

PLANNING, DESIGN AND ACCESS STATEMENT

PROPOSED CHANGES TO OFFICES INCL PEDESTRIAN AND VEHICLE ACCESS

250 Brook Drive, Reading, RG2 6UA

794-PLN-NPI-12389
September 2025

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Draft	Client Review	GF/MR	CF	CF	10 Sept 25
Final	Submission	GF/MR/HW	CF	CF	18 Sept 205

Approval for issue

Camilla Fisher

18th September 2025

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

Grant Fixter
Senior Planner

Sherwood House
Sherwood Avenue
Newark
Nottinghamshire
NG24 1QQ

T +44 1636 605 700
E grant.fixter@rps.tetrattech.com

Prepared for:

AWE

Bryan Lyttle
Estate Planning and Development Lead

AWE
Aldermaston
Reading
Berkshire
RG7 4PR

Contents

1	INTRODUCTION	1
2	APPLICATION SITE	3
	The Green Park Site.....	3
	Application Site.....	3
	Planning History	4
3	PRE APPLICATION DISCUSSIONS.....	5
4	THE PROPOSED DEVELOPMENT	7
5	PLANNING POLICY CONTEXT	10
	Local Planning Policy	10
	Reading Borough Local Plan (2019).....	10
	Emerging Local Planning Policy	12
	National Planning Policy.....	12
6	PLANNING APPRAISAL	14
	Principle of Development	14
	Design and Access.....	14
	Character and Amenity.....	15
	Flood Risk.....	15
	Ecology	15
	Transport	17
7	SUMMARY AND CONCLUSION.....	18
	Planning Balance.....	18
	Conclusion.....	19

Appendices

Appendix A – Pre-application response

1 INTRODUCTION

- 1.1 This Planning, Design and Access Statement (PDAS) has been prepared by RPS on behalf of AWE (the Applicant), to support the submission of a planning application for site improvements to the existing 250 Brook Drive office site ahead of tenancy occupation.
- 1.2 Currently the existing building is unoccupied and the proposed development is described as *“Site improvements to include the installation of upgraded footpaths and their associated lighting, additional security measures in the form of bollards, planters, new and replacement CCTV and new ANPR, with associated electrical cabinet; new smoking shelter, bike shelter and associated charging and a new bus drop/pick up point (including waiting shelter and pedestrian barriers) and associated works.”*
- 1.3 The PDAS has been prepared having regard to the Council’s validation requirements, whilst incorporating a Design and Access section which includes a summary of the overall design approach taken for these upgrades.
- 1.4 The application is accompanied by a Flood Risk Assessment (FRA) which assesses risks to people and the environment for a variety of flood events, a Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment which assess the impacts of the Proposed Development on the natural environment.
- 1.5 The PDAS describes the Application Site and provides an overview of the Proposed Development. It considers the relevant legislation and planning policy framework and goes on to assess the proposals within that context, in addition to considering several technical reports which accompany this submission. The PDAS is structured as follows:
- Section 1 provides an introduction to the PDAS and Proposed Development;
 - Section 2 discusses the Application Site, its surroundings and the planning history;
 - Section 3 provides an overview of the Pre-application discussions which have taken place;
 - Section 4 provides an overview of the Proposed Development;
 - Section 5 outlines the relevant local and national planning policies in respect of the Proposed Development;
 - Section 6 comprises the Design and Access Statement, discussing the relevant elements of the Proposed Development and how the scheme has developed as well as providing the planning appraisal of the Proposed Development against the relevant local and national planning policies; and
 - Section 7 presents the planning balance argument and provides a conclusion to the PDAS.
- 1.6 This statement should be read alongside the following application drawings and documents submitted in support of the planning application:
- Covering Letter;

- Flood Risk Assessment ref ENV20926;
- Ecological Appraisal Report ref LAN5156-770;
- Biodiversity Net Gain Assessment ref LAN5156-770;
- Drawings:
 - Proposed layout plan ref AES/0003560/0022 Rev03
 - CCTV main building locations R-D3165-EVO-TH-00DRW-YY-680
 - Bus waiting shelter plan ref 12389-0022-01
 - Smoking shelter plan ref 12389-0024-01
 - E-Bike cycle shelter plan ref 12389-0023-01
 - ANPR/CCTV equipment plan ref 12389-0025-01
 - Safetyflex surface mount planter drawing SL001-167
 - Safety Flex retractable bollard plan RB003-50 52
 - Safety Flex static bollard plan TS006+100 23
- Data Sheets:
 - Parabola Bollard Light data sheet
 - Pedestrian guardrail - JSW 36 issue 03 data sheet
 - TBSC Ebike shelter data sheet
 - CBTO4 4m tilt CCTV data sheet
 - TP4S 4m tilt CCTV data sheet
 - Safetyflex surface mount planter data sheet
 - RB003-50 bollard data sheet
 - Truckstopper 6-30 data sheet
 - Sulham Woodmeadows BNG Stats

2 APPLICATION SITE

The Green Park Site

- 2.1 The Green Park Business Park is on the southern edge of Reading between the centre and the M4 Junction 11 and was originally developed in 2000. The surrounding site comprises of numerous office buildings generally centred around the Longwater Flood Relief Channel. The park is entirely within Reading Borough and is designated within the Local Plan as a core employment area for office and commercial use. It is now supplemented with a residential area and a railway station.
- 2.2 The park has a focus on green landscaping by utilising its lakeside with a boardwalk and habitat areas for local wildlife. Although it is not a designated nature reserve, reports show there are over 60 birds, 11 dragonfly species and various others have been sighted within the park. The Foundry Brook corridor runs along the eastern boundary of the site and forms part of Readings green network. The park has various initiatives and can source its electricity entirely from renewable energy. There are no ecological designations within or immediately adjacent to Green Park, the nearest Local Wildlife Site is Fobney Meadows which is over 1km away.

Application Site

- 2.3 The application site relates to 0.41ha within the wider site associated with 250 Brook Drive (hereafter referred to as the application site and the wider site accordingly). The wider site is located towards the eastern side of the business park and includes the existing building, surface parking areas and landscaped borders. The existing building has three floors providing 65,000sq ft. It was constructed with the first phase of Green Park's development and has been continually occupied since then, although currently vacant whilst the Applicant makes required upgrades ahead of occupation.
- 2.4 Surrounding the existing building are surface car parks, footpaths and landscaping for the use and enjoyment of the building occupiers. There are no residential buildings on this plot or adjacent to it. The EA Flood Map for Planning (available online) indicates that the wider site is located within Flood Zone 2, with the exception of the western footpath at the back of the building which is partially located in Flood Zone 3; further detail is set out in the submitted Flood Risk Assessment (FRA).
- 2.5 The wider site and the application site have no specific ecological or tree-designation constraints. It is a previously developed, managed office plot. There are trees within the wider site, none of which are covered by a Tree Preservation Order. Ornamental trees are located within the application site.
- 2.6 The wider site is close to Foundry Brook and is linked to the ecology there. However, all works proposed as part of the application comply with the 10m boundary requirement to the Brook. There are no other statutory constraints, the nearest SSSI (the Kennet and Avon Canal) is approximately 10km away. There are no heritage constraints on the site.
- 2.7 The application site falls within Reading's defined settlement boundary and an area designated for employment with no overlay of special designations on the Local Plan Policies Map.

Planning History

2.8 The wider site's planning history is related to its original development and subsequent security requirements. Green Park business park development was constructed in 1999, since then several planning approvals have been granted within the boundary of 250 Brook Drive which are relevant to the current proposal, as set out in Table 1 below:

Table 2-1: Planning History

Reference	Description	Decision	Decision Date
PL/00/0373	Installation of 3 pole-mounted CCTV cameras, 3 ram raid bollards, a back-up generator and battery system	Approved	11/10/2000
PL/00/0079	Installation of company logos and other directional signage on the building precinct	Approved	13/11/2000
PL/01/1400	Erection of smoking enclosure on roof terrace of the building, and of security barrier and the perimeter of the site.	Approved	27/03/2001
PL/02/0425	Installation of 1 pole mounted CCTV camera (Retrospective).	Approved	18/06/2002
PL/11/0678	Discharge of conditions of planning permission 00/00795/FUL	Conditions Discharged	04/10/2011
PL/22/0769	External refurbishment works the existing office building (Use Class E(g)), including alterations to the main entrance, elevations, and roof (to include the installation of PV panels), landscaping works, and amendments to form an external cycle store	Approved	21/10/2022

2.9 The above history shows that there has been a pattern of minor works to support the requirements of the occupants.

3 PRE APPLICATION DISCUSSIONS

- 3.1 A pre-application submission was made to Reading Borough Council, as the Local Planning Authority (LPA) In December 2024. At this time the proposed works were “proposed erection of 2m high security fencing, pedestrian and vehicular access gates, CCTV cameras (18 in number on the corners of the building) and additional car park lighting at an existing office building”.
- 3.2 A meeting was held between the Applicant and the LPA on 30th January 2025 where the proposals were further discussed, by which time also included the proposal of an outdoor smoking shelter and associated works.
- 3.3 The LPA provided written response on the 11th February 2025 which can be seen in Appendix A.
- 3.4 Subsequent to the pre-application discussions, refinements were undertaken to the proposals including the reduced fence height and associated gate from 2m to 1.5m and taking on board comments from the Landscape officer the alignment of the fence was reviewed and was moved back from the highway to behind the existing vegetation treatment. This has reduced the impact on the street scene.
- 3.5 The Applicant wrote to the LPA (via email) on the 6th March 2025 setting out the amended fence alignment and that they were of the opinion that the fence would now fall as Permitted Development under Schedule 2, Part 2, Class A of the General Permitted Development Order which allows for the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, subject to the below conditions. The Applicant set out how the proposals complied with the conditions which are reflected below.

GPDO Conditions	Compliance
<i>(a) the height of any gate, fence, wall or means of enclosure erected or constructed adjacent to a highway used by vehicular traffic would, after the carrying out of the development, exceed— (i) for a school, 2 metres above ground level, provided that any part of the gate, fence, wall or means of enclosure which is more than 1 metre above ground level does not create an obstruction to the view of persons using the highway as to be likely to cause danger to such persons</i>	Not applicable
<i>(ii) in any other case, 1 metre above ground level;</i>	Due to the alignment of the fence to behind the vegetation bund and trees, this would not be classed as adjacent to the highway
<i>b) the height of any other gate, fence, wall or means of enclosure erected or constructed would exceed 2 metres above ground level;</i>	No – 1.5m in height
<i>(c) the height of any gate, fence, wall or other means of enclosure maintained, improved or altered would, as a result of the development, exceed its former height or the height referred to in paragraph (a) or (b) as the height appropriate to it if erected or constructed, whichever is the greater; or</i>	Not applicable

<i>d) it would involve development within the curtilage of, or to a gate, fence, wall or other means of enclosure surrounding, a listed building.</i>	No, the building is not listed.
---	---------------------------------

Table 3-1 – Conditions of Schedule 2, Part 2, Class A and project compliance

- 3.6 The LPA reviewed the information and confirmed on the 16th April 2025 that they concurred with the Applicant that the fence is Permitted Development.
- 3.7 Whilst the fencing is no longer part of the proposals for which planning permission is required, the Applicant confirms that the fencing to be installed will include hedgehog holes as requested by the Ecologist as part of the pre-application response.
- 3.8 The Applicant can also confirm that the fencing will not have any impact on the existing visibility splays at the site and gates will be appropriately set back, open into the site and remain open during day-time working hours.

4 THE PROPOSED DEVELOPMENT

- 4.1 As set out above, the application site is part of the wider 250 Brook Drive site. The application site area is 0.41 hectares and has been drawn to take into account only those elements of the site upgrades which require planning permission.
- 4.2 The overarching requirement for the proposed development is to increase the security of the site to meet the requirements of the Applicant ahead of tenancy occupation. Other aspects, such as the footpaths and shelters are for the betterment of the employees and to encourage sustainable modes of transport to work as an alternative to the car.
- 4.3 As set out on the submitted proposed layout plan ref AES/0003560/0022 Rev03 the proposed development will include the following:

Description	Location within site	Details	Plan ref for details
CCTV	On existing main building	14 wall mounted CCTV units	R-D3165-EVO-TH-00DRW-YY-680
Paved footpath	Around the front and eastern elevation of the building (annotated blue hatched on the plan)	3m wide, paved, level to match existing - Natural stone paving slabs with granite sett edging random pattern to match existing footpath between fire exit to decking area, Totalling 157.2sqm.	Proposed layout ref AES/0003560/0022 Rev03
Self binding gravel footpath	Around the western side of the building providing a pedestrian route to the smoking and EV charging shelters (annotated purple triangles on the plan)	1.5m wide, leading to 3m wide along the western & eastern elevation and then 1.5m to the rear, self binded gravel, totalling 142.53sqm.	
Paved footpath	Adjacent to existing bike rack and to front of building	1.5m wide, paved, totalling 15.8sqm	
Footpath lighting	Along proposed and existing footpaths around the building providing safe routes around the building and to the existing connecting footpaths external of the site.	59 lighting columns, 1m in height (AFFL), 360-degree distribution. 1800K “Amber” colour temperature bulb to ensure “bat friendly” lighting Dusk til dawn requirement.	Parabola Bollard Light data sheet
New bus drop/pick up point, including: vegetation removal, waiting shelter,	To the front of the building at the end of the existing access route, northern side.	Waiting shelter – 3m(w) x 2m(d) x 2.4m(h), 6sqm total floorspace. Back & left side fully enclosed with hardwood wall panelling. Frame finished with powder coating black (RAL9005) Galvanised pedestrian guard rail, 1.1m high Kerb and block paving to match existing	Bus Waiting Shelter plan ref 12389-0022-01. Pedestrian guardrail - JSW 36 issue 03 data sheet

Pedestrian barriers and new kerb.			
Security bollards	In front of the main building access and adjacent to the proposed e-bike charging shelter and existing storage compound	6 no. manually retractable, 0.950m high 38 no. static –1m high Mitre top, with stainless steel shroud	Safety Flex RB003-50 52 and Safety Flex TS006+100 23 plans and RB003-50 manually operated bollard and Truckstopper 6-30 data sheets
Smoking shelter	Pavillion smoking shelter (by Safety Storage Systems) to the west of the building.	3m(W) x 2m(D) x 2.4m (H), 6sqm total floorspace Back & right side fully enclosed with hardwood wall panelling. Frame finished with powder coating black (RAL9005)	Smoking Shelter plan ref 12389-0024-01
E-bike charging station with shelter	E-bike shelter to the west of the building.	4.1m(W) x 2.1m(D) x 2.1m (H), total 8.61sqm floorspace 10 bikes capacity, lockable access panel and secure locking bar. Galvanised steel	E-Bike cycle shelter plan ref 12389-0023-01 and TBSC Ebike shelter data sheet
Hardstanding for smoking and e-bike shelters	In shelter location	Totalling 22.8sqm Concrete with A393 anti crack mesh top and bottom	Proposed layout ref AES/0003560/0022 Rev03
Replacement and additional CCTV columns	Replacement of the existing CCTV posts at the rear of the building (x1 North West & x1 South West) and an additional post located where the proposed 3m paved footpath meets the existing footpath to the rear	4m (H) Tilt over cabinet base CCTV post with concrete bases 1.0m (L) x 1.0m (W) x 0.5m (D) Black in colour (RAL 9017)	ANPR/CCTV equipment plan ref 12389-0025-01 and CBTO4 4m tilt CCTV data sheet
New CCTV column	One new post on the west side of the first bellmouth to the parking areas	4m (H) Tilt over square section CCTV post with concrete base 1m (L) x 1m (W) x 0.5m (D) Black in colour (RAL 9017)	ANPR/CCTV equipment ref 12389-0025-01 TP4S 4m tilt CCTV data sheet
ANPR	Site entrance (inside inbound gate between footpath & edge of road)	1No. 1m high ANPR camera post with associated 0.45m x 0.45m concrete base Black in colour (RAL 9017)	ANPR/CCTV equipment ref 12389-0025-01
Electrical cabinet	Adjacent to the main entrance housing the CCTV and ANPR controls	1.5m wide, 0.45m depth and 2m in height. Black in colour (RAL 9017)	ANPR/CCTV equipment ref 12389-0025-01

Surface mounted planters	To the front elevation of the building (x4) and to the rear of the service compound gates (x2)	6 units in total providing additional vehicular security and landscape treatment. 2m long, 1.2m wide and 0.87m height.	Safetyflex surface mount planter drawing SL001-167 and Safetyflex surface mount planter data sheet
---------------------------------	--	--	--

- 4.4 The proposed building mounted CCTV, whilst only 14 in number, does not fall to be considered as permitted development due to the proximity of the locations (shown as blue dots on the submitted plan ref R-D3165-EVO-TH-00DRW-YY-680) and as such do not meet the tests of the GPDO.
- 4.5 Vehicular and pedestrian access into the site off Brook Drive will be unaffected by the proposed development with only internal upgrades for the betterment of the site's operations. There will be no change to the sites function, and therefore no increase in traffic or footfall. Existing parking spaces are not affected by the proposed upgrades. Disabled spaces are to be provided on site. These are formed within existing parking spaces by painting additional lines and does not constitute development for which planning permission is required. Adjacent to these spaces will be EV charging points, which fall as permitted development. These are shown for information only.
- 4.6 The proposals result in the removal of removal of two trees, a small section of hedgerow, a small area of grassland. Further details are set out in the submitted Ecology and Biodiversity Net Gain reports.

5 PLANNING POLICY CONTEXT

- 5.1 This section of the PDAS considers relevant planning policy framework for the site and surrounding area, specifically considered against the development plan and other policy guidance. The development plan for this site is the Reading Borough Local Plan, adopted in 2019, and the National Planning Policy Framework (NPPF) is also directly considered. Relevant local and national policies, and the sites planning history with a focus on the proposed changes to CCTV, ANPR, footpath and shelter provision.

Local Planning Policy

- 5.2 Any proposed development must be judged against the relevant development plan and other planning policy and guidance. The Reading Borough Local Plan forms the main reference point. Policies relevant should be referred to in accordance with the statutory development plan unless material considerations indicate otherwise.
- 5.3 The Reading Borough Local Plan 2019's applicable policies are as follows:
- CC1: Presumption in Favour of Sustainable Development
 - CC3: Adaption to Climate Change
 - CC5: Waste Minimisation and Storage
 - CC7: Design and the Public Realm
 - CC8: Safeguarding Amenity
 - EN11: Waterspaces
 - EN12: Biodiversity and the Green Network
 - EN14: Trees, Hedges and Woodlands
 - EN16: Pollution and Water Resources
 - EN18: Flooding and Drainage
 - TR1: Achieving the Transport Strategy
 - TR3: Access, Traffic and Highway-Related Matters
 - TR4: Cycle Routes and Facilities
 - TR5: Car and Cycle Parking and Electric Vehicle Charging

Reading Borough Local Plan (2019)

- 5.4 CC1: Presumption in Favour of Sustainable Development reflects the NPPF's ruling of sustainable development. The Council will take a positive approach to proposals that accord with the plan and contribute to sustainable development.
- 5.5 CC3: Adaption to Climate Change requires developments to demonstrate how they have been designed to incorporate measures to adapt to climate changes, specifically the 4th criterion requires

development to minimise the impact of surface water runoff and include resilience measures for any increases in river flooding levels as a result of climate change.

- 5.6 CC5: Waste minimisation and Storage is aimed at ensuring developments make provision for waste management generated by the works. Construction waste must be managed responsibly, and new shelters should not impede existing waste storage on site.
- 5.7 CC7: Design and the Public Realm, requires all development to be of a high design quality, maintain or enhancing the character and appearance of the area. The design of the new shelters, pathways and equipment will need to high quality and sympathetic to Green Park setting. Development should create a safe environment and discourage crime through good design, consistent with Secured by Design principles.
- 5.8 CC8: Safeguarding Amenity, states that development should not negatively impact the environment of surrounding occupiers. The site is in a commercial area, so this policy is relevant to potential effects such as noise or light pollution from the security lighting or cameras. It will be expected to avoid unacceptable glare, noise or other disturbance to nearby businesses and should not harm the comfortable environment of Green Park.
- 5.9 EN11: Waterspaces, seeks to protect and enhance watercourses and their corridors. Development must not adversely affect the function or setting of the brook and should maintain a buffer clear of development (10m) to protect biodiversity.
- 5.10 EN12: Biodiversity and the Green Network tasks prevention to net loss of biodiversity and encourages net gains. The site forms part of Reading's Green Network. The proposal should be designed to minimise impacts on existing landscaping and wildlife. Any removal of vegetation will need to be ecologically compensated and enhanced in line with EN12.
- 5.11 EN14: Trees, Hedges and Woodlands policy protects important trees intending to extend tree cover in the Borough. There are several mature trees that exist around the building. The development should retain existing trees wherever possible and incorporate new planting if any trees are unavoidably lost. A tree survey will be expected and an Arboricultural Impact Assessment (AIA). The Reading Tree Strategy (2021) also identifies priorities for tree planting in Reading and enforces mitigation planting if tree removal is proposed.
- 5.12 EN16: Pollution and Water Resources section requires that developments do not result in unacceptable pollution to air, water, and other environments. The proposals additional lighting will need to be designed to be wildlife friendly, avoiding excessive lighting near the brook or trees. There is no indication of risk of pollution from the proposal.
- 5.13 EN18: Flooding and Sustainable Drainage must be considered. Requirements for anything in flood prone areas must be safe and involve flood mitigation drainage. Works are minor and at ground level, however the design of new hard surfaces such as the new footpaths, should make sure that no increase in surface water is possible and use permeable materials where appropriate.

- 5.14 TR1: Achieving the Transport Strategy, aligning the development with Reading's Local Transport Plan goals to encourage sustainable travel choices. Pedestrian footpaths sheltered cycle parking and a bus shelter all positively respond to TR1 by allowing for ease of use for non-car modal travel.
- 5.15 TR3: Access, Traffic and Highway-Related Matters policy ensures that new access for works do not hinder the safety of the arterial roads. Alterations at the site entrance must maintain visibility and safe operation. TR3 states that development will only be permitted where any new or altered accesses are safe and suitable, without impacting congestion or the environment. The applicant can confirm that sightlines at the entrance are kept clear and that gates are set back from the road, and that the ANPR system shall not affect the public roads. The internal footpath will improve pedestrian safety within the site, and there is not an increase in vehicle parking, so traffic will remain unchanged by the proposal.
- 5.16 TR4: Cycle routes and facilities encourages developments to improve access for cyclists, both from and within the development and to integrate cycling through the provision of new facilities and the development of new facilities for cycling will be acceptable. It also seeks for cycle routes to not be detrimentally impacts by development and for improvements to routes and/or cycling facilities to be sought either within documents, or via planning contributions. The Proposed Development has no impact on existing cycle routes however does provide an e-bike charging station and shelter, encouraging an alternative, sustainable mode of transport to the site.
- 5.17 TR5: Car and Cycle Parking and Electric Vehicle Charging seeks for developments to provide car and cycle parking that is appropriate to the accessibility of locations to sustainable transport facilities, with a particular focus on public transport. As a whole, the Proposed Development encourages alternative, sustainable modes of transport to the Site, and provides a secure e-bike shelter with a capacity for 10 bikes.

Emerging Local Planning Policy

- 5.18 Reading Borough Council is in the process of a Partial Local Plan Update looking to extend the term to 2041 and update certain policies. The most recent update was in May 2025 when the partial update was submitted for examination, but has yet to be adopted. There is an emphasis on strengthening climate change, sustainability, and expectation to introduce more requirements for low-carbon development and BNG.
- 5.19 Relating to the proposal, the update does not significantly affect the policies relevant to this proposal. The focus within the appraisal section will remain on complying with the adopted 2019 Local Plan policies summarised, whilst referring to emerging policy if applicable.

National Planning Policy

- 5.20 The NPPF promotes the need for sustainable development. Proposals that accord with the development plan should be approved without delay (NPPF paragraph 11). In this case, the scheme is a sustainable investment in existing employment premises and raises no strategic policy conflicts.

- 5.21 Relevant sections of the NPPF include well-designed places. Planning decisions should ensure developments are sympathetic to local character, create safe and inclusive environments and do not harm amenities. Paragraph 102 of the NPPF is directly relevant to this proposal's security measures. It states that "planning policies and decisions should promote public safety and take into account wider security and defence requirements by anticipating and addressing possible malicious threats... in locations where large numbers of people are expected to congregate." Developments should feature proportionate steps to ensure public safety. The proposed CCTV and ANPR cameras are aimed at improving safety and security for the building's occupants. The scheme helps reduce the risk of potential crime through good design.
- 5.22 The NPPF also includes promotion of sustainable transportation, for example prioritising pedestrian and cycle movements. The inclusion of pedestrian pathways and e-bike shelters is consistent with this national policy by supporting alternatives to car use.
- 5.23 Environmental sustainability is expected from developments to conserve and enhance the natural environment (Chapter 15). Minimisation of impacts to biodiversity and providing net gains as well as preventing development from increasing flood risk. This proposal will align with these principles as it is designed to avoid ecological harm. There will be no building works closer than 12m to the brook and will only incorporate small scale enhancements to be in line with paragraph 174 and the mandatory net gain requirements. Flood risk has been given consideration as the site is in Zone 2 and the vulnerable elements of the scheme are low. Permeable surfacing will be used to ensure compliance with managing flood risk.
- 5.24 The project represents proportionate enhancement of existing employment building that reflects the NPPF balanced approach. It supports economic use of land, whilst improving sustainability.

6 PLANNING APPRAISAL

Principle of Development

- 6.1 The application site is located within Green Park Core Employment Area as defined within both the adopted and emerging local plan. No change of use is proposed as part of this application and 250 Brook Drive would retain its existing use as an office providing employment. The proposals relate to security and site betterment proposals to support the continued use of the existing office building.
- 6.2 As such, the principle of development is deemed acceptable and the Proposed Development complies with the appropriate local and national policies in this respect.

Design and Access

- 6.3 Policy CC7 (both adopted and emerging) requires high quality design in all development and for development to maintain and enhance the character and appearance of the surrounding area. This application seeks to enhance the working environment, alongside additional security requirements with no change to the building itself or gross internal area.
- 6.4 The Proposed Development has been designed to reduce, as far as possible, any potential negative impacts on the environment. This has been achieved through the selection of appropriate materials and siting of the proposed shelters. The Proposed Development will comprise appropriate uses and scales which effectively integrates into the surrounding environment.
- 6.5 The security measures proposed are constrained by functional requirements, however the Applicant has sought to ensure that impacts are minimised by the choice of surface mounted planters which act as vehicle deterrents whilst offering a soft, visual experience also. The additional security measures will not impinge the access to the Application Site which would cause a detriment nor disrupt the internal circulation of the Application Site.
- 6.6 There is no change to the existing vehicular and pedestrian access to the site proposed as part of this application, which has appropriately served operations on site and will continue to do so. The proposed alterations to the footpaths are all within the Application Site, will aid access and improve circulation whilst providing access to other elements which form part of the Proposed Development, such as the smoking and bike shelters.
- 6.7 There would be no increase in vehicle movements as a result of the Proposed Development; indeed the proposals will aid encouragement of alternative forms of transport to the site via the provision of an e-bike shelter and charging provision and a betterment in facilities regarding the provision of a bus drop off point and shelter.
- 6.8 Additionally, the Proposed Development will not impede the existing waste storage on the Application Site. Minimal waste is envisaged to arise from the Proposed Development and will be managed responsibly, in accordance with Policy CC5 of the Local Plan.

Character and Amenity

- 6.9 The Proposed Development falls within the existing confines of Green Park with no residential neighbours, meaning adjacent uses are not sensitive.
- 6.10 Owing to the form of development, there would be no overlooking, overbearing, overshadowing or loss of privacy issues as a result of the Proposed Development. It will be seen as subservient to the existing building and not have any detrimental impact on the character of Green Park.
- 6.11 The proposed use does not represent a form of development associated with potential disturbance. The proposed lighting is low level and 1800K “Amber” colour temperature bulb is proposed to ensure “bat friendly” lighting.
- 6.12 There will be no significant impacts in respect of amenity levels, meaning the Proposed Development complies Policy CC8 of the Local Plan in this respect.

Flood Risk

- 6.13 Due to the location of the application site, and the proposed additional footpaths and areas of hardstanding, a Flood Risk Assessment (FRA) has been submitted as part of the application. The aim of the FRA is to outline the potential for the site to be impacted by flooding, the potential impacts of the development on flooding both onsite and in the vicinity, and the proposed measures which can be incorporated into the development to mitigate the identified risks. The report has been produced in accordance with the guidance detailed in the NPPF.
- 6.14 The site is located within Flood Zone 2 and partially within Flood Zone 3. Although the site is not within a recognised area which benefits from formal flood defences, Spatial AIMS defence data shows that there are ‘informal’ flood defences in the vicinity of the site with a 1 in 2-year standard of protection.
- 6.15 When climate change allowances are included, during the 1% + 25% CC and 35% CC event, the flood extent slightly encroaches into the site, impacting the pedestrian access to the west, the site building still appears to remain out of the flood extent.
- 6.16 EA Surface Water flood modelling indicates that the site has a ‘very low’ risk from surface water flooding.
- 6.17 Overall, it has been demonstrated that the proposals would be safe, without increasing flood risk elsewhere and thus considered to be in accordance with adopted and emerging policies CC3 and EN18 of the Local Plan.

Ecology

- 6.18 An Ecological Appraisal has been prepared which confirms the impacts of Proposed Development are minimal. The proposals result in the removal of two trees, a small section of hedgerow, a small area of grassland. Hedgerow removal will be undertaken outside of the bird nesting season (late February-August inclusive) to avoid disturbance, where practicable. If undertaken during the nesting season, an Ecological Clerk of Works (ECoW) will be consulted prior to the removal of the hedgerow.

- 6.19 No works are proposed immediately adjacent to the brook, the closest being 15m avoiding any encroachment or harm to the watercourse environment, fully compliant with policy EN11.
- 6.20 As set out in the submitted Biodiversity Net Gain (BNG) report, the development proposals result in a total net unit change of -0.15 habitat units and -0.02 hedgerow units, resulting in a requirement of 0.18 (habitat) and 0.03 (hedgerow) units to meet a 10% BNG. No landscaping or enhancement is proposed and the future vegetation to be within the planters has not been included within any BNG calculation. Other enhancement measures recommended within the Ecological report, such as bird boxes and insect houses will be considered as part of the wider site improvements however are not included within this proposal as suitable locations are outside of the redline.
- 6.21 In order to satisfy BNG requirements, the proposal is to purchase the required units at an off-site location where units are readily available as close as possible to the application site. The rationale for this being that, although the requirement of 0.18 habitat units and 0.03 hedgerow units to achieve the 10% gain, could be provided outside the redline on the wider 250 Brook Drive site, as the Applicant is only entering into a 10-year lease they are not able to sign up to the statutory 30 year management. Discussions with the landowner have not been able to establish an agreement to take on this management after the lease ceases. Landscaping upgrades are being proposed by the Applicant for the betterment of the location for the enjoyment of employees, but these are not part of the application or tied in as BNG.
- 6.22 To this end, the Applicant has made contact with the nearest location identified via the Future Homes Hub UK service which currently has units to sell (this is a service which helps to connect developers with landowners, land managers and others developing and selling biodiversity units under BNG). The habitat bank identified, Sulham Woodmeadows (managed by BioCap Limited), is in the neighbouring LPA (West Berkshire), however the BNG scheme also allows another spatial category called National Character Areas (NCA). Green Park is within the Thames Valley NCA and part of the identified site falls within the same area.
- 6.23 This scheme allows for developers to purchase the applicable number of habitat units they require and make a one-off payment. This payment includes covering the 30 year management which the landowner has signed up. The Draft BNG Plan submitted as part of the application establishes how BNG is to be achieved, although cannot yet be completed until the planning permission progresses.
- 6.24 Further information regarding Sulham Woodmeadows can be found at [Sulham Woodmeadows | BioCap](#) and the submitted data sheet.
- 6.25 As such, it is clear there are no ecological reasons as to why the scheme cannot be developed and that the Proposed Development complies with both adopted and emerging EN12 of the Local Plan, particularly with regards to off-site BNG when on-site provision is not achievable.

Transport

- 6.26 The Application Site will utilise the existing internal access road and there will be no net increase in vehicle movements. The proposals to the pedestrian footpath's increase pedestrian safety and allow for easier circulation internally around the Application Site.
- 6.27 There is sufficient space for on-site parking, with some existing bays being redefined with white markings for more efficient parking on site with the inclusion of disabled spaces. There will be a total of 11 marked disabled parking bays close to the main entrance of the building. These are formed within existing parking spaces by painting additional lines and therefore does not constitute development for which planning permission is required. There are no additional changes proposed to the existing vehicle parking arrangement. Therefore there will be no net loss of car parking spaces as a result of the Proposed Development.
- 6.28 Additionally, the proposal provides a secure e-bike charging station and shelter with a capacity of 10 bikes, encouraging an alternative and sustainable mode of transport to the site. This is in addition to the existing bike rack provision, providing a net gain in cycle storage and a new e-bike charging station and shelter.
- 6.29 The existing manual drop down bollards at the entrance to the Application Site are to remain. The proposed ANPR system will not affect public roads and shall be set back from the public highway.
- 6.30 Therefore, the proposed development is considered in accordance with Policies TR1, TR3, TR4 and TR5 of the Reading Borough Local Plan.
- 6.31 As such, it is considered that there would be no significant impacts upon the public road network as a result of the Proposed Development.

7 SUMMARY AND CONCLUSION

- 7.1 The Proposed Development constitutes the installation of upgraded footpaths and their associated lighting, additional security measures in the form of bollards, planters, new and replacement CCTV and new ANPR, with associated electrical cabinet; new smoking shelter, bike shelter and associated charging and a new bus drop/pick up point (including waiting shelter and pedestrian barriers) and associated works.
- 7.2 These additions and replacements are required to increase the security of the site ahead of tenancy occupation alongside creating a betterment to the site for employees and to encourage alternative, sustainable modes of transport to work.
- 7.3 This report and the supporting assessments have demonstrated that these proposals are acceptable in all respects.
- 7.4 The external works are considered to be minor, improving the functionality and security of the site for the Applicant, whilst not having any detrimental impact to the surrounding environment or future users of the building.

Planning Balance

- 7.5 In respect of the principle of development, it has been demonstrated the Proposed Development complies with all relevant national and local planning policies and would assist in ensuring operations can effectively take place at 250 Brook Drive.
- 7.6 There will be no adverse impacts to the character and amenity of the area owing to the setting of the site, surrounding development and the scale of the Proposed Development.
- 7.7 The necessary security measures are functional and do not impinge on access to or within the Application Site, however the impacts of these features have been minimised via the choice of surface mounted planters which act as vehicle deterrents whilst offering a soft, visual experience also.
- 7.8 A Transport Statement is not required as the Proposed Development is for the same use as that existing, makes use of the existing internal road network and would not result in an increase in vehicle movements. The Proposed Development would aid in the movement and circulation of pedestrians around and within the Application Site as well as providing infrastructure to support and encourage alternative, sustainable modes of transport to the Application Site.
- 7.9 The submitted Ecology Appraisal confirms the Application Site could be developed without there being negative impacts on the surrounding ecology and an offsite BNG payment will ensure statutory requirements are met.
- 7.10 A Flood Risk Assessment which accompanies the submission confirms the Proposed Development would be safe and that the Application Site can be developed without being at risk of flooding or increasing risk to surrounding areas.

- 7.11 Overall, it is clearly demonstrated that the Proposed Development complies with all relevant policy and there are no technical reasons as to why permission should not be granted and the scheme cannot be developed.

Conclusion

- 7.12 The Proposed Development is considered acceptable in principle, as it is compatible with the existing surrounding uses, gives rise to no material harm, is in accordance with national guidance and the adopted Development Plan for the area, and there are no other material considerations to indicate that the application result in any negative impacts. In accordance with Paragraph 11 of the NPPF 2024 (the presumption in favour of sustainable development), the Proposed Development should be approved without delay.

Appendix A

Pre-application response

Camilla Fisher
RPS
20 Western Avenue,
Abingdon
OX14 4SH

Emma Gee
Acting Executive Director for
Economic Growth and
Neighbourhood Services

Civic Offices,
Bridge Street
Reading,
RG1 2LU
☎ 0118 9373787

Our Ref: PL/24/1668
Your Ref:

Direct: ☎
11 February 2025

Your contact is: Anthony Scholes, Planning

Dear Camilla,

PLANNING PRE-APPLICATION ENQUIRY RESPONSE

Pre Application Number: PL/24/1668

Location: 250 Brook Drive, Reading, RG2 6UA

Proposal: Proposed erection of 2m high security fencing, pedestrian and vehicular access gates, CCTV cameras (18) additional car park lighting at an existing office building, outdoor smoking shelter, and associated works.

Thank you for your enquiry.

Site Description and Surrounding Area:

The proposal site consists of a four-storey office building located within Green Park. The building is set 100m from the highway along Brook Drive. Associated vehicle parking is provided to the front of the site. The surrounding area is considered predominantly commercial with a mix of three storey offices which vary in scale, design and appearance.

The site is located within Flood Zone 2 as designated by the Environment Agency.

Proposal

The pre-application advice is sought in relation to the provision of a 2m high security fence around the perimeter of the site due to the security needs of the intended tenant.

Following our meeting on 30 January 2025, some additional elements were added to the proposal. These include an outdoor smoking shelter, connecting footpaths, up to 18 building mounted security cameras.

Relevant Planning History

990373 - Installation of 3 pole-mounted CCTV cameras, 3 ram raid bollards, a back-up generator and battery system. Approved 11 October 2000.

990799 - Installation of company logos and other directional signage on the building and precinct. Approved 13 November 2000.

990799/ADV - Installation of company logos and other directional signage on the building and precinct – Application Permitted on 13/11/2000

990373/FUL - Installation of 3 pole-mounted CCTV cameras, 3 ram raid bollards, a back-up generator and battery system – Application Permitted on 11/10/2000

011400/OUT - Erection of smoking enclosure on roof terrace of the building, and of a security barrier at the perimeter of the site. – Application Permitted on 27/03/2001

020425/FUL - Installation of 1 pole mounted CCTV camera (Retrospective). – Application Permitted on 18/06/2002

110768/APC - Discharge of conditions of planning permission 01/00049/OUT – No Conditions to Discharge on 04/10/2011

110766/APC - Discharge of conditions of planning permission 02/00502/FUL - No Conditions to Discharge on 23/09/2011

110678/APC - Discharge of conditions of planning permission 00/00795/FUL - No Conditions to Discharge on 04/10/2011

220769/FUL - External refurbishment works to the existing office building (Use Class E(g)), including alterations to the main entrance, elevations and roof (to include the installation of PV panels), landscaping works, and amendments to form an external cycle store. Approved 21 October 2022.

Consultees

RBC Ecology

- *The applicant should ensure that any plans comply with EN11: WATERSPACES (notably the bit about being fencing (para 4.2.50) being set back of 10metres from the watercourse).*
- *we would expect to see detailed plans marked up with the location of the hedgehog holes;*
- *Is there extra lighting proposed as part of the CCTV – any additional lighting to the north west where the Foudry is and near trees will need to be wildlife friendly*

Following the in-person meeting, BNG discussions required further comment from RBC's ecologist.

The ecologist provided the following: “... if they keep away from the stream (which is a priority habitat) it may be exempt from BNG as it would be below the de-minimis threshold.”

RBC Natural Environment Officer

The following points are raised by the natural environment officer to be addressed in any future application:

- *Proposals require tree removal, with exact numbers and a net gain to be confirmed*
- *We need a clear tree removal plan. And an AIA and AMS for any works.*
- *Landscape proposals will be required to mitigate tree / vegetation loss*
- *Full specifications for fence post hole installation to be provided*

- Confirmation of any tree branches providing climbing aid
- Details of electricity supply for gate and where that will be located
- Normal tree protection specs are not feasible so a clear statement on how damage to adjacent retained trees is avoided during works is required.

Thames Valley Policy Crime Prevention Design Advisor

There is limited information provided on the scheme proposals. However, the proposed 2m high security fencing would seem appropriate given the intended occupier of the offices (as named on the submitted drawings). Details of the security fencing (including the proposed security rating) should be provided with any future planning application. Fencing should be to at least LPS 1175 Issue 7 SR2 or equivalent, and higher specification may be appropriate depending on the precise use of the premises. The final scheme should also ensure that any trees located adjacent to the fence do not provide a climbing aid.

Details of the vehicular access gates should also be provided and these should be to the same height and security standard as the fencing. Security bollards to achieve PAS 68 (Vehicle Security Barriers) should also be considered at the entrance.

As a general comment, for specification of any works for the scheme more generally, I would recommend the applicant consults the Secured by Design Commercial Guide 2023.

The above comments are made on behalf of Thames Valley Police and relate to designing out crime only.

RBC Transport Officers

This pre-application enquiry is for the erection of 2m high security fencing, pedestrian and vehicular access gates, CCTV cameras (18 in number of the corners of the building) and additional car park lighting at 250 Brook Drive. There is limited information provided on the scheme proposals. The proposed fence layout is illustrated in the extract below.

If a full application is submitted, the following information is requested;

- *Visibility splays from the proposed vehicular access should not be impacted by the proposed fencing. Existing and proposed visibility splays should be submitted for review.*
- *Confirmation of the set back distance of the gates (from the carriageway) should be provided.*
- *Details of the type of gates proposed should be provided. Clarity on whether gates will be electronically operated and need electricity supply. How will authorised staff access the site. All gates should open into the site, away from the carriageway.*
- *Details of pedestrian access arrangements should also be provided.*

Relevant Planning Policy and Guidance

National Planning Policy Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given). Accordingly, the National Planning Policy Framework December 2024 and the following development plan policies and supplementary planning guidance are relevant and would be applied to any future proposal:

Reading Borough Local Plan 2019

CC1 Presumption in Favour of Sustainable Development
CC3 Adaption to Climate Change
CC5 Waste Minimisation and Storage
CC7 Design and the Public Realm
CC8 Safeguarding Amenity
EN2 Areas of Archaeological Significance
EN11 Waterspaces
EN12 Biodiversity and The Green Network
EN14 Trees, Hedges and Woodlands
EN16 Pollution and Water Resources
EN18 Flooding and Sustainable Drainage Systems
TR1 Achieving The Transport Strategy
TR3 Access, Traffic and Highway-Related Matters

Supplementary Planning Documents & other relevant documents/guidance

Reading Tree Strategy (2021)

Appraisal

The main issues are:

- Design considerations and impact on the character and appearance of the area
- Tree works and Ecology matters
- Transport matters
- Other matters

Design considerations and impact on the character and appearance of the area

Policies CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character:

“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form...”

Policy EN11 (Waterspaces) also states that:

“Reading’s waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor.”

The current proposal would see a 2m high black security fence erected to the street frontage and around the entire site for security needs of the future occupier. Though security needs are acknowledged, it is advised that in order to be acceptable the fencing to the street frontage would need to be set behind the existing vegetation as to avoid significant negative impacts on the character and openness of the roadway and surrounding public realm. Provided this change is made, there is likely to be sufficient justification for the fencing, based on the specific needs of the prospective occupier. A condition may be recommended that the fencing be removed if the occupier vacates the building. The proposal includes a gate, and controlled pedestrian access that would be setback a sufficient distance from the highway, including for highway safety as discussed below, which would be accepted visually despite its possible negative impact upon the character and appearance of the area.

To the rear, the proposed fence would be built to the outer boundary of the plot. This specific needs of the tenant are acknowledged however it is also necessary to avoid fencing being overbearing or overly-enclosing on the public footpath and its users. The alignment should be adjusted accordingly. Noting also the ecology points below which discuss the position of the fencing near Foudry Brook.

A number of supplementary aspects were discussed during our meeting. These included: various security cameras attached to the main building, large moveable planters that would act as anti-ram barriers to the front of the building, an external smoking shelter with a connecting pathway. These minor works are not considered to be readily visible from public areas, and are not considered objectionable within the setting of the building and its scale.

Tree Works and Ecology Matters

The application site is adjacent to Foudry Brook an area of ‘priority habitat’ and is within a mature landscaped setting. Trees and ecological matters will need to be carefully considered as discussed below.

Trees

Policy EN14 of the Reading Borough Local Plan (2019) states: *“Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”*

The proposed development requires the removal of a number of trees, though as noted above, the exact number is unclear. It would be expected that the natural environment officer’s comments are fully considered and addressed to ensure that any impacts on existing trees would be sufficiently managed and where necessary offset through alternative planting. This would include sufficient detail of the method of installation, and footing details, and provision of appropriate replacement landscaping to mitigate any harm.

Ecology

In relation to local policies regarding biodiversity, the site lies adjacent to a Green link (east of the site), and adjacent to a priority habitat (Foudry Brook) as per Policy EN12 (Biodiversity and the Green Network) which reads:

“a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network.

The Green Network comprises:

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
- Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, New development shall demonstrate how the location and type of green 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.*

New development shall demonstrate how the location and type of green 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

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

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. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.

Policy EN11 (Waterspaces) states: “Where development in the vicinity of watercourses is acceptable, it will:-

- Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;*
- Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses;*
- Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;*
- Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it;*
- Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;*
- Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses; and*

- *Pursue opportunities for deculverting of watercourses.”*

In addition to local policies, Biodiversity Net Gain is now mandatory for all developments, barring several exemptions. BNG would need to be maintained for a

30 year period required for BNG. The responsibility would rest with the landowner and this is something to be resolved between those parties with an interest in the land, separately from Planning.

In the first instance, the applicant is requested to provide detailed information to determine the baseline biodiversity value of the site via the biodiversity metric tool. The applicant would be responsible for demonstrating that the proposed development would or would not meet an exemption as set out within the Regulation. As RBC's Ecologist has advised, setting back the fencing from Foudry Brook, may change the status of the development with regard to mandatory BNG. Should the proposal demonstrate an exemption, BNG will not apply. It is advised that the applicant engage with RBC ahead of submission when a design is finalised to ensure the BNG approach is agreed.

Where the development would require Biodiversity Net Gain, it is acknowledged that on-site may not be possible. The application should detail how an off-site BNG would meet the biodiversity hierarchy for any off-site provision.

As noted within the RBC Ecology response above, the proposal is required to detail sufficient mammal gaps around the fencing, as well as detailing any additional lighting proposed.

With regard to policy EN11, specifically: *“Be set at least ten metres back from the watercourse **wherever practicable and appropriate** to protect its biodiversity significance;”*. It is noted that there may be practicable or other restrictions on achieving a 10m setback to the watercourse. Given the final location of the fence may be subject to change, the applicant is advised to consider the BNG matters, and RBC's ecologists comments. The applicant is also requested to provide a detailed statement as to how the proposal would protect the biodiversity significance in line with the policy requirements above.

Transport matters

Policy TR3 of the Reading Borough Local Plan states: *“In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.*

Development will only be permitted where:-

- i) Accesses and works to the highway comply with the adopted standards of the Transport Authority;*
- ii) The development would not have a material detrimental impact on the functioning of the transport network;*
- iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*
- iv) The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and*
- v) For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.”*

Given the design of the access gates, and pedestrian access is acceptable in design terms, the applicant would only be required to provide sufficient information ...

Other Matters

It is noted that the applicant has sought clarification on a number of points:

Red Line Plan

There is no objection to the indicative red line plan accompanying this enquiry. The remainder of the site should be included in a blue line plan, and the areas of works covered by a red line plan.

Indicative location of CCTV

The exact location and design for CCTV is not necessarily expected with the application. Indicative locations, or zones would be sufficient for the planning application.

Off-site BNG

Subject to BNG being required, off-site BNG in lieu of on-site may be an acceptable solution. The applicant queried if Reading Borough Council had any programs for off-site BNG. Unfortunately, RBC does not have any current programs that officers would be aware of. The applicant should carefully consider the BNG hierarchy when considering the approach to off-site BNG, including engagement with Council to ensure any separate commercial agreement is acceptable.

Conclusion

In line with the above, officer's acknowledge that some form of security fencing is necessary for the proposed occupiers of the premises who have entered a 10 year lease for the building. The potential impacts of the fencing, though negative to the open green character of the area are likely to be supported on balance based on the specific needs, and security considerations. This is subject to the fencing being set behind the existing belt of trees to the frontage, and set back from the footpath to the rear. The removal following cessation of the lease/need for the fencing could be included in a condition should this be considered necessary. The remainder of the scheme would appear to have limited impact on the character and appearance of the building and the area given the extensive setting of the building, and setback from the highway and publicly accessible areas. There is a need to carefully consider and ensure that all impacts upon the natural environment (ecology and trees) are adequately compensated for within the proposal. Follow-up pre-application advice in relation to BNG may be advisable when a final design is confirmed.

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

SDV

pp

Anthony Scholes
Senior Planning Officer