

PLANNING STATEMENT

PREPARED BY



ON BEHALF OF PROCTOR & GAMBLE

**NEW AND REPLACEMENT ROOF PLANT,
WALKWAYS AND ENCLOSURES, AND NEW
ACCESS STAIRS (REVISED PROPOSAL)**

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

NOVEMBER 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.
- 1.3 The building provides an important product testing and development function. It employs a significant scientific workforce. The Reading Innovation Centre is important for the area economically and helps to cement Reading's status as a major science/industrial centre.
- 1.4 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, now decommissioned).
- 1.5 The air handling unit units for the workshop have reached the end of their economic life. The internal units present operational issues within the building and are also difficult to maintain. Therefore, these facilities are to be relocated, externally. Several related challenges arise, primarily regarding service and maintenance access, but also the safety of staff.
- 1.6 Although permitted development rights facilitate some plant installations, the scale, location and related access arrangements mean that detailed planning permission is required for the proposed works.
- 1.7 Permission was granted for ostensibly the same development described above by notice dated 6th June 2025 (PL/25/0391). This application should be seen as a revised version of that proposal.

- 1.8 Following the grant of planning permission, the applicant determined that the proposed spiral staircase (providing maintenance access to the roof) was neither fit for purpose nor operationally acceptable.
- 1.9 Although the staircase would have improved upon the existing cage ladder, the structure would sit immediately adjacent to plant cupboard doors and external condenser units; the minimum clearance requirements of which would be impeded by the stairs. The staircase would also present access and safety issues, particularly for operatives moving tools and/or spare parts to this location (noting there is no direct access onto the roof from the R&D building).
- 1.10 It was decided, therefore, that alternative stairs should be installed on the south side of the building, where constraints are minimal and a straight, twin flight set of stairs can be installed without any notable complication.
- 1.11 The appropriate route to consenting has been carefully considered.
- 1.12 The revised proposals involve not only revised siting, but stairs of a different design. A non-material amendment (pursuant to s96A) or a minor material amendment (pursuant to s73) have, therefore, been ruled out. Likewise, an application for a standalone set of stairs would, notwithstanding the constraints identified at 1.7 above, leave open the prospect of being able to implement two sets of stairs, which should be avoided.
- 1.13 Accordingly, a separate, revised planning permission, is being sought.
- 1.14 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 replacement and 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 an external staircase, now positioned on the south side of the building.
- Decommission 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 this.

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

2.9 Building Regulations approval for the works will be sought in due course.

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. The Council has submitted a revised Local Plan to the Planning Inspectorate. The related Examination is underway and, therefore, increasing weight may be applied to the revised policies therein. However, our review of the Submission version document confirms that there are no changes to relevant policies and objectives that could conceivably bring the Council to a different position.

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. The principle of installing roof plant enclosures was firmly established through approval of PL/25/0391.
- 4.2 The positioning of two new plant enclosures on the roof was acknowledged as a visual alteration from the prevailing situation, where there is only a single fan unit installed (albeit decommissioned). However, the existing unit is located adjacent to the roof parapet, with no screening (see 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 approved 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. The Council explicitly agreed with this conclusion in its determination of PL/25/0391.
- 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. No objection was raised in relation to PL/25/0391.

- 4.6 As before, notable detail is submitted with this revised 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 (see image at Appendix C), thereby uniting the plant elements. The extant planning permission includes conditions requiring the development to be implemented in accordance with the submitted drawings and details, and we anticipate the Council will take the same approach to the present planning application.
- 4.8 Thus, whilst 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 Notwithstanding the applicant's original position regarding Policy EN17, a Noise Assessment was subsequently submitted and reviewed by the Council's EHO. It was agreed that, subject to the mitigation identified in the Assessment, Policy EN17 was complied with. No aspect of the revised proposals alters the outcome or recommendations of the earlier Assessment. Thus, the applicant anticipates that the same planning condition will be imposed.
- 4.11 The main matter for consideration, is the repositioning of the proposed access stairs, and the related alterations to their design.
- 4.12 The applicant requires a straight, continuous stairway (split into two flights) to ensure safe and effective access to the flat roof and the proposed plant. This will be the only access to the roof and must, therefore, be sufficient for regular inspection and maintenance of the roof and plant.

- 4.13 Proctor & Gamble has established KPI for maintenance and related access. These meet and frequently exceed Building Regulations and DDI requirements, and this is certainly the case here. The height and length of the stairs requires two flights (with an appropriately sized landing between). The risers are relatively shallow (170mm), whilst the treads are deep (290mm), creating a shallow pitch of circa 30 degrees.
- 4.14 Whilst the proposed staircase projects into the adjacent perimeter access route, the submitted location plan confirms a clear passing gap of 5.6m is sustained, and thus there is no impact on vehicle operations in the vicinity.
- 4.15 The proposed staircase is to be constructed supplied and fitted by a specialist company. The stairs are likely to be manufactured off-site, delivered and lifted into place. They will be constructed from galvanised steel, with guard railings and a roof access platform (which will connect with roof platform). A galvanised steel box frame cage and lockable gate with galvanised steel mesh infill will be installed at the base of the stairs (to prevent unauthorised access and protect users on the lower flight), with a further galvanised steel box frame (with lifting beam) to the head of the top flight.
- 4.16 The proposed stairs and related infrastructure are utilitarian in appearance, but this is not unusual for the Gillette campus, nor the wider Basingstoke Road industrial area. Indeed, similar galvanised steel roof walkways exist elsewhere on the campus. The proposals arguably comply with policies CC7 and CC8, as supported by policy CC2.

5. Conclusions

- 5.1 The application seeks revised planning consent for the installation of new roof plant and relocated access stairs at Gilette'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.
- 5.3 Relevant development management policies have been identified and applied to the proposed development.
- 5.4 Planning permission has already been granted for much the same proposal, where officers found matters of design and amenity, wholly acceptable (subject to relevant planning conditions). The revised stairs is the only difference.
- 5.5 Consistency in decision making is a fundamentally important principle which underpins the public's trust in the planning system. Local planning authorities must reach the same position unless material considerations direct otherwise.
- 5.6 Since the earlier grant of planning permission, a updated development plan has been submitted to the Secretary of State. However, this is no material change to the policies most relevant to the determination of this revised application. We are not aware of any changes 'on the ground' (i.e., the relevant buildings or local area) which justify a change of approach. The only material difference, therefore, relates to the revised stair design.
- 5.7 The design, whilst functional, is the minimum facility required for safe and effective access to the roof, and is similar to other stairs/roof access facilities here and elsewhere within the designated employment area.
- 5.8 The proposals comply with the policies of an up-to-date development plan and should therefore be approved without delay.

APPENDIX A



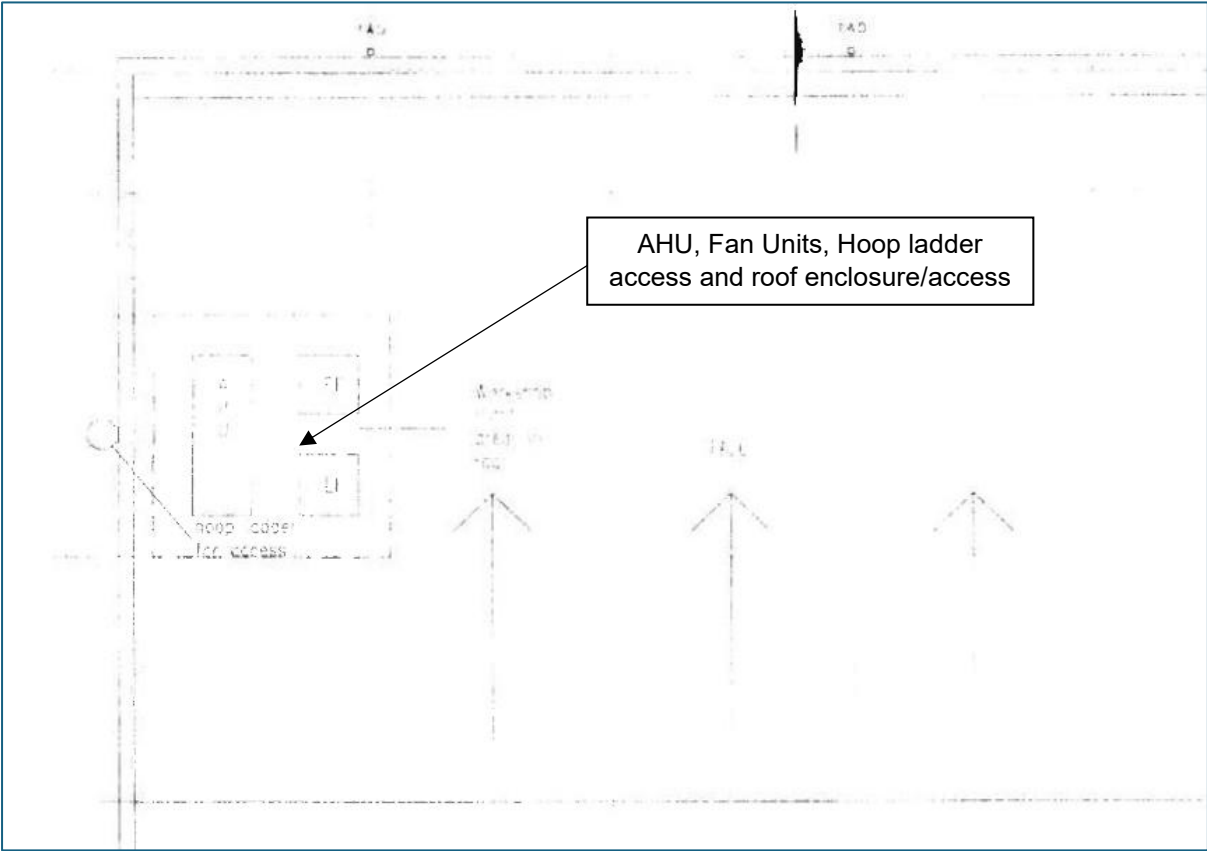
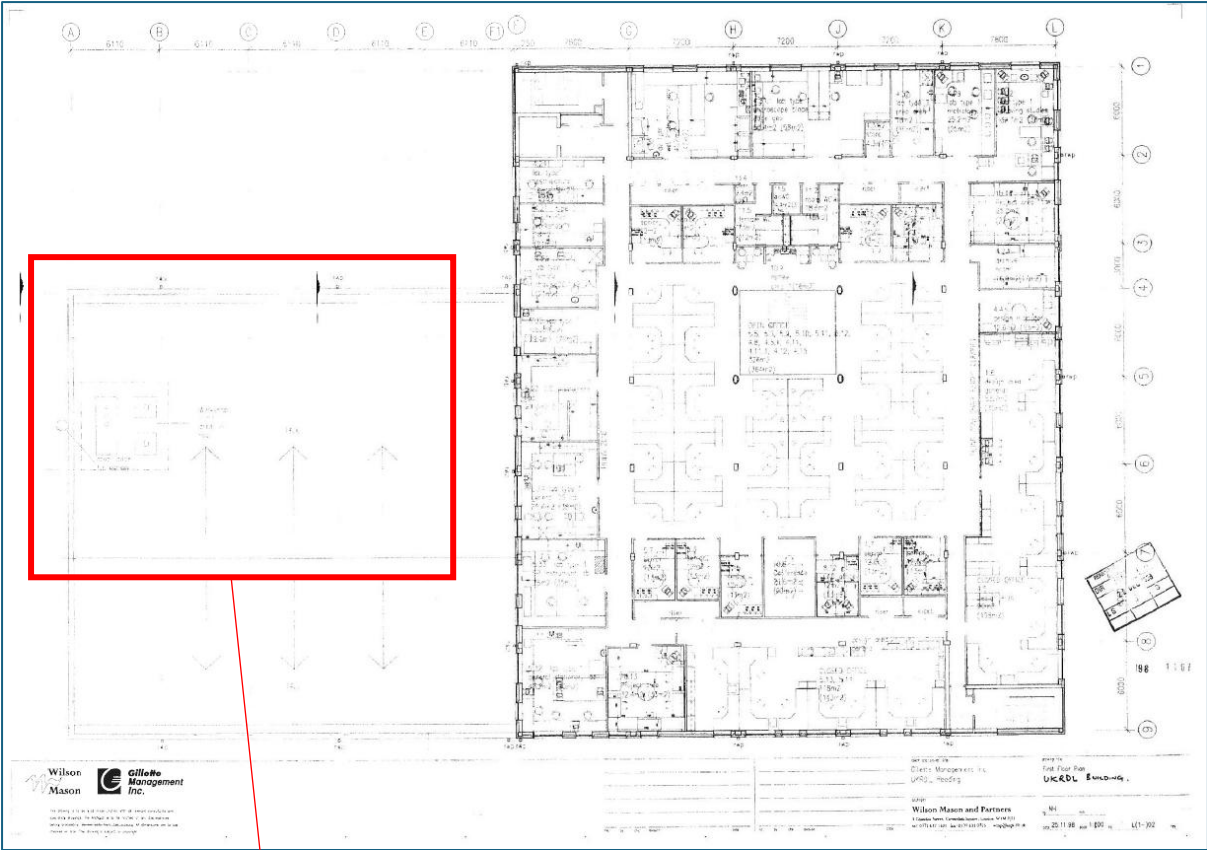
Workshop roof and approx.
locations of proposed units and
revised staircase.



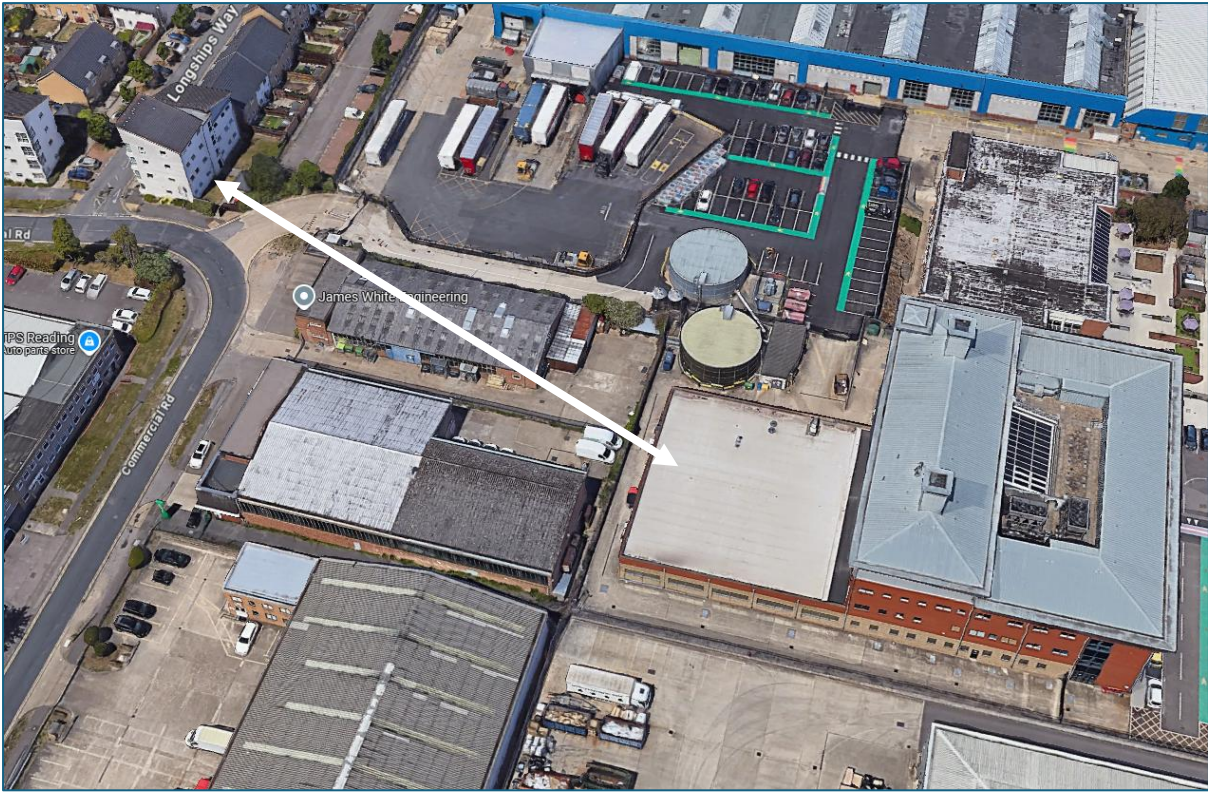
Flat roof over the workshop, viewed
from a first-floor laboratory.



APPENDIX B







Distance between roof plant and nearest NSR.

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