

PLANNING STATEMENT

PREPARED BY



**FOR CUNDALL
JOHNSTON & PARTNERS LLP
ON BEHALF OF PROCTOR & GAMBLE**

**NEW AND REPLACEMENT PLANT,
ROOF WALKWAYS AND ENCLOSURES
AND NEW ACCESS STAIRS**

**GILETTE INNOVATION CENTRE,
452 BASINGSTOKE ROAD
READING, RG2 0RX**

MARCH 2025

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1. Background

- 1.1 The Reading Innovation Centre is located on the west side of Basingstoke Road and accommodates Gillette's UK research and development function.
- 1.2 The capability of the centre was significantly enhanced in 2000 with the opening of a dedicated R&D facility, pursuant to planning permission 98/1107 (granted 28th April 1998). The building comprises two parts: (i) a three-story building of offices and laboratories; and (ii) a single story workshop located to the rear. The latter provides an important product testing and development function, and employs a significant number of highly skilled workers. The Reading Innovation Centre is important for the area economically and helps keep Reading on the map as a major science/industrial centre.
- 1.3 The existing air handling/cooling units for the building are split into two systems. Those serving the principal part of the building are located within a void at roof level (effectively a fourth storey); whilst those serving the workshop are partly internal (hung on the underside of the roof structure) and partly external (fan unit located on North side of flat roof, albeit now decommissioned).
- 1.4 The air handling unit units for the workshop have reached the end of their economic life. The internal units also present operational issues within the building and are difficult to maintain. Therefore, these facilities are to be relocated, externally. Several related change are required, primarily regarding service and maintenance access.
- 1.5 In the absence of permitted development rights, detailed planning permission is required for the proposed works.
- 1.6 This statement explains the proposals in more detail before reviewing the development plan and relevant policies, guidance and other material considerations. The proposal is then assessed in terms of its compatibility with the buildings and immediate area, including in terms of design and amenity. Conclusions are then drawn.

Proposed Development

- 2.1 The application seeks planning permission for the replacement relocation of air handling plant and related works, in connection with the ongoing operation of the research and development facility here.
- 2.2 Gillette has instigated a program of refurbishment to the HVAC system, to sustain appropriate internal environmental conditions in the ground floor workshop, laboratories and offices. Much of the plant machinery here is original, and, therefore, approaching 25 years old. Whilst many facilities have been serviced in situ, a wider replacement program is now underway. The majority of the proposed works are internal and do not require planning permission. Indeed, some chiller units have already been replaced.
- 2.3 The air handling unit (AHU) supplying the workshop is presently hung from the underside of the roof structure. Maintenance is complex and the unit has no heat recovery system. The proposed replacement unit is intended to alleviate summer overheating issues and address the maintenance problem. This will be achieved by relocating the new AHU to the flat roof over the workshop, on a new structural frame with ductwork, pipes and electrical supply passing through the roof via appropriately weathered openings. The new units will be craned into position and new access routes established.
- 2.4 It is also proposed to replace and relocate the workshop hybrid dry cooler with an adiabatic cooler. This unit caters for heat rejection from process machinery but was decommissioned several years ago, despite the fan units remaining on the roof. A replacement unit will be craned onto the roof and placed on a proprietary frame, further in-board of the parapet than at present. The units will be connected through the roof surface and made weather tight.
- 2.5 A more detailed summary of the proposals is set out below:
 - Remove hybrid fan unit and pipework, and make good the roof.

- Construct new steel subframe to transfer the AHU load directly onto the building's primary structure via stubs (as the existing roof structure has limited weight capacity)¹.
- Create platforms and install replacement AHU and adiabatic cooler units in the locations identified on the proposed roof plan.
- Construct freestanding walkways between the existing raised walkway (adjacent to the three-storey component) and the new AHU/cooler units (connected by galvanised steel platforms).
- Install louvred screens to create enclosures around the new AHU/cooler units, along with louvre screen doors to each.
- Install horizontal 'life-line' wire safety system across workshop roof.
- Remove existing roof access ladder and hoop, and replace with external spiral staircase with guard rail to roof edge.
- Decommissioned existing AHU and remove from underside of workshop roof. Commission replacement AHU/cooler units and make good all openings and connections.

2.6 All proposed works will take place within Gillette (Proctor & Gamble) land.

2.7 A temporary storage and works area will be established adjacent to the building, though separate planning permission is not required for these.

2.8 Some localised strengthening of the steel frame system and foundations may be required, though these are entirely internal works, and no separate planning permission is needed.

1. Does not require planning permission but included within the proposals for completeness.

Relevant Planning Policy

- 3.1 Central to Reading Borough Council's corporate strategy, is the provision of necessary infrastructure to support the economy, and this is reflected in the Local Plan vision to harness Reading's economic strength.
- 3.2 The spatial strategy for Reading confirms that employment uses will continue to be focused and protected within the 'major existing employment areas' which includes the Basingstoke Road employment zone where Gillette's Innovation Centre is located.
- 3.3 The Council has identified a substantial requirement for employment/industrial development. Paragraph 3.2.10 of the Local Plan states that "*the majority of the employment areas need to be retained and, where possible, intensified and improved, to provide this role.*"
- 3.4 Policy E2 of the Local Plan identifies the locations of 'core employment areas', which includes the Basingstoke Road and is where new and improved industrial development should be located. Policy CS36 seeks retain and enhance these core areas.
- 3.5 There are then various non-employment policies and objectives which are equally relevant to proposals for new infrastructure.
- 3.6 Policy CC1 ostensibly repeats the NPPF presumption in favour of sustainable development, in terms of approving proposal which are consistent with policies in the development plan.
- 3.7 Policy CC2 sets out more detailed criteria by which to judge design and construction-related aspects of new development. Its requirements are broad. However, the policy explicitly confirms that the "*...refurbishment of existing industrial stock, will be acceptable*" where design and use of natural resources are agreed.

- 3.8 Policy CC3 relates to climate change adaptation and measures to be incorporated into new development.
- 3.9 Policy CC7 relates to the design of development by applying criteria which seek to improve the quality and character of the relevant area.
- 3.10. Policy CC8 requires that new development must “...*not cause a detrimental impact on the living environment of existing residential properties*” and sets out a number of related criteria, including in relation to noise, disturbance, and visual quality. The policy anticipates the imposition of planning conditions where these are needed to assure that the relevant criteria are met.
- 3.11. There are then three further development control policies which are particularly relevant to proposals for new/replacement plant:
- Policy EN15 requires development to reduce the effects of poor air quality (but noting that application of the related criteria is only triggered where development would detrimentally affect air quality).
 - Policy EN16 confirms that development will not be permitted where it will be damaging to the noise environment, particularly in terms of sensitive receptors (i.e., residential development); and
 - Policy EN17 is more specific and states that: “*Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dB below the existing background noise level, as measured at the nearest noise sensitive receptor.*”
- 3.12. Whilst the policies and standards referred to above pre-date the most recent version of the National Planning Policy Framework, there is nothing to indicate that they are out-of-date. Indeed, the proposal engages matters primarily at the local level and where the adopted Local Plan is able to adequately encourage and/or control, as necessary, new development.

4. Analysis of the Proposal

- 4.1 The proposal involves a building in industrial use within a core employment area (specifically EM2d) and where the continued use of buildings for employment-based activity is firmly encouraged; as is the continued optimisation of such buildings for their intended use. The surrounding buildings are also in industrial use and frequently involve roof-mounted equipment. Thus, the principle of installing plant enclosures of the building is established.
- 4.2 The positioning of two new plant enclosures on the roof is acknowledged as a visual alteration from the prevailing situation, where there is only a single fan unit installed (albeit decommissioned). However, this unit is located adjacent to the roof parapet, with no screening (see third photo at Appendix A). The unit is highly visible and of rudimentary design. Its removal is highly desirable.
- 4.3 It is also relevant that the original grant of planning permission for the R&D Centre here included a large rooftop plant enclosure. This can be seen on the approved drawings at Appendix B. The enclosure was intended to comprise a single AHU and two further fan units, along with hoop-top ladder from ground level, and access onto the roof deck. Whilst this was not implemented (the plant was primarily installed inside the building), it is relevant that rooftop plant was previously proposed and authorised.
- 4.4 Unlike the originally proposed plant, the current proposals sit further from the parapet. They are also located away from the highest point of the roof deck and are, therefore, not prominent when viewed from ground level.
- 4.5 Beyond the building, views are limited to locations within the industrial area. Whilst this does not absolve the need for good design, the plant units will be surrounded by louvred enclosures that are consistent with the prevailing form of development here. The only exception is the potential for views from the west from Commercial Road, albeit even these amount to no more than glimpses between buildings, as seen in Appendix C).

- 4.6 Considerable detail is submitted with the application, including detailed plans, sections and elevations of each plant enclosure.
- 4.7 The proposed louvred screens will match those used in the west elevation of the principal building (again, see image at Appendix C), thereby uniting the plant elements. The applicant is content to accept a planning condition requiring the submission and approval of the detail (i.e., colour, texture and design, etc) of the proposed louvres. This is consistent with the approach taken with the original grant of planning permission here.
- 4.8 Thus, although the proposed enclosures represent a visual change, they are not unexpected in an industrial context and are consistent in appearance with components of the existing building. The proposals therefore comply with the objectives of policy CC7.
- 4.9 There is nothing about the AHU or cooler units which engage with policy EN15, given the emissions relate to extraction and chilling from typical employee working environments, rather than extraction from industrial or other processes. Similarly, there are no odour-related issues to consider.
- 4.10 That the proposed works involve plant located on the roof of a building deeply embedded into a designated industrial area, should negate further appraisal of sensitive receptors pursuant to policy EN16. However, it is acknowledged that the nearest dwellings (the apartments on the corner of Commercial Road and Longships Way) are circa. 100m from the proposed plant enclosure, (see Appendix D) and so ought to be considered.
- 4.11 The applicant's acoustician has reviewed the proposed plant in relation to: (a) likely operating and tonal characteristics²; (b) the distance between the noise source and receptor; (c) the use of the intervening space; and (d) mitigation provided by the enclosures; and concluded that *"the noise generated by the new equipment would not result in an adverse impact at these properties."*

2. See Cundall's accompanying letter of 30th January 2024

4.12 To this end, application of Policy EN17 ought not to be necessary.

4.13 Notwithstanding this, the applicant is willing to accept the following noise rating planning condition:

“The specific sound level of the plant/equipment hereby approved, (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise sensitive facade shall be at least 10dB below the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation.”

4.14 Whilst the condition does not require submission and/or approval of details of acoustic performance, it ensures the plant operates at EN17 compliant levels.

5. Conclusions

- 5.1 The application seeks planning permission for the installation of new roof plant, to replace and improve air handling and temperature control units within the workshop space at Gillette's R&D facility on Basingstoke Road.
- 5.2 The principle of improving the building's operation in this way is readily established, noting the employment designation and policies which explicitly support the retention and improvement of existing industrial stock. Relocation of services to the roof will also secure significant operational benefits.
- 5.4 Relevant development management policies have been identified and applied to the proposed development.
- 5.5 The appearance of the plant enclosures and stair access are consistent with the character of the area and the specific design of the building.
- 5.6 Consideration has been given to local visual and acoustic amenity, and no issues exist which cannot be mitigated or which otherwise warrant objection. Conditions are proposed regarding enclosure materials and plant rating.
- 5.7 The proposals comply with the policies of an up-to-date development plan and should therefore be approved without delay.

APPENDIX A



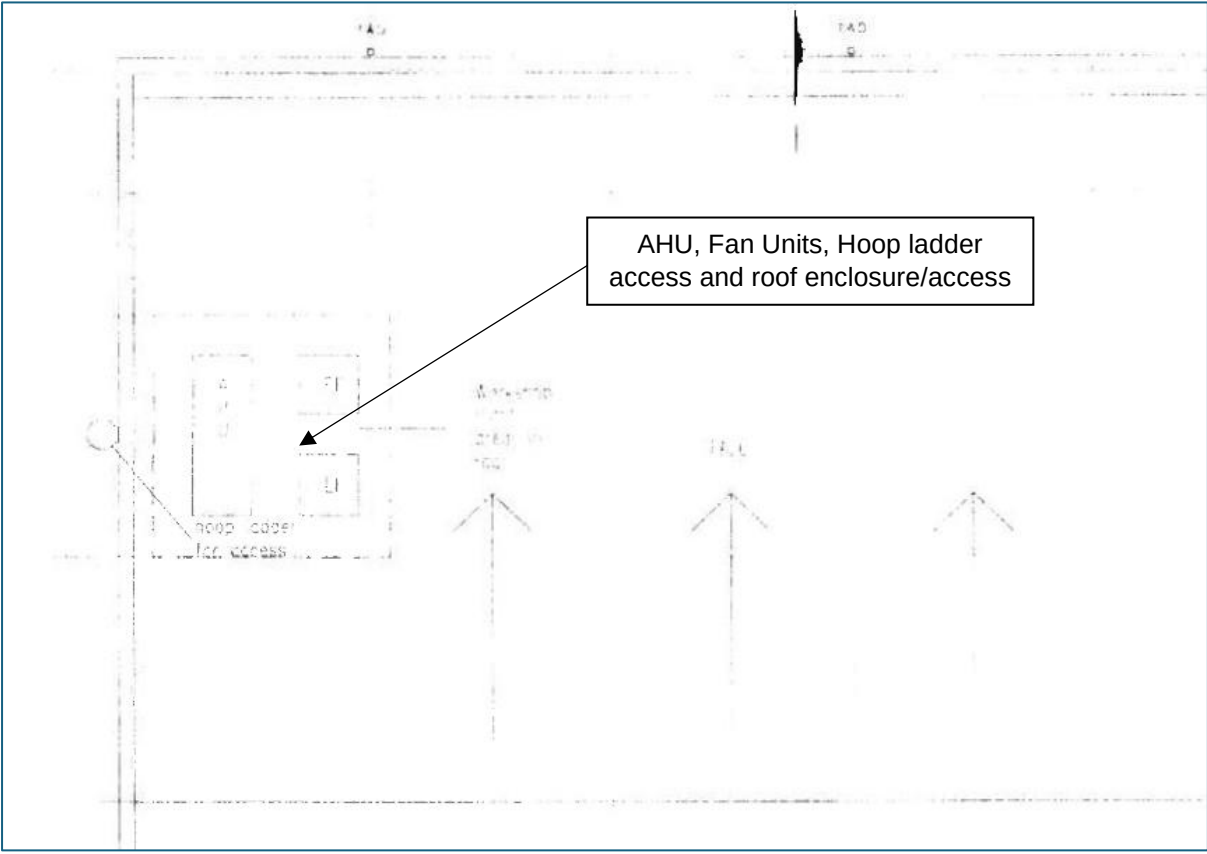
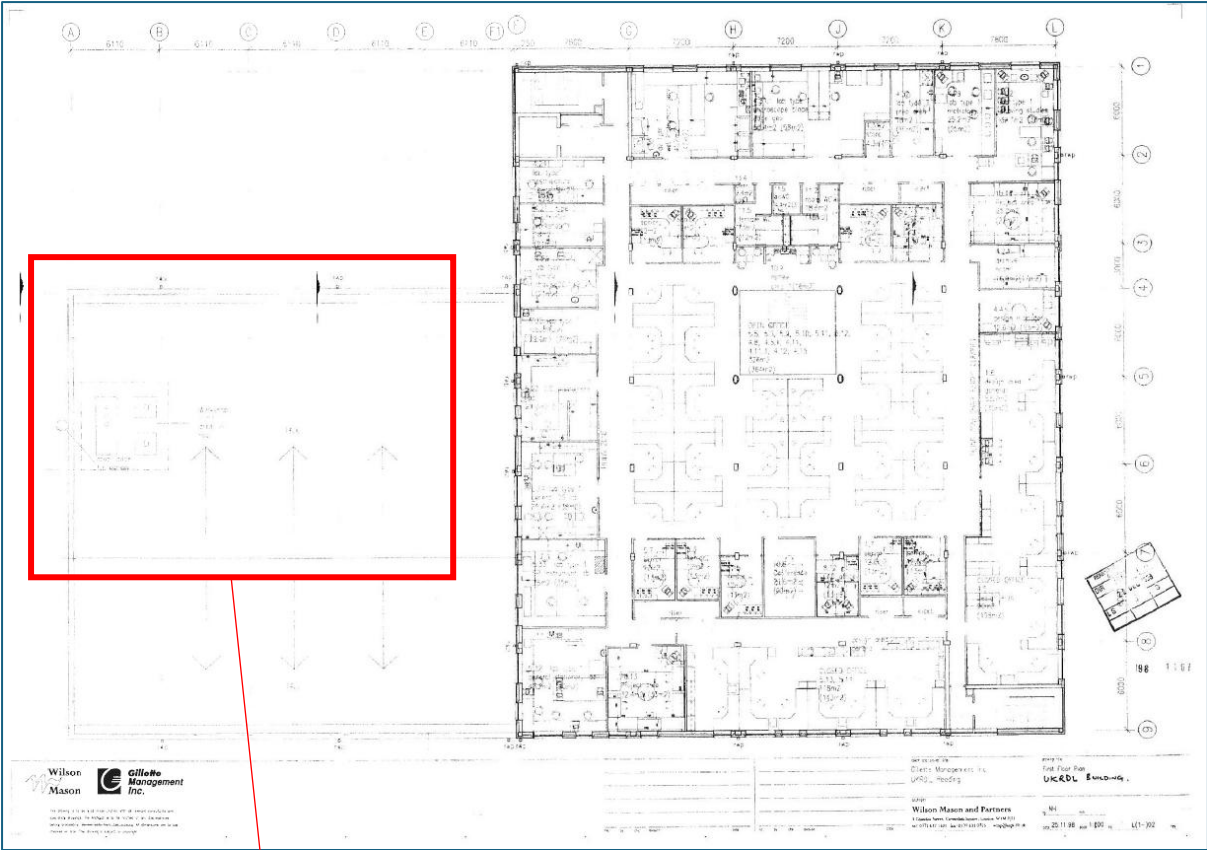
Workshop roof and approx. locations of proposed units.



Flat roof over the workshop, viewed from a first-floor laboratory.

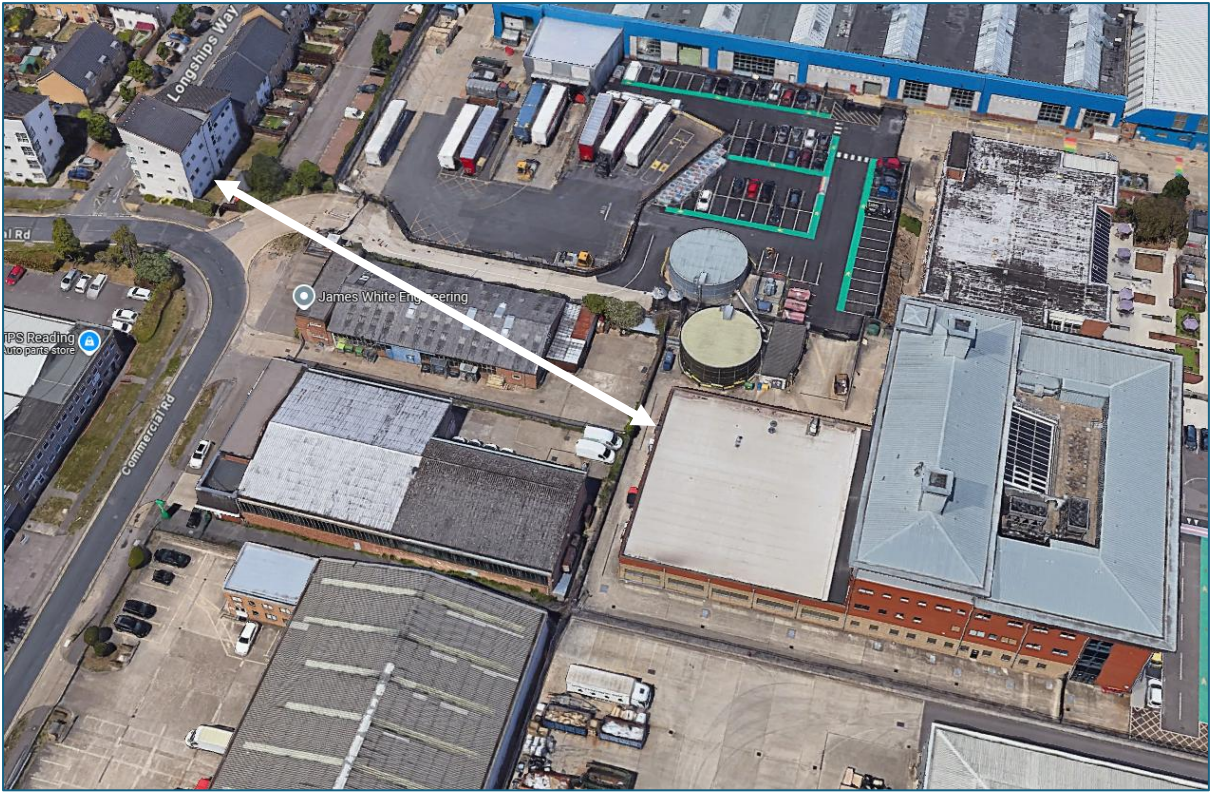


APPENDIX B





Proposed Cooler (left) and AHU (right) units



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