



Memorandum

To	Thomas Bradfield	From	Savills Planning
		Date	23 May 2024
Cc:		Ref.	M240522 – Worton Grange Ecology Note

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TECHNICAL NOTE

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APPLICATION REFERENCE: 231254

Introduction

This Technical Note has been prepared to provide justification for the proposed layout including soft landscaping and habitats to be provided onsite as a result of the proposal at Worton Grange, Reading (the '**Site**').

The response is in relation to the planning application (Ref: 231254) for: '*Demolition of an existing building and erection of new building to allow a flexible use within classes, E(g)(ii), E(g)(iii), B2 and B8 and a series of physical works to reconfigure the site, new hard and soft landscaping and associated infrastructure*' (the '**Application**'). The Application was validated on 1 September 2023 and there have been ongoing conversations relating to all technical matters.

The only outstanding matter to address relates to Biodiversity Net Gain ('**BNG**'). It should be noted that the BNG requirement for the Site is pursuant to Policy EN12; it is not a mandatory requirement pursuant to the Environment Act 2021 as the application was submitted before 12 February 2024.

This Note provides details of: occupier requirements (which drives the layout of the Site), proposed soft landscaping and BNG and the economic benefits of the proposed development having regard to the strategic objectives of the development plan.

Future Occupier Requirements

The development proposed as part of the original application included a preferred yard with a depth of 48.5m at the widest point (Dwg no. P402 Rev M). Following consultation responses from RBC Ecology (seeking the retention of more existing trees and landscaping), the Applicant team sought to minimise the extent of the yard.

The proposed development comprises a mid-scale premises and will accommodate multiple Heavy Goods Vehicles (**HGVs**). Accordingly the minimum yard depth to accommodate both docked vehicles and a turning circle for manoeuvrability is 45m. Reducing the yard depth further would materially comprise the operation of the building and therefore its suitability to meet standard occupier requirements.

As shown on the Proposed Site Layout (Dwg no. P402 Rev M), the yard depth has been reduced to 45m at the widest point. This optimised site layout allows for greater retention of existing trees and further soft landscaping to be provided along the eastern boundary of the Site.

Soft Landscaping and BNG

Policy EN12 of the Local Plan relates to biodiversity and geodiversity and states that a mitigation hierarchy approach will be used to consider the loss of on-site biodiversity. The Policy states:

“In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity.”

The proposed development accords with the exceptional circumstances identified in Policy EN12.

The need for redevelopment of the Site is considerable given the existing floorspace has been vacant for approximately 10 years. The Site is allocated within a Core Employment Area ('CEA'); the most important employment land within the Borough and integral to meeting policy objectives relating to economic growth and job creation.

Paragraph 3.2.10 of the Local Plan states that a high level of need has been identified for new floorspace for employment development. This means that the majority of employment areas need to be retained and, where possible, intensified to continue to provide this role. Policy EM1 states that provision will be made for a net increase of 148,000 sq. m of industrial and / or warehouse space in the Borough.

It is explicitly acknowledged within the Local Plan that there is a significant need for the additional, modern employment floorspace as proposed as part of this application. The proposal to intensify land within a CEA and bring a vacant site back into positive economic use accords directly with the strategic objectives and land use framework of the adopted Local Plan.

The significant need for employment floorspace and intensification of the CEAs then must to be considered against the baseline ecological value of the Site. As set out in the ecology report and BNG calculation, the majority of the habitat types at the Site have a 'Distinctiveness' grading of either 'Low' or 'Very Low'. The Site does not have any particularly rare or high value habitats that would warrant specific protection.

As set out above, the proposed development seeks to optimise the biodiversity on Site within the context that the primary function of the land should be for employment uses to help meet the economic needs of the Borough. The proposed service yard has been reduced to the minimum requirement to allow for the retention of more existing trees and the provision of additional on-site landscaping and habitat creation.

As part of this Technical Note and the wider application documents, the Applicant has demonstrated that:

1. The need for the development clearly outweighs the need to protect the value of the Site (which is low and not particularly 'distinct'); and
2. The impact cannot be avoided, mitigated or compensated for on-site beyond what is proposed (the effect of which is a reduction in BNG of 48.84%).

The mitigation hierarchy has been followed and so it is appropriate for the Applicant to provide an off-site contribution to offset the impact of the proposed development and loss of bio-diversity.