for the period 2013 to 2036. Development that would exceed the levels of employment development set out in the policy, after existing permissions and allocations are accounted for, will need to either:
- Demonstrate that it will not result in additional need for local housing; or
 - Mitigate its impacts on the need for local housing.
- 4.6 **Policy EM2 ('Location of New Employment Development')** states that major employment uses, including industrial and storage and distribution will be located in the A33 corridor on the Core Employment Areas.
- 4.7 **Policy EM4 ('Maintaining a Variety of Premises')** states that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range.
- 4.8 **Policy CC2 ('Sustainable Design and Construction')** states that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. To meet these requirements, all major non-residential developments are required to meet the most up to date BREEAM 'Excellent' standards, where possible.

- 4.9 The accompanying text to Policy CC2 states that in some cases, developments for industrial and/or warehouse uses may find it more difficult to meet these standards. In these cases, developments are expected to demonstrate that the standard to be achieved is the highest possible for the development and at a minimum meets the BREEAM 'Very Good' standard.
- 4.10 **Policy CC7 ('Design and the Public Realm')** states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form include:
- Layout: urban structure and urban grain;
 - Landscape;
 - Density and Mix;
 - Scale: Height and Massing; and
 - Architectural detail and materials.
- 4.11 **Policy CC6 ('Accessibility and the Intensity of Development')** states that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.
- 4.12 **Policy TR1 ('Achieving the Transport Strategy')** states that planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services and similar measures.
- 4.13 **Policy TR3 ('Access, Traffic and Highway-Related Matters')** states that in determining proposals involving a new or altered access onto the transport network or the generation of additional trips on the transport network, consideration will be given to the effect of safety, congestion and the environment. In this case, development will only be permitted where:
- (i) Accesses and work to the highway comply with the adopted standards of the Transport Authority;
 - (ii) The development would not have a detrimental impact on the functioning of the transport network;
 - (iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
 - (iv) The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
 - (v) For non-residential uses, off street servicing would be provided.
- 4.14 **Policy TR4 ('Cycle Routes and Facilities')** states that developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities.

- 4.15 **Policy TR5 ('Car and Cycle Parking and Electric Vehicle Charging')** 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. It also states that new non-residential development with communal car parks should have 10% of spaces providing an active charging point.
- 4.16 **Policy EN11 ('Waterspaces')** states that Reading's waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor.
- 4.17 **Policy EN12 ('Biodiversity and the Green Network')** states that all new development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible. It also states that 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.
- 4.18 **Policy EN14 ('Trees, Hedges and Woodlands')** states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will also be maintained or enhanced. Policy EN14 also states that new development should make provision for tree retention and planting within the application site, particularly on the street frontage, to improve the level of tree coverage within the Borough and to maintain and enhance the character and appearance of the area in which the site is located.
- 4.19 **Policy CC3 ('Adaption to Climate Change')** states that all developments should demonstrate how they have been designed to incorporate measures to adapt to climate change. This includes detail on; opportunities for natural heating and ventilation; thermal mass; use of trees and planting as part of a landscaping scheme to provide shading; the impact on surface water runoff from the development in the design of the drainage system and mitigation and resilient measures for any increases in river flooding levels.
- 4.20 **Policy CC4 ('Decentralised Energy')** states that any non-residential development of over 1,000 square metres shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.
- 4.21 **Policy CC5 ('Waste Minimisation and Storage')** states that 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.

- 4.22 **Policy EN16 ('Pollution and Water Resources')** states that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation.
- 4.23 It also states that development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.
- 4.24 **Policy EN17 ('Noise Generating Equipment')** states that where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.
- 4.25 **Policy EN18 ('Flooding and Drainage')** states that where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater in any way or in any way increase the risks to life and property arising from flooding. It also states that all major developments must incorporate SuDS as appropriate.

Material Considerations

National Planning Policy Framework

- 4.26 The NPPF is underpinned by a presumption in favour of sustainable development which is embodied within Paragraph 11.
- 4.27 Paragraph 8 sets out the economic objectives to “help build a strong, responsive and competitive economy”.
- 4.28 Paragraph 80 goes on to advise that “planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth”.
- 4.29 Moreover, Paragraph 38 sets out that Local Planning Authorities should:
- “...work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*
- 4.30 Paragraph 118 relates to the Government’s objective of making effective use of land and states that planning decisions should, *inter alia*, promote and support the development of under-utilised land and buildings.

Planning Practice Guidance

- 4.31 The online PPG was initially published in March 2014 and has been updated since, most recently in July 2019. The PPG supports the policies within the NPPF.

RBC Annual Monitoring Report (2019)

- 4.32 RBC's Annual Monitoring Report (December 2019) confirms that there has been a recent loss of B1 floorspace, particularly in south Reading. There has also been a loss of B2 floorspace. The Report confirms that the long-term trend has been a reduction in B1/B2 floorspace, so that 2016/17 saw the lowest level in over 25 years. The level of B8 space has increased over recent years and has increased slightly over the last year.

5 Planning Assessment

Principle of Development

- 5.1 This application seeks the demolition of Brunel Retail Park to allow the redevelopment of 2 no. new commercial units (Use Class E/B2/B8), with ancillary office space, car parking, servicing arrangements, landscaping and associated works.
- 5.2 As previously noted, the Site, which is not allocated for a specific use, currently comprises a retail warehouse, containing 13 no. retail units. The UK's retail sector is currently in a fragile state and is undergoing significant structural changes. Those changes are affecting all parts of the sector, with many high-profile failures leading to vacant units. In addition to this, there have been many administrations and CVAs and traditional out-of-centre retailers are reducing their store requirements. This coupled with the effects of Covid-19 on retailing has led to asset managers reviewing their options for out of centre sites and putting forward proposals for potential diversification or as it has become termed, repurposing. The proposed development will therefore ensure the long-term occupancy of the Site, in line with existing and future marketing demand.
- 5.3 The Site does fall within the A33 Corridor, which was confirmed at pre-application stage by RBC Officers. Policy EM2 ('Location of New Employment Development') of the Reading Local Plan (2019) identify the A33 Corridor as being a focus for office and employment floorspace, alongside Reading Town Centre and the defined Core Employment Areas. Furthermore, RBC's evidence base identifies a shortfall in industrial and warehouse floorspace, specifically in the Annual Monitoring Report (2019). The proposed development would help address this shortfall in a location that has long been accepted as appropriate for employment uses.
- 5.4 Notably, the proposals will create local employment opportunities (during construction and operational phases) and represent a significant investment into the local economy. The proposals will help to achieve employment floorspace as set out in Policy EM1 ('Provision of Employment Development') of the Reading Local Plan (2019). This investment in the site will deliver a sustainable economic development which is strongly supported by the NPPF. On this basis, the principle of development should be fully supported.
- 5.5 The development is also acceptable in that it would not result in an additional need for local housing and would not give rise to a need for further housing, in line with the requirements set out in local policy.
- 5.6 In summary, the principle of the proposed development is supported at both local and national level. The principle of development has also already been informally accepted by Planning Officers at RBC through pre-application discussions. On this basis, the principle of development should be fully supported.

Development Management Considerations

- 5.7 There are a number of development management considerations which need to be taken into account as part of the proposed development. These are outlined below.

Design & Layout

- 5.8 A Design and Access Statement (DAS) has been prepared by Fletcher-Rae Architects and accompanies this application. The DAS confirms that the applicant's intention is to create a high quality sustainable development, to benchmark new standards in industrial facilities and attract the highest quality occupiers to this location.
- 5.9 Furthermore, the DAS confirms that during the design development process, various site configurations were considered. The decision to opt for the proposed development, allows the full retention of the principle internal infrastructure and access points, whilst also offering flexibility if partial retention of retail can be achieved.
- 5.10 In order to reduce the perceived building mass, a design iconography has been developed to create a rhythm of materials and forms in a proportion sympathetic to the original retail development using articulation and textural changes to all elevations. It is proposed to utilise a bold sinusoidal profile combined with composite microrib cladding in light and mid grey tones.
- 5.11 Furthermore, the elevational treatment is deliberately fragmented in tonal greys with texture relief panels of varying sizes combined with a strong horizontal banding. The modular floor to ceiling glazing to offices and tonal cladding modules transition around the building to reduce the perception of mass.
- 5.12 Further detail on design can be found in the accompanying DAS prepared by Fletcher-Rae. The DAS demonstrates that the proposals for both Phase 1 and 2 accord with both national and local planning policy, in particular Policy CC2 and CC7 of the Reading Local Plan (2019).

Highways

- 5.13 A Transport Assessment (TA) has been prepared by TTP Consulting, following consultations with RBC Highways department. In summary, the TA has demonstrated that the potential change of trips has been estimated for both phases using trip rate information (TRICS) and the exercise demonstrates that overall, during the PM and Saturday peak periods, there would be fewer overall trips associated with the proposed development. Furthermore, the TA confirms that during the AM peak there will be no material changes to the trips.
- 5.14 Furthermore, the TA confirms that an analysis of HGV trip generation indicates that Phase 1 could result in up to 3 no. additional two-way movements in the AM peak. It is also indicated that Phase 2 could result in up to 10 no. additional two-way movements across all peak periods. The TA considers this increase not to be severe, particularly considering that there is an overall vehicle trip generation reduction during the weekday evening and Saturday peak periods.
- 5.15 The TA also confirms that the proposed car parking levels for both Phase 1 and 2 are in line with the most recently adopted standards, with 10% active vehicle charging provision also to be provided.
- 5.16 The TA concludes that the proposals for both Phase 1 and 2 are considered to accord with both National and Local planning policy requirements and as such are deemed to be acceptable in highways and transport terms. Further detail can be found in the Transport

Assessment prepared by TTP Consulting, which has been submitted as part of the planning application.

Ground Conditions

- 5.17 A Preliminary Risk Assessment (PRA) has been prepared by Delta Simons. The PRA confirms that following a land contamination risk assessment, significant potential sources of contamination have not been identified, associated with the current land use. Widespread contamination is considered unlikely and the PRA has identified a low to moderate risk of soil / groundwater contamination and hazardous ground gas at the Site.
- 5.18 Furthermore, the PRA confirms that asbestos may be present within the Made Ground and within the existing buildings.
- 5.19 The PRA recommends that an environmental site investigation would be undertaken in conjunction with a geotechnical investigation to help establish the site-specific ground model and groundwater regime at the Site and enable an assessment of foundation and engineering solutions to be made.
- 5.20 Further detail can be found in the Preliminary Risk Assessment prepared by Delta Simons, which has been submitted as part of this planning application.

Air Quality

- 5.21 An Air Quality Assessment (AQA) has been prepared by WYG. As previously outlined, the Site is adjacent to an AQMA.
- 5.22 In terms of the construction phase, the AQA confirms that without mitigation, some of the identified receptors are at 'medium risk' of dust emissions. Site-specific mitigation has been recommended. These include mitigation measures such as; recording all dust and air quality complaints, identifying the causes and taking and recording appropriate measures to reduce these emissions in a timely manner; carrying out regular site inspections; and remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on the site.
- 5.23 In terms of the operational phase, the AQA confirms that the impact description of the effects of changes in traffic flow as a result of the proposed development is determined to be "negligible" at all existing receptors. Overall, there is predicted to be a reduction in road traffic emissions as a result of the proposed development.
- 5.24 Further detail can be found in the Air Quality Assessment prepared by WYG, which has been submitted as part of this planning application.

Ecology

- 5.25 An Ecological Assessment (EA) has been prepared by Ecology Solutions. As previously outlined, the Site is close to the River Kennet and Fobney Meadow, both of which are allocated as part of a Major Landscape Feature. Furthermore, the Site is partially within the Biodiversity Opportunity Area 50m buffer and partially within the Canals and River Trust Planning Buffer.

- 5.26 The EA confirms that it is highly unlikely that the proposed development will have a direct adverse effect upon any nearby statutory and non-statutory designated sites. Although unlikely, to ensure best practice, methods will be employed to prevent any potential adverse impacts on the River Kennet, particularly with regards to pollution.
- 5.27 The scheme will provide a measurable net gain of 12.14%. The completed metric spreadsheet is appended as **Document 6**.
- 5.28 The EA summarises that overall, there is no overriding ecological constraint to the proposed development. It concludes that the proposed development would accord with planning policy with regard to nature conservation and shall ensure net biodiversity gains are delivered, whilst also elevating on-site interest for a number of protected or notable fauna groups. The proposed development therefore accords with Policy EN11 and EN12 of the Reading Local Plan (2019).

[Trees / Landscaping](#)

- 5.29 A Tree Survey Report has been prepared by Encon Associates and accompanies this planning application. As previously outlined, there is a TPO (ref. 118/05) at the northern boundary of the site.
- 5.30 The Tree Survey Report confirms that there are 11 no. individual trees and 5 no. groups of trees located in / within the proximity of the application boundary. The majority of the trees are of a good quality with 8 no. individual trees and all 5 no. groups of trees categorised as B2 trees. 2 no. individual trees are considered to be of a lower quality and categorised as C2 trees. 1 no. tree is categorised as A2 which is high quality of particular arboricultural or landscape importance. This tree is currently protected by the TPO.
- 5.31 The report confirms that as a result of the proposed development, 2 no. trees require removal to facilitate the new car park layout and servicing yard for Unit 1. Both trees are category B2 (i.e. good quality). The remaining trees to be retained will be protected from harm during the construction process by fencing them off from vehicular movements and material storage.
- 5.32 A landscaping scheme has been designed by Encon Associates to improve the visual appearance of the street scene and increase the longevity of the existing tree population. The landscaping scheme confirms that 15 no. new specimen tree planting will be planted around the site, particularly focused at the southern boundary. Furthermore, it also confirms that there will be hedge, shrub, shelter belt and bulb planting around the site, again particularly focused at the southern boundary.
- 5.33 Further details on the landscaping scheme and tree survey can be found in the requisite documents prepared by Encon Associates. The details provided in these documents demonstrate that the proposed development accords with national and local planning policy, in particular Policy EN14 of the Reading Local Plan (2019).

[Sustainability / BREEAM / Energy](#)

- 5.34 A Sustainability Statement and BREEAM Pre-Assessment has been prepared by Envision and an Energy Statement has been prepared by Crookes Walker. Both documents accompany this application.

- 5.35 The Sustainability Statement outlines a number of design measures to ensure that sustainable design and construction is promoted throughout the development process. It also ensures and that the proposed development complies with Policy CC2 of the Reading Local Plan (2019) and confirms that the proposals meet the BREEAM 'Excellent' standards. These design measures include; a SuDs strategy to achieve a minimum of a 30% reduction in peak discharge rates in comparison with the existing regime; 10% of the car parking will incorporate electric vehicle charging points; sustainable material selections with timber to be procured with Forest Stewardship Council accreditation; and attainment of biodiversity net gain through the protection of existing features and the enhancement of the park with additional ecologically beneficial landscaping. Further design measures are outlined in the Sustainability Statement.
- 5.36 Further information on the sustainable design measures and how the proposed development meets BREEAM 'Excellent' standards can be found in the accompanying Sustainability Statement.
- 5.37 The Energy Statement, prepared by Crookes Walker confirms that there will be a reduced energy demand due to improvements over the building fabric and building services systems. Furthermore, the Statement outlines that low / zero carbon technologies will be utilised.
- 5.38 The proposed development is considered to comply with the sustainability and energy requirements outlined in the Reading Local Plan (2019) and the Reading Borough Council Sustainable Design and Construction SPD (2019).

Noise

- 5.39 A Noise Impact Assessment has been prepared by WYG and accompanies this planning application.
- 5.40 The Assessment confirms that maximum noise levels from the proposed building services plant are predicted to be at least 10dB below existing night-time background noise. Furthermore, it states that specific noise levels from HGV servicing at the proposed site are predicted to be around or below background noise levels at all sensitive receptors during the daytime and night periods. The assessment also confirms that the noise levels have the potential to be exceeded during the night period at the overlooking receptors along Padworth Avenue.
- 5.41 To demonstrate how noise associated with the proposed redevelopment will be controlled, additional mitigation (in the event that the site will operate during the night-time period 23:00 to 07:00) has been included in the form of acoustic barriers up to 4.0 metres high along the southern and western boundary around the service yard for Unit B and intermediate barriers within the service yard.
- 5.42 Given that the acoustic barriers will only be implemented if Unit B operates during the night-time period (23:00 to 07:00), we would suggest that the following condition is imposed:

'The development shall be carried out in accordance with the recommendation of the WYG Noise Assessment (November 2020) submitted in support of the application. In particular, a scheme of acoustic barriers (4 metre high) shall be implemented in accordance with the noise assessment Figure 6.1, if and when Unit B operates on a 24-hour basis'.

- 5.43 This mitigation has been included despite the potentially affected receptors being located within the Kennet Island development, which is understood to incorporate acoustic design measures that take into account the existing industrial and commercial uses of the development site and its surroundings.
- 5.44 The Assessment concludes that the proposed development is not expected to have an 'adverse impact' on health or quality of life and as such accords with relevant national and local planning policy, including Policy EN17 of the Reading Local Plan (2019).

Flood Risk

- 5.45 A Flood Risk Assessment has been prepared by Bradbrook Consulting. Bradbrook Consulting have also had pre-application discussions with the Environment Agency which is detailed in their assessment. A Flood Risk Sequential Assessment has been prepared by Quod. Both documents accompany this application.
- 5.46 According to the Environment Agency, the Site is partly within Flood Zone 2. The Flood Risk Sequential Assessment confirms and demonstrates that there are no sequentially preferable sites for this development.
- 5.47 The Flood Risk Assessment confirms that the site is at low risk of flooding from all sources. It also confirms that the accompanying drainage strategy is in line with national and local standards and would not increase the flood risk. The Assessment also includes details of SuDs measures such as an attenuation tank and controlled discharge. Finally, the assessment concludes that the proposed development will not increase the risk of flooding to the site or surrounding areas and the scheme is in accordance with national and local planning policy, particularly Policy EN18 of the Reading Local Plan (2019)
- 5.48 Further details regarding flood risk, drainage and foul sewage is included in the accompanying Flood Risk Assessment.

External Lighting

- 5.49 An External Lighting Report and drawing (ref. 1990-EX-6301) has been prepared by Crookes Walker and accompanies this planning application. The documents show the proposed lighting layouts and the light levels achieved around the proposed development site.
- 5.50 The documents illustrate that around the west and south boundaries to the park, the light levels are between 0 and 7 lux in all cases. It is also confirmed that external lighting spill is minimal.
- 5.51 The proposed external lighting scheme is considered to comply with relevant national and local planning policy, specifically Policy EN16 of the Reading Local Plan (2019).

Summary

- 5.52 Overall, the proposed development is in line with the adopted and emerging policy objectives to achieve high quality, flexible employment development. The proposed development of Brunel Retail Park is considered to be acceptable in principle. Appropriate mitigation has been recommended where required and will be adhered to as the development progresses.

Other Material Considerations

- 5.53 In addition to the technical issues addressed above, wider material considerations focus on the socio-economic benefits arising from the proposals. These economic benefits should be provided significant weight.
- 5.54 The proposal will result in the creation of local job opportunities through not only the provision of a new commercial unit, but through construction, security and maintenance. The proposals will also result in a substantial investment into the local economy.

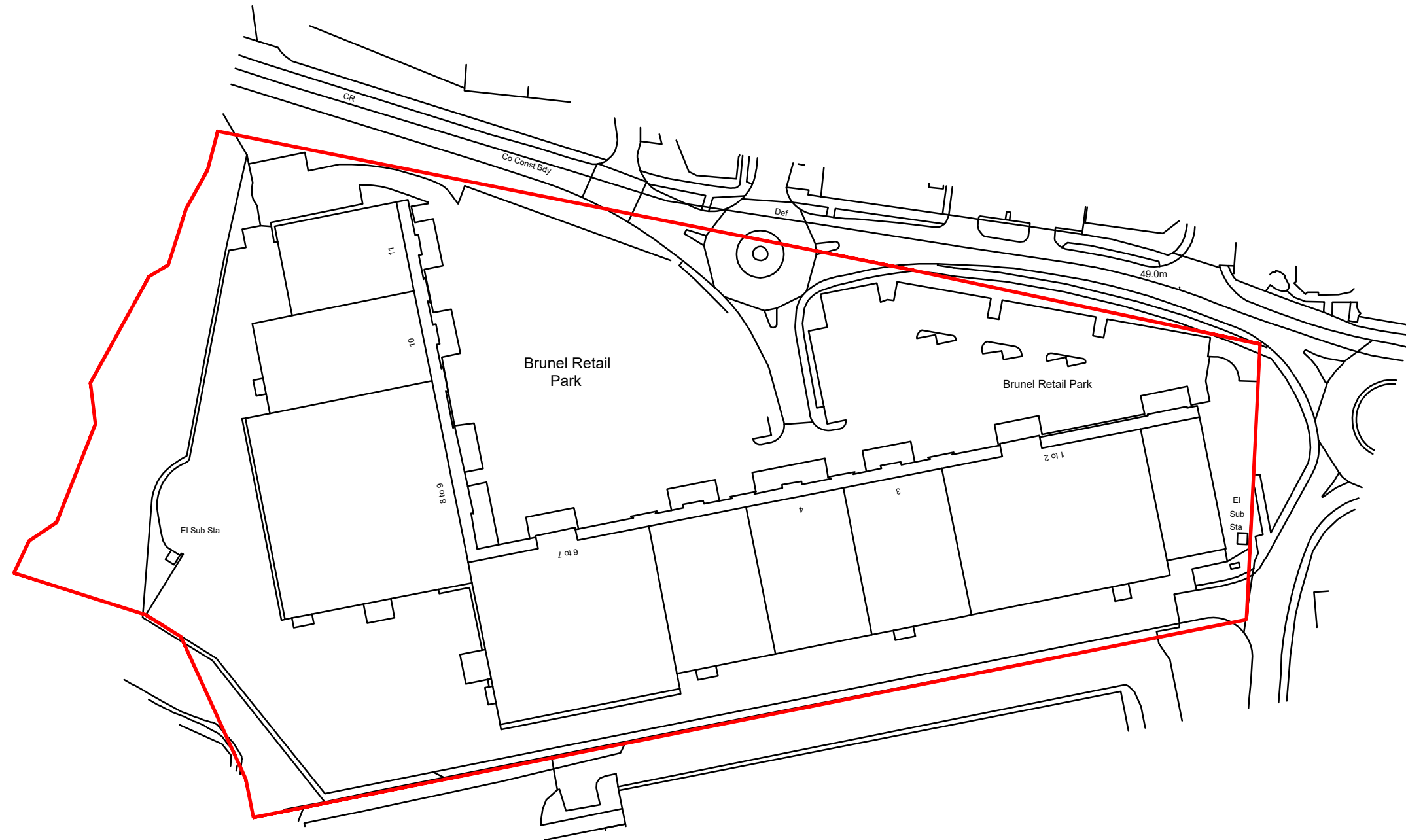
6 Conclusion

- 6.1 This Planning Statement has been prepared by Quod on behalf of the owner of Brunel Retail Park on Rose Kiln Lane, Reading. It supports two planning applications relating to the redevelopment and potential part retention and consolidation of the existing retail floorspace.
- 6.2 The redevelopment is market-led and looks to respond to market demand. Full operational flexibility is essential if the scheme is to be delivered, including Class E(g)(iii), B2 and B8 uses. Any limitation will affect the viability of the scheme.
- 6.3 It has been demonstrated in this Planning Statement that the proposed development for a flexible mix of employment uses (Class E, B2 and B8) is entirely appropriate within this location, is in line with current market requirements and is compliant with both national and local planning policy. The Site benefits from being located in the A33 Corridor and the submitted scheme delivers a development which complies with new development in this location. The proposal seeks to create two high quality, modern industrial warehouses that will be attractive to prospective occupiers.
- 6.4 The development, which has been the subject to pre-application discussions, will contribute significantly towards the Council's key priorities of creating local employment opportunities and creating new employment floorspace.
- 6.5 The supporting documentation submitted with the application demonstrates that there are no environmental or technical constraints to developing this site.
- 6.6 Overall, it has been demonstrated that there are no adverse impacts that would significantly and demonstrably outweigh the benefits brought about as a result of this proposal. The presumption in favour of sustainable development therefore applies in this case.
- 6.7 This Planning Statement has demonstrated that the proposed development accords with local, strategic and national policies. Overall, the proposed employment development will result in a number of economic and social benefits as well as supporting the aims of planning and economic policy at a local and national level. On the basis that the proposal accords with the development plan, the presumption in favour of sustainable development should be applied and planning permission should be granted without delay.



DOCUMENT 1

SITE LOCATION PLAN (APPLICATION 1)



General Notes

All site dimensions shall be verified by the Contractor on site prior to commencing any works.

Do not scale from this drawing.

Only work to written dimensions.

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 Site Boundary

Revision

Scale 1:1250@A3

Status Planning

Drawn by CF

Date October 2020

Client

Westmount Real Estate

Project

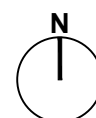
Brunel Retail Park, Reading

Drawing Description

Location Plan

Drawing No. 19032_PL01

Rev.



fletcher|rae
Architects | Master Planners | Designers

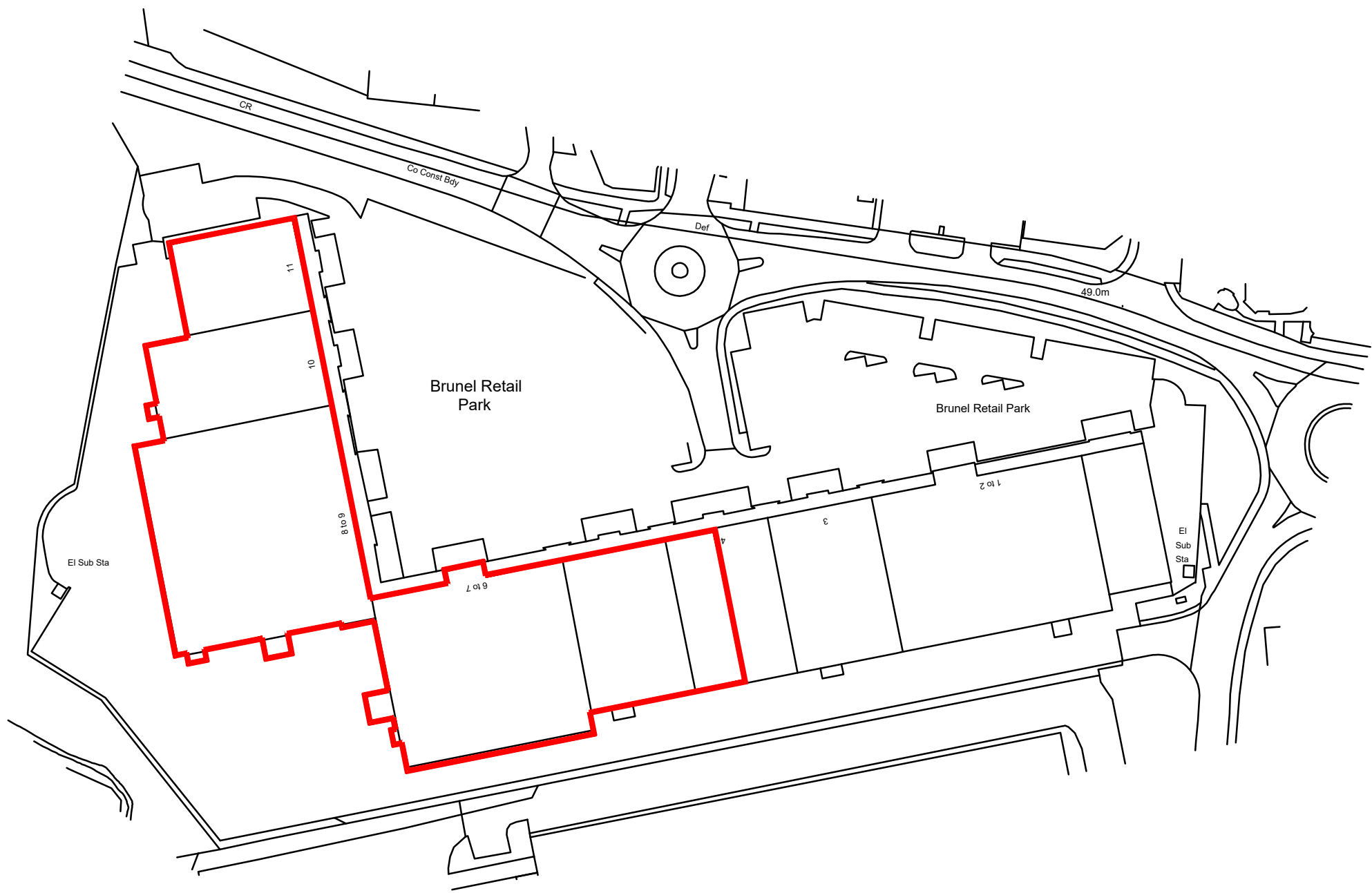
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DOCUMENT 2

SITE LOCATION PLAN (APPLICATION 2)



General Notes

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 Site Boundary

Revision

Scale 1:1250@A3

Status Planning

Drawn by CF

Date November 2020

Client

Westmount Real Estate

Project

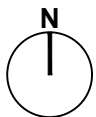
Brunel Retail Park, Reading

Drawing Description

Location Plan - Retained Retail

Drawing No. 19032_PL40

Rev.



fletcher|rae
Architects | Master Planners | Designers

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DOCUMENT 3

**COPY OF PRE-APPLICATION SUBMISSION TO READING BOROUGH COUNCIL
(DATED 20TH MAY 2020)**

Our ref: TR/CW/Q100414
Your ref:
Email: tim.rainbird@quod.com
Date: 20th May 2020

Strictly Private and Confidential

Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

By email
(plgadmin@reading.gov.uk)

Dear Sir / Madam

Pre-Application Advice Request
Brunel Retail Park, Reading, RG2 0HS
Repurposing Proposals
Submitted on behalf of Mayfair Capital Investment Management Limited

We are instructed by our client, Mayfair Capital Investment Management Limited c/o Westmount Retail Estate ('the Applicant'), to submit a formal pre-application request relating to the repurposing proposals at Brunel Retail Park, Reading, RG2 0HS ('The Site').

The purpose of this submission is to provide an update on the Retail Park's ownership and set out the rationale for the repurposing proposals, an explanation of the three planning applications being prepared along with the type and scope of information that is proposed to be included in support the future applications. To assist Officers' consideration of the proposals, the following documents are appended to this letter:

1. **Pre-Application Advice Form;**
2. **Site Location Plan;**
3. **Proposed Site Plan (drawing ref. 19032 – SK07);**
4. **Vision Document, prepared by Fletcher-Rae;**
5. **Local and National Planning Policy Note, prepared by Quod;**
6. **Transport Scoping Note, prepared by TTP Consulting; and**
7. **Sustainability Overview, prepared by Envision.**

A copy of the completed pre-application advice request form appears at **Document 1**. Level 3 service is sought as the development is over 1,000 square metres. A virtual meeting and written advice are requested.

We trust that the enclosed provides Officers with sufficient information to consider the pre-application proposals.

1 Introduction

The Site comprises Brunel Retail Park, an established Retail Park located to the south of Reading Town Centre and accessed off Rose Kiln Lane. The Retail Park currently comprises 13no. retail units. Of these retail units, three are currently vacant.

The majority of the retail units operate under Use Class A1 (Retail), with the exception of retail Units 10 and 11 which operate under Use Class A3 (café/restaurant).

The UK's retail sector is currently in a fragile state and is undergoing significant structural changes. Those changes are affecting all parts of the sector with many high-profile failures leading to vacant units. In addition to this, there have been many administrations and CVAs and traditional out of centre retailers are reducing their store requirements. This coupled with the potential effect of Covid-19 on retailing has led to asset managers reviewing their options for out of centre sites and putting forward proposals for potential diversification or as it has become termed, repurposing.

As part of the Applicant's asset management initiatives, three planning applications are proposed to be submitted to repurpose the retail park, the driving force behind which is to maximise the use of an underutilised brownfield site which has a number of voids which could further increase given the ongoing economic uncertainty. Each of the proposals is described below.

Application 1 – redevelopment of units 6b, 7, 8, 9, 10 and 11 to provide a single industrial unit (flexible Use Classes B1c, B2 and B8), with dedicated car park and service yard;

Application 2 – part change of use and reconfiguration of Units 5 and 6a to accommodate Dreams, Shoezone, Subway and Costa (displaced as a result of Application 1); and

Application 3 – external alterations to and amalgamation of Units 3a and 3b to accommodate the displaced B&M (displaced as a result of Application 1), including the creation of an external sales area.

It is in this context that the pre-application request is advanced.

2 The Site and Surrounding Area

Brunel Retail Park is located to the south of Reading. A Site Location Plan can be found at **Document 2**. It is an established Retail Park which comprises of approximately 14,767 square metres of floorspace at both ground floor and mezzanine level. Brunel Retail Park includes parking for approximately 451 cars.

The Site comprises 13 no. retail units, of which three are currently vacant. A schedule of the Retail Park as existing is outlined below:

Unit Number	Existing Occupier	Ground Floor Area (GIA) (sqm)	Mezzanine Floor Area (sqm)
1	Halfords	701	341
2	Pets at Home	935	n/a
3a	Vacant	1202	n/a
3b	Next	1212	600
4	Go Outdoors	1868	1538
5	Vacant	931	n/a
6a	Dreams	467	339
6b	Shoe Zone	459	n/a
7	Vacant	937	n/a
8	B&M	1897	275
9	Laura Ashley (in administration)	460	354
10	Subway	94	n/a
11	Costa	165	n/a
Total		11,328	3,447
Total Floorspace		14,775	

The majority of the Units at Brunel Retail Park operate under A1 Use Class (Retail), specifically open A1 non-food planning consent. This is with the exception of Units 10 and 11 which both operate under A3 Use Class (café and restaurant).

The Site is accessed via Rose Kiln Lane, via a 4-arm roundabout junction. Access to the service yard to the rear of the Site is taken via a priority-controlled junction on Gillette Way. There is parking for up to approximately 451 cars, of which 367 spaces are within the customer car park and the remainder in the service yards to the rear of the terraces.

The surrounding area to the Site is predominately commercial in nature, with a large warehouse to the south, a Morrison's supermarket, and petrol filling station to the east and industrial units to the north. The River Kennet which runs in a broadly north-south orientation is located to the west of the Park. The closest residential properties to the Site are located circa. 200 metres to the south west on Greenham Avenue.

According to the Environment Agency, part of the Site falls within Flood Zone 2. The western boundary of the Site falls within Flood Zone 3 and the River Kennet is located within circa. 40 metres of the Site. The River Kennet and the neighbouring Fobney Meadow are both allocated as part of a Major Landscape Feature. Kennet Island Nature Reserve is located the south west of the Site, between the Site and the River Kennet.

The Site is not within a conservation area. There are no listed buildings or structures on or adjacent to the Site. There are no Tree Protection Orders (TPOs) on or adjacent to the Site.

3 Relevant Planning History

Planning History

There is extensive planning history at the Retail Park. The planning history outlined below is that which is relevant to this pre-application request and is no way an exhaustive list of all historic consents.

The baseline permission for this site is application ref. 94/00442/FD, dated 23rd December 1994. The permission was for;

“Erection of a non-food retail warehouse (A1) with ancillary serve area and car parking for 500 cars”.

The permission was subject to 20 no. conditions. Of relevance is Condition 13 which relates to the restriction of subdivision of the retail units. Condition 13 states that subdivision is not allowed if it results in

- More than 14 no. separate non-food retail units;
- Units measuring at less than 485 square metres;
- More than 6 no. retail units measuring less than 900 square metres; or
- More than 3 no. retail units measuring at less than 700 square metres.

No condition was imposed as part of application ref. 94/00442/FD which restricted the sale of particular goods at the retail units.

Also of relevance where Conditions 12 and 14 which were imposed as part of baseline application ref. 94/00442/FD. These conditions put restrictions on use class operations at the Retail Park.

These conditions were later varied under application ref. 131106 to state:

“All units shall not be used for the sale of goods other than DIY, furniture, home furnishings, floor coverings, electrical and photographic goods, automotive parts and accessories, cycles, products for and including domestic pets, sports goods, leisure goods, clothing and footwear and ancillary items and for no other purpose within Class A1 of the Town and Country Planning (Use Classes) Order 1987; and

“Not more than 3 retail units shall be used for the sale of clothing and footwear”

NB: excludes Unit 4 which is subject to a different consent

As a result of application ref. 131106, all units save for Units 1, 2, 3a, 4, 8, 10 and 11 are subject to the above use class restrictions. The use class restrictions for the other units have either been imposed as part of a variation of condition application (to vary Condition 12 and/ or 14) or have been subject to a separate permission.

Application ref. 11/00431/FUL was permitted on 12th May 2011 for minor external alterations to elevations and internal works to create two units and reconfiguration of the car park. This resulted in the creation of Unit 3a and 3b.

Application ref. 131743 was permitted on 18th March 2014 for the erection of two new units for use within Class A1 and / or Class A3, alterations to the wider site and car park layout and associated works. This related to Units 9 and 10.

Application ref. 170215 was permitted on 29th June 2017 for the works to Unit 4, including reconfiguration of existing mezzanine floorspace and insertion of additional mezzanine floorspace of 1,053sqm, the creation of an external display area of 465sqm and associated works including new fire doors.

There is no other planning history of relevance.

4 Proposed Development

The Applicant would like to discuss three, interlinked development opportunities at the Retail Park with Officers at Reading Borough Council ('RBC'). It is envisioned that all three proposals will be submitted as separate planning applications, but in parallel to ensure consistency. Details of the three development opportunities are outlined below.

Application 1

A Proposed Site Plan (drawing ref. 19032 – SK07) can be found as **Document 3**.

Application 1 proposes to demolish Units 6b, 7, 8, 9, 10 and 11 at the Site. This results in a total loss of 4,638 square metres of A1 and A3 floorspace. The demolition is proposed so that a new dedicated commercial (B1c/B2/B8) unit with ancillary office space can be erected on the Site for which there is strong demand.

The proposed unit – which will be known as 'Unit 9' – will measure at 4,263 square metres. This consists of 3,822 square metres of commercial floorspace at the ground floor and 441 square metres of ancillary office space at first floor level.

The proposed unit will be a high-quality facility, designed to incorporate BREEAM 'Very Good' sustainable design and specification. The ancillary office element of the commercial unit will be arranged along the full length of the north-western elevation in order to enable continuation of the active street frontage. The proposed new unit has an internal clear height to haunch of 10m which is a standard requirement for a commercial unit of this size.

The redevelopment will result in the creation of 45 no. car parking spaces which will be designated for the commercial unit. It will also result in the creation of 12 no. cycle parking spaces, in accordance with the relevant parking standards. The reduction of retail space and associated parking will consequently reduce Retail Park's car parking from 367 to 265 spaces.

The existing service yard access will be modified to facilitate access to the warehouse service yard. Access will be taken from the existing access at Rose Kiln Lane. The route is proposed to be extended through to the service yard to the rear of the retail terrace and also to facilitate access to the staff car park for the new commercial warehouse.

Extensive mounding and landscape buffering, together with a 2.4m high acoustic fence to the perimeter of the service yard will be provided. This will provide sufficient screening of the Site.

The accompanying Vision Document provides further detail on the proposed development, particularly in terms of design and materials. This appears as **Document 4**.

Application 2

As outlined above, Application 1 will result in the demolition of existing retail units at the Site, specifically Units 6b, 7, 9, 10 and 11. As a result, Dreams, Shoezone, Subway and Costa will be displaced.

Application 2 proposes the part change of use and reconfiguration of Units 5 and 6a to accommodate Dreams, Shoezone, Subway and Costa. The second application therefore ensures that current occupiers who would otherwise have been lost by the proposed industrial unit can be retained on the Retail Park. This is particularly positive in terms of protecting important local jobs.

There are no restrictions preventing the reconfiguration of Units 5 and 6a. However, the use of those units is limited to Class A1 (as per Condition 12 of application ref. 131106). As such, a part-change of use is sought to accommodate the requirements of Subway and Costa.

We also propose that a planning condition is imposed on the Decision Notice which states that the change of use will only come into effect once the use of Unit 10 (Subway) and Unit 11 (Costa) has ceased. This will effectively result in a unit swap and will not result in more than two A3 retail units operating at the Retail Park at any one time.

Application 3

Application 1 will result in the demolition of Unit 8 and therefore the displacement of B&M. Application 3 is for the external alterations and amalgamation of Units 3a and 3b to accommodate the displaced occupier. It will also include the creation of an external sales area.

Amalgamation of Unit 3a and 3b is not restricted by existing planning conditions.

Further information on the three proposed applications can be provided at the pre-application meeting, if required.

5 Planning Policy Context

Section 38(6) of the Planning and Compulsory Order Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

In this instance, the Development Plan consists of the Reading Borough Local Plan which was adopted on 4th November 2019. This document sets out RBC's planning policies for development within Reading up to 2036. Material considerations chiefly comprise the National Planning Policy Framework (NPPF) (2019), the supporting Planning Practice Guidance (PPG) and RBC's employment land reviews.

There are a number of local and national planning policies that are of relevance to the three proposed applications. These are outlined in a separate policy document, which can be found at **Document 5**.

6 Key Planning Considerations

This pre-application seeks advice on three separate proposals specifically relating to the diversification of Brunel Retail Park.

Principle of Development

Application 1

Application 1 seeks permission for the demolition of Units 6b, 7, 8, 9, 10 and 11 to allow the redevelopment of a new commercial unit (Use Class B1/B2/B8), with ancillary office space, car parking, servicing arrangements, landscaping and associated works.

The Site is not allocated for a specific use and the existing retail use is not protected by local planning policy. The Site does fall within the A33 Corridor, which policies within the Local Plan identify as being a focus for office and employment floorspace, alongside Reading Town Centre and the defined Core Employment Areas.

RBC's evidence base identifies a shortfall in industrial and warehouse floorspace and the proposal would help to address this shortfall in a location that is long accepted as appropriate for employment uses (A33 Corridor).

The development is also acceptable in that it would not result in an additional need for local housing and would not give rise to a need for further housing, in line with requirements set out in local policy.

The principle of development for Application 1 is therefore accepted.

Application 2

Application 2 seeks permission for the part change of use and external alterations to facilitate the subdivision of Unit 7 – which is currently vacant – so that Shoezone, Subway and Costa can remain operating at the Retail Park.

As outlined above, subdivision at Unit 7 is not restricted. Furthermore, the provision of units operating under Use Class A3 has already been accepted at the Site under application ref. 131743 (dated 18th March 2004). It is considered that given this application will essentially result in a 'unit swap' for Subway and Costa Coffee, the retail policy tests that would usually have to be addressed as part of a change of use would not have to be satisfied. We would like to confirm this position at the pre-application meeting.

It is therefore considered that the principle of development for Application 2 is accepted.

Application 3

Application 3 is for the external alterations and amalgamation of Units 3a and 3b to accommodate the displaced occupier. It will also include the creation of an external sales area.

Amalgamation is not restricted at Unit 3a and 3b, therefore the principle of development is accepted.

Other Development Management Considerations

There are a number of development management considerations which will need to be taken into account at application stage. These are outlined below:

Transport and Access

The proposed development will utilise the existing access at Rose Kiln Lane. The servicing access at Gillette Way will also be retained but upgraded to serve the vehicle needs of the operator, including the need to provide access for cars and HGVs.

The proposed site layout has been designed to minimise any potential impacts on the existing roads and will ensure that pedestrians and vehicles can safely access the Site.

A Transport Assessment will be submitted in support of the planning application. An initial Transport Statement has been prepared and submitted as part of this pre-application request for comment by Reading Borough Council Highways Department. It can be found at **Document 6**.

Impact on Residential Properties

A key consideration is the relationship of the Site to the nearby residential properties. The closest residential properties are located circa. 200 metres to the south west of the site on Greenham Avenue. The scale and design of the proposals have been designed to ensure that the scheme is in keeping with the wider area whilst also being a functional design to meet the operational needs of any future occupier.

Furthermore, the Committee Report associated with application ref. 170215, dated June 2017 noted that the impact on residential amenity was not an issue due to there being no residential properties in proximity.

Landscaping and Trees

There is dense planting at the western boundary of the Site, which shields it from the River Kennet. This landscaping is proposed to be retained as part of the proposed development(s). Further landscaping is also proposed around the new commercial unit.

A Landscaping Scheme will form part of the suite of documents submitted as part of the three planning applications.

Flood Risk & Drainage

According to the Environment Agency, part of the Site falls within Flood Zone 2. The western boundary of the Site falls within Flood Zone 3 and the River Kennet is located within circa. 40 metres of the site. As the Site is partly within Flood Zone 2 and 3, the planning application will be accompanied by a Flood Risk Assessment.

Furthermore, a drainage scheme will also be submitted in support of the application(s), which will assess the impact of the proposed developments and outline any mitigation required.

Contamination Report

A Phase 1 Contamination Report will be undertaken as part of the full planning application(s) to ascertain whether there is any existing contamination at the Site.

Sustainability Assessment

A Sustainability Overview accompanies this pre-application and can be found at **Document 7**. The overview provides an initial assessment of the proposals as well as detailing what materials are to be submitted with the future planning application(s).

It confirms that a combined Sustainability Statement, incorporating a BREEAM pre-assessment and energy assessment will be submitted. This will also include:

- A statement to address all relevant policies identified in Readings' SPG on Sustainable Design and Construction (2019).
- A BREEAM pre assessment made against BREEAM New Construction 2018 criteria for application 1.
- An SBEM Energy Assessment of the new industrial unit, showing compliance with Ene 01 4 credits (NC 2018)
- An SBEM energy assessment of the existing and proposed components of applications 2 + 3, in line with the BREEAM method, demonstrating how energy efficiency will be promoted through the incorporation of new thermally efficient elements where specified, and the incorporation of new modern and efficient equipment by the tenants. Demonstrating a minimum of 6 credits under Ene 01 (BREEAM Refurb 2014).

It would be useful for the relevant Officer to comment on this provision.

Other Considerations

Socio-Economic Benefits

In addition to the technical issues addressed above, wider material considerations focus on the socio-economic benefits arising from the proposals. These economic benefits should be afforded significant weight.

The proposal will result in the creation of local job opportunities through not only the provision of a new commercial unit, but through construction, security and maintenance. The proposals will also result in a substantial investment into the local economy.

The scaling down of the Retail Park will ensure that the vacant units on the Site are kept to a minimum.

7 Planning Application Scope

We would like to agree the documents required to support the planning application when we meet. At this stage, we are looking to agree the documents that will support the principal application which is the redevelopment to provide a new industrial unit. Those documents are outline below.

- Application Forms, certificates, and relevance Notices;
- The requisite planning application fee;
- Planning Drawings;
- Design & Access Statement;
- Planning Statement;
- Transport Assessment;
- Travel Plan;
- Flood Risk and Drainage Assessment;
- Desktop Contamination Report (Phase I);
- Sustainability Statement (including Energy Statement);
- Landscaping Scheme; and
- Topographical Survey.

The other two applications are minor in nature and will be supported by relevant plans and the Planning Statement which supports the primary redevelopment application.

8 Community Infrastructure Levy and Section 106

On review of the Adopted Community Infrastructure Levy Charging Schedule (2015), the charge for Class B floorspace (including offices) and retail is nil, as the Site falls outside of the Reading Central Core.

We wish to confirm this position and the provision of any Section 106 obligations at the pre-application meeting.

9 Points for Discussion

In light of the above, we would suggest the following agenda items when we meet.

- Introductions;
- Background;
- Proposed development;
- Principle of development;
- Scope of Transport Statement;
- Key development management considerations;
- Supporting documents;
- Determination (Delegated or Committee); and
- Any Other Business

In terms of personnel, ideally, we would like to meet with senior development management and policy Officers.

10 Conclusions

The proposals being considered will ensure that a well-established, sustainably located retail use will continue to be in active use. They will also ensure that the Site is utilised to its potential by providing a new commercial and ancillary office offer. This will in particular result in the provision of new employment opportunities and inward investment into the local economy.

Moreover, we are confident that national and local planning policy can be satisfied in terms of all three development options.

We are grateful for the Officer's consideration of this pre-application request, and we look forward to discussing the proposals further in due course. In the meantime, if there is any further information we can provide that may assist Officers' assessment of the scheme, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Rainbird', with a stylized, wavy flourish at the end.

Tim Rainbird
Director



DOCUMENT 4

COPY OF READING BOROUGH COUNCIL PRE-APPLICATION RESPONSE

PRE-APPLICATION REPORT

WITHOUT PREJUDICE

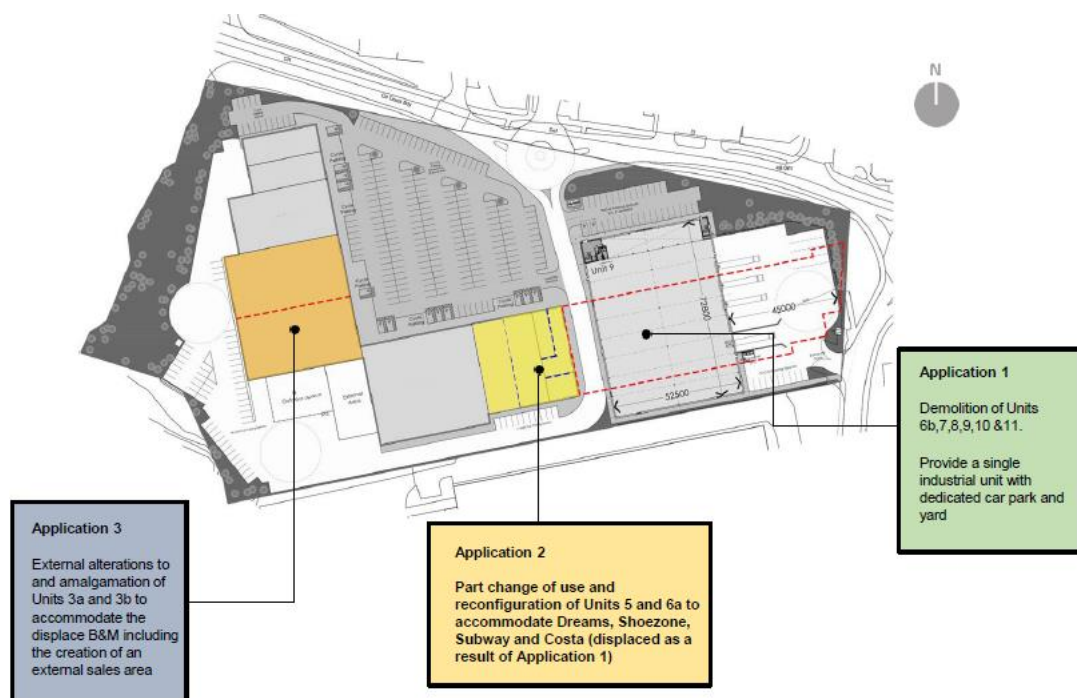
BRUNEL RETAIL PARK, ROSE KILN LANE, READING

200715/PREAPP - Application 1 - Redevelopment of Units 6b,7,8,9,10 and 11 to provide a single industrial unit, with dedicated car park and service yard. Application 2 - Part change of use and reconfiguration of Units 5a and 6, to accommodate the displaced Dreams, Shoe Zone, Subway and Costa Units. Application 3 - External alterations to and amalgamation of units 3a and 3b to accommodate the displaced B & M. (amended)

The Proposal:

Redevelopment of Brunel Retail Park via three proposed separate applications including:

- Application 1 - Demolish Units 6B, 7, 8, 9, 10 and 11 (loss of 4638sqm A1 and A3 floorspace) and develop a single industrial unit B1c/B2/B8 distribution centre with ancillary B1a offices (4263sqm) to be serviced from the existing access point from Gillette Way. 45 no. car parking spaces, including 2 accessible and 12 cycle spaces - 3,822sqm gf and 441sqm office first floor (to be known as Unit 9). Reduced retail car parking of 265 spaces (from 367). Proposed 2.4m high acoustic fence to the perimeter of the service yard.
- Application 2 - Part change of use and reconfiguration of Units 5 and 6a for Dreams, Shoezone, Subway and Costa, displaced by Application 1.
- Application 3 - Consolidating and retaining a reduced retail area and with external alterations to Units 3a and 3b to accommodate displaced B&M and the creation of an external sales area along with cosmetic and structural improvements to the retained building fabric (7293sqm). Retaining 232 no. car parking spaces including 13 no. accessible; 60 no. staff car parking spaces and 40 no. cycle spaces, with a continuation of the internal roadway from Rose Kiln Lane for servicing.



Information reviewed is as follows:

Received 26th May 2020, unless otherwise stated:

- Pre-application form
- Site Location Plan
- Proposed Site Plan - Drawing no: 19032-SK07
- Vision Document, prepared by Fletcher Rae
- Local and National Planning Policy Note, prepared by Quod
- Transport Scoping Note, prepared by TPP Consulting
- Sustainability Overview, prepared by Envision

1st Pre-application meeting took place on 24th June 2020

Site Description/ Background:

Brunel Retail Park is an established retail park of 3.5ha on Rose Kiln Lane, located approximately 3km south of Reading town centre. It has 11,328sqm of floorspace (plus 3,447 mezzanine floor space) and is comprised of 13 units with 351 car parking spaces to the front, and further spaces within the service area to the rear, accessed off Gillette Way to the south-east. Immediately to the north and south is a mix of industrial units, to the east a Morrison's store, and to the west the A33 strategic route from the M4 to Reading.



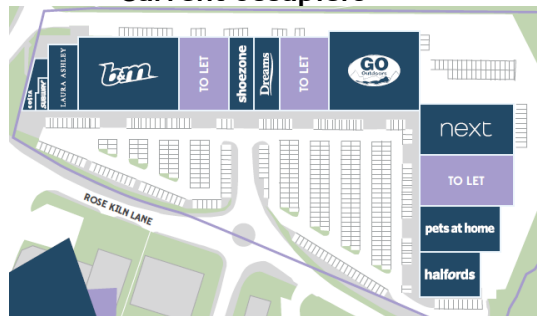
The Retail Park was originally granted permission for A1 units in 1994 with conditions limiting the goods which could be sold (Condition 12); limiting the total number of units to 14, and the range of minimum sizes (Condition 13); and limiting the number of units to 2 which could sell clothing and footwear (Condition 14).

Since that time there have been a number of applications for change, most notably permission for an extension to Unit 3 in 1995, extensions and refurbishment of Unit 8 in 2004, two new units in 2011, variation of conditions 12 and 14 to: vary the range of goods which could be sold within Unit 3; the number of units which could sell clothing and footwear and the percentage of sales area for specific types of goods, two new units for A1/A3 use (currently Costa and Subway (see planning history below) in 2013; and new mezzanine in Unit 4 2017.

The plan below shows the current occupiers of the Retail Park. You state in your Vision Document' that due to "*structural changes in the retail warehouse market over the last few*

years, particularly sales shift to online, have led to distress in the sector and increased vacancy rates across the country”. This has been seen across all types of retail centres and of course has been compounded by the Coronavirus pandemic. Your intention is to adjust the size of the retail park with a view to achieving full occupancy and improved vibrancy and to develop a single large logistics unit, which you state there is a shortage of within Reading.

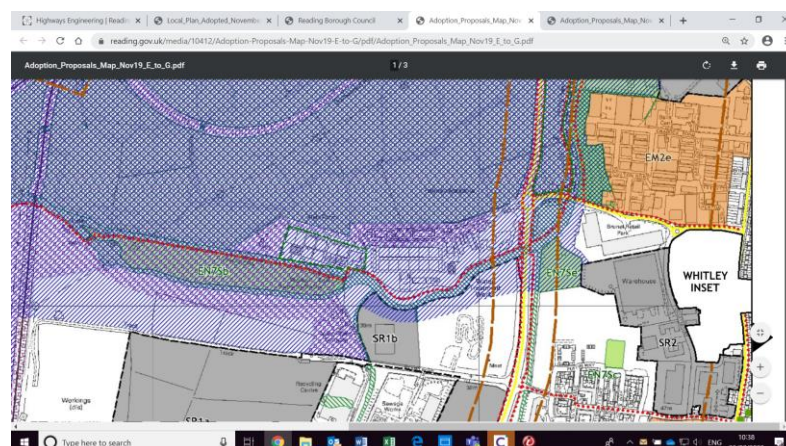
Current occupiers



Unit Number	Existing Occupier	Ground Floor Area (GIA) (sqm)	Mezzanine Floor Area (sqm)
1	Halfords	701	341
2	Pets at Home	935	n/a
3a	Vacant	1202	n/a
3b	Next	1212	600
4	Go Outdoors	1868	1538
5	Vacant	931	n/a
6a	Dreams	467	339
6b	Shoe Zone	459	n/a
7	Vacant	937	n/a
8	B&M	1897	275
9	Laura Ashley	460	354
10	Subway	94	n/a
11	Costa	165	n/a
Total	11,328	3,447	
Total Floorspace		14,775	

Site constraints:

The following is an extract from the Reading Borough Local Plan Proposals Map 2019.



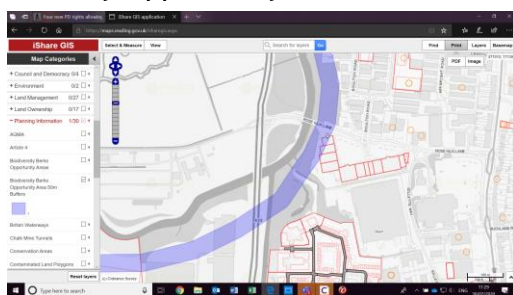
The relevant site-specific policy for the site and surrounding area is:

- Close to Air Quality Management Area (EN15 - brown dashed line);
- North of 'Land North of Manor Farm Road Major Opportunity Area' (SR2 - grey area);
- West of Whitley District Centre (RL1);
- South of Core Employment Area - 'North of Basingstoke Road' (EM2e - brown area);
- Cycle routes (Policy TR4 - red dots);
- Adjacent to Major Landscape Feature (EN13 - blue hatching);
- Rose Kiln Lane is a classified Highway (TR3 - yellow line).

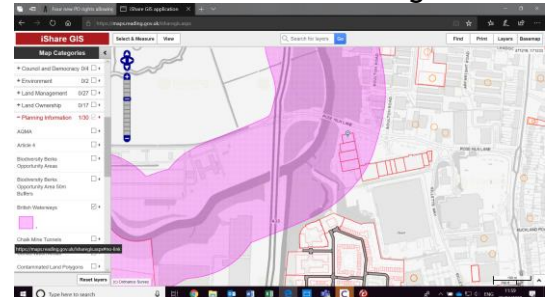
In addition there are the following constraints/considerations:

- Partially within the Biodiversity Opportunity Area 50 m buffer (EN12 - purple area);
- Partially within the Canal and Rivers Trust Planning Buffer (pink area - please note this shows 50m, although the Canal and River Trust website identifies a 150m buffer for major development);
- Partially in Flood Zone 2 (Between 1 in 100 and 1 in 1,000 annual probability of river flooding (EN18 -blue area)
- TPO 118/05 at eastern sent of site (green dot)
- Contaminated Land (EN16 - red area)

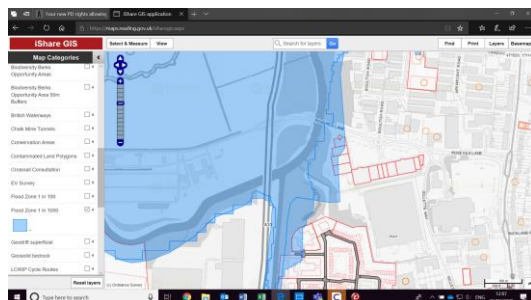
Biodiversity Opportunity Area - 50 m Buffer Zone



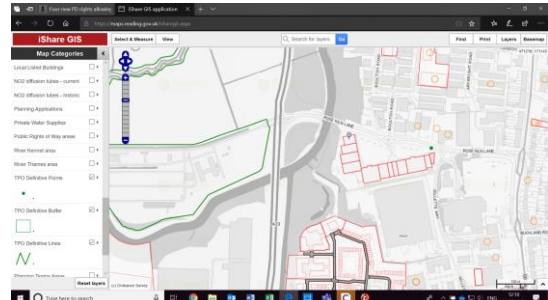
Canal and Rivers Trust Planning Buffer



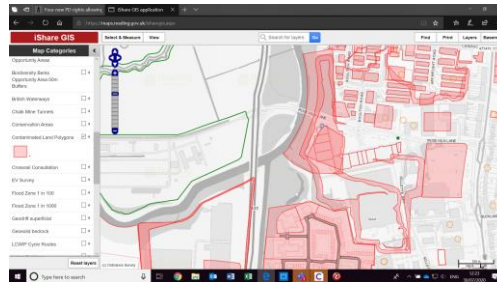
Flood Zone 2



TPO 118/05



Contaminated Land



There are also other relevant borough wide policies. All policies are set out under the 'Relevant Policies' section below.

Relevant Planning History:

The following is a summary of some of the main decisions.

94/00443/FD (940948) - Erection of Non-Food Retail Warehouses (A1) with ancillary service area & car parking for 510 cars - Approved 23rd December 1994

95/00255/FD (950019)- Erection of non-food retail extension to Unit 3 & 30 additional car parking spaces - Approved 19th September 1995

04/01113/FUL (041089)- Extension to Unit 8 and refurbishment of existing retail park including the re-cladding of existing park, the erection of four advertising totem stands and the erection of new entrance features to the units - Approved subject to a S106 legal agreement 14th December 2004

11/00431/FUL (110118)- Minor alterations to elevations and internal works to create two new units and reconfiguration of car park - Approved 12th May 2011 (N.B. Units 3a and 3B)

11/00967/VARIAT (110655) - Minor alterations to elevations and internal works to create two new units and reconfiguration of car park without complying with condition 5 of planning permission 11/00431/FUL - Approved 3rd August 2011

11/00673/VARIAT (111326)- Erection of non-food retail warehouses (A1) with ancillary service areas and car parking for 510 cars without complying with conditions 12 and 14 of planning permission 94/0043/FD- Approved 5th October 2011

11/01362/NMC (111445)- Non-material change to planning permission 11/0431/FUL to allow reconfiguration of the sub-divided units and the relocation of the entrance doors at Unit 3C - Withdrawn 26th October 2011

131106/VAR - Approval of condition 12 relating to the planning application reference 94/0443/FD - Approved 18th October 2013 (N.B. relates to all units except for 1, 2, 3a, 4, 8, 10 and 11. These have use class restrictions imposed as part of 11/00673 or separate permissions))

131743/FUL - Erection of two new units for use within Class A1 and / or A3, alterations to the wider site and car park layout and associated works. Approved - 18th March 2014 (N.B. Units 9 and 10)

141189/NMA - Non material change to planning permission 131743 to alter the timescales for the submission of a BREEAM Interim Certificate - Agreed 20th August 2014

141264/NMA - Application for a non-material amendment following a grant of planning permission (131743) relation to alterations to the approved elevations. Agreed 5th September 2014

150315/NMA - Non material change to planning permission 131743 relating to the fencing and rear servicing. Agreed 19th March 2015

151140/NMA - Application for a non-material amendment following a grant of planning permission (131743) - Agreed 23rd July 2015

170215/FUL - Works to Unit 4 including reconfiguration of existing mezzanine floorspace and insertion of additional mezzanine floorspace of 1,053sqm, the creation of an external

display area of 465sqm and associated works including new fire doors. - Approved 29th June 2017

Consultation Responses:

Environment Agency

The EA does not respond directly to Local Authorities for pre-application enquiries. You would need to approach the EA separately for pre-application advice, which I understand is chargeable.

Their pre-application advice note is attached at Appendix 1. below, which provides information and guidance about issues within their remit at the planning application stage.

Ecology

Awaited - to send separately.

Environmental Protection and Nuisance:

Awaited - to send separately.

Natural Environment (tree officer):

Brunel Retail Park is located within Whitley ward which has a low canopy cover, less than the 12% canopy cover which the Borough Council wishes to achieve in the new Tree Strategy. The Borough Council seeks to enhance tree numbers in areas with limited tree cover with a commitment to protect the existing trees.

One Plane tree to the front of the site is protected as T1 of Tree Preservation Order 118/05 and there are also a number of other significant trees elsewhere within the site. These trees will need to be protected during any building works and the applicant will need to submit a BS:5837 Arboricultural Method Statement in support of any future planning applications to show how this will be done.

In support of the Council's aims to increase tree canopy cover within the ward of Whitley, any scheme to redevelop the site will also need to allocate adequate areas for soft landscaping and which should include a robust scheme of landscape planting which will include additional trees on site. We would welcome the inclusion of green roof (on flat roofs) and living wall elements where possible in order to enhance the green credentials of the site and mitigate the long-term impact of climate change.

Transport

Awaited - full comments to be sent separately (summary points included below).

Relevant Policies:

National Planning Policy Guidance

National Planning Policy Framework (NPPF)

Section 2 - Achieving Sustainable Development

Section 6 - Building a Strong Competitive Economy

Section 8 - Promoting Healthy and Safe Communities

Section 9 - Promoting Sustainable Transport

Section 11 - Making Effective Use of Land

Section 12 - Achieving Well-Designed Places

Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 15 - Conserving and Enhancing the Natural Environment

Adopted Reading Borough Local Plan - November 2019

Policy CC1: Presumption in Favour of Sustainable Development
Policy CC2: Sustainable Design and Construction
Policy CC3: Adaptation to Climate Change
Policy CC4: Decentralised Energy
Policy CC5: Waste Minimisation and Storage
Policy CC6: Accessibility and the Intensity of Development
Policy CC7: Design and the Public Realm
Policy CC8: Safeguarding Amenity
Policy CC9: Securing Infrastructure
Policy EN11: Waterspaces
Policy EN12: Biodiversity and the Green Network
Policy EN13: Major Landscape Features and Area of Outstanding Natural Beauty
Policy EN14: Trees, Hedges and Woodland
Policy EN15: Air Quality
Policy EN16: Pollution and Water Resources
Policy EN17: Noise Generating Equipment
Policy EN18: Flooding and Drainage
Policy EM1: Provision of Employment Development
Policy EM2: Location of New Employment Development
Policy EM4: Maintaining a Variety of Premises
Policy TR1: Achieving the Transport Strategy
Policy TR2: Major Transport Projects
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR4: Cycle Routes and Facilities
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
Policy RL1: Network and Hierarchy of Centres
Policy RL2: Scale and Location of Retail, Leisure and Culture Development
Policy RL5: Impact of Main Town Centre Uses
Policy SR2: Land North of Manor Farm Road Major Opportunity Area

Supplementary Planning Guidance/Documents

Revised Parking Standards and Design (2011)
Sustainable Design and Construction (2019)
Employment, Skills and Training (2013)
Planning Obligations under S106 (2015)

Other Relevant Documents

Tree Strategy (2020)
The Reading Biodiversity Action Plan (2006); Reading Biodiversity Action Plan, Draft for Consultation (Feb 2020)
National Design Guide (MHCLG, October 2019)

ASSESSMENT

The main issues to be considered are:

- a) Principle
- b) Design
- c) Transport/ Parking
- d) Sustainability
- e) Landscaping & Ecology
- f) Environmental Matters
- g) S106 & Community Infrastructure Levy
- h) Submitting a planning application

a) **Principle**

Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development, which lies at the heart of the National Planning Policy Framework (para. 11 NPPF).

It goes on to state that “Planning applications that accord with the policies in the development planwill be approved without delay, unless material considerations indicate otherwise.....”

The three overarching objectives defined in the NPPF, to achieving sustainable development are economic, social and environmental. The social role requires planning to support strong, vibrant and healthy communities and a high-quality built environment. The environmental role requires the natural, built and historic environment to be protected and enhanced with mitigation and adaptation to climate change; these aspects will be addressed below.

With regard to the economic role, the proposal would contribute to economic activity through contributing to “building a strong, responsive and competitive economy” as defined in the NPPF, both through the construction period and as part of the ongoing operation of the proposed distribution and retail uses. The proposal would also enable businesses to adapt and would support economic growth (para 80. NPPF).

The site is located in South Reading and Paragraph 3.2.6 of the Reading Borough Local Plan (RBLP, 2019) states that South Reading is one of the main parts of the Borough where there are significant sites potentially available for development, particularly in the area close to the A33. It goes on to state that South Reading will be the location to meet much of Reading’s need for new employment floorspace, with a strong focus on industry and warehousing.

Policy EN1 of Reading Borough Local Plan (RBLP, 2019) Policy EM1 sets out the quantum of new office and industrial/ warehouse development over the Plan period. Although it states that:

“Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, will need to either: (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing, which may be through the provision of additional residential development.

However, it does go on to state that *“Proposals to provide a freight consolidation centre in a location with good access to the strategic highway network will be supported, subject to other policies in this plan”.*

Policy EM2 identifies the relevant locations for such development and for major employment uses, including industrial and storage and distribution states that these should be in the A33 corridor or in the Core Employment Areas. The site is located just to the east of the A33 and falls within the defined ‘Corridor’ (Fig 6.1, RBLP), and is located opposite employment area EM2e: North of Basingstoke Road, and therefore, in terms of its specific location is considered to be acceptable in principle.

It should be noted, however, that the site is immediately to the north and adjacent to the site allocation SR2 a primarily residential area (between 680 and 1,020 dwellings)

along with an extension to the Whitley District Centre, school provision and open space and public realm improvements, and small business units for mixed use including residential. Therefore, any future development of the Brunel Retail Park, would need to be mindful of this and developed in this context. It will be important that any future proposal for the Brunel Retail Park would not jeopardise the bringing forward of the allocated site. It would need to be clear, with a proposed 24 hour operation, for example, how likely impacts on residential amenity would be addressed and mitigated/minimised. This would include the requirement for a sufficient buffer between the access to the proposed service area and this allocated site. The covering letter refers to the provision of an acoustic fence to the rear boundary, which would partially contribute towards such mitigation.

The proposal also includes for ancillary offices totaling 441sqm to serve the proposed new B1c/B2/B8 unit. As these would be ancillary to the B use then it is considered that a sequential test as required under Para. 86 of NPPF would not apply in this case.

The remainder of the proposal relates to consolidating, and moving existing users to other units in the proposed retained retail park. It is accepted that the specific types of goods which can be sold, the total number of units selling specific types of goods, and the proportion of floor area for specific goods is already established along with the fact that there is permission for two A1/A3 units, previously assessed and considered as acceptable.

The covering letter makes it clear that proposed Application 2 proposes the change of use and reconfiguration of Units 5 and 6a to accommodate the existing users: Dreams, Shoezone, Subway and Costa. These units have an existing condition which limits the use to A1 (condition 12 131106). The submitted information states that a change of use would be sought to accommodate the A3 uses, however Costa and Subway are already considered as A1, so a change of use would therefore not be required. In any case, from September 1st 2020, The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757) will come into force and will make changes to the existing 1987 Use Classes Order. Under the change A1 and A3 will be within the same new E Commercial, Business and Service use class (Schedule 2). The regulations are intended to reform and simplify the Use Classes Order to make it easier for a permission to change use without the need for a planning application.

Similarly, for Application 3, which involves amalgamating units 3a and 3b and creating an external sales area for an existing tenant of the retail park B&M, as there would be no overall net increase of retail space it is confirmed that there would be no requirement to apply a sequential test under para 86 of the NPPF, with respect “to *planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.*” The overall principle is considered acceptable.

The consolidation of the retail part of the site and the development of a new distribution unit would be considered acceptable in principle, according with making effective use of land (NPPF) and employment policies. Although the principle of the use and location are considered acceptable this would be subject to satisfactorily meeting other policy requirements, including, but not solely, with respect to transport, landscaping, sustainability and energy efficiency standards. These are addressed further below.

b) **Design**

Section 12 of the National Planning Policy Framework (NPPF) places significant weight on ensuring good design which is a key aspect of sustainable development and should positively contribute towards making places better for people. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.

The National Design Guide includes a number of characteristics to consider in achieving good design, and one of these relates to the context of a site where well-designed development is that which *“responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones.”*

RBLP Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.” Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials. Developments will also be assessed to ensure that they respond positively to their local context”*

The site is close to the River Kennet and within the buffer for a Biodiversity Opportunity Area. Under Policy EN11 there is the requirement for water spaces to be protected, enhanced and that *“there will be no adverse impact on the function and setting of any watercourse and its associated corridor”*.

The Retail Park is located in an area comprised largely of industrial/ other commercial buildings. There is a range of styles and ages of building, with cladding materials predominantly in white and grey, some more traditional brick units to the north, mostly flat roofs, with varying levels of glazing. However, the overriding character is relatively low rise with relatively open frontages with parking and some landscaping to the street frontage.

The proposal includes for some reworking of the retained units, and a new industrial unit. The proposed B1C/B2/B8 unit would have an internal clear height of 10m, which the submitted information states is the requirement for a logistics' unit. It would be deeper than the adjacent retained retail units, so would project forward of the existing building line. However, this is considered to be acceptable, since there would still be a good set back from Rose Kiln Lane, with car parking to the front as with the remainder of the retail park, and with a retained landscape strip frontage, providing a continued appearance of openness and spaciousness.

In terms of the design of the building itself, the street scene shows that this has taken cues from the local area and has included measures to reduce the overall bulk of the building through articulation and textural changes on all elevations. The principal elevation is proposed with a *“projecting colonnade canopy supported on slender circular columns combined with extensive glazing and full height curtain walling to the building corners”*. This is considered to blend within the overall street scene and relates well both to the proposed retained retail unit, but the wider area.



It is considered that the design incorporates sufficient variety of form especially to the front and side elevation to the retail park, the roofscape and use of materials to achieve a good balance between the functional requirements of an industrial building and appearance. However, some adjustments to the elevation to Gillette Way (facing the roundabout) as seen below would be welcomed.



The proposed elevation to Gillette Way, although set further back from the highway than the existing buildings, offers less visual interest than the elevation to Rose Kiln Lane. The indicative imagery (extract below) indicates a significant level of planting. It is important that this intention is carried through to any formal submission, by including a landscaping scheme which includes good sized trees. One thing to consider, alongside developing a landscaping scheme, is the location of future signage, so that there would not be a request to diminish the overall landscaping in the future. Any landscaping should also include along the southern boundary.



As this elevation to Gillette Way is as prominent as that facing Rose Kiln Lane are there other mechanisms which could be incorporated that would also improve its appearance from this side? It is accepted that as an industrial building, and serving as the side of the building with loading bays, there are limited opportunities for enhancing the design, but could any detailing used on the Rose Kiln Lane frontage be carried through to the side? Could there be any glazing, or breaking up of the side elevation?

Overall it is considered that the proposed building would achieve a good balance between function and design and that the overall proposed layout works effectively within the constraints of the existing layout and form of the retail park, whilst achieving a satisfactory servicing area both for the industrial building and for the retained retail units, subject to any detailed comments which Transport may have.

The Natural Environment Officer has highlighted the need to think carefully about landscaping, protection of the TPO tree, and any further opportunities for greening including green roofs, which would also assist with the sustainability credentials of the applications, in accordance with our adopted policies, and need to be carefully integrated into the design process.

As a Major level application any formal submission would need to be supported by a Design and Access Statement.

c) **Transport/ Parking**

Full Transport comments will be sent under separate cover responding to the details within the submitted Transport Scoping Note, however the following is a summary of the key issues:

- The Highway Authority are happy with the methodology of using TRICS to establish trip generation, however, it is noted that the floor areas for the proposed uses have not included the ancillary office. Revised trip rates would be required including the 441m² of ancillary office. I have not undertaken a review of the actual TRICS data presented but I will provide this under a separate response.
- An assessment should be undertaken to establish the increase in HGV movements.
- It is noted that the retail park currently provides parking that is below the council standard with the application proposing to reduce this further. For the Highway Authority to agree to this reduction, suitable justification must be provided to ensure that overspill parking does not occur.
- The number of accessible bays is currently acceptable.
- A provision of 1 space per 94m² is proposed for the B1c/B2/B8 use, which is in excess of the council's standard, however, in this instance I have no objection to this provision as this will ensure overspill parking does not occur.
- The proposed B1c/B2/B8 should provide a provision of 3 accessible bays in line with the Council's policy.
- The proposed B1c/B2/B8 should provide a provision of electric charging points in line with the Council's adopted Local Plan.
- The application should be submitted with tracking diagrams to ensure that HGVs can satisfactorily access and egress the site from the Rose Kiln Lane roundabout and through to the rear service area unimpeded. It would appear that the roundabout is to be provided with hatching at the entrance to the site which removes the existing pedestrian refuge island. This cannot be supported as this will be detrimental to pedestrian movement.

- Tracking diagrams will also be required for the altered access onto Gillette Way to ensure that two-way movements can be provided.
- The proposal seeks to include pedestrian access to the B1c/B2/B8 use on the southern side of the access onto Gillette Way, however currently there are no pedestrian facilities on the southern side and no crossing facility at this access. If a full application is submitted the design of this access must be reviewed to provide suitable facilities for pedestrians.
- It is noted that the vehicle entrance to the B1c/B2/B8 use car park is located 9.5m approx. from the roundabout junction which will result in conflicting movements in and around the roundabout which the Highway Authority could not support. In accordance with the Councils geometric design guide for access onto classified roads an access could not be supported if it is within 20m of the roundabout junction.
- The Highway Authority have no objection to the proposed cycle numbers for the retained retail use and accept that the distribution will result in an improvement.
- Cycle parking for the proposed B1c/B2/B8 use should however be provided in accordance with the B1b/B1c standard of 1 space per 250m². This should be provided within a covered and conveniently located store.
- I will confirm via a separate response whether any pedestrian / cycle enhancements would need to be secured through this application.

d) **Sustainability**

As one of the local authorities which declared a climate emergency in 2019, the aim is to eliminate carbon dioxide emissions in Reading by 2030. In this context there are a number of policies within the new Reading Borough Local Plan, which are relevant to new development. The newly adopted Supplementary Planning Document ‘Sustainable Design and Construction (2019)’ also emphasises the need and importance of securing positive environmental improvements as part of any new major development such as this.

The overarching sustainability policy CC2 requires proposals for new development to be designed and have site layouts which “use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.” In order to achieve this all major non-residential developments are required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible; All non-residential development should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard; and should include recycling greywater and rainwater harvesting where systems are energy and cost effective.

The submitted Sustainability Overview makes it clear that the aspiration will be to “*attain the highest rating practicable for the new build industrial unit (application 1)*”, however the Council’s expectation would be for a policy compliant position. If this would not be achievable then there would need to be adequate justification and detail presented as to why an ‘Excellent’ rating could not be achieved in this specific case, which would be assessed and considered as part of any formal application. As the supporting text to Policy CC2 recognises certain developments are less able to reach the excellent standard and should meet BREEAM ‘Very Good’ as a minimum, but, if this were the case, then clear reasons would need to be presented.

With respect to Applications 2 and 3 evidence is presented that the BREEAM standards that are technically applicable to non-domestic refurbishment works (applications 2+3) are the BREEAM UK Non-domestic Refurbishment and Fit Out (2014). These are identified by Envision as widely recognised as not fit for purpose. The consultant highlights a further recent case in Reading where such an approach was accepted (191841 - related to works to the House of Fraser). Having reviewed that case it is clear that it was acknowledged that *“the proposals, as largely a refurbishment proposal, do not align neatly with the standard BREEAM / Energy requirements.”* This was accepted based on:

- The submission of a robust assessment as part of the formal application submission;
- Committing to incorporating a range of sustainability and energy measures ; and
- Securing various measures via condition, prior to occupation, rather than securing an official BREEAM rating to demonstrate that measures committed to within the documentation at application stage have been installed and achieved.

Such an approach would be considered acceptable in the case of the proposals as they are currently presented. The material proposed to be submitted with a formal application, as set out on page 18 of the Envision Statement, is considered acceptable, but would still be subject to consultation, which may generate additional issues/ requirements.

Other policies to be addressed would be Policy CC3: Adaptation to Climate Change, CC5: Waste Minimisation and storage and CC4: Decentralised Energy.

e) **Landscaping & Ecology**

The site currently has landscaped areas to the Rose Kiln and Gillette Way frontages, which includes a protected tree. The western part of the site is within the buffer zone for a Biodiversity Opportunity Area of the River Kennet and adjacent to the Kennet and Holy Brook Meadows Major Landscape Feature.

Policy EN14: Trees, Hedges and Woodland states that:

“Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.”

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”

Policy EN12 Biodiversity and the Green network states:

‘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'

Policy EN11 reads: *"Where development in the vicinity of watercourses is acceptable, it will:- [...] "Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities; [...] Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses;"*

Policy EN13 states that:

"Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.

As set out under the Natural Environment comments above there is the need for any scheme to enhance the number of trees and protect the existing trees within the context of a robust landscaping scheme.

It will be important to ensure that the scheme is designed to maximise its value for wildlife and a new wildlife friendly landscaping scheme, including new tree planting in the car park as well as the frontage and other boundaries, particularly with regard to screening the site in the context of the allocated residential site to the south.

In accordance with paragraph 180 of the NPPF any lighting would need to minimise the impacts on wildlife.

Reading has declared a climate change emergency, and soft landscaping and opportunities for greening must be considered and included where possible. Measures such as green walls, and green and brown roofs, would also provide a further means to green the scheme and assist with improving sustainable credentials and meeting relevant policies to become carbon neutral. Additionally, the development should include measures that *"improve air quality and reduce the effects of poor air quality' (EN15).* The redevelopment of the site provides an opportunity to present an innovative scheme.

f) Environmental Matters

Environmental Protection and Nuisance specific comments will be sent under separate cover.

The relevant policies are set out above, but in summary the key matters to consider are as follows:

Contamination

The site is identified as contaminated land and Policy EN16 states that *"development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site."*

It is likely that an assessment and any required remediation would have been undertaken as part of previous permissions, however it will be necessary to submit a

‘phase 1’ desk study as to the likely risks and to determine what further investigation is necessary.

Flood Risk & Waterway

Policy EN18: Flooding and Sustainable Drainage requires development to be directed to areas as the lowest risk of flooding in the first instance, following the Sequential and Exception Test set out in the NPPF. The western end of the site is within Flood Zone 2 and a Flood Risk Assessment will therefore be required, which is acknowledged within the covering letter.

As referred to above, the Environment Agency offer a paid pre-application service in order to identify and resolve issues prior to the submission of a planning application.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards. More details are set out under policy EN18.

The Canals and River Trust should be consulted on major developments within 150m of a waterway. They offer a free pre-application service. It is advised that they are contacted prior to a formal submission to determine whether they consider there would be any likely effect to any watercourse, let off or culvert. (see more details on their website¹)

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedence of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this, recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development is located adjacent to an Air Quality Management Area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

External lighting

If the plans are to include external lighting, the full application should include lighting details to include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles) and an isolux contour map to show light spill levels.

Construction and demolition phases

It is usual to attach conditions to any permission which control hours of construction and require the submission and approval of a construction method statement which includes setting out provisions for the control of noise and dust with respect to impacts on residents and businesses.

g) S106 & Community Infrastructure Levy (CIL)

The development would be liable to Community Infrastructure Levy (CIL) however, in line with the Council’s Charging Schedule (2015) there would be nil charge for the proposed uses in this location.

¹<https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/planning-applications/our-notified-area>

An obligation/financial contribution for employment, skills and training both for construction and end user would be required (see the Employment, Skills and Training SPD, 2013 for further details - <https://www.reading.gov.uk/media/1064/Employment-Skills-and-Training-Supplementary-Planning-Documents-Adopted-April-2013/pdf/Employment-Skills-And-Training-Supplementary-Planning-DocumentsApr13.pdf>)

There may be other matters, which need to be addressed including with respect to transport, which will be confirmed as part of the further consultation comments to follow.

It is recommended that contact is made with Reading UK CIC² who are the economic development arm of the Council and who will be able to advise on developing an Employment, Skills and Training Plan.

h) Submitting a Planning Application

The Council's validation requirements are set out at the following link: http://www.reading.gov.uk/media/2660/Validation-Checklist-Updated-Dec-2016/pdf/Validation_Checklist_Final_Dec_16.pdf

The following documentation would be expected as part of a formal submission*:

- Air Quality Statement
- Contaminated Land Survey & Report
- DAS
- Ecological Statement
- Energy Assessment
- External Lighting Details
- Flood Risk Assessment
- Heads of Terms Proposals
- Landscaping Strategy
- Planning Statement
- Plans and Drawings
- Sustainability Statement
- SUDs
- Transport Assessments & Travel Plan
- Tree Survey/ Arboricultural Method Statement
- Vehicle Parking and Servicing Details

As a major application it would be a committee decision.

As the site is under 5ha no EIA Screening opinion is required under Schedule 2 of the EIA Regulations (2018 amendment) under 10. (a) Industrial Estate Development

Conclusion

Subject to addressing relevant policy matters through the application submission as set out above, the principle of the proposed 3 presented applications is considered acceptable. Further consultation responses will be sent in due course.

² <https://livingreading.co.uk/readinguk/contact-us> - Economic Development Manager

APPENDIX 1: ENVIRONMENT AGENCY ADVICE NOTE



Thames Area

Pre-application Advice Note

December 2018

This document sets out the environmental issues we will consider when providing our planning application consultation advice to Local Councils. It can be used by applicants, developers and consultants at the pre-planning stage.

Fluvial Flood Risk

Development must be safe and should not increase the risk of flooding.

You can view a site's flood zone on the Flood Map for Planning on our website: <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

If your proposed development is located within flood zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG) <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Here you can determine whether the flood risk vulnerability of your proposed development and the flood zone are compatible. You can also establish if there are flood risk sequential test and exception test requirements for your proposed development.

If your proposed development is located within flood zone 2 or 3 and its vulnerability and flood zone are considered acceptable under the NPPG then a site specific Flood Risk Assessment (FRA) is required to support any subsequent planning application. This is required by paragraph 163 of the National Planning Policy Framework (NPPF)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Guidance on the content of a site specific FRA can be found on the NPPG and the .gov website: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

We are in the process of making the majority of our data open source by June 2016. However, if you need more detailed flood risk modelling data to help you produce a FRA then please contact our Customers and Engagement team at Enquiries_THM@environment-agency.gov.uk.

Climate Change Allowances

On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances in a site-specific FRA: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

If you have any questions regarding this guidance, please contact our Customers and Engagement team: Enquiries_THM@environment-agency.gov.uk

Groundwater Quality

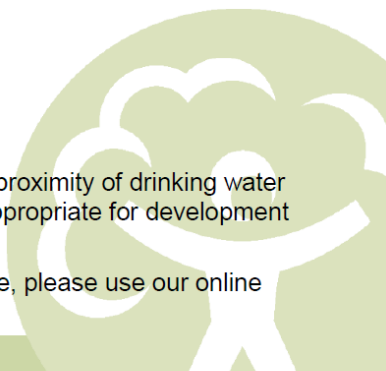
Development must not cause pollution to the water environment.

Source Protection Zones

These zones indicate that an area is very sensitive to pollution risks due to the proximity of drinking water sources and the way groundwater flows. In these areas we may consider it inappropriate for development to discharge foul or surface water into the ground.

To see if your proposed development is located within a Source Protection Zone, please use our online map: <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

www.gov.uk/environment-agency



Contaminated land

The NPPF takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of remediation.

Where contamination is known or suspected, a desk study, site investigation, remediation and other works may be required to enable safe development (paragraph 178 of the NPPF). Minimum requirements for submission with a planning application are a preliminary risk assessment, such as a site walkover or desk top study. Site investigation and remediation strategy reports may be required for submission with a planning application for sensitive land use types or where significant contamination, or uncertainty, is found. When dealing with land affected by contamination, developers should follow the risk management framework provided in the CLR11, Model Procedures for the Management of Land Contamination:

<https://www.gov.uk/guidance/land-contamination-risk-management>

Pollution

If the proposed development use has the potential to pollute ground or surface water receptors then an assessment to establish whether the risk of pollution is acceptable or can be satisfactorily mitigated for will be required within any planning application.

Main Rivers

Ecology

If a Main River flows through or is within 10 metres of your proposed development site an ecological survey is required to establish whether development is likely to have a detrimental impact on the biodiversity of the watercourse. We would not support development proposals if there was shown to be a likely detrimental impact on the watercourse and associated habitats. We would also seek suitable enhancements where appropriate in line with paragraph 170 of the NPPF.

Your scheme should be designed with an ecological buffer zone of at least 10 metres, measured from the top of the bank of the watercourse; enhance the conservation value of the watercourse and associated habitats; ensure access for flood defence maintenance. This width of buffer provides the minimum width of habitat needed to provide for functioning of wildlife habitats, while being able to facilitate informal access for enjoyment of the river.

This buffer zone should be managed for the benefit of biodiversity for example by the planting of locally native species, of UK provenance. The buffer zone should be maintained as a natural or semi-natural habitat, free from built development, lighting, parking areas, private gardens and formal landscaping. The buffer should be provided on both sides of a watercourse which flows through the development. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements. A long term management plan will also be required.

To identify any Main Rivers in proximity to your proposed development please see our Main Rivers Consultation Map: <http://apps.environment-agency.gov.uk/wiyby/151293.aspx>

Water Framework Directive (WFD)

With any development alongside watercourses, consideration should be given to the requirements of the Water Framework Directive (WFD) <http://ec.europa.eu/environment/water/water-framework/>. This includes preventing overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) <https://www.gov.uk/search?q=River+Basin+Management+Plans>.

Where appropriate, a WFD Assessment (<http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/>) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. In some cases the requirements of a WFD assessment can be incorporated into an Environmental Impact Assessment (EIA). Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Environmental Permitting Regulations

To see if your proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website:

<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>

From 6 April 2016 an Environmental Permit is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated Main River.

Further pre-application options

We are able to provide detailed and bespoke advice and answer technical questions for a charged fee which equates to £100 per hour.

If you are interested in finding out more about this service, please email:

Planning_THM@environment-agency.gov.uk

We can explain this service and provide you with a bespoke quote for further pre-application advice that you may require.

Please note

This document is a response to a pre-application enquiry only and does not represent our final view in relation to any future planning application made in relation to any site.

You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

If you have any questions please contact the Thames Sustainable Places team:

Planning_THM@environment-agency.gov.uk

Memo

To: Alison Amoah

From: Helen Craddock (RBC Ecology Consultations)

CC:

Date: 06 August 2020

Re: Planning application ref: 200715

Address: Brunel Retail Park Rose Kiln Lane Reading

Description: Application 1 - Redevelopment of Units 6b,7,8,9,10 and 11 to provide a single industrial unit, with dedicated car park and service yard. Application 2 - Part change of use and external alterations to facilitate subdivision of Unit 7, to accommodate the displaced Shoe Zone, Subway and Costa Units. Application 3 - External alterations to and amalgamation of units 3a and 3b to accommodate the displaced B & M

Background

The pre-application site comprises a retail park (large retail units, hardstanding, and hedging) adjacent to the River Kennet and associated wetland habitats. It is proposed to demolish a number of the retail units and erect a new warehouse, and to subdivide, amalgamate, and make alterations to the remaining retail units to accommodate the displaced retailers.

The adjacent river and wetland habitats are likely to comprise one or more priority habitats (as per the NPPF) and host a number of protected and priority species including foraging and commuting bats, otter, water vole, reptiles, and nesting birds. The applicant would need to clearly demonstrate that the proposals would not adversely affect these habitats or the wildlife therein either during or post construction (for example through increased noise, run-off and contamination, artificial lighting, etc). Furthermore, the buildings on site may contain features suitable for use by roosting bats which could be affected by the proposals.

As such, an ecological assessment (comprising an extended Phase 1 Habitat and Species Scoping Survey of the site and surrounding habitats, bat surveys of the buildings, and any phase 2 surveys) would need to be submitted alongside the planning applications. The report should include details of the potential effects of the development on adjacent habitats and wildlife both during and post construction and detail proposals for ecological mitigation and compensation.

The report should in particular consider in detail what impact any new lighting will have on these important habitats.

Moreover, in accordance with paragraph 175 of the NPPF, which states that "*opportunities to incorporate biodiversity in and around developments should be encouraged*" the report should contain details of biodiversity enhancements to be provided on and around the new

development. Ideally the applicant should demonstrate (using the Defra 2 biodiversity metric) that the development will result in a net gain for biodiversity on and around the site.

Survey requirements

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey protected species.

Extended phase 1 habitat & protected species scoping survey

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

Phase 2 ecology surveys

If the surveys show that the site contains habitats suitable for protected species further surveys for species such as bats may need to be carried out.

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of the building and any trees to be removed is thoroughly searched for bats and signs of bats, this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats then further surveys would not be required. However, if bats are found or the buildings and/or trees have features suitable for use by roosting bats, further emergence and or dawn surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) may need to be carried out to confirm the presence or absence of bats and, if bats are present, to characterise the roost and establish mitigation requirements.

Planning policy

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."

Summary

An ecological assessment (comprising an extended Phase 1 Habitat and Species Scoping Survey of the site and surrounding habitats, bat surveys of the buildings, and any phase 2 surveys) would need to be submitted alongside the planning applications. The report should include details of the potential effects of the development on adjacent habitats and wildlife both during and post construction and detail proposals for ecological mitigation and

compensation. The report should in particular consider in detail what impact any new lighting will have on these important habitats.

To: Mrs Alison Amoah

Your Ref: 200715

From: Ross Jarvis

My Ref: EP /673434

Date consultation received: 25/06/2020 Date:

Application Number: 200715

Premises Address: Brunel Retail Park Rose Kiln Lane Reading

Application For: Application 1 - Redevelopment of Units 6b,7,8,9,10 and 11 to provide a single industrial unit, with dedicated car park and service yard. Application 2 - Part change of use and reconfiguration of Units 5a and 6, to accommodate the displaced Dreams, Shoe Zone, Subway and Costa Units. Application 3 - External alterations to and amalgamation of units 3a and 3b to accommodate the displaced B & M. (amended)

Environmental Protection concerns

Noise generating development

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology. It is likely that this development will include noisy mechanical plant such as air conditioning, kitchen extraction, generator, externally ventilated plant room.

The noise assessment needs to establish the predicted noise rating level taking account of any characteristic factors like tonality or impulsiveness of the noise. The rating level should be compared with the background noise level.

Our noise policy states for proposed new plant:

The noise source specific noise level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor and the rating level should not exceed the background level (as measured in accordance with BS4142:2014).

Within Reading there is strong justification for requiring the plant specific noise level to be at least -10dB below the measured background level. Specifically to prevent cumulative impact from addition of plant over time which could result in background creeping up to levels which might cause adverse health impact, which is more likely in a densely occupied town such

as Reading. Levels of -10dB ensure that the background level is not increased and nuisance is unlikely.

However, there may be some situations where this cannot be achieved there may be some flexibility where this is justifiable for example where there are very low background noise levels, etc.

Kitchen Extraction - odour

In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005).

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedence of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development is located within or adjacent to an air quality management area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

The assessment must use a full dispersion model to predict the pollutant concentrations at the building façade for the proposed year of occupation as well as any impacts during the development phase. The input parameters used in the assessment must be agreed with a member of the Environmental Protection Team. Where the assessment identifies an impact on air quality a mitigation plan demonstrating sufficient mitigation to protect the dwellings from poor air quality must also be included.

Possible mitigation against increased emissions:

- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant
- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Provision of cycling facilities / residents cycles

- Improvements to local public transport

It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, however, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

Bin storage - pest proofing

There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. Developers should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin.

Re-development of land - pest control

Where development will be taking place on sites with a former land use, particularly with a former drainage network, you are advised to ensure that former unused drains have been removed and / or properly capped or the proposed development may be at risk of rodent ingress.

It is likely that rats will occupy a cleared site. If there is a significant gap between site clearance and re-development, it is recommended that baiting be carried out to eradicate rats prior to redevelopment. This is to prevent rat populations which may be disturbed due to the redevelopment of the site causing subsequent problems to residents and businesses in the local area.

Contaminated Land

Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.

Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.

It is possible that the desk study will recommend further intrusive site investigation, if consent is given the further investigation will be required by condition, along with a condition for a remediation strategy and a condition for validation certification that remedial works have been successfully completed. The remediation strategy shall be submitted and approved prior to development and the validation certification prior to occupation. If no contamination is found by the intrusive investigations, then all conditions will be discharged.

External lighting

If the plans are to include external lighting, the full application should include lighting details to include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles) and an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00). The plans should show neighbouring buildings so that the predicted impact on them can be assessed. The applicants should demonstrate that light levels will not exceed the relevant guidance lux levels specified in the table below. Information should also show how glare will be controlled.

Environmental Zone - Brightness	Light trespass (into windows) Ev [Lux]	
	Pre-curfew (before 23:00hrs)	Post-curfew (after 23:00hrs)
E3 - Suburban	10	2
E4 - Urban	25	5

Institute of Lighting Professionals : Guidance Notes for the Reduction of Obtrusive Light GN01:2011

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.

A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.

The hours of noisy construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays.

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 should be burnt on site.



DOCUMENT 5

COPY OF CANALS AND RIVER TRUST PRE-APPLICATION RESPONSE

Charlotte Williams

From: Jane Hennell <Jane.Hennell@canalrivertrust.org.uk>
Sent: 16 November 2020 12:55
To: Charlotte Williams
Subject: Pre-application
Attachments: image005_wmz was removed from this message; Response CRTR-PLAN-2020-31099.pdf

Dear Ms Williams

I have considered all three of your proposals. Due to the location of the site the Canal & River Trust have no comments to make on any them. For your information, the nearest section of the River Kennet is not owned by the Trust, we simply act as Navigation Authority.

Kind regards

Jane Hennell MRTPI
Area Planner
M 07747 897793
Canal & River Trust

Gloucester Waterways Museum, Llanthony Warehouse, The Docks, Gloucester, GL1 2EH



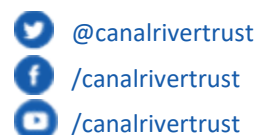
canalrivertrust.org.uk

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**Canal &
River Trust**
Making life better by water



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Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

DOCUMENT 6

BIODIVERSITY NET GAIN METRIC ASSESSMENT

The Biodiversity Metric 2.0 - Calculation Tool

Start page

Project details

Planning authority:	
Project name:	9352: Brunel Retail Park, Reading, Berkshire
Applicant:	
Application type:	
Planning application reference:	
Assessor:	
Reviewer:	
Revision:	
Assessment date:	
Planning authority reviewer:	

Cell style conventions

	Enter data
	Automatic lookup
	Result

Instructions

Main menu

Results

View all

Reset view

The Biodiversity Metric 2.0 - Calculation Tool

Main menu

Start page

Instructions

Technical data

Results

Street tree helper		
Tree size	Tree number	Area
Small		0.0000
Medium		0.0000
Large		0.0000
Total	0.00	0.0000

Start here

1

2

3

4

On-site baseline

A-1
On-site
habitat
baseline

B-1
On-site
hedge
baseline

C-1
On-Site
river
baseline

On-site post development

A-2 Habitat
creation

A-3 Habitat
enhancement

A-4 Habitat
accelerated
succession

B-2 Hedgerow
creation

B-3 Hedgerow
enhancement

C-2 River
creation

C-3 River
enhancement

Off-site baseline

D-1
Off-site
habitat
baseline

E-1
Off-site
hedge
baseline

F-1
Off-site
river
baseline

Off-Site post development

D-2 Habitat
creation

D-3 Habitat
enhancement

D-4 Habitat
accelerated
succession

E-2 Hedgerow
creation

E-3 Hedgerow
enhancement

F-2 River
creation

F-3 River
enhancement

The Biodiversity Metric 2.0 - Calculation Tool

Return to start
page

Headline results

Detailed results

Habitat trading
summary

[Return to results menu](#)

On-site baseline	Habitat units	6.57
	Hedgerow units	0.00
	River units	0.00
On-site post-intervention (including habitat retention, creation, enhancement & succession)	Habitat units	5.12
	Hedgerow units	1.01
	River units	0.00
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention (including habitat retention, creation, enhancement & succession)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change (including all on-site & off-site habitat retention/creation)	Habitat units	0.55
	Hedgerow units	1.01
	River units	0.00
Total net % change (including all on-site & off-site habitat retention + retained habitat)	Habitat units	12.14%
	Hedgerow units	Check Data
	River units	0.00%

0952 Brunel Retail Park, Reading, Berkshire
A-1 Site Habitat Baseline

Continued / Show Columns

Condense / Show Rows

Main Menu

Instructions

Habitats and areas			Habitat distinctiveness		Habitat condition		Ecological connectivity			Strategic significance			Suggested action to address habitat losses	Ecological baseline Total habitat units	
Ref	Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Score	Condition	Score	Ecological connectivity	Connectivity	Connectivity multiplier	Strategic significance	Strategic significance			Strategic position multiplier
1	Urban	Urban - Introduced shrub	0.06	Low	2	Poor	1	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.12
2		Urban - Amenity grassland	0.05	Low	2	Poor	1	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.10
3	Urban	Urban - Developed land, sealed surface	3.05	V.Low	0	N/A - Other	0	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00
4		Urban - Vegetated land - Ruderal/Ephemeral	0.02	Low	2	Poor	1	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.04
5	Sparsely vegetated land	Heathland and shrub - Mixed scrub	0.05	Medium	4	Moderate	2	Low	Unconnected habitat	1	Within area formally identified in local strategy	High strategic significance	1.15	Same broad habitat or a higher distinctiveness habitat required	0.46
6		Woodland and forest - Lowland mixed deciduous woodland	0.27	High	6	Moderate	2	Low	Unconnected habitat	1	Within area formally identified in local strategy	High strategic significance	1.15	Same habitat required	3.73
7	Urban	Urban - Street Tree	0.03	Low	2	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.12
8	Urban	Urban - Artificial unvegetated, unsealed surface	0.04	V.Low	0	N/A - Other	0	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00
9															
10															
11															
12															
13															
Total site area ha			3.54											Total site baseline	4.57

Retention category biodiversity value								Respoke compensation agreed for unacceptable losses	Comments	
Area retained	Area enhanced	Area succession	Baseline units retained	Baseline units enhanced	Baseline units succession	Area lost	Units lost		Assessor comments	Reviewer comments
			0.00	0.00	0.00	0.06	0.12		Includes amenity planting areas on Plan ECO2.	
			0.00	0.00	0.00	0.05	0.10			
			0.00	0.00	0.00	3.05	0.00		Includes building and hardstanding areas on Plan ECO2.	
			0.00	0.00	0.00	0.02	0.04		Includes recontouring ground areas on Plan ECO2.	
0.05			0.46	0.00	0.00	0.00	0.00		Magic Map classifies this as part of the priority habitat deciduous woodland area. However, a habitat survey and review of Google Earth satellite imagery shows this area is definitively open scrub habitat.	
0.27			3.73	0.00	0.00	0.00	0.00			
0.02			0.08	0.00	0.00	0.02	0.04			
			0.00	0.00	0.00	0.04	0.00		Includes artificial grass areas on Plan ECO2.	
0.34	0.00	0.00	4.27	0.00	0.00	3.23	0.30			

9352: Brunel Retail Park, Reading, Berkshire
A-2 Site Habitat Creation

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Post development/ post intervention habitats																	Habitat units delivered	Comments	
Proposed habitat	Area (hectares)	Distinctiveness	Score	Condition	Score	Ecological connectivity			Strategic significance			Temporal multiplier		Difficulty multipliers					
						Ecological connectivity	Connectivity	Connectivity multiplier	Strategic significance	Strategic significance	Strategic position multiplier	Time to target condition/years	Time to target multiplier	Difficulty of creation category	Difficulty of creation multiplier				
Urban - Street Tree	0.06	Low	2	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	27	0.382	Low	1	0.09	Considered to class as moderate condition as all ornamental shrub species provide value to pollinators according to RHS plants for pollinator lists.		
Urban - Introduced shrub	0.04	Low	2	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0.965	Low	1	0.15			
Urban - Amenity grassland	0.03	Low	2	Poor	1	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0.965	Low	1	0.06			
Urban - Woodland	0.18	Medium	4	Moderate	2	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	27	0.382	Low	1	0.55			
Urban - Developed land; sealed surface	2.98	V.Low	0	N/A - Other	0	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	0	1.000	Low	1	0.00			

9352: Brunel Retail Park, Reading, Berkshire

B-2 Site Hedge Creation

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Main Menu		Instructions						Multipliers												Hedge units delivered	Comments	
Baseline ref	New hedge number	Proposed habitats			Habitat distinctiveness		Habitat condition		Ecological connectivity			Spatial quality				Temporal multiplier		Difficulty of creation multiplier				
		Habitat type	Length km		Distinctiveness	Score	Condition	Score	Ecological connectivity	Connectivity	Connectivity multiplier	Strategic significance		Strategic position multiplier	Time to target condition/years	Time to target multiplier	Assessor comments		Reviewer comments			
1		Native Species Rich Hedgerow	0.15	Medium	4	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy		Low Strategic Significance	1	10	0.700	0.67	0.84				
2		Native Species Rich Hedgerow	0.03	Medium	4	Good	3	Low	Unconnected habitat	1	Area/compensation not in local strategy/ no local strategy		Low Strategic Significance	1	10	0.700	0.67	0.17				
3																						
4																						
5																						
6																						
7		Creation Length/KM	0.18															1.01				