
Reading International Logistics Park Planning Statement

Prepared by Barton Willmore LLP on behalf of Arlington LP UK Limited

December 2019

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090131**

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(RECEIVED 23/09/2019)**

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Arlington LP UK Limited ("the Applicant") and in support of an application for full planning permission on the site to be referred to as Reading International Logistics Park, which is part of the site of the former brewery (the 'Application Site'). The Application Site lies within the jurisdiction of Reading Borough Council (RBC).

1.2 The application has been the subject of pre-application advice (reference 190122/PREAPP) from Officer's, which has informed the development proposals. The content of the pre-application advice is summarised in this Statement.

1.3 The description of development is as follows:

'Demolition and redevelopment to provide 15,045 sqm area of class B1(c), B2 and B8 floorspace in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works.'

1.4 This planning statement identifies and describes the key opportunities presented by the proposed development and assesses the proposals against relevant planning policies, and its conformity with the Development Plan.

1.5 The structure of this Statement:

- Section 2 – Background and Content;
- Section 3 – The Proposed Development;
- Section 4 – Pre-Application Consultation;
- Section 5 – Planning Policy Context and Application Scheme Compliance;
- Section 6 – CIL Planning Obligations Heads of Terms; and
- Section 8 – Conclusion and Summary of Benefits.

1.6 This Planning Statement is supported by the following documents:

- Planning Application Form;
- Combined Ownership Certificates and Agricultural Land Declaration;
- Site Location Plan;
- Site Block Plan;
- Correct Fee;
- Design and Access Statement;
- Complete Community Infrastructure Levy Form;
- Sustainable Drainage System Proposals (SUDS);
- Air Quality Assessment
- Ecological survey & reports
- Energy and Sustainability Statement
- External Lighting Strategy
- Flood Risk Assessment
- Heritage Statement
- Landscape principles
- Noise & Vibration Impact Assessment
- Proposed plans
- Planning Statement
- Signage Strategy
- Transport Assessment
- Travel Plan
- Tree Survey
- Utilities Surveys and proposals
- Vehicle Parking & Waste collection details

The Applicant

1.7 The Applicant, Arlington LP UK Limited, is a leading UK integrated property business with a reputation for pioneering innovation and a dedication to providing world-class real estate services and opportunities for dynamic businesses.

1.8 Founded in 1981, Arlington were the UK pioneer of the business park concept. They originally focused on creating large-scale masterplanned, managed environments for offices and hi-tech users, typically located at motorway junctions. Arlington have since diversified their business and now create and manage mixed-use estates featuring offices, industrial and Research and Development buildings, in sustainable urban or

'edge of urban' locations, supported by comprehensive amenities and accessible by a range of transport modes. Specifically, they have also tailored logistics solutions for Ocado, Toolbank, Air Business, Direct Wines, TBS and Arla.

Summary

- 1.9 The application site has the benefits of an extant planning permission, conforms with site allocation SR4e of the 2019 Adopted Local Plan, will assist in the delivery of the MRT Bus System that RBC is completing, is acceptable in all other respects, and will bring back into active use a long term vacant site, creating new job opportunities and investments for the borough. As the pre-Application RBC letter of advice confirms, the proposal is supported by both the LPA and the highways authority.

2.0 BACKGROUND AND CONTEXT

Site Location

- 2.1 The Application Site has been outlined in red on the submitted application drawings. The Application Site area is 3.46 hectares and lies to the East of the Northern exit of the M4 Junction 11 and South of the A33 roundabout leading on from Junction 11. The site has an allocation in the Adopted Local Plan and is situated within the ward of Whitley.
- 2.2 A copy of the Proposals Map (November 2019), showing the location of the Application Site is set out below:

Planning Application Site Plan: SR4e

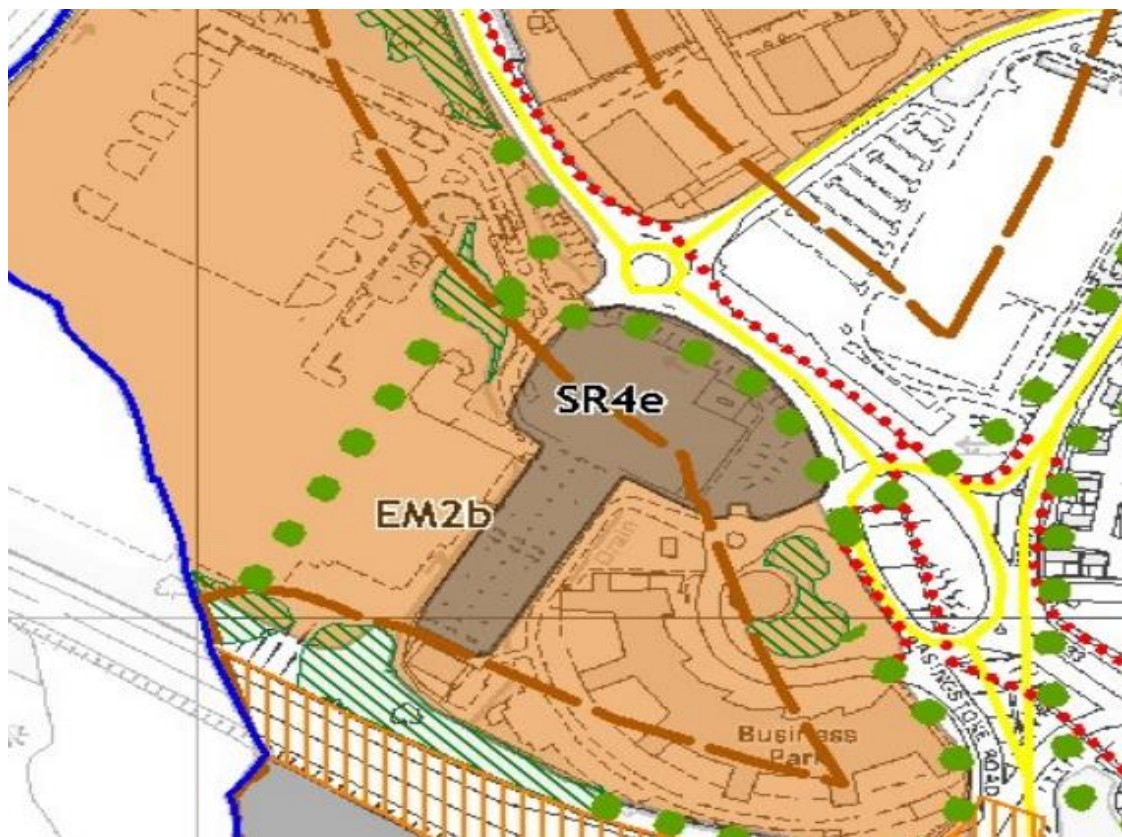


Figure 1 – Planning Policies Map, taken from the Proposals Map (Adopted November 2019)

- 2.3 The site is situated in South Reading, in an area which is predominantly industrial in character. The use classes of the surrounding buildings include industrial warehousing, such as the Tesco Distribution Centre, located adjacent and to the West, the Reading International business Centre offices, located adjacent and to the East. A hotel and various retail and fast food outlets located to the North.
- 2.4 The South of the site is bounded by 'Busy Bees' nursery school. Beyond this, is a small area, designated by the proposals map as a Local Wildlife Site, Local Nature Reserve or an Area of Biodiversity Action Plan Habitat. The M4 motorway runs along this boundary.
- 2.5 Between the Reading International Office Development and the Application Site lies the listed Grade II building, 'Little Lea Cottage'.
- 2.6 In the Local Plan, the site's allocation, under policy SR4e, supports industrial and employment redevelopment of the Application Site. It confirms that the office use of the extant planning permission and the redevelopment of the site for employment uses, including industrial warehousing, would be an appropriate redevelopment.
- 2.7 Paragraph 3.2.6 of the Adopted Local Plan states the following for the South of Reading area, highlighting the need to improve and redevelop vacant sites in the areas close to the A33:

'The south of Reading is the other main part of the Borough where there are significant sites potentially available for development, particularly in the area close to the A33. The accessibility of this area is expected to increase substantially with the Mass Rapid Transit scheme linking the town centre with the recently-opened MereOak park and ride. Many of the sites that could be developed are vacant or underused and of poor visual quality and offer an opportunity to create a high-quality gateway into Reading.'

- 2.8 The Application Site can be accessed by car, bike, foot and bus. Journey times by public transport from central Reading are around 25 minutes.

- 2.9 There are circa nine local bus routes serving the area around the site. Services are to and from Reading Town Centre (including central train station) and connect to districts such as Kennet Island, Green Park and Mere oak park and ride.
- 2.10 Plans for the forthcoming MRT system are progressing and a bus stop is likely to be located on the Northern perimeter of the site, which will provide express travel to and from Central Reading. Part of the application site frontage onto the A33 is proposed to be transferred to the Highways Authority (RBC), to aid in the completion of the MRT routing, as part of this planning application proposal.
- 2.11 Being located adjacent to the major motorway junction (M4, J11), with fast links to both Heathrow Airport and the M25 (45 minutes) and London (90 minutes). The location is suitable for the proposed uses, including B8 warehouse storage and distribution.
- 2.12 The Application Site is located within the boundary of Flood Zone 1, which has a low probability of flooding and is highlighted in light blue in figure 1, above.

Tree Protection Order

- 2.13 There are a number of trees which surround the boundaries of the site. A Woodland Tree Protection Order (TPO) was formalised by RBC at Planning Committee on 3rd April of 2019. In discussion with the LPA, a suitable approach has been agreed as part of this planning application for landscaping and addressing the approach to TPOs. Further details are provided later in this report.

Planning History

- 2.14 The Application Site has an extant permission, granted on 27th July 2009, under reference number: 090530 (09/00685):

"Planning permission for the development permitted by Planning Consent 06/00627/VARIAT dated 22/8/06 namely development of offices with associated leisure facilities, landscaping, service roads and 969 car parking spaces for office development, together with retention of 457 existing car parking spaces for brewery use but without complying with Conditions 3, 4, 6, 7, 8, 9, 11, 12, 14, 16, 18, 21, 22, 23, 24, 25, 26 and 27 of that Consent."

- 2.15 Conditions for the extant permission were discharged under reference: 090131, issued on 1st February 2010 (**APPENDIX 2**), by the demolition of the former brewery structure on The Application Site:

“Discharge of conditions 3, 4a, 6a, 7a, 8a and 12b of planning consent 09/00685/VARIAT.”

- 2.16 The Application Site therefore has an extant planning permission applicable to it for 33,445sqm of office floorspace in a building of up to six storeys and 1,426 car parking spaces, which is important in respect of assessing the acceptability of the planning application (the subject of this statement), particularly in respect of highways impact, impact on heritage assets, and TPO trees.

Summary

- 2.17 The Application Site is currently a derelict area of hardstanding, with no existing structures. The extant permission has been implemented by the demolition of the former brewery building was carried out by a contractor, commissioned by the owner of the site on 1st February 2010. Since demolition was completed, the site has spent a small amount of time in use as a temporary carpark, for the rest of the time it has been vacant.
- 2.18 The Proposed Development seeks to bring back in to use an area of previously developed land, in a sustainable location. The proposal will create an attractive gateway to reading from the M4 motorway junction, which will be a vast improvement, both visually and economically to the current situation.

3.0 THE PROPOSED DEVELOPMENT

3.1 As previously identified, despite the extant permission for office development, there has been no market interest for ten plus years. However, clear market demand exists, in particular, for Class B8 Warehousing and Distribution. The applicant therefore wishes to re-focus the opportunity for redevelopment onto a land use for which there is demand, hence this planning application.

3.2 This application seeks full planning permission for the following:

'Demolition and redevelopment to provide 15,045 sqm area of class B1(c), B2 and B8 floorspace in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works.'

3.3 The proposed development will deliver the following:

- Four high quality units with individual service yards (Class B1c, B2 or B8);
- Ancillary office space, attached to each unit;
- The height of the proposed units is 15.5m (equivalent to four storeys of offices). This is a reduction in height when compared with the extant scheme, which permits six commercial storeys;
- One hundred and forty-two parking spaces, 10% with electrical charging points;
- Seven disabled parking spaces;
- Forty four cycle parking spaces for staff;
- Enhanced frontage / landscape treatment onto the A33; and
- Facilitation of the MRT along the A33 frontage.

3.4 A breakdown of the area of development is as follows:

- Unit 1: 3,591sqm of floor space, building height 15m and 36 car parking spaces
- Unit 2: 6,417sqm of floor space, building height 15.5m and 59 car parking spaces
- Unit 3: 2,244sqm of floor space, building height 13m and 19 car parking spaces
- Unit 4: 2,793sqm of floor space, building height 13m and 28 car parking spaces

Employment Generated

- 3.5 The proposed development will provide approximately 200 - 400 direct jobs and indirect jobs. There will also be jobs created during the construction phase of the development.
- 3.6 Reading Borough Council's Local Plan (2019) states that the area defined as 'South Reading' is the most deprived area in the borough. The education and skills of the general population in this area is generally lower than the borough as a whole. The proposed development would benefit the community by providing employment opportunities for the local people.

Appearance and Design

- 3.7 The proposed development is seeking full planning permission and has been designed in detail by the project architect. There are no existing structures on the site currently, so the design proposed has been specifically developed in order to:
- Create a new 'gateway' to Reading; and
 - Compliment the nearby, Grade II Listed Building – Little Lea Cottage;
 - Include good quality landscaping;
 - Provide employment space that the market is demanding;
 - Use materials and effects to visually soften the appearance of the industrial units; and
 - Includes signage zones, as shown on the building elevation drawings.
- 3.8 Further details of the design can be found in the Design and Access Statement and the Landscape Principles Report, which should be referred to alongside this document.

Access, Car & Cycle Parking

- 3.9 Pedestrian access will be from the existing footway on Basingstoke Road (A33) on to the site adjacent to Unit 1. A 1.5m wide footpath within the site will provide access to units, 2, 3, and 4.
- 3.10 Vehicle access for units 2, 3 and 4 for both cars and service vehicles, is from the A33 roundabout, coming towards the Tesco unit via an existing access. The access road into the development will be wide enough to allow two HGVs to pass safely. Access to Unit 1 is from the existing Business Park.

- 3.11 Basingstoke Road (A33) provides a combined cycleway/footway. Cyclists have easy and direct access to a designated covered cycle parking area immediately outside the four proposed units within the car park areas.
- 3.12 One hundred and forty-two car parking spaces are proposed in total for staff/visitors, of which seven are specifically for disabled parking. The disabled parking spaces will be located at each unit. 10% of the overall parking spaces will be equipped for electric charging. Forty-four cycle parking spaces are proposed in total. Each unit will have the following provision:

	General Parking	Car Electrical Charging Points	Disabled Parking	Car	Cycle Parking
Unit 1	34	4	2		10
Unit 2	56	6	3		20
Unit 3	18	2	1		6
Unit 4	27	3	1		8
Total	135	15	7		44

4.0 PRE-APPLICATION CONSULTATION

Pre-Application

- 4.1 The development proposals for The Application Site have been subject to several pre-application discussions with the Council. The initial pre-application information was submitted by Barton Willmore to the Council on 28th January 2019.
- 4.2 The first pre-application meeting held at RBC then followed on 8th April 2019. Following the initial consultation, a second pre-application meeting took place on 18th July 2019. The LPA's formal comments were received on the 23rd September 2019. The full pre-application report is attached at **APPENDIX 3** and is summarised below:
- **Principle of development** – The report states that officers consider the principle of the proposed flexible uses for B1 (c), B2 and B8 would be acceptable, subject to meeting other policy requirements.
 - **Design – scale, layout, appearance** – Officers consider the application proposal to be acceptable. To reach this point, the scheme design, particularly building footprint, layout and the landscaping proposals, have evolved.
 - **Transport / parking** – The highways authority considered the proposed scheme will result in a net reduction in impact in comparison to the extant permission, which the site benefits from. The overall parking numbers need to adhere to RBC standards. It was confirmed that Policy TR5 requires installation of Electric Vehicle Charging at 10% of spaces.
 - **Landscape and biodiversity** – The benefits of the proposal brought about by the comprehensive scheme layout and design, including the provision of land for MRT purposes, are considered to justify the loss of TPO trees on site. RBC recommended various methods to counteract the loss of trees such as temporary planting along the land allocated for the MRT and consulting Thames Water about possibilities for planting over the culvert.
- 4.3 With regard to the recent climate change emergency declaration by RBC, measures such as green walls, green and brown roofs were suggested as a way to 'green' the scheme.

- **Sustainability** – In order to meet the requirements of Local Plan policies CC2, CC3, CC4 and CC5, relating to sustainable design, climate change and waste minimisation, RBC advises that a scheme will need to introduce methods such as photovoltaics, and decentralised energy provision, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of provision.
- **Section 106 and community infrastructure Levy (CIL)** – RBC confirmed there will be a CIL nil charge for proposed Class B uses at the site location. A financial contribution and/or land transfer will be sought to assist in the delivery of the MRT along the site frontage.
- **Signage** - Officers advised that an application should include a signage strategy, so that this is designed into the scheme, rather than be an 'after thought'.
- **Watercourse / flooding / drainage** – Officers reiterated the requirement of policy SR4, that 'a landscaped buffer to the watercourses, with development set back 10 metres from the top of the bank of the river wherever possible.'
- **EIA screening opinion** – The screening threshold for Schedule 2, 10 a) industrial estate development projects in the Town & Country Planning (EIA) Regulations 2017 (as amended) states the need for EIA screening, where the site area exceeds 5ha. The application site therefore falls below this threshold and thus will not require an EIA screening opinion as it is not EIA development.

5.0 PLANNING POLICY CONTEXT AND APPLICATION SCHEME COMPLIANCE

- 5.1 This section sets out the planning policies that are relevant in considering the change of use to a hotel.
- 5.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. The planning application proposals will therefore need to be considered against the relevant development plan policy documents and other material considerations.

National planning Policy Framework (NPPF) (February 2019)

- 5.3 The National Planning Policy Framework (NPPF) (February 2019) is a material consideration in the determination of planning applications (Paragraph 2).
- 5.4 Paragraph 10 notes that "*at the heart of the Framework is a presumption in favour of sustainable development*" which is expanded upon in Paragraph 11 and confirms that for decision-taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or."

- 5.5 Chapter 6 of The NPPF (2019) states that significant weight should be placed on the need to support economic growth and productivity. Paragraph 82 notes that planning policies should recognise and address the specific locational requirements of different sectors.

Statutory Development Plan

- 5.6 The current Development Plan for Reading Borough Council comprises:
- Local Plan - Adopted November 2019
 - Proposals Map – Adopted November 2019

Relevant Planning Policies

5.7 The policies of the Reading Borough Council Local Plan (November 2019) relevant to the proposal are set out below:

- Policy CC2: Sustainable Design and Construction;
- Policy CC3: Adaptation to Climate Change;
- Policy CC4: Decentralised Energy
- Policy CC5: Waste Minimisation and Storage
- Policy CC7: Design and the Public Realm;
- Policy EM1: Provision of Employment;
- Policy EM2: Location of New Employment Development;
- Policy EM4: Maintaining a Variety of Premises;
- Policy EN6: New Development in a Historic Context;
- Policy EN14: Trees, Hedges and Woodlands
- Policy TR1: Achieving the Transport Strategy;
- Policy TR3: Access, Traffic and Highway-Related Matters
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging;
- Policy SR4e: Part of Former Berkshire Brewery Site.

5.8 How the application proposal responds to the relevant policies is explained below under topic headings.

Allocation

5.9 Policy SR4e Part of the Former Brewery Site, supports the redevelopment of the application site for both the extant permission for offices (class B1) but also for industrial and warehouse development.

5.10 As a consequence, and as a matter of planning principle, the application proposal is in compliance with the redevelopment allocation for the site.

Climate Change and Sustainability

5.11 Policy CC2: Sustainable Design and Construction, states that new development will be acceptable where it makes appropriate and effective use of resources including energy, water, minerals and materials. The required standard for major non-residential development is BREEAM 'Excellent' standards where possible

- 5.12 Policy CC3: Adaption to Climate Change, states that all developments will demonstrate how they have been designed to adapt to climate change and gives guidance with regard to building design, use of trees and natural materials to assist with shading and managing predicted climatic conditions and also how drainage systems should incorporate mitigation measures against flooding.
- 5.13 Policy CC4: Decentralised energy, states how developments should demonstrate how consideration has been given for non-residential developments of over 1,000 sqm, to providing a decentralised energy supply or linking to an active decentralised energy source.
- 5.14 Policy CC5: Waste minimisation and Storage, seeks demonstration of measures to minimise generation of construction waste and in the use and life of buildings. Design should facilitate effective waste management.
- 5.15 In order to meet the requirements of the above policies, the proposed development will introduce Photovoltaic Panels to provide the best solution for sustainable energy savings and therefore help to mitigate the impact of climate change. More information on the selection method for this technology can be found in the Renewable/Sustainability Energy Report by Clancy Consulting, which is included in the application.
- 5.16 The use of sustainable of SuDS features has been considered for the development and can be incorporated within the design. More information on the selection method for this technology can be found in the Flood Risk Assessment and Outline Drainage Strategy by Baynham Meikle, which is included with the application.
- 5.17 To meet the requirements of policy CC5, the design of the development provides bin store enclosures on site, in order to promote effective waste management and recycling. Drawing number: 6204 – 078 shows the design of bin enclosures on the site.

Heritage

- 5.18 Policy EN6: New Development in Historic Context: States that the historic environment will shape and inform new development. New development will enhance its architectural and visual qualities and be sensitive to historic context.

- 5.19 The Heritage Assessment included with the application concludes that the proposed development is in accordance with 'Policy EN6: 'New Development in Historic Context'. The assessment informs that the amount of development that has been consented and / or built already, means that the context for the heritage asset has already changed and the application proposal is consistent with this altered environment.

Biodiversity and Trees

- 5.20 Policy EN12: Biodiversity and the Green Network states that the identified Green Network (as outlined on the proposals map), shall be maintained, protected, consolidated, extended and enhanced. Development should not result in a net loss of biodiversity and geodiversity and provide a net gain for biodiversity wherever possible.
- 5.21 Policy E14: Trees, Hedges and Woodlands states that trees, hedges and woodlands will be protected from damage or removal where they are of importance. New development should make provision for tree retention and planting within the application site, to maintain and enhance the appearance of the area. Measures must be in place to ensure that trees are adequately maintained.
- 5.22 The landscaping proposals for the site aim to meet the requirements of policy EN12 by:
- Extending the existing road-side landscape character along the A33 to provide a mature, high quality and strong visual connection and continuity of the adjacent landscape character.
 - Promoting biodiversity, through the use of predominantly native species, whilst creating an attractive landscape.
 - Installing biodiversity features, such as log piles from felled trees on site, and placing bat boxes along the woodland as ecological enhancements.
- 5.23 Following formalisation of a Woodland Tree Protection Order, in April 2019, the proposals aim to meet the requirements of Policy EN14 and replace existing trees and vegetation with a materially better scheme, whilst also allowing the site to be redeveloped by:
- Retaining existing trees wherever possible and bringing into positive management;

- The five category B TPO trees will not be felled unless damage will be caused by the development; and
- Providing attractive vegetative planting with semi-mature trees, hedges and earth profiling throughout the site, promoting an enhanced 'green corridor' along the A33.

The Design and Access Statement, Landscape Proposals document should be referenced for full details of the landscape strategy.

Design

- 5.24 Policy CC7: Design and the Public Realm states that All development must be of a high quality that maintains and enhances character and appearance of the area of Reading in which it is located. This principle should be applied throughout all areas of the design process including landscape, layout, scale and height and architectural detail.
- 5.25 The design proposals for the site have been developed having due regard to the existing site and its immediate context, to create an appropriately sited development, which will allow access by all available modes of transport and giving high priority to pedestrian access. The design of all the elements of the submission seeks to make a positive contribution to its surroundings, with attractive contemporary design, which functions well and is safe to use for everyone. In particular the issues of form, scale, materials and colour have been considered, together with the landscape treatment and the relationship of the building within its environment. The Design and Access Statement provides further explanation.

Employment

- 5.26 Policy EM1: Provision of Employment Development states that 148,000 sq. m of industrial and/or warehouse space will be made available in the plan period. It recognises that allocated sites will now not need to make provision for housing. It also states 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."

- 5.27 Policy EM2: Location of New Employment Development states that other major employment usage, including industrial storage and distribution will be located along the A33 corridor
- 5.28 Policy EM4: Maintaining a Variety of Premises states that arrange of types and sizes of units should be present in the borough and proposals should maintain or enhance this range.
- 5.29 With regards to the above employment policies, the proposal will contribute to meeting RBCs target, as outlined in policy EM1, for Industrial or warehouse space. It also complies with policy EM2, to provide industrial storage along the A33 corridor. The proposal provides a range of differently sized units, which complies with policy EM4.
- 5.30 The proposed development will offer around 200-400 sustainable jobs, due to the current need for high-quality goods storage and logistics sites. In the past, the site was marketed, for many years as office development, in-line with the extant permission. There was little interest shown and thus, the change in approach in order to bring the site back into active use.

Transport

- 5.31 Paragraph 109 of the NPPF (2019) states that development should only be refused on highways grounds *"if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

- 5.32 Policy TR1: Achieving the Transport Strategy states that development should meet the objectives of the Local Transport Plan. Permission will only be granted where the application shows measures to promote and improve sustainable transport facilities, such as provision to encourage non-car methods and improve safe routes.
- 5.33 Policy TR3: Access, Traffic and Highway-Related Matters states that 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 on safety, congestion and the environment.
- 5.34 As part of the planning application, Arlington has agreed a land transfer to RBC, to be used for the proposed MRT system. This supports policy TR1 and will have a positive impact on the site, due to the incentive for staff to use this method (once available) to travel to and from their workplace. It is anticipated that the logistics and warehousing sector will provide jobs that local people are most likely to fill, and for whom travel by public transport will be convenient for.
- 5.35 The Transport Assessment demonstrates through a multimodal assessment of person and vehicle trip generation that the proposals will generate significantly lower levels of trips than would otherwise be generated by the extant permission on the site. This fully supports policy TR3.

Car Parking

- 5.36 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging states that development should provide car and cycle parking which is appropriate to accessibility of public transport. All non-residential developments with at least 10 spaces should also allocate 10% of spaces for an active charging point.
- 5.37 The development incorporates electric charging points for 10% of spaces. Drawing reference: 6204 084 – Site Layout Plan shows the location of these spaces.

6.0 CIL PLANNING OBLIGATIONS HEADS OF TERMS

- 6.1 In line with Reading Borough Council's validation requirements and its Planning Obligations Under Section 106 SPD (April 2015), the proposed Heads of terms (HoTs) for the Section 106 Agreement planning obligations are set out below. The need for infrastructure related planning obligations has been superseded by the Community Infrastructure Levy (CIL), which was adopted by RBC in January 2015.
- 6.2 RBC's CIL Charging Schedule came into effect in January 2015. The CIL rate for General Industrial (Class B1(C), B2 and B8) development is not chargeable.

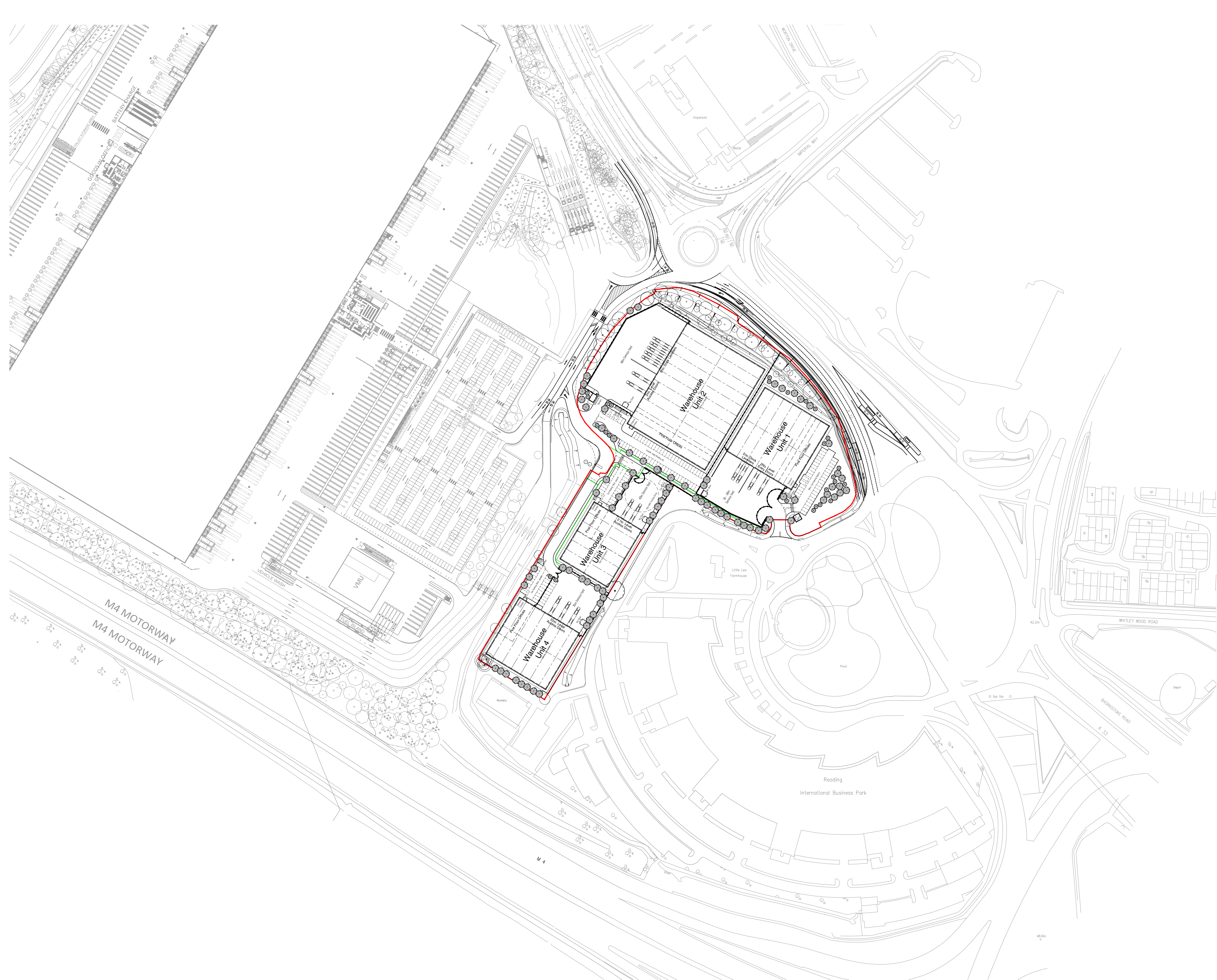
7.0 CONCLUSION AND SUMMARY OF BENEFITS

- 7.1 This planning statement has been prepared in support of a full planning application for the following development:

'Demolition and redevelopment to provide 15,045 sqm area of class B1(c), B2 and B8 floorspace in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works.'

- 7.2 The proposed development has been designed with full regard given to the relevant planning policy framework, conforming to national and local requirements. Pre-application discussion with the LPA has taken place and the application proposals are generally supported and comply with policies and the site allocation, in the 2019 local plan. The scheme will bring back into use the vacant site for employment uses for which market demand exists.

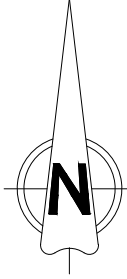
APPENDIX 1
SITE LOCATION PLAN



notes

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client



project

Reading International

drawing

Site Location Plan

scale 1:1250 @ a1 drawn ZI

checked spp date 27.09.19

no

6204 - 60
Planning

APPENDIX 2
DISCHARGE OF CONDITIONS, REFERENCE: 090131

Ms N Walter
Scott Brownrigg
St Catherine Court
46-48 Portsmouth Road
Guildford
GU2 4DU

Our Ref: 09/02076/APPCON
Your Ref: 13925P/2.02

Direct: ☎ 0118 939 0461
e-mail: Julie.williams@reading.gov.uk

1st February 2010

Your contact is: Julie Williams, Planning & Building Control

Dear Ms Walter,

Reading International Business Park, Reading
Discharge of conditions 3, 4a, 6a, 7a, 8a & 12b of planning consent 09/00685/VARIAT

Further to your application to discharge the above listed conditions of the above consent I can confirm the following:

Condition 3 (measures to prevent mud on road):

The submissions as shown on plan reference: MMD-260292-C-DR-00-XX-0001 sent by email on 28th January and details on the amended and approved CMS (see below) are considered to be acceptable. The condition is discharged, provided the approved works are carried out in accordance with the approved details during demolition of the site.

Condition 4a (Contamination - SEMP Plans required):

The Environment Agency has reviewed the walkover survey produced by BAE systems, dated 15 January 2010, and officers are satisfied with its conclusions. They have therefore recommended that this condition can be discharged.

Condition 6a (CMS required):

The submissions as sent in on 28th January by email and amended by email the same day have been considered by colleagues and are now considered to be acceptable. The condition 6a is discharged in accordance with these approved details.

Condition 7a (surface water - SEMP Plans required):

The Environment Agency has reviewed Drawing MMD-260292-C-DR-00-XX-0001 Revision P1 and the email sent in by Jon Bray of Scott Brownrigg containing photos of the site. The Environment Agency have confirmed that they are satisfied that the fencing shown on the

drawing will reduce the risk of polluted surface water runoff reaching the watercourse. However they recommend that the applicant ensures that no gap is left at the bottom of the fencing to ensure that surface water runoff is contained. On this basis the Environment Agency recommend that the discharge of condition 7a.

Condition 8a (buffer zones - SEMP Plans required):

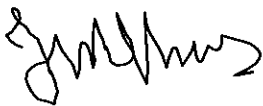
The Environment Agency has reviewed Drawing MMD-260292-C-DR-00-XX-0001 Revision P1 and the email sent in by Jon Bray of Scott Brownrigg containing photos of the site. These suggest that the fencing shown on the drawing should adequately protect the buffer strip from detrimental impact by machinery and therefore they are now able to recommend discharge of condition 8a.

Condition 12b (tree protection details required):

Details of tree protection measures provided by John Mould on unreferenced plan and comprising heras fencing inside the site on the east side and existing boundary fencing to the north were considered adequate during demolition. These protective measures need to remain in place to ensure full compliance with this condition.

On the basis of the above recommendations all relevant pre-demolition conditions have been discharged, with condition 18 - Archaeology confirmed no longer necessary at the time that 09/00685/VARIAT was granted. I hope that this information is clear but please contact me if clarification is required.

Yours sincerely,



Julie Williams
South/West Area Planning Manager

JB 1/2/10

APPENDIX 3
PRE-APPLICATION LETTER AND REPORT (RECEIVED 23/09/2019)



FAO Robin Meakins
Barton Willmore
7 Soho Square
London
W1D 3QB

Frances Martin
Executive Director for Economic Growth
and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787
Our Ref: 190122
Direct: ☎ 0118 9372286
e-mail: alison.amoah@reading.gov.uk

23 September 2019

Your contact is: Mrs Alison Amoah, Planning

Dear Robin,

PRE PLANNING APPLICATION ENQUIRY RESPONSE

Enquiry Reference: 190122

Address: Reading International Business Park, Reading, Berkshire, RG2 6DA

Proposal: Pre-application advice for four units, totalling 15, 204sqm for flexible B1(c), B2 or B8 use, with parking and landscaping

Thank you for your enquiry. Further to the two sets of details submitted in January and July and two pre-application meetings, held in April and July, I now attach the final pre-application response.

In summary, the principle of the proposed development would be acceptable, although a greater overall quantum than the range set out in the emerging (almost adopted policy). However this is likely to be considered satisfactory subject to the scheme being able to meet policy requirements including with regard to transport, landscaping, design, ecology, transport and sustainability.

The proposal will require an EIA Screening Opinion and any formal submission, if found acceptable, would be subject to a S106 legal agreement.

Please note that the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

p.p. 

Mrs Alison Amoah
Principal Planning Officer

PRE-APPLICATION REPORT

WITHOUT PREJUDICE

190122/PREAPP - Pre-application advice for four units, totalling 15,204sqm for flexible B1(c), B2 or B8 use, with parking and landscaping [following pre-applications meetings this reduced slightly to 15,083sqm]

The Proposal:

- Four flexible use warehouse/industrial/storage/light industrial (B1 (c), B2 or B8: Unit 1 - 3629sqm; Unit 2 - 6,417 sqm; Unit 3 2,244sqm; and Unit 4 - 2,793sqm
- 146 no. vehicle parking spaces - Unit 1 - 38; Unit 2 - 60; Unit 3 - 22; and Unit 4 - 26
- Landscaping

Information reviewed is as follows:

Received 28th January 2019:

- Pre-application form
- Location Plan
- Transport Assessment Scoping Note, Technical Note, TN 001 (V1.1), prepared by PBA
- Covering letter dated 15th January 2019, prepared by Barton Willmore
- Preliminary Site Layout Plan Existing Trees - Drawing no: 6204-27
- Preliminary Site Layout Plan - Drawing no: 6204-26
- Unit 1 Building Plan - Drawing no: 6204-28
- Unit 1 Elevations & Sections - Drawing no: 6204-29
- Decision notice for permission 09/00685/VARIAT
- Permitted drawings for permission 09/00685/VARIAT
- Letter to RBC Natural Environment Officer dated 27/11/2018 - objection to TPO 12/18, prepared by Aspect Tree Consultancy
- Letter to RBC Natural Environment Officer dated 22/2/2019 - re TPO 12/18, prepared by Barton Willmore
- Letter to RBC Natural Environment Officer dated 14/3/2019 - re TPO 12/18, prepared by Barton Willmore

1st Pre-application meeting took place on 8th April 2019 (notes as in Appendix 1- prepared by Barton Willmore), following which further amended information was submitted as follows received 12th July 2019:

- Proposed Landscape Base Plan
- Site Overview
- Initial Thoughts document, which included:
 - Site in Context
 - Site in Context Birds Eye View
 - Existing condition photos
 - AJA Preliminary Site Layout October 2018
 - AJA Preliminary Site Layout October 2018 and PBA Plan
 - AJA Preliminary Site Layout June 2019 and PBA Plan
 - AJA Preliminary Site Layout June 2019, PBA Plan and Vegetation Loss
 - AJA Preliminary Site Layout with Indicative Planting - June 2019
 - Proposed Landscape Base
 - Site Overview
 - Street View 1 - approach from Basingstoke Road
 - CGI View 1 - approach from Basingstoke Road
 - Street View 2 - approach from Basingstoke Road
 - CGI View 2 - approach from Basingstoke Road

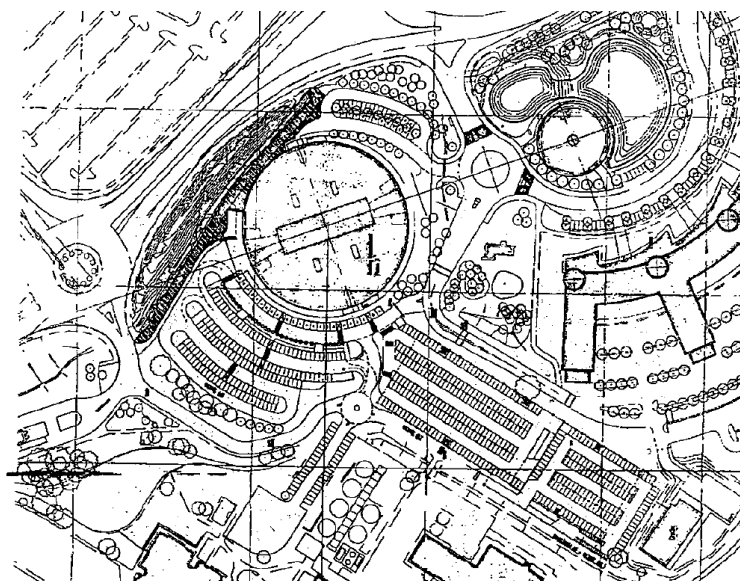
- Street View 3 - view along A33
- CGI View 3 - view along A33
- Street View 4 - view along A33
- CGI View 4 - view along A33
- Street View 4 [5] - approach from Imperial Way
- CGI View 4 [5] - approach from Imperial Way
- CGI View 5 [6] - Warehouse Unit 1
- Warehouse Unit 1 - Swept Path Analysis 10.5 Articulated Vehicle - Drawing no: 43337/5501/001 Rev A
- Warehouse Unit 2 - Swept Path Analysis 10.5 Articulated Vehicle - Drawing no: 43337/5501/002 Rev A
- Warehouse Unit 3 - Swept Path Analysis 10.5 Articulated Vehicle - Drawing no: 43337/5501/003 Rev A
- Warehouse Unit 4 - Swept Path Analysis 10.5 Articulated Vehicle - Drawing no: 43337/5501/004 Rev A

2nd Pre-application meeting took place on 18th July 2019 (notes as in Appendix 2, prepared by Barton Willmore) and a further drawing was provided - Preliminary Site Layout Plan Existing Trees - Drawing no: 6204-40

Site Description/ Background:

The site is 3.45ha located in South Reading alongside the A33 close to Junction 11, which was previously used as part of the Berkshire Brewery and is now largely hard standing with access points and landscaping.

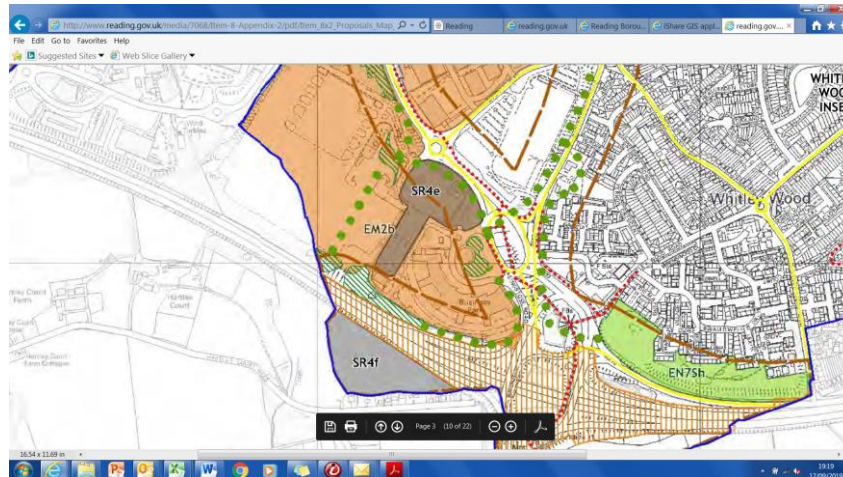
A full planning permission was granted in 2002 (00/01447/FUL) for office development of just under 34,000sqm, in a six storey circular building with plant on the roof. This was subsequently varied (06/00627/VARIAT & 09/00685/VARIAT). The pre-application site is part of what was originally known as phase iii of the Reading International Business Park (Verizon occupies the original Phases I & II to the south).



Pre-application discussions for the 2009 VARIAT concluded that the demolition of the original warehouse would have comprised a material operation, which would have implemented the 2006 permission. The 2009 permission amended all the original pre-commencement conditions by inserting the words “with the exception of demolition works” where appropriate.

As demolition has now taken place the 2009 permission is therefore extant. You have set out in your submission that the extant permission should be used as a baseline against which any new proposals for the site should be considered, along with new planning policy context.

The covering letter submitted with the pre-application enquiry refers to part of the site being within Wokingham Borough, but it is unclear which area of the site this refers to. See extract from the Draft Proposals Map below, which shows the site (labelled as SR4e) in the context of the Borough boundary, which is in dark blue (Please note as it is close to the borough boundary, Wokingham would be consulted on any formal proposal).



In terms of the emerging policy, which will be the relevant policy at the time of a formal submission, the site is:

- An allocated employment site SR4e within the Core Employment Area EMP2b;
- Within an Air Quality Management Area (EN15 - brown dashed line on extract above);
- Adjacent to a listed building - Lea Farmhouse (EN1);
- Subject to a TPO (12/18 (EN14);
- Adjacent to one of the MRT routes, which runs in front of the property alongside the A33 (TR1, TR2).
- In Flood Zone 2 (1 in 1000 yr event -EN18)
- Includes part of an Existing or Proposed Green Link (Policy EN12 - green dots on map extract above) and is close to areas of Biodiversity Interest (EN12 - green hatching)
- Close to Cycle routes (Policy TR4 - red dots on map extract above)

Relevant Planning History:

00/01447/FUL (Civica Ref: 990690) - Demolition of existing brewery bottling plant and erection of new office (33,910sqm floorspace) with associated leisure facilities, landscaping, servicing and estate roads and provision of car park to provide 969 spaces for the proposal and retention of existing 457 spaces for the brewery - Approved 5/2/2002 subject to legal agreement.

06/00627/VARIAT (Civica ref: 060942) - Variation of Condition 1 of Planning Consent 00/01447/FUL to extend the time limit for the commencement of development for a further 3 years - Approved 22/8/2006 subject to legal agreement.

09/00685/VARIAT (Civica Ref: 090530) - Planning permission for the development permitted by Planning Consent 06/00627/VARIAT dated 22/8/06 namely development of offices with associated leisure facilities, landscaping, service roads and 969 car parking spaces for office development, together with retention of 457 existing car parking spaces for brewery use but without complying with Conditions 3, 4, 6, 7, 8, 9, 11, 12, 14, 16, 18, 21, 22, 23, 24, 25, 26 and 27 of that Consent - Approved 27/7/2009 subject to legal agreement.

Consultation Responses:

Environment Agency

We are no longer able to respond to you directly for pre-applications where you consult us on behalf of a developer. You will be aware we are now charging for non-statutory planning advice to ensure we cover costs. We continue to provide responses to statutory consultations from local planning authorities on validated planning applications free of charge. However, we do charge for detailed planning advice to planning enquiries that we receive from developers. Therefore, we cannot provide bespoke comments on your enquiry at this stage.

We have attached our pre-application advice note [Appendix 3 of this pre-application response] which provides information and guidance about issues within our remit at the planning application stage and we would be grateful if you forward this to your customer.

We encourage customers to come to us directly for advice where there are constraints within our remit as we still want to influence sustainable development. We will provide customers with further bespoke advice, if required, at a chargeable rate. This includes reviews of technical documents, meetings and site visits. Our charges will be £100 per hour + VAT.

We recommend that your customer contacts us directly at planning_thm@environment-agency.gov.uk.

Ecology

The pre-application site comprises a section of Reading International Business Park where it is proposed to develop the land for industrial use. As per aerial imagery, the site currently comprises hardstanding with trees, scrub and possibly some buildings. The site is connected to habitat of good ecological value - it backs on to woodland at the southwest and northeast, with a lake 60m southeast and grassland field 290m southwest. The site may be used by nesting birds, bats, reptiles and other protected or notable wildlife.

As such, there would be a risk that the proposals would impact upon protected species and an ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) would need to be submitted with any application.

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 buildings or trees to be removed are 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 will not be required. However, if bats are found or if the building 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 establish the characterisation of the roost and mitigation requirements.

Summary - The pre-application site may contain habitats suitable for use by protected species and surveys to confirm their presence or absence will need to be undertaken. These surveys, and any mitigation plan, will need to be submitted with the planning application as the application could not be able to be determined without this information. The applicant should be aware that some ecology surveys are seasonal and should ensure that they factor this into their timeframes for the project.

Environmental Protection and Nuisance

Concerns:

- Noise arising from development
- Air Quality impact - increased emissions

Noise generating development - Although the development is likely to generate some noises, its location is far from particularly noise sensitive receptors and I therefore do not anticipate noise issues from operation of the site as proposed. I would therefore have no objections on grounds of noise.

Air Quality - Increased exposure - The transport scoping assessment would indicate that traffic generated as a result of proposals would be expected to be lower than that of the extant consent and therefore I would have no objections on grounds of air quality impact.

Natural Environment

Comments provided prior to the 1st pre-application meeting: There is a significant difference between that approved and that proposed. In tree/landscape terms, the new proposals have a greater impact on existing trees and allow for less new trees by virtue of 4 buildings now being proposed with associated service yards and parking, as opposed to one building on the A33 frontage surrounded by parking. Parking obviously allows new trees within it and around it; the canopies having space to grow, which buildings do not allow.

The southern portion of the woodland (adjacent to the access into Reading International Business Park - RIBP) now has parking proposed almost up to the boundary leaving minimal space for trees, whereas a greater green buffer was previously allowed for. This difference is visually detrimental.

In relation to the green buffer on the A33 boundary, it is unclear whether the new development footprint will result in a greater direct loss of trees - it would seem reasonable to suggest that this is the case given that a larger extent of buildings proposed instead of car parking.

In the application letter from Barton Willmore (BW), it is stated (in the 'trees' section) that '*...the extant planning permission grants permission for us to clear the site, including the area subject to the woodland TPO*'. I will be seeking clarification on this in that BW have also made it clear that they do not have to and do not seek to fell all trees on the A33 boundary; the planning permission does not require this and in the 'approved' plan provided with the TPO objection from Aspect Tree Consultancy, the strip of land along the A33 boundary and an area to the south (adjacent to the RIBP junction) are specifically annotated as '*trees and vegetation beyond the consented development footprint, assumed to not have consent for removal*'.

I will be advising them that with the TPO in place, they are only able to remove trees whose felling is required to implement the consent.

Through objections to the TPO it has been indicated that a tree survey has been done. This does not appear to have been provided - this, along with an Arboricultural Impact Assessment and landscape principles will be required on submission of a planning application.

The allowance for the MRT is noted in the covering letter from BW, however this does not appear to be shown on the proposed plan - this will be required in order to establish the degree of landscape buffer remaining within the site. As with the Imperial Way (Worton Grange) development, is it important that sufficient landscaping can be provided within the site, unaffected by the MRT.

Comments on meeting notes from 18th July as prepared by Barton Willmore: Para 2.04 indicates that I expressed concern about the lack of car park trees due solely to the MRT. Whilst the MRT has an impact, the main problem is the additional units on what the extant permission has as car park. The overall tree planting is much reduced as a result, hence the concern. Also, we want to seek green and brown roofs and green walls, not just green walls / brown roofs. Noting that green roofs are better than brown in terms of carbon capture, air pollution.

Transport

Comments provided following the 1st pre-application meeting:

- The trip rates provided for the extant permission identify 446 arrival vehicle movements which I stated at the meeting were over inflated, due to the number of car parking spaces provided on site as part of that permission. However following a further review of the extant permission it would appear that a larger provision of parking is provided and therefore the trip rates are acceptable subject to clarity on the number of approved parking spaces is confirmed. I think it would also be useful to do an assessment based on the previous use for reference.
- The trip rates for the proposed use have utilised just the B8 use but generally a B2 use would generate a higher trip rate and therefore trip rates for all uses should be provided for all proposed uses and those with the highest trip rate used as a robust assessment.
- Parking is in accordance with the Councils SPD and is therefore acceptable.
- I am happy that given the proposed use would be less than that previously permitted that junction assessments for the A33 / Imperial Way roundabout and the RIBP site entrance / A33 / Basingstoke Road signalised roundabout would be acceptable instead of an assessment of the model data.
- I will arrange for a review of the A33 to take place so that this will inform the proposed design of the scheme.
- Cycle parking should be in accordance with the Councils SPD.
- Tracking diagrams should be provided confirming that access and egress can be accommodated for all vehicles.
- Given the proposal is still likely to result in an increase in trips on the Highway Network above the previous use on the site it is likely that a contribution towards the delivery of the South MRT scheme along the site frontage would be sought.

Following the 1st pre-application meeting BW sought clarification on 17th April as follows: "With regard to the request for junction assessment of the 'RIBP site entrance / A33 / Basingstoke Road signalised roundabout', could we agree to undertake junction assessment for the northern section of this junction, which serves the southern site access, along with the A33 / Imperial Way roundabout which serves the northern site access; as outline in purple on the below/attached plan? This would be a consistent scope for the 'RIBP

site entrance / A33 / Basingstoke Road signalised roundabout' to that agreed for the Worton Grange development”



Planning Officer note: *This was confirmed as acceptable and on 2nd May 2019 Transport stated “I have reviewed the Worton Grange application and I am happy that the assessment is consistent with the Worton Grange development with the RIBP access and egress included within the assessment.” Details of the land area to be safeguarded for MRT were also provided via email on 5th June 2019 (see Appendix 3)*

ONR

I have consulted with the emergency planners within West Berkshire Council, which is responsible for the preparation of the Burghfield off-site emergency plan required by the Radiation Emergency Preparedness and Public Information Regulations (REPPiR) 2001. They have provided adequate assurance that the proposed development can be accommodated within their off-site emergency planning arrangements.

The proposed development does not present a significant external hazard to the safety of the nuclear site.

Therefore, ONR does not advise against this development.

Relevant Policies:

National Planning Policy Guidance

National Planning Policy Framework (NPPF)

Section 2 - Achieving Sustainable Development

Section 6 - Building a Strong Competitive Economy

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

Section 16 - Conserving and Enhancing the Historic Environment

Please note that as the existing local planning policies within the Core Strategy (2008, altered 2015) and the Sites and Detailed Policies Document (2012, altered 2015) will shortly be superseded by the emerging Reading Borough Local Plan, the pre-application

response has focussed on the emerging policies, as these will be the ones that any future application would be assessed against.

Emerging Reading Local Plan - Submission Draft March, 2018

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 EN1: Protection and Enhancement of the Historic Environment
Policy EN11: Waterspaces
Policy EN12: Biodiversity and the Green Network
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
Policy EM2: Location of New Employment Development
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 SR4: Other Sites for Development in South Reading

Supplementary Planning Guidance/Documents

Revised Parking Standards and Design (2011)
Revised Sustainable Design and Construction (2011)
Employment, Skills and Training (2013)

The main issues to be considered are:

- a) Principle
- b) Design - scale, layout, appearance
- c) Transport/ Parking
- d) Landscaping & Ecology
- e) Sustainability
- f) Other matters
- g) S106 & Community Infrastructure Levy
- h) Submitting a planning application

a) Principle

The site is a specific allocation under the emerging Reading Local Plan Policy SR4e which states:

SR4e PART OF FORMER BERKSHIRE BREWERY SITE

Development for employment uses. The site has an existing permission for 33,910 sq m of offices, but would also be suitable for industrial and warehouse development. Related commercial uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres.

Development should:

- Enhance the setting of the listed Little Lea Farmhouse;
- Provide for a green link along the A33 frontage;
- Include a landscaped buffer to the watercourses around the site, with development set back at least 10m from the top of the bank of the river wherever possible;
- Address any contamination on site;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and
- Safeguard land which is required for mass rapid transit routes and stops.

Site size: 3.7 ha 11,000-13,000 sq m of industrial and warehousing

The principle of the proposed flexible uses for B1 (c), B2 and B8 would therefore be acceptable subject to meeting other policy requirements.

Officers raised concerns at both pre-application meetings with regard to the overall floorspace of the proposed scheme, which exceeds the range as set out in the policy. However, following further discussion about specific potential user requirements and subject to any formal submission being able to satisfactorily address other policy requirements, a larger footprint of scheme could be acceptable.

b) Design - scale, layout, appearance

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: -

- and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.
- Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.”

The pre-application scheme includes for a far greater level of built form compared to the previous office approval, with four different buildings of varying size, with independent parking/ servicing areas, and two main access points - southern for Unit 1 and northern for the remaining 3. As referred to above, officers raised concerns regarding the overall scale of the buildings to plot size, and in particular the effect that such has on being able to achieve an effective landscape buffer to the site, and landscaping within the scheme generally.

Therefore, at the pre-application meetings officers explored whether smaller units could be achieved both in terms of overall floor plate, but also the overall height of

the units, proposed at maximum of 12m to underside of roof, whilst still meeting operator requirements, in order to be able to achieve a better built form to plot ratio. However, the applicant team advised that the proposed layout is intended to maximise the site having regard to known future occupier requirements, such as dimensions of service yards. Similarly the overall heights are required for specific user requirements.

Following the first meeting in April 2019 an amended plan was presented which included a slight reduction to Unit 1 (the southernmost unit) and some additional landscaping on the southern end, albeit the majority of the scheme was otherwise largely unaltered.

During the course of the discussion officers became more comfortable with the overall scale. Although the proposed buildings would be visually prominent from A33, they need to be considered in the context of surrounding development. In particular the existing Verizon office buildings are significant and dominating in the local context, but also the former Worton Grange site opposite the site (east). Additionally the consented and extant scheme would have been a 6 storey building, albeit with much less overall foot print.

The imagery provided relates to Units 1 and 2 only, and shows relatively simple form flat roofed industrial buildings with a proposed palette of different greys, and white materials, becoming lighter in tone from bottom to top. This would help to reduce the apparent height of the buildings. The style and materials, of the Units seen, would not be inconsistent with the surrounding buildings especially the Tesco site to the north.

The imagery also shows a solid wall to the A33 frontage, which compared to the existing partial wall and open fencing is considered to be an oppressive feature, and an alternative approach to dealing with this frontage as part of the design needs to be presented. However, in overall terms, the design of the proposed scheme would be considered as acceptable in the context.

Any formal submission would, however need to include a Design and Access Statement, which includes further details of the proposed cladding materials and how a high quality appearance, especially along A33, would be achieved, along with providing a justification as to the size and shape of the buildings in terms of the commercial/market requirements.

A Heritage Statement, would also need to demonstrate the acceptability of the scheme within the context of the adjacent listed building (Policy EN1: Protection and Enhancement of the Historic Environment).

Such information should include views of the proposed scheme, along the lines of those submitted as part of this pre-application enquiry, but with a wider view to be seen within their wider context.

c) Transport/ Parking

The Transport comments are included above, however in summary Transport identified that the proposed scheme would result in a net reduction in impact in comparison to the extant permission. It was agreed, however, during the first meeting that a relatively 'light touch' highways assessment would be required, which would be a junction assessment. Subsequent to the meeting Transport confirmed that the proposed area to include within the junction assessment, as presented by PBA, would be acceptable (see above). In addition there was agreement regarding the specific inputs into the assessment. This was via email exchange between Transport and PBA

dated 26th July 2019, and 5th August 2019, regarding the distribution and impact assessment areas and the trip rates respectively.

Transport has also confirmed that the overall parking numbers accord with RBC standards.

Electric Vehicle Charging (EVC) points would need to be included within the car parking area in line with Policy TR5: Car and Cycle Parking and Electric Vehicle Charging, which requires 10% of spaces to have an active charging point.

d) Landscape and Biodiversity

As you are aware the site is now subject to a TPO. However, in addressing this site, Natural Environment has made it clear in correspondence that full planning permission, if implemented, would override a TPO, and that any new proposal would be assessed and considered on balance with other issues.

At the first meeting Natural Environment identified that it would be important for sufficient landscaping to be provided within the site which is unaffected by the MRT, and ensuring a suitable tree buffer along the A33 frontage (Policy EN14, CC7).

Following the initial meeting, plans were updated to show the safeguarded MRT, culvert and foul easement. A large proportion of the current trees, now included in the TPO would be retained, although further detail of a tree survey and Arboricultural Impact assessment would be required as part of any formal submission.

At the second meeting there was further discussion regarding the need to have good landscaped boundaries/buffers to the A33, but also to the northern part of the site. It is clear, because of the proposed overall building footprints that the proposal includes fewer trees within the body of the site itself compared to the consented scheme, which is considered a negative change.

It was suggested that temporary planting be put in place until the MRT comes forward and additionally that there could be the potential to undertake planting over the Thames Water (TW) culvert. A recent example within the Borough was within the Dee Park development where TW agreed a tree pit design. The applicant in that instance needed to provide comfort to TW that suitable barriers would be used to contain root growth, through a root barrier specification and tree pit design for TW's approval, including details of sewer depth. For reference, although this is information from 2013, and might not be wholly applicable in this case, TW also stated that:

1. The existing sewer would need to be lined along this length with an acceptable liner such as reinforced fibre glass. This will not only give it some added protection should the roots penetrate the root barrier, but will also give us the comfort that this sewer will remain serviceable for some years to come. For further guidance on acceptable specification please refer to Water Industry Specification 4-34-04.

2. We would require further details of the exact tree pit that is to be used and the associated specification for review. We would also request that the tree pits are individual for each tree rather than covering the entire length.

We advise therefore that you explore the acceptability with TW.

Also we highlighted that Reading has declared a climate change emergency, and therefore soft landscaping and opportunities for greening must be considered and included where possible. Measures such as green walls, green and brown roofs, were suggested as a means to 'green' the scheme and assist with improving sustainable

credentials and meeting relevant policies to become carbon neutral. These alternatives methods of greening are particularly necessary given the decrease in tree planting opportunity offered in the current scheme, compared to the extant permission.

With respect to biodiversity, the site Includes part of an 'Existing or Proposed Green Link' and is close to areas of 'Biodiversity Interest', which is covered by Policy EN12: Biodiversity and the Green Network, and this requires *"the identified Green Network.... to be maintained, protected, consolidated, extended and enhanced"* and that there should be *"no net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible."*

Policy EN12 therefore, needs to be addressed in any formal submission, including responding to the specific requirements set out by Ecology, as included in the consultation section above.

e) Sustainability

As one of the local authorities which declared a climate emergency earlier in the year, the aim is to eliminate carbon dioxide emissions in Reading by 2030. In this context there are a number of policies within the local plan which are relevant to new development.

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 developmentsare required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;....Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective."* The supporting text (para 4.1.4) accepts that *"some types of development, such as industrial uses, warehouses and schools might find it more difficult to meet these standards. In these cases, developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard."*

Any formal submission will need to address these requirements, and one of a number of possible measures, as discussed at the second meeting would be the provision of photovoltaics. Other policies to be addressed would be Policy CC3: Adaptation to Climate Change, CC5: Waste Minimisation and storage and CC4: Decentralised Energy, which sets out that *"Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of a CHP plant, or other form 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."*

f) 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 B uses in this location.

With regard to S106, as the proposal is likely to result in an increase in trips on the network above the previous use it is likely that a contribution towards the delivery of the South MRT along the site frontage would be sought.

The Council would also seek a land transfer of an 8m strip along the A33 to provide an inbound lane for MRT.

In addition an obligation/financial contribution for employment, skills and training both for construction and end user (see the Employment, Skills and Training SPD, 2013 for further details). It is recommended that contact is made with Reading UK CIC who are the economic development arm of the Council and who will be able to advise on developing an Employment, Skills and Training Plan.

g) Other Matters

Signage - Officers raised the issue of the potential conflict of future signage and landscaping and there was discussion over submitting an overall signage strategy, i.e. to set parameters for future occupiers, which Arlington could control, and such details could be conditioned as part of any future acceptable scheme.

Watercourse/flooding/drainage - There are watercourses/ ditches around the site and a storm water culvert within the site itself. The allocation specifically identifies the need to *"Include a landscaped buffer to the watercourses around the site, with development set back at least 10m from the top of the bank of the river wherever possible"*. Policy EN11: Waterspaces seeks the protection and enhancement of waterspaces.

As part of a formal submission the Environment Agency would be consulted. It should be noted that in responding to the extant permission, when it was being considered, they required conditions to maintain a buffer strip to the watercourse and contamination survey, no soakaways in contaminated land and details of site drainage to be approved to prevent pollution of groundwater.

The site is within Flood Zone 2 and a Flood Risk Assessment will therefore be required. In terms of the sequential test this has already been undertaken as part of the background for developing the new local plan. The following link provides the details of the sequential and exceptions tests for each allocated site.
http://www.reading.gov.uk/media/8646/EV028-Sequential-and-Exception-Test-Local-Plan-2018/pdf/EV028_Sequential_and_Exception_Test_Local_Plan_2018.pdf

As a major application SUDs details would need to be submitted and this should be undertaken with specific reference to Policy EN18: Flooding and Drainage.

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

In summary the following documentation would be expected as part of a formal submission (as emailed on 29/4/19).

- Affordable Housing Statement - for employment site 2500sqm or greater refer to Pg 9, Item 1 Validation Requirements)
- Air Quality Statement
- Contaminated Land Survey & Report
- DAS
- Ecological Survey and Report (refer to details in the Ecology response above)
- Energy Efficient Statement
- External Lighting Details
- FRA
- Heads of Terms Proposals
- Heritage Statement
- Landscape Principles

- Noise Assessment
- Planning Statement
- Plans and Drawings - please note that if any plans are produced at greater than A3 paper size then 1 paper copy of plan(s) must be provided to Planning Department, Civic Offices, Bridge Street, Reading RG1 2LU - the red line plan needs to include the relevant highway accesses.
- Signage Strategy (as referred to above)
- Sustainability Statement
- SUDs
- Transport Assessments & Travel Plan; (BW also identified the submission of a Delivery and Servicing Plan in the Pre-application letter)
- Tree Survey/ Arboricultural Method Statement
- Utilities Statement
- Parking - vehicular and cycles
- Viability Appraisal - Where affordable housing is required, but the applicant cannot meet the level of provision set out.

As previously confirmed by email on 15th April 2019 an **EIA Screening Opinion** will be required, because the proposed site and scheme is considered to fall under Industrial Estate Development Projects (under Infrastructure Projects in Schedule 2 of the EIA Regulations) and the development would exceed 0.5 ha.

APPENDIX 1 - MEETING NOTES - 8TH APRIL 2019 - PREPARED BY BARTON WILLMORE



MEETING NOTES

Project: Reading International Logistics Park - 29718

Subject: Pre-Application Meeting – First Meeting at Reading Borough Council

Date: 8th April 2019

Present:

Daniel Pagella (DP)	Arlington
George Wilson (GW)	Arlington
Justin Thomson (JT)	Macgregor Smith
Simon Poole (SP)	AJA Architects
Andy Wells (AW)	Peter Brett Associates
Robin Meakins (RM)	Barton Willmore
Amy Clarke (AC)	Barton Willmore
Alison Amoah (AA)	RBC
Julie Williams (JW)	RBC
Sarah Hansen (SH)	RBC
Darren Cook (DC)	RBC

Location: Reading Borough Council, Civic Offices, Bridge St, Reading RG1 2LU

No.	Subject	Action
The purpose of the meeting was to discuss the principle of the proposal which accords with the Local Plan allocation and to seek approval from all parties. The main objective was to clarify RBC's position on the constraints, these being; highways, trees and heritage impact		
	RM introduced agenda and summarised the relevant policies relating to the application	
1.0	Principle	
1.01	SP gave an overview of the scheme design, confirming that despite having a full extant office permission on the site, no market interest has been shown over the last 10+ years. As a consequence an alternative scheme, which market demand does exist for is now proposed. This is for class B8 and is likely to be urban logistics.	
1.02	The layout proposed maximises the site configuration having regard to known occupier requirements such as dimensions of service yards etc.	
1.03	Reference was made to the existing and emerging planning policy for context. This was as follows: The existing policy states as follows:	

DM17: GREEN NETWORK (this runs along the A33 boundary of the site)

The identified Green Network comprises Local Wildlife Sites, Local Nature Reserves, Areas of Biodiversity Action Plan (BAP) habitats and designated open space plus both existing and potential Green Links, all of which are shown on the Proposals Map. It also includes Biodiversity Opportunity Areas, shown in Figure 4. These Green Links shall be maintained, protected, consolidated, extended and enhanced.

New development shall demonstrate how the location and type of open space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

SA2b: BERKSHIRE BREWERY

The priority for the Berkshire Brewery site is continued employment (B2/B8/B1c) use, Any proposals for development on the site will:

- i) Ensure that development, where it is visible from the A33, contributes towards a high-quality entrance to Reading;
 - ii) Make an appropriate contribution towards facilitating a Mass Rapid Transit/public transport route, which may include provision of land for the route;
 - iii) Retain and enhance existing ecology on site; in particular, the watercourses, lake, woodland, marshy grassland adjacent to the northern boundary of the site and grassy banks;
 - iv) Retain and enhance current and potential green links as defined on the Proposals Map, and provide new landscaping and open space to contribute to green links where possible. Proposals will also take account of any impacts on Thames Basin Heaths Special Protection Area;
 - v) In meeting the Council's sustainability requirements, secure energy from a decentralised energy source;
 - vi) Enhance suitable tree cover along the A33; and
 - vii) Take account of potential flooding, including from surface water.
- Proposals for mixed use development incorporating residential will additionally:
- viii) Ensure that constituent elements of the site (e.g. the R13 site, the main Brewery site, and the part of the site within Wokingham Borough) strongly relate to one another, thereby not comprising two or three separate inward-facing developments;

The **emerging policy** states as follows:

SR4e PART OF FORMER BERKSHIRE BREWERY SITE

Development for employment uses. The site has an existing permission for 33,910 sq m of offices, but would also be suitable for industrial and warehouse development.

Development should:

- ☐ Enhance the setting of the listed Little Lea Farmhouse;
- ☐ Provide for a green link along the A33 frontage;
- ☐ Address any contamination on site;
- ☐ Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and

	☐ <i>Safeguard land which is required for mass rapid transit routes and stops. Site size: 3.7 ha 11,000-13,000 sq m of industrial and warehousing</i>	
1.04	It was agreed that the proposed B8 scheme accords with adopted and emerging policy in principle and is therefore in principle acceptable. It was agreed that the detailed design of the scheme is to be worked through at a follow-on meeting. It was noted that the proposed floorspace is more than the guide given in emerging policy, which may be acceptable but dependent on a suitable approach to accommodating the MRT, green corridor, and the heritage setting of Little Lea farmhouse.	
2.0	Transport	
2.01	It was agreed that in light of the local plan allocation and the extant planning permission for offices, the overall impact of the B8 scheme will result in a net reduction in impact on the highway capacity and highway junctions. Therefore the proposals are acceptable in transport terms, even though the junctions are already over capacity. There is no technical highways basis to get to the scheme.	
2.02	Based on the above, only a light touch highways report/assessment needs to accompany the planning application. There is no need to undertake any traffic counts and reliance can be placed on the wider context brackets as described above) and also any data that RBC already hold.	
2.03	It was confirmed that RBC secured 8M of land from the nearby Tesco site for the creation of an inbound MRT lane. This is presently being built out.	
2.04	Land will need to be secured from the Arlington site for the continuation of the inbound route of the MRT system. The A33 frontage will provide capacity for this. The green frontage should be retained as much as possible (even considering that the MRT system will require the felling of some trees). DC undertook to liaise with PBA (RBC's consultants) to work up an MRT scheme (or land take strip required) and to provide this to AA, so that a revised site layout can be prepared.	
2.05	It was confirmed that the car parking provision accords with RBC's SPD on parking and therefore is acceptable.	
2.06	In accordance with the draft highways methodology proposed by PBA, it was suggested that a number of checks should be undertaken. These include: 1. check whether it is appropriate to assess 447 car movements based on only 200spaces; and 2. Since the application will include land-use B2 as well as land-use B8, the TRICS assessment should also be undertaken for land-use B2.	
2.07	RBC confirmed that the MRT route from the town centre passing the application site was under construction. On this basis RBC confirmed that it would seek land transfer of an 8m strip fronting onto the A33 as part of the application in order to provide an inbound lane for the MRT along the Arlington site boundary.	

2.08	RBC confirmed that there are highways issues associated with the Tesco operation. The way in which Tesco has chosen to operate, which is unconstrained through planning restrictions, result in blockages of the roundabout access to the Arlington site. RBC confirmed that Tesco has provided £250,000 as part of its planning permission in order to signalise The roundabout. However, RBC consider that signalising the roundabout is unlikely to enhance its operation and therefore is presently undecided about whether to progress this.	
3.0	Trees	
3.01	It is accepted that given the extant scheme and the likely need for RBC to construct the MRT route, the recently TPO'd trees are not likely to be lost. In principle that is acceptable provided that a suitable green landscape buffer or corridor is included in the scheme proposals. Further review can take place in the second pre-app meeting once a revised scheme has been tabled by Arlington. It was also recommended that consideration be given to signage so that this does not compromise the landscape proposals.	
4.0	Heritage	
4.01	A light touch heritage impact report will be needed to accompany the planning application to address the presence of the listed Little Lea farmhouse. Given the change that has already occurred to its setting caused by both the Verizon office campus and the extant 360 permission, it is not anticipated this will be a critical issue of concern, but due regard needs to be had.	
5.0	Next Steps	
5.01	Alison Amoah (RBC) will confirm if an EIA is required for the site. DC will brief PBA and confirmation of the MRT land take will be provided to Arlington. This will then allow a revised scheme to be prepared that would enable a further follow-on pre-app meeting to take place.	AA/DC
5.02	With regards to Section 106 and CIL requirements. RBC stated that there would probably be fees for transport but will need to confirm. A payment or plan for employment, skills and training will be required	
5.03	When asked regarding the expectations for public consultation. RBC did not feel that an extensive campaign would be needed. They appeared comfortable with Arlington's approach of a Q&A event and leaflet distribution in the local area.	

APPENDIX 2: MEETING NOTES 18th JULY 2019, PREPARED BY BARTON WILLMORE

MEETING NOTES

Project: Reading International Logistics Park - 29718

Subject: 2nd Pre-Application Meeting

Location: Reading Borough Council, council offices

Date: 18th July 2019

Present:

Alison Amoah (AA)	RBC
Julie Williams (JW)	RBC
Sarah Hanson (SH)	RBC
George Wilson (GW)	Arlington
Robin Moxon (RMO)	Arlington
Simon Poole (SP)	AJA Architects
Cormac Lennon (CL)	Macgregor Smith
Daniel Osborne (DO)	Barton Willmore
Amy Clarke (AC)	Barton Willmore

Copy to:

Darren Cook (DC)	RBC
Daniel Pagella (DP)	Arlington
Justin Thomson (JT)	Macgregor Smith
Robin Meakins (RME)	Barton Willmore
Stephen Millns (SM)	Stantec

Location: Reading Borough Council, Civic Offices, Bridge St, Reading RG1 2LU

No.	Subject	Action
The purpose of the meeting was to discuss the scheme proposals, which accord with the Local Plan allocation and to seek approval from all parties. The main objective was to clarify RBC's thoughts on the design and scale and also to assess the constraints, these being; highways, trees and heritage impact, following the changes made since the first pre application on 8 th April 2019.		
1.0	Principle	
1.01	DO gave an overview of the content and actions from the last pre application meeting, focusing on the design and land to be allocated to the MRT system route.	
1.02	AA commented that the overall area allocated in the Emerging Local Plan (Policy SR4e) for the building footprint on the site is; 11,000 – 13,000 SQM. The proposed scheme totals an area of 15,083 SQM, which AA and JW expressed	

	concern that this exceeded the amount of development permitted by the allocation JW also expressed concerns with scale and the proximity to the A33 junction. She also stated that she could not see any significant changes to the scheme shown at the first meeting. Following discussion, officers became more comfortable with the proposed design and asked that wider views were prepared, so that unit 1, in particular could be seen in the wider context. Officers also requested that additional planting is placed on the A33 zone as a buffer.	
2.0	Landscaping and Design	
2.01	SH and JW raised concerns with regard to the landscaping along the Northern perimeter of the site and along the boundary of the MRT land. They were concerned that the proposed planting would not be full enough to create the desired landscaping effect. CL commented that only shrubs could be planted along this boundary because of the setting of the sewer easement. SH talked of a previous agreement with Thames Water which allowed planting of trees above easements. CL will explore further the possibility of planting trees. SH talked briefly about Arlington installing temporary planting until the MRT route is introduced.	CL
2.02	Materials: JW was concerned about the quality of materials for the exterior of the buildings. SP stated that high specification, blended cladding in a pallet of greys would be used on the buildings which will be seen from the road. The buildings which will not be visible will have a lower grade cladding, but the colour and blending will remain constant across the scheme. Full details will be provided as part of the planning application	
2.03	Signage: AA raised concerns over signage to the site. She commented that the illustrative scheme showed a business name at the top of the unit 1, which is visible from the A33 junction. Her concerns relate to the trees which will be planted top the front of this unit and might be vulnerable to excessive cutting by the tenant, in order to maintain visibility of the business name/logo. GW and RMO were keen to convey the landscaping standards and restrictions that they enforce on tenants at their other business parks and will send to AA, SH and JW some images for reference. GW / RMO to indicate signage on plans and AC to resubmit to RBC	GW / RMO GW / RMO / AC
2.04	Extant Permission - Tree Planting: SH stated that RBC have declared a climate change emergency at Planning Committee on 17th July. She emphasised the need to provide soft landscaping and stated green walls and brown roofs are attractive to RBC.	

	She commented that the extant permission allowed for tree planting in the car park. In the revised design this tree planting has been removed due to the allocation of land for the MRT. The team agreed to consider options to 'green' the scheme.	
3.0	EIA	
3.01	With regards to EIA, AA confirmed that an EIA screening opinion request should be included in the application. This was supported by her email to Robin Meakins on 29/04/19.	
4.0	Planning Obligations	
4.01	Affordable Housing: DO commented that an affordable housing contribution does not apply in the emerging policy, as the site has been allocated. The current policy however, states that an AH contribution will be required. Officers agreed, and as a planning application is likely to be approved following the adoption of the Local Plan, this should not be an issue JW advised that a note on this, outlining reasons for not providing AH will need to be provided in the planning statement.	RME/DO/AC
4.02	Training and Skills: JW advised that UK CIC should be consulted with regards to meeting the requirement of providing a training and employment skills plan. They will be able to provide advice as to what is an acceptable contribution	Arlington
4.03	CIL: AA confirmed that CIL does not apply to this application	
4.04	Timelines: Arlington confirmed that the expected timeline for the application to be submitted within next two months	
5.0	Next Steps	
5.01	JW advised that the CGI's would need to be expanded to include surrounding buildings (such as Tesco) in order to provide more context for the scheme.	CL / JT
5.02	The Planning application submission should also provide justification for the size and shape of the units – i.e. commercial reasons and market demand	Arlington
5.03	Investigate emerging policies around climate change, AA to highlight these	AA / BW
5.04	The team are to make contact and advise ward councilors of the proposed scheme, as part of the pre-application consultation.	RBC

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/60777/2116950.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

APPENDIX 4: LAND FOR SAFEGUARDING FOR MRT (blue)

