Reading Borough Council: Local Plan Partial Update
Matter 1: Legal Requirements and Procedural Matters

Hearing Statement on behalf of CBRE Investment Management

14th October 2025

Turley

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Client

CBRE Investment Management

Our reference

00631

14th October 2025

1. Introduction

1.1 This Statement has been prepared by Turley on behalf of CBRE Investment Management (CBRE IM) in response to Matter 1 of the Inspector's questions for the Reading Borough Local Plan Partial Update Stage 1 Examination.

1.2 CBRE IM is promoting land at Meadow Road, Reading ('the Site') for a high- quality commercial redevelopment close to Reading town centre.

1.3 Despite this, the site is currently allocated within the Local Plan Partial Review Update under Policy WR3b (Other Sites for Development in West Reading and Tilehurst: 2 Ross Road & part of Meadow Road) for residential development.

1.4 CBRE IM have progressed a planning application under reference 25/1191 for:

"*Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping*"

1.5 This application is under determination at present.

1.6 A copy of the proposed site layout plan, Planning Statement and Design and Access Statement is included at Appendix 1 of this Statement.

1.7 The proposed development's case is founded on:

- There is no reasonable prospect of the site coming forward for residential use, it is not viable, and it is not CBRE IM intention for the site. It means the requirements of paragraph 127 (paragraph 126 of the 2023 Framework) of the National Planning Policy Framework (The Framework) are met;
- There is a significant need for employment floorspace as evidenced by the Local Plan Partial Review Update (Commercial Needs Assessment Jan. 2025 and Reading Employment Area Analysis April. 2025);
- The existing use of the site for employment is the legal fall back; and
- There are substantial economic and environmental benefits resulting from the proposals.

1.8 As set out in our Regulation 19 representations, at present the emerging Reading Local Plan Partial Review disregards our clients representations as to the deliverability of the site as a residential allocation.

1.9 We note that **Examination Document EX002**, which forms Part 1 of the Councils responses to the Inspectors questions notes under employment IQ36 that "*No sites that were proposed for employment development at call for sites, Regulation 18 or Regulation 19 stage have been omitted from the LPPU other than Royal Court, Kings*

Road, which formed part of a larger site for which a mixed use residential and commercial allocation was proposed. Please see the answer to IQ29 and Appendix 4"

1.10 This position is factually incorrect. Our clients Regulation 19 representations sought to redesignate the site for employment use rather than residential.

1.11 The same Examination Document also notes at page 18 of the PDF document that "*Experience in Reading is that landowner intention can change quite quickly, and sites can come forward unexpectedly quickly or can remain undeveloped for much longer than expected, or can come forward for an entirely different use than anticipated*"

1.12 We would invite the Inspector to consider these matters as part of the examination process.

1.13 The Examination will be focussed on the tests of soundness set out in paragraph 35 and other requirements outlined in the National Planning Policy Framework (the Framework) published in December 2023 and will be examined against the 2023 Framework. This is consistent with the transitional arrangements set out in Annex 1: Implementation of the Framework (December 2024).

1.14 This Hearing Statement has therefore been prepared on this basis.

2. Matter 1: Legal Requirements and Procedural Matters

Question 1.17 - Does the SA adequately and accurately assess the likely effects of the policies and proposals in the LPPU on the SA's objectives? Does the SA test the LPPU against reasonable alternatives where these exist, such as different options for housing and economic growth? Does the SA test for housing growth consistent with the local housing need including the cities and urban centres uplift? Was the testing of the policies and proposals in the LPPU and of the reasonable alternatives undertaken on a like for like basis? Were reasons given for rejecting the appraised alternatives?

2.1 The role of the Sustainability Appraisal (SA) is to promote sustainable development by assessing the extent to which the emerging options, when judged against reasonable alternatives, will help to achieve relevant local environmental, economic and social objectives.

2.2 Regulation 12(2) of the Environmental Assessment of Plans and Programme Regulations 2004 requires that an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. It states:

"*12.— Preparation of environmental report*

(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of–

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of–

(a) current knowledge and methods of assessment;

(b) the contents and level of detail in the plan or programme;

(c) the stage of the plan or programme in the decision-making process; and

(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment."

(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation.

(5) When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.

(6) Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority's invitation to engage in the consultation. 22

2.3 The courts have held that the duty is not simply to *assess* all reasonable alternatives, but also to *explain* the reasons for selecting the alternatives dealt with. Unless this is done, the reader of the environmental report will be unable to understand the basis for selecting the alternatives and whether the selection was deficient. This position was outlined by Ouseley J, in ***Heard v Broadland*** DC [2012] Env LR 23 at paragraph 66-71.

2.4 The requirement to consider reasonable alternatives to the draft plan involves more than assessing generic alternatives e.g. not adopting a plan at all. The duty requires the plan-making authority to identify and assess reasonable alternatives to the specific policies in the draft plan. For example:

- In **City & District of St Albans v Secretary of State for Communities and Local Government** [2010] JPL 10, at [21], the failure to subject specific policies within the East of England Plan relating to greenfield urban extensions to Strategic Environmental Assessment of reasonable alternatives was held to be unlawful;

- In **Heard**, Ouseley J held that the Broadland Joint Core Strategy was unlawful because the reasonable alternatives to a proposed urban extension north-east of Norwich had not been assessed in accordance with the SEA Directive;

- In **Save Historic Newmarket Ltd v Forest Heath District Council** [2011 JPL 1233, Collins J quashed the housing policies in the Forest Heath Core Strategy on the basis that there had not been Strategic Environmental Assessment of the reasonable alternatives to the allocation of a particular site for residential development; and

- In **Ashdown Forest**, the Court of Appeal quashed the Wealden District Core Strategy in part because a policy limiting development within certain distances of the Ashdown Forest SPA and SAC had not been the subject of Strategic Environmental Assessment of reasonable alternatives

2.5 The Local Plan Partial Update is supported by a Sustainability Appraisal (SA) dated November 2024) (**Examination Document LP005)**.

2.6 The SA sets out at Paragraph 2.9 that:

"*The Sustainability Appraisal assesses the policies and sites set out within the Local Plan Partial Update*."

2.7 Paragraph 2.10 states:

"*Considering the Local Plan Partial Update comprises an update of a select number of policies only, it is not deemed necessary to carry out a full new Scoping Report*"

2.8 We do not consider this a reasonable approach, the Council should fully assess the implications of the Local Plan Partial Update. As set out at paragraph 3.4 of the SA there are material changes in circumstance since the original SA was completed and this has clear implications on policy choices and reasonable alternatives. A full updated SA scoping report should be completed.

2.9 **Examination Document EX002**, containing the Council's responses to the Inspectors initial questions, sets out in response to IQ17 that:

"*Yes. The Sustainability Appraisal considered each site and policy change in turn against the 20 objectives. The proposed changes to specific sites are assessed, as well as a "retain as existing" option alongside reasonable possible alternatives*."

2.10 We do not agree with this position and it is our view that it is more nuanced that this.

2.11 The SA considers our clients land interests under WR3 'Other sites for development in West Reading and Tilehurst' at Appendix 3. It does not include an assessment against each individual allocation which forms part of Policy WR3 rather it groups the identified sites (**19 sites**) together.

2.12 These sites cumulatively deliver (at the lower end of the policy range) 567 homes. A significant contribution to the Council's overall housing supply. It is therefore incongruous for the Council to simply bulk these sites together. This approach completely disregards the nuances between the sites and different sustainability and deliverability issues. We fail to see how reasonable alternatives have been considered for this policy and the respective sites when such a generic approach is taken in the first instance.

2.13 The Council should be required to re-run the SA with each site considered on its own merits.

2.14 Notwithstanding our clients concerns with the approach to the SA in respect of Policy WR3, we would also observe that the options assessed simply include:

- 'proposed approach option'; and
- 'business as usual' option.

2.15 The Council's justification for this is laid out at paragraph 5.38-5.39 of the SA which notes:

"*However, because this Sustainability Appraisal has been produced in support of a Partial Update to the existing Local Plan, the majority of the policies listed here are pre-*

existing within the currently adopted local plan. As such, there is little point in appraising the 'no plan/no policy' approach, except for the new policies proposed (Purpose-Built Shared Living Accommodation, Health Impact Assessments and Urban Greening Factor). For the majority of the policies, therefore, a 'business as usual' analysis has been undertaken, which means that an equivalent Local Plan policy or allocation, if any exists, would be carried forward, and a 'proposed approach', which is the proposed alterations to the existing policy as set out within the Regulation 18 'Scope and Content' document. Sustainability Appraisal – November 2024 28 5.39 Alongside 'proposed approach' and 'business as usual,' a range of other reasonable alternatives are assessed. These differ from policy to policy, or site to site. For instance, where a policy sets a threshold, alternative thresholds may be assessed. ***In the case of sites, alternative options will depend on the location, site size and constraints, but should cover all of the reasonable potential alternative uses of each site.***"

2.16 We would again note that this has not been undertaken for Policy WR3 due to the sites being grouped together. Our client is actively pursuing a commercial use on the site, which is already in commercial use. They have not promoted the site to the Council and indeed entered in to pre-application discussions with the Council prior to the submission of the Plan for examination. The Council were and are fully aware that the site is proposed to remain in its existing use and despite the references at paragraph 5.39 as emboldened above, there has been no consideration of the site remaining in and potential for an intensified employment use.

2.17 The retention of the land as employment use is a clear reasonable alternative in this instance.

2.18 This is even more pertinent when consideration is given to the need for industrial and/or warehouse space laid out within the 'Reading Commercial Needs Assessment (January 2025) (**Examination Document EV008**), as also set out within the Reading Employment Area Analysis (April 2025) (Examination Document EV010) (published April 2025) which identified at Paragraph 1.6 a need for:

- 85,803 of office floorspace; and
- 167,113 sqm of industrial, warehouse and research and development floorspace

2.19 Paragraph 1.7 of this review confirms that:

"This is a very significant level of new floorspace, particularly for industrial and warehouse space. Whilst there has continued to be new development of offices both in the town centre and out of town locations in recent years, the geographical extent of Reading's more traditional employment areas suitable for industrial and warehouse space has changed little over recent decades, other than to contract somewhat. Meeting these needs will require new sites to be identified, but it will also mean needing to ensure that those employment areas ***which genuinely have a future for that use continue to provide space for employment uses****" [our emphasis]*

2.20 We also note that in relation to Policy EM1 the reasonable alternative considered include:

- Revised policy to make reference to the updated needs for office, industrial and warehouse uses based on latest data

- Provision for employment development based on data that is over 5 years old.

2.21 These options are, respectively, completely overlooking the principle concern. The Council are as a matter of course required to

"*…This should include **planning for and allocating sufficient sites to deliver the strategic priorities of the area** (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies*)"

Paragraph 21 of the NPPF

2.22 And of course, they are required to meet the tests of soundness which requires plans to be positively prepared noting "***as a minimum, seeks to meet the area's objectively assessed needs***"

2.23 Accordingly, a set of options which considers meeting the latest evidenced identified need or relying on out-of-date evidence is not a true consideration of reasonable alternatives. The Council should at least be considering an option which looks at an increased employment requirement as an alternative also. Further reinforced by the fact the spirit of the employment requirement is it being treated as a 'minimum'.

2.24 This is particularly important given our clients concerns regarding the Council's assertions on meeting the employment need itself. The emerging Local Plan Review, notes at paragraph 4.3.5 that "*There is scope to accommodate the full level of need within Reading Borough. This conclusion has been reached primarily by the Housing and Economic Land Availability Assessment (HELAA) process, supplemented by other evidence where necessary*."

2.25 The Council sole basis upon which it determines that it can meet its need is therefore the HELAA. A document which documents land rather than allocating it for delivery. It is plainly obvious that there is no cogent plan for meeting the Council identified need for employment space, with the entirety of the review principally focused on the delivery of housing.

2.26 As an example. A significant proportion of the Council purported 'supply' is derived from Site Reference WH001, Land south of Island Road at Smallmead, identified with the HELAA as capable of delivering 94,221sqm of floorspace, aka over 55% of the total requirement over the plan period for logistics and industrial. The HELAA identifies the site as "***potentially** suitable, available and **potentially** achievable*". [our emphasis]

2.27 The HELAA suitability assessment for the site concludes the following:

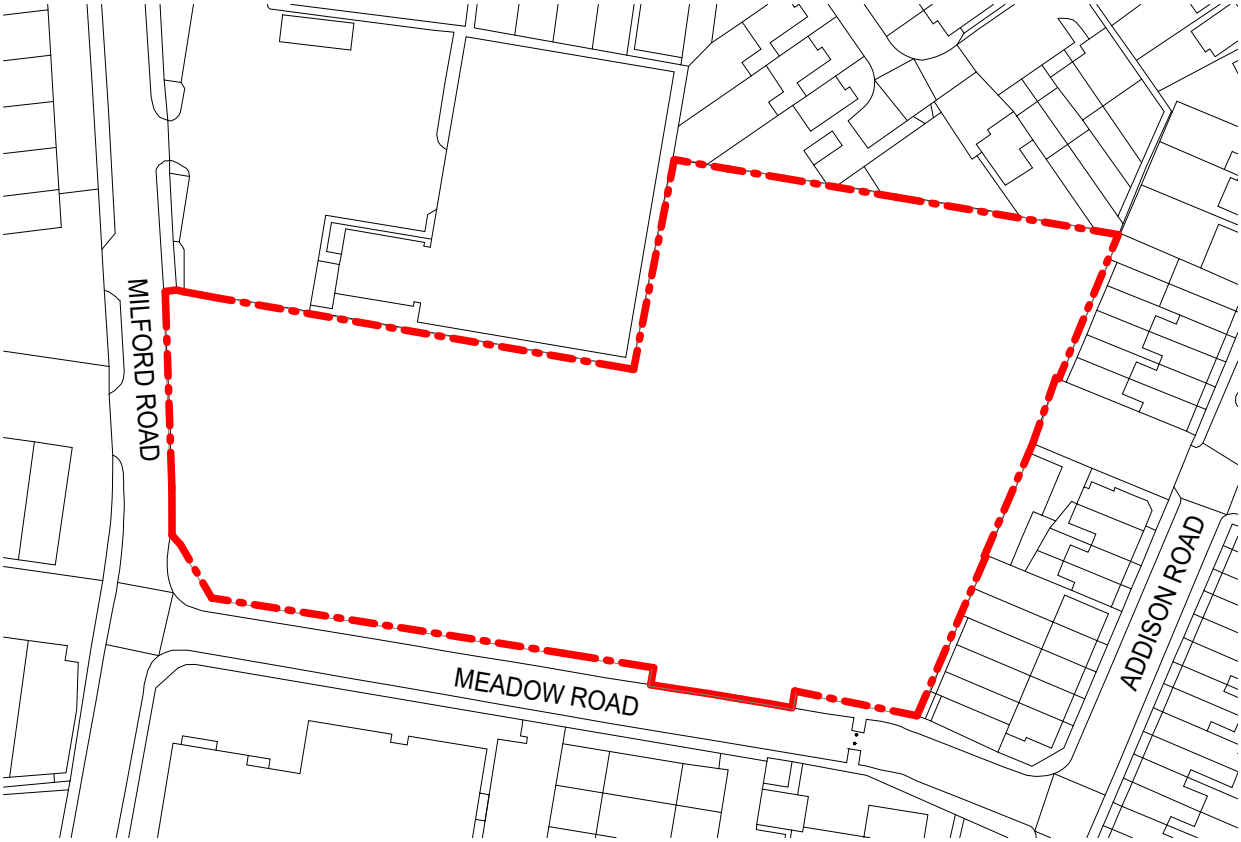
"*Several aspects require further investigation, and transport issues need to be considered, but in principle employment development is potentially suitable subject to DEPZ as existing allocation. Proximity of MRF, sewage works, contamination issues mean residential development not suitable*."

2.28 There is no guarantee that this site will come forward development nor any certainty that it will deliver as envisaged by the HELAA. Therefore, there can be no reliance or certainty placed on the evidence which indicates that the Council can meet this need and a higher requirement as a result should have been tested through the SA scoping process.

2.29 At present, we specifically do not consider that the SA tested the Local Plan Partial Update against reasonable alternatives where these exist, such as different options for housing and economic growth on specific sites.

Appendix 1: Site Layout Plan to application 25/1191

Revisions:	Drawn/Chkd:	Date:



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0 50 100 m

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Client: V7 ASSET MANAGEMENT

Project Name : MEADOW ROAD, READING

Drawing Title: SITE LOCATION PLAN

Job No:	11677	Status:		Project Stage:	PL
First Issue Date:	04/17/25	Scale:	1 : 1250	Lead/Checked:	ME

Project:	Originator:	Zone:	Level:	Type:	Role:	Drg. No:	Rev:
MEAD -	PRC -	/ -				PL001	

BIM File Name: MEAD-PRC-ZZ-ZZ-M3-A-000000

Appendix 2: Planning Statement to application 25/1191

Planning Statement

Land at Meadow Road, Reading

August 2025

Turley

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Appendix 1:	Relevant Planning Policies	

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Client

CBRE Investment Management

Our reference

00631

1. Introduction

1.1 This Planning Statement has been prepared by Turley on behalf of CBRE Investment Management (the Applicant) in support of a full planning application (RBC) to redevelop land at Meadow Road, Reading ('the Site') for a high- quality commercial redevelopment close to Reading town centre.

1.2 The site comprises c. 0.89ha of previously developed land, including land within the Richfield Avenue Core Employment Area. The site is occupied by existing commercial premises on short-term lease arrangements, with connections to A329 Internal Distribution Road (IDR), facilitating connections to the M4 Corridor (Junctions 10, 11, 12) providing connections to London, wider South East and beyond.

1.3 The description of development is as follows:

"*Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping*"

Accompanying Documentation

1.4 This Planning Statement is intended to assist RBC in its determination of the planning application and has been prepared in accordance with the requirements set out in the National Planning Policy Framework (the Framework) and Planning Practice Guidance ('PPG'). It seeks to evaluate the proposed development against national and local planning policies and considers the planning justification for the proposed scheme.

1.5 This Statement should be read in alongside the supporting plans and drawings set out in Table 1.1 and accompanying documents outlined in Table 1.2

Table 1.1: Application Plans

Drawing Title	Drawing Number
For Approval	
Site Location Plan	11677-PL001
Existing Site Plan	11677-PL002
Existing Floor Plans Building 1	11677-PL003
Existing Floor Plans Building 2	11677-PL004
Existing Elevations Building 1	11677-PL005
Existing Elevations Building 2	11677-PL006
Proposed Site Plan	11677-PL010
Proposed Floor Plans Units 1-3	11677-PL011
Proposed Floor Plans Units 4-7	11677-PL012

Proposed Floor Plans Units 8-9	11677-PL013
Proposed Floor Plans Units 10-11	11677-PL014
Proposed Elevations Units 1-3	11677-PL015
Proposed Elevations Units 4-7	11677-PL016
Proposed Elevations Units 8-9	11677-PL017
Proposed Elevations Units 10-11	11677-PL018
Proposed Roof Plans Units 1-3	11677-PL019
Proposed Roof Plans Units 4-7	11677-PL020
Proposed Roof Plans Units 8-9	11677-PL021
Proposed Roof Plans Units 10-11	11677-PL022
Street Scenes	11677-PL023
Proposed SW Landscape GA Sheet 1 of 2	11677-PL030
Proposed SW Landscape GA Sheet 2 of 2	11677-PL031
Proposed HW Landscape GA	11677-PL032
Landscape Section	11677-PL033
Not For Approval – For Information Purposes	
Unit 11 and 10 CGI from Milford Road	-
CGI from Addison Road	-
Aerial CGI view looking east	-
Aerial CGI view looking west	-

Table 1.2: Supporting Document

Document Name	Consultant
Application Forms and Certificates of Ownership	Turley
Community Infrastructure Levy Form 1	Turley
Design and Access Statement	PRC
Air Quality Assessment	Quantum Air
Preliminary Ecological Appraisal	Phlorum
Biodiversity Net Gain Assessment	Phlorum
Energy Statement	Shepherd Brombley Partnership
Sustainability Statement	Verte

Flood Risk Assessment and Drainage Strategy	Baynham Meikle Partnership Limited
Flood Risk Sequential Test	Turley
Noise Impact Assessment	Quantum Acoustics
Transport Assessment	Stunt Consulting
Travel Plan	Stunt Consulting
Daylight and Sunlight Report	Right of Light Consulting
External Lighting Proposals	Shepherd Brombley Partnership
Ground Investigation	Baynham Meikle Partnership Limited
Archaeological Desk Based Assessment	RPS
Statement of Community Engagement	Turley
Economic Benefits Assessment	Turley
Viability Evidence	V7

Structure of Planning Statement

1.6 The remainder of the Statement is structured as follows:

- **Section 2:** an overview of the site context and surroundings including reference to any site-specific designations and pre-application engagement.
- **Section 3:** sets out a summary of the proposed development for the site.
- **Section 4:** a summary of the planning policy context relating to the site and proposed development.
- **Section 5:** an assessment of the principle of development and proposed uses against planning policies contained within the National Planning Policy Framework and the Local Development Plan.
- **Section 6:** consideration of scheme design and other technical considerations to demonstrate suitability and deliverability as well as compliance with planning policy requirements.
- **Section 7:** a summary of relevant Planning Obligations and the draft Section 106 'Heads of Terms'.
- **Section 8:** evaluation of the scheme within the 'planning balance'.
- **Section 9:** provides a conclusion on the planning assessment undertaken and scheme summary.

2. Site Context, History and Description

2.1 This section considers the history, context and description of the Site.

Context and Surroundings

2.2 Reading is widely recognised as the principal regional and commercial centre of the Thames Valley[1] and recognised as a strategic regional growth hub. One of the reasons for Reading's continued success is its excellent regional and national connectivity.

2.3 The town is a major transport interchange, continuing to benefit from Reading Station and its strategic location on the M4 corridor and proximity to Heathrow Airport and London.

2.4 Reading railway station is located within walking distance to the site and is one of the most important hub railway stations in the UK at the convergence of 4 national lines for both passengers, freight, and the Trans European Network. It provides a range of direct national, regional and local services to key economic centres including London, Birmingham, Bristol, Manchester and Cardiff.

2.5 The station has recently undergone circa £750m of strategic improvements and upgrades, creating an additional five rail platforms and making it one of the busiest stations outside London. This also includes the introduction of the Elizabeth Line provide fast and frequent connections to in central and east London, including Bond Street, Farringdon, and Canary Wharf (4 services per hour).

2.6 Reading is located immediately north of the M4 and can be easily accessed from 3 junctions (10 to 12) to provide strategic road access west towards Bristol and Wales and wider southwest, as well as facilitating connections eastward towards Heathrow, Gatwick and towards London and the M25.

2.7 The site is well located and benefits from good vehicular access, situated adjacent to the A329 and A33, leading towards the M4 Junction 11, with links into Basingstoke, Wokingham, Swindon, London and beyond

2.8 Reading Train Station is located 0.50 miles from the application site, approximately 12minute walk.

2.9 The site benefits from strong transport links, with nearby bus stops less than 0.2 miles from site (5minute walk), with the 18 Buzz; 22 Pink; and 23 Berry bus services providing connections to Tilehurst, Town Centre, Forbury Retail Park, and Caversham

The Site

2.10 The site is located north of Meadow Road, east of Milford Road and extends across 0.89ha. An aerial view of the site is shown in Figure 2.1 below:

[1] Profile of Reading https://images.reading.gov.uk/2019/12/borough_profile_2017_updated.pdf

Figure 2.1: Aerial View of Site

2.11 The site is best described in two distinct halves. The eastern half of the site includes a large area of hardstanding, with two storey commercial units sited along the northern boundary, including 8no. roller shutter doors for goods vehicles (Talbot House). The site is currently occupied by Rocco Brands Group Limited (Unit 1), an online greetings card supplier, Phantom Brewing Co. Limited unit 2 and 3), and Green Metro Coaches Limited a bus depot operating on the hardstanding area and Talbot House.

2.12 The northeastern, and eastern boundaries abut residential gardens (including Denbeigh Play Area to the northeast).

2.13 Beyond the eastern boundary, residential development comprises 2.5 storey terraced housing. To the south, the site abuts Meadow Road, beyond which lies the recently completed Bellway residential development for 96 dwellings and associated car parking, public realm and landscaping (application ref. 171814).

2.14 Access to the eastern half of the site is provided via an existing vehicular access. There remains an access via Ross Road to the east, however this is since stopped up.

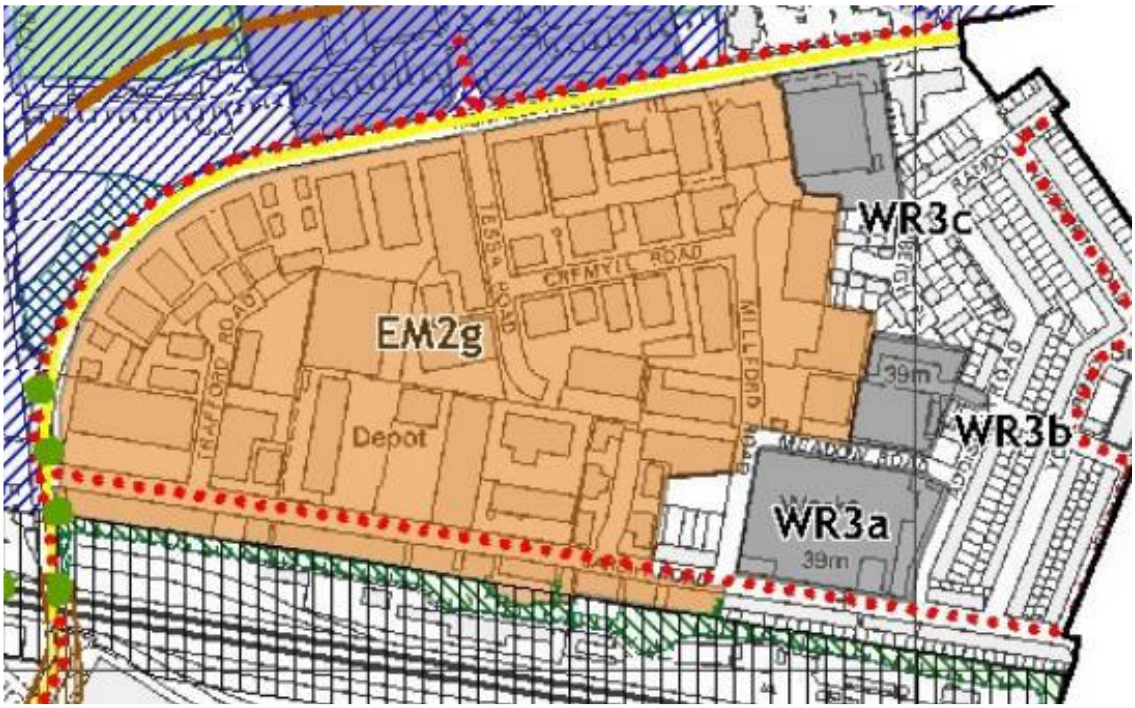
2.15 The western half of the site comprises a series of 2 storey commercial units (and ancillary uses) with ornamental landscaping along the western edge. This commercial units remain in active use and are sited within the Core Employment Area. Access to the western half of the site is gained via Meadow Road.

2.16 Overall, the site is bordered to east and south by residential dwellings, including new build residential units. To west and north, the site adjoins commercial units forming part of Richfield Avenue Core Employment Area.

Statutory Designations

2.17 A review of Reading Borough Council proposals map is provided in Figure 2.2 below.

Figure 2.2: Extract of Reading Local Plan Policy Map



- The eastern half of the site is designated within the Reading Local Plan under Policy WR3b (Other Sites for Development in West Reading and Tilehurst: 2 Ross Road & part of Meadow Road) (Grey Shading in Figure 2).
- The western half of the site is designated within the Reading Local Plan under Policy EM2g (Core Employment Area: Richfield Avenue) (Orange Shading in Figure 2).
- The site is within an Air Quality Management Area (indicated by the red line in Figure 2.1).

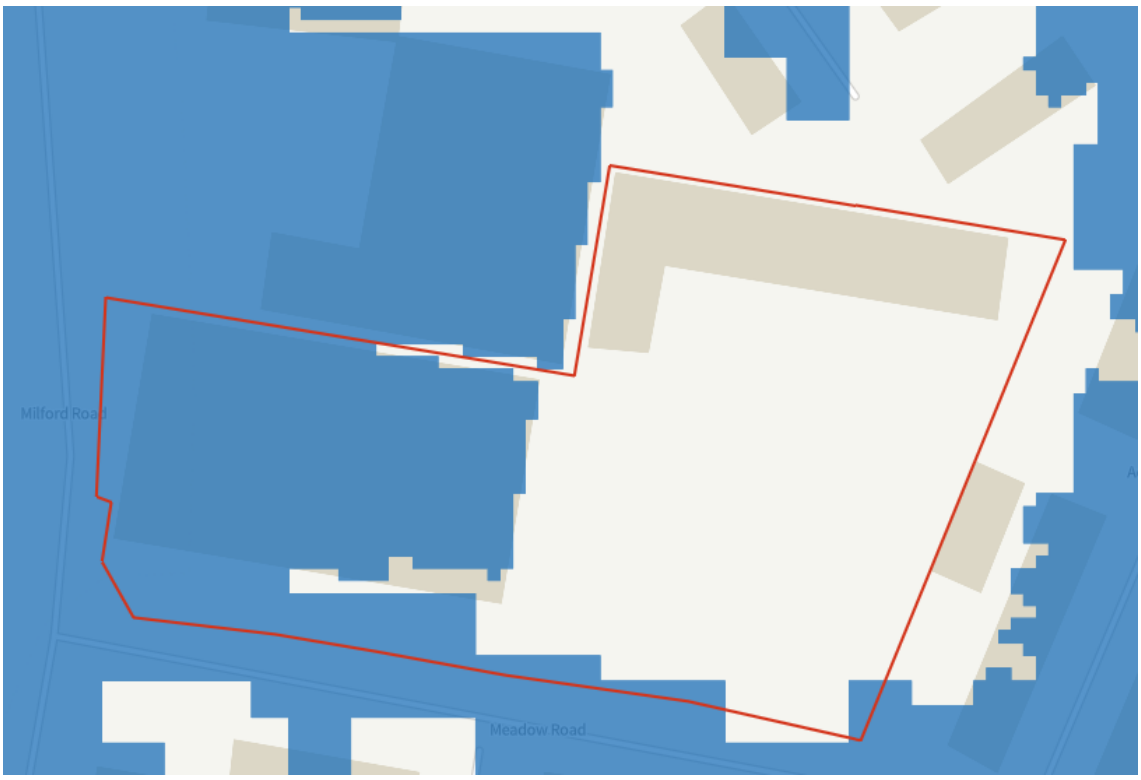
2.18 There are no identified listed heritage assets within or in close proximity to the site.

2.19 There are no ecology or biodiversity designations or constraints on the site.

2.20 The site is not subject to landscape designations.

2.21 A review of the Government's flood risk map for planning indicates the western area of the site is located within Flood Zone 2 as shown in Figure 2.3 below. Small areas of the site are subject to surface water flooding:

Figure 2.3: Extract of the Government's flood risk map for flooding (Note: Red line for indicative site location only)



Site Planning History

2.22 A review of the Council's online planning register sets out that the eastern half of the site has the following relevant planning history:

- **200054**: Application for prior notification of proposed demolition. Approved March 2020.

- **211761**: Erection of a new perimeter fencing and sliding gate on the southern boundary, installation of new permeable hardstanding (above existing concrete hardstanding) and kerbing within the curtilage of industrial premises and installation of the proposed French drain to perimeter, catch pit and petrol interceptor and associated works in connection with existing car parking and storage use. Approved December 2021.

2.23 The above is not considered pertinent to the current proposals for the site, rather reaffirming the existing status of the site, and longstanding operation of commercial uses on the western half of the site.

2.24 We are aware of the recent application at the former Cox & Wyman site, Cardiff Road, Reading, RG1 8EX, to the south of the application site submitted under ref. 171814 and approved in November 2018 for the following:

"Demolition of existing site buildings and boundary treatments and erection of 96 no. dwellings (48 x 3 bed houses; height 2 to 3.5 storey and 40 x 1-2 bed flats, 8 x 3 bed flats within 2 apartment blocks; height 3 to 4 storey) including associated surface car parking, public realm and landscaping on land at the former Cox & Wyman building, Cardiff Road."

2.25 The redevelopment of the former Cox & Wyman site is considered complete and residential development fully occupied.

Pre-Application Engagement

2.26 The Applicant has been fully committed to engaging with RBC early in the pre-application process, recognising the benefits this can provide to the application process for both parties, and to contribute towards the evolution of the proposals by resolving issues at the pre-application stage (in accordance with paragraph 40 of the Framework).

2.27 The Applicant has engaged and been in contact with Reading Borough Council (RBC) on the application proposals since November 2024. Meetings have been held to positively discuss the proposals, including a roundtable workshop 28 November 2024 to present the development proposals, the principle of development, and supporting information to accompany any forthcoming application.

3. The Proposed Development

Description of Development

3.1 Full planning permission is sought for the following development:

"*Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping*"

Layout and Scale and Appearance

3.2 The proposed quantum of development, the size of individual units and the servicing areas have been designed specifically to accord with prevailing market conditions and occupier requirements.

3.3 The sites existing buildings are dated and do not meet the current operational requirements or sustainability criteria expected of modern day occupiers.

3.4 The proposals comprise the demolition of the existing buildings and structures and the construction of circa 4,300sqm, across 4 buildings and broken into 11 individual units/demises of varying sizes suitable for flexible occupancy.

3.5 The range of units and the flexible use proposed ensures that there are opportunities for a range of occupiers to accommodate to the site.

3.6 The units are all to be within flexible E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision where appropriate).

3.7 Table 3.1 below outlines the size of each unit:

Table 3.1: Unit Size

Unit Number	Gross External Area
1	184
2	188
3	287
4	206
5	192
6	205
7	225

8	499
9	551
10	820
11	936

3.8 The proposals seek to ensure an efficient use of previously developed land for commercial employment purposes on land currently used for such purposes.

3.9 The proposed development seeks to respond to this context, with a range of building heights extending from 8.5m to 10.5m in ridge height. The proposed buildings with lower ridge heights will be sited on the eastern parcel of the site, adjacent to the residential areas, with larger buildings sited on the west of the site, fronting Milford Road, fronting the Core Employment Area.

3.10 The Design and Access Statement in support of this application provides a detailed summary of the design rationale for the proposed development. In summary the proposed appearance is a sympathetic design that transitions in character and materials from the Core Employment Area to the west, and residential uses to the south and east of the site.

3.11 A combined material palette of metal cladding and brickwork will aid in this transition, providing contrast in colour and texture that adds visual interest for pedestrian and cycle movements across the site.

3.12 Curtain wall features and glazing will be provided in a vertical arrangement, responding positively to the residential development to south, with supplemental landscaping and public realm improvements to the current baseline of the site to create an improved street scene.

Access and Parking

3.13 Vehicular access to Units 1-9 is proposed to be maintained via Meadow Road to the south of the site, with an internal access road providing direct access to these units.

3.14 Units 10-11 are proposed to be accessed via Milford Road to the west of the site, fronting the existing Core Employment Area.

3.15 The accompanying tracking plans submitted with this application demonstrates how HGV can access/exit the development forward gear.

3.16 The existing access point to the east of the site via Ross Road, will remain as an emergency access to site. The Applicant is happy for this to be secured by a suitably worded condition in any future planning consent.

3.17 Vehicle parking bays (including accessible bays) are provided in compliance with Reading Borough Standards with sitewide provision of 40 parking bays, including 11 accessible bays, (one for each proposed unit), with cycle parking provided through sheltered

Sheffield stands within the development at each respective unit, providing 24 cycle spaces.

3.18 11 Electric Vehicle charging points will be provided within the development with the capacity to serve 22 vehicles. In addition, the remaining parking bays will be provided with ducting to enable future connectivity for EV charging, enabling 100% of parking bays with active and passive facilities for electric vehicles).

3.19 The proposed development seeks to provide a fully inclusive environment which will be designed in compliance with current British Standards and Building Regulations Part M. The proposed building will be provided with accessible WC's and showers suitable for wheelchair users and provision will be made for future passenger lifts to be installed by end users.

Public Realm and Landscaping

3.20 The site comprises previously developed land adjacent to the town centre boundary. There are no existing landscape features present on site with pavement and public realm area of this part of Meadow Road have similar spatial constraints making opportunities for significant public realm and landscape improvements in this area of Meadow Road relatively limited.

3.21 Notwithstanding the above the proposals have a strong focus on re-creating and reactivating Meadow Road, noting its prominent corner location and sensitive design approach which creates a transition in townscape from Milford Road to Meadow Road. The proposals seek to create an attractive, activated area which will draw pedestrian and cycle movements.

3.22 The proposal includes seek to include for street trees the internal road layout will be accommodated within planters to raise the amenity of the immediate surrounds of the buildings. Native hedge mix and tree planting will be planted along the boundaries of the site, with ornamental features among parking areas and close to building entrances to present a formal appearance, legibility and distinction of public and private spaces.

3.23 The external amenity areas of the building will also be carefully landscape and proposals for these areas are fully described within the Design and Access Statement.

4. Planning Policy Context

Introduction

4.1 This Section outlines the key planning policy considerations relevant to the proposed development at a national and local level.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides as follows:

"*If regard is to be hard to the development plan for the purposes of any determination under the Planning Acts the determination must be made in accordance in accordance with the plan unless material considerations indicate otherwise*."

4.3 In addition, Section 70(2) of the Town and Country Planning Act 1990 states:

"*In dealing with an application for planning permission or permission in principle the authority shall have regard to the provisions of the development plan, so far as material to the application …and any other material considerations."*

4.4 The relevant sources for consideration for this application are as follows:

- The Development Plan, comprising;
  - Reading Borough Local Plan (November 2019)
  - Proposals Map (November 2019)
- Other material considerations (including the Framework and emerging development plan documents).

4.5 The site is not situated within an area with a 'made' Neighbourhood Plan area.

The Development Plan

Reading Borough Local Plan (Adopted November 2019)

4.6 The Local Plan is the principal Development Plan document in the Borough; it covers the period to 2036 and was adopted in November 2019.

4.7 The policies identified in the Reading Borough Local Plan which are relevant to the site are set out below and full extracts of the relevant planning policies are provided at Appendix 1.

- Policy CC1: Presumption in favour of sustainable development
- Policy CC2: Sustainable Design and Construction
- Policy CC3: Adaptation to climate change
- Policy CC4: Decentralised Energy

- Policy CC6: Accessibility and the intensity of development
- Policy CC7: Design and the Public Realm
- Policy CC8: Safeguarding Amenity
- Policy EN14: Trees, Hedges and Woodland
- Policy EN15: Air Quality
- Policy EN16: Pollution and Water Resources
- Policy EN17: Noise Generating Equipment
- Policy EN18: Flooding and Sustainable Drainage Systems
- Policy EM1: Provision of Employment Development
- Policy EM2: Location of New Employment Development
- Policy EM3: Loss of Employment Land
- Policy EM4: Maintaining a variety of premises
- Policy TR3: Access, Traffic, and Highways related matters
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
- Policy WR3b 2 Ross Road & Part of Meadow Road: Development for residential

Other Material Considerations

The Framework

4.8 The revised Framework was adopted in December 2024. The Framework covers a range of land issues including, transport, infrastructure, the economy, climate change and the natural and historic environments. The following key paragraphs are considered to be of relevance to the determination of this application:

- Paragraphs 7 – 11 (Presumption in favour of sustainable development)
- Paragraphs 39, 40, 48 – 49 (Decision-making)
- Chapter 6 (Building a strong and competitive economy)
- Paragraphs 109, 115, 116 and 117 (Promoting Sustainable Transport)
- Paragraph 124, 125, 127 and 128 (Making effective use of land)
- Paragraphs 131 and 135 (Achieving Well-Designed Place)
- Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change)

- Paragraphs 187, 193, 196, 198 and 201 (Conserving and enhancing the natural environment)

- Chapter 16 (Conserving and Enhancing the historic environment)

Planning Practice Guidance

4.9 The Planning Practice Guidance (PPG) provides direction on the consideration and determination of planning applications, alongside various other technical and procedural matters, supporting the overall implementation of the policies contained within the NPPF.

Supplementary Planning Documents

4.10 There are a number of documents that are SPD's/SPG's the determination of this planning application, these are as follows:

- Employment, Skills and Training SPD (April 2013);

- Revised Parking Standards and Design SPD (2011);

- Planning Obligations under Section 106 (2015); and

- Sustainable Design and Construction SPD (2019).

4.11 We have set out the scope for each SPD/ SPG below and the key parts of each document relevant to the proposals which will be referenced within the assessment sections of this statement.

Employment, Skills and Training SPD (2013)

4.12 This SPD sets out obligations which will be sought from developers within the context of the construction of the scheme. The purpose of which is to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development. This is particularly pertinent against a backdrop whereby there are vast disparities in education across the town.

Revised Parking Standards and Design SPD (2011)

4.13 The SPD sets out that within Zone 2, the following maximum parking standards will apply:

	Office Use	Research and High Tech	Light Industrial	Storage and Distribution
Commercial - 1 space per m2				
Zone 2	100m2	100m2	125m2	200m2

Sustainable Design and Construction SPD (2019)

4.14 This document aims to promote high standards of Sustainable Design and Construction, in order to guide policies, set out in the Reading Borough Local Plan.

Planning Obligations under Section 106 (2019)

4.15 This Guidance sets out the Council's approach towards seeking planning obligations, alongside the introduction of the Council's Community Infrastructure Levy (CIL) Charging Schedule (2015).

Emerging Local Plan

4.16 Reading Borough Council is in the process of a preparing a Local Plan Review. The draft Local Plan Review was submitted for examination on 9th May 2025. At the time of writing, the public hearing sessions for the Local Plan Review are yet to be scheduled.

4.17 The Local Plan Review identifies that provision will be made for a net increase of 30,000-86,000sqm of office floorspace and 167,000sqm of industrial, warehouse and/or research and development space in Reading Borough for the period 2023 to 2041 (emerging Policy EM1).

4.18 Emerging Policy EM2 identifies that major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas. The Local Plan Review retains EM2g: Richfield Avenue, that covers the west.

4.19 Paragraph 4.3.10 reiterates that:

Major employment development for industrial, storage and distribution or similar uses (over 2,500 sqm) will be directed primarily to the Core Employment Areas, or to areas along the high-accessibility A33 corridor to the south. These areas are currently relatively successful industrial and warehousing areas which are likely to continue to be needed in employment use. There is some scope for intensification of employment sites within Core Employment Areas, such as development on surplus parking or servicing space, which will be acceptable subject to other material considerations.

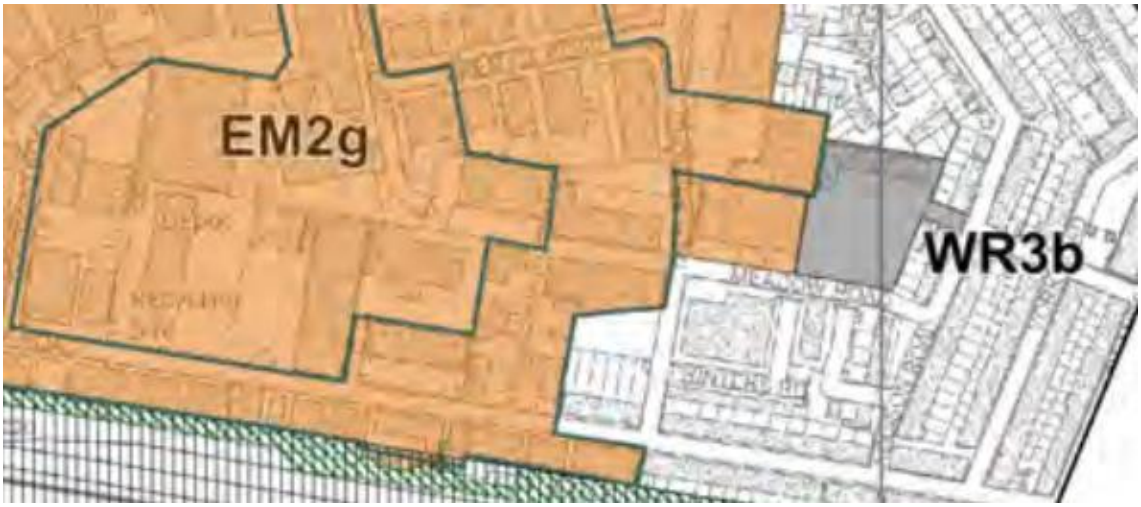
4.20 Emerging Policy EM4 identifies that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. In particular, the overall level of start-up and grow-on space should be maintained and, where possible, increased, and any loss of small units should be offset by new provision.

4.21 Supporting Paragraph 4.3.17 notes that:

"In order to ensure a healthy and balanced local economy, we need to make sure that a variety of sizes and types of employment premises are available. This variety of premises should be widened, including seeking more modern and flexible employment space in the designated industrial areas, as well as flexible office buildings in the centre and elsewhere that can easily be subdivided to provide spaces for small and growing businesses."

4.22 Emerging Policy WR3b – 2 Ross Road & Part of Meadow Road continues to allocate part of the application site for residential uses. An extract of the Pre-Submission Draft Proposals Map (November 2024) is provided in Figure 4.1 below.

Figure 4.1: Extract of the emerging Local Plan Review Proposals Map



4.23 The Local Plan Review anticipates a yield of 41-61 dwellings from the site.

4.24 The Applicant made representations to the draft Local Plan Review (Reg. 19 Consultation; December 2024), noting their objection, and concern regarding the allocation of the site for residential uses, which is not supported by the landowner, or Applicant.

4.25 No application for residential development has been submitted since the adoption of the current Local Plan 2019, and the proposed development sought through this application seek to redevelop the site of for employment uses in line with extant lawful use of the site.

Emerging Local Plan Partial Update Evidence Base

4.26 There are a number of documents submitted as part of the public examination process that have formed part of the evidence base to inform the preparation of the emerging Local Plan for Reading.

Reading Commercial Needs Assessment

4.27 Reading Borough Council (hereafter referred to as 'the Council') commissioned Lambert Smith Hampton to prepare a Commercial Needs Assessment published in July 2025.

4.28 The Assessment identifies and predicts future employment floorspace and land requirements of the following:

- A predicted need of between 227,917 sqm (without allowance for loss replacement and margin) to 403,870 sqm (including allowance for loss replacement and margin) of employment space (or 43.7 ha to 80.0ha) in the Borough of Reading.

5. Planning Assessment

5.1 The legislative basis for decision making is contained within Section 70(2) of the Town and Country Planning Act 1990 which requires a local planning authority in determining a planning application to have regard to the development plan insofar as it is relevant and other consideration that are material, and Section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.2 This section undertakes an analysis of the proposed development against relevant policies in the Development Plan, having regard to the form and type of the proposal, its location and other material considerations. It also applies the approach to decision making under the Framework (2024).

5.3 There is a very strong and compelling planning case for approving the proposed development without delay, including:

- The proposed development is clearly a sustainable form of development and will deliver circa. 80 direct FTE jobs on site during the operational phase;
- The proposed development comprises an effective use of brownfield land as supported by the Framework; and
- The proposed development meets an identified employment need within Reading, supporting its status at the centre of the Thames Valley

The Principle of Development

5.4 The proposed development site is a brownfield site within the urban area of Reading. It is currently utilised for a range of commercial premises and the buildings fail to provide the high quality floorspace required by potential occupiers and institutional investment. It is in need of redevelopment to maximise market attractiveness, bring in new occupiers and to support the vibrancy of this part of Reading.

5.5 The principle of the development gains strong support at national level from the Framework:

- Paragraph 8 sets out the economic objective to "*help build a strong, responsive and competitive economy*"
- Paragraph 11 sets out that for decision-taking, development proposals that accord with an up-to-date development plan should be approved without delay.
- Paragraph 39 sets out that Local planning authorities should: "…*work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*."
- Paragraph 85 identifies that planning decisions should help "*create the conditions in which businesses can invest, expand and adapt. Significant weight should be*

placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"

5.6 The adopted Local Plan recognises *"the economic success of the town, which functions as the centre of the Thames Valley, one of the most economically dynamic regions in the country. Reading is a hub for a variety of businesses, including ICT, professional services and pharmaceuticals, and at the same time it still hosts a number of industrial activities, and has an increasing role in logistics*" (Paragraph 1.2.3).

5.7 The published Vision in the Local Plan sets out that:

"Reading will continue to thrive as an internationally recognised economic centre, and the core of a wider, vibrant urban area and surrounding hinterland within other authorities, that makes a vital contribution to the UK economy. It will be an environment where new business can start up and flourish. It will continue to adapt to ensure its success continues with economic changes and new working practices".

5.8 In respect of existing employment areas, Paragraph 3.2.10 emphasises that:

"*a high level of need has been identified for new floorspace for employment development, to help ensure the future prosperity of Reading. This means that the majority of our employment areas need to be retained and, where possible, intensified, to continue to provide this role. As such, there is not scope for wholesale redevelopment of employment land to help meet housing needs"*

5.9 The above helps establish the locational principles of commercial development within the Borough through which the proposed submission wholly aligns. The emerging Local Plan Review brings forward the above vision and employment need.

5.10 The pertinent policies for the consideration of the principle of the development within the adopted Development Plan comprise:

- Policy EM1 (Provision of Employment)
- Policy EM2 (Location of New Employment Development)
- Policy EM3 (Loss of Employment Land)
- Policy EM4 (Maintaining a variety of Premises)
- Policy WR3b (Other sites for development in West Reading and Tilehurst) (2 Ross Road & Part of Meadow Road)

5.11 Each of these are addressed in turn below:

5.12 Policy EM1 (Provision of Employment) identifies that provision will be made for a net increase of 53,000-112,000 sqm of office floorspace and 148,000 sqm of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.

5.13 Paragraph 4.3.1 confirms that "*Reading is the largest population and employment centre in Berkshire, which is one of the economic powerhouses of the UK …The components of*

continued strong economic growth, such as access to Heathrow airport, strong transport links to London and the west, a highly skilled workforce and a high standard of living, are likely to continue to be in place across the plan period"

5.14 Reading Borough Council published its Annual Monitoring Report[2] in December 2024. This Report confirms that the long-term trend has been for a reduction in office and general industrial floorspace (Paragraph 7.7).

5.15 The proposed development seeks the redevelopment and regeneration of an existing employment site within, and immediately adjoining a Core Employment Area where the intensification of jobs is an accepted principle.

5.16 The development proposes circa 4,300sqm of flexible employment uses, in accordance with the requirements of Policy EM1, forecasting at least 148,000sqm of industrial / warehouse space to 2036. The location of site, situated in close proximity to the strategic highway network within Region, with strong accessibility by sustainable and active travel modes to transport nodes and working populations demonstrates compliance with the requirements of Policy EM1.

5.17 Further, the redevelopment of this site for employment uses directly aligns with the spatial vision of the Local Plan in ensuring the future prosperity of Reading and enhance its position as the economic hub of the Thames Valley and wider South East region.

5.18 Policy EM2 (Location of New Employment Development) expects major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas. This includes Richfield Avenue Core Employment Area (EM2g).

5.19 Supporting Paragraph 4.3.10 considers "*these areas are currently relatively successful industrial and warehousing areas which are likely to continue to be needed in employment use. There is some scope for intensification of employment sites within Core Employment Areas, such as development on surplus parking or servicing space".*

5.20 The proposed development directly accords with the overarching objective of Policy EM2, with the proposals seeking to provide new commercial floorspace within the Core Employment Area, tailored to operational and energy efficient standards expected of occupiers and current market trends.

5.21 There would be no loss of employment land within Core Employment Areas accordance with Policy EM3 (Loss of Employment Land), with the resulting development providing enhanced provision "*that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity*" (Paragraph 4.3.12)

5.22 Policy EM3 (Loss of Employment Land) reaffirms that within Core Employment Areas, the overall level of employment land should be maintained. Paragraph 4.3.12 notes that "*Core Employment Areas have been identified as those areas of greatest economic significance, providing space that is required to ensure that the Reading economy is*

[2] https://images.reading.gov.uk/2024/12/Annual-Monitoring-Report-2023-24.pdf

balanced and that those activities which support higher value businesses are in close proximity".

5.23 As noted within the Economic Benefits Statement, the proposals will deliver "***60 net additional employment opportunities*** *for individuals living throughout the region, when allowing for economic multipliers, displacement and leakage. Around* ***30 FTE jobs*** *could also be created in total for residents of Reading, given the site's location*." The aims of Policy EM3 are therefore met.

5.24 Policy EM4 (Maintaining a variety of premises) sets out that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. Paragraph 4.3.17 notes that the "*variety of premises should be widened, including seeking more modern and flexible employment space in the designated industrial areas".*

5.25 The proposal clearly achieves this policy through the delivery of 11 employment units offering flexible space.

5.26 It is recognised that the eastern half of the site is subject to an existing allocation for residential uses under Policy WR3b (2 Ross Road) with an expected yield of 39-60 dwellings. Supporting Paragraph 7.3.12 states "*this policy identifies those sites within West Reading and Tilehurst where development will be appropriate. As well as contributing to meeting the identified needs of the Borough, allocation can help provide physical regeneration of sites which are in some cases vacant or underused*".

5.27 The principle of redevelopment on the eastern half of the site is established through its allocation under Policy WR3b. Policy WR3b outlines how development should meet set criteria that would, inter alia, ensure appropriate separation or buffers between residential and industrial areas, to improve the relationship between the two uses in the local area, address matters of noise, air quality, contamination, and ensure that residential access is generally separated from accesses to commercial areas.

5.28 It is accepted that the development of part this site for commercial units conflicts with Policy WR3b as the site is allocated for residential uses. However, (a) it is necessary to consider conformity with the development plan as a whole and (b) in any event there exist strong material considerations, outlined below, which outweigh this specific policy conflict.

Other Material Considerations

Paragraph 127 of the Framework and The Deliverability of the Residential Allocation

5.29 The submission of this application for new commercial development reflects market optimism for the proposed development, evidenced by its location within and adjoining a Core Employment Area, proximity to the existing strategic road network and wider connectivity to nationally strategic economic nodes of train stations and airports in the southeast.

5.30 Paragraph 127 of the Framework is clear that:

127. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

[emphasis added]

5.31 There are two key points to establish under paragraph 127. First, that there is no reasonable prospect of a residential use coming forward on the eastern portion of the site. Second, that the proposals contribute to meeting an unmet need for development in the area.

5.32 Each are addressed in turn.

No reasonable prospect

5.33 The Local Plan was adopted in November 2019 and as a result has been in place for c.5 and a half years.

5.34 There has been no progression of the site for residential purposes, despite land around the site coming forward for residential development.

5.35 Figure 10.1 of the adopted Local Plan identifies the Overall Timescales for the delivery of site proposals.

5.36 For Policy WR3b (2 Ross Road and Part of Meadow Road), it was identified that the timescales for the delivery of this site were classified as 'Longer term / unknown'. This is beyond the previous categorisation of site delivery of 'Long (2031 – 2036)' and thus makes no contribution to housing supply or housing trajectory within the adopted plan period.

5.37 The adopted Local Plan (2019) is expected to guide development to 2036. The Council clearly considered that this site would subsequently not deliver housing within the Plan Period. No application for residential uses has come forward on the site during the preparation or adoption of the Local Plan.

5.38 Notwithstanding this, the Council have continued to carry forward the allocation under Policy WR3b for a similar quantum of development in the Local Plan Review.

5.39 Figure 10.1 of the emerging Local Plan Review now considers that the site could be delivered for residential uses towards the end of the Plan Period (2033-2041). The change in position from the adopted Local Plan (where timescales were 'unknown') has

been made without any evidence or engagement with the landowner to confirm that the land is available and deliverable for residential uses.

5.40 The Applicant currently has no intention of bringing forward the site for residential development and has made representations to this effect in the Regulation 19 consultation of the Council's Local Plan Review.

5.41 The Applicant considers the redevelopment of the site for commercial uses the only viable proposition, and that the provision of housing as per the identified allocation is unviable.

5.42 The Application is supported by a viability assessment prepared by V7.

5.43 This viability assessment provides an evaluation of the following development scenarios:

- Existing industrial and commercial uses
- Proposed industrial and commercial uses sought through this application
- Policy compliant residential development including 30% affordable housing (Policy H3 and requirements of WR3b)

5.44 The assessment work completed identifies that a residential development on the site would not be a viable proposition.

5.45 In comparison, the proposed development provides an intensification of net jobs on site, in a sensitive and high quality design that better relates to the surrounding commercial and residential context. It is viable.

5.46 In line with the requirements of Paragraph 127, the viability assessment confirms that the redevelopment of the site for commercial and employment generating uses is a more deliverable use, meeting an identified in within and adjoining a Core Employment Area.

5.47 Overall, there is no reasonable prospect of the site coming forward for residential use.

The Need for Employment Floorspace

5.48 As part of the Local Plan Review, the published Reading Employment Area Analysis (published April 2025) identified at Paragraph 1.6 a need of

- 85,803 of office floorspace; and
- 167,113 sqm of industrial, warehouse and research and development floorspace

5.49 Paragraph 1.7 of this review confirms that:

"This is a very significant level of new floorspace, particularly for industrial and warehouse space. Whilst there has continued to be new development of offices both in the town centre and out of town locations in recent years, the geographical extent of Reading's more traditional employment areas suitable for industrial and warehouse

space has changed little over recent decades, other than to contract somewhat. Meeting these needs will require new sites to be identified, but it will also mean needing to ensure that those employment areas ***which genuinely have a future for that use continue to provide space for employment uses****" [our emphasis]*

5.50 The emerging Local Plan Review, notes at paragraph 4.3.5 that "*There is scope to accommodate the full level of need within Reading Borough. This conclusion has been reached primarily by the Housing and Economic Land Availability Assessment (HELAA) process, supplemented by other evidence where necessary*."

5.51 The Council sole basis upon which it determines that it can meet its need is therefore the HELAA. A document which documents land rather than allocating it for delivery. It is plainly obvious that there is no cogent plan for meeting the Council identified need for employment space, with the entirety of the review principally focused on the delivery of housing.

5.52 As an example. A significant proportion of the Council purported 'supply' is derived from Site Reference WH001, Land south of Island Road at Smallmead, identified with the HELAA as capable of delivering 94,221sqm of floorspace, aka over 55% of the total requirement over the plan period for logistics and industrial. The HELAA identifies the site as "***potentially*** *suitable, available and* ***potentially*** *achievable*". [our emphasis]

5.53 The HELAA suitability assessment for the site concludes the following:

"*Several aspects require further investigation, and transport issues need to be considered, but in principle employment development is potentially suitable subject to DEPZ as existing allocation. Proximity of MRF, sewage works, contamination issues mean residential development not suitable*."

5.54 There is no guarantee that this site will come forward development nor any certainty that it will deliver as envisaged by the HELAA. Therefore there can be no reliance or certainty placed on the evidence which indicates that the Council can meet this need.

5.55 Furthermore the Economic Benefits Assessment which supports this application notes that:

Reading Borough Council monitor progress against its key economic development and employment policies and reports this via its Annual Monitoring Reports (AMRs).

Indicator 5 monitors the net amount of employment floorspace completed by type across various locations in the borough, including Central Reading, the A33 Corridor, Core Employment Areas (outside of the A33 corridor) and other locations. This monitoring shows that over the 4 year period from 2020-21 to 2023-24 the borough has experienced a net loss of 22,181sqm of industrial and warehouse floorspace, including 2,816sqm within Core Employment Areas (outside of the A33 corridor).[27]

Whilst some of these losses are associated with demolitions ahead of employment redevelopment[28]*, the ongoing loss of B2 industrial floorspace is in line with a longer term trend acknowledged by the Council.*[29] *Although these losses are being offset, to a*

degree, by increases in new B8 floorspace, the rate of new floorspace completed is evidently not to levels envisaged by Policy EM1 of the adopted Local Plan.

The implications of these trends on the supply of floorspace are considered further below with reference commercial agency advice obtained from Haslams, This market intelligence and insight is provided in a letter enclosed at ***Appendix 1*** *and recognises the strategic and multifaceted role of the Richfield Avenue Core Employment Area in Reading's industrial and warehouse market, as well as its continued contribution to Reading's industrial and warehouse employment base.*

The advice from Haslams is also instructive in enabling an understanding of localised market trends which in combination contribute to there being a strong unmet demand and need for the types of units being proposed.

In summary, these market factors include:

- *The very strong local occupier interest within the North Reading submarket, in contrast to the South and East which is more attractive to national occupiers seeking larger units.*

- *The strong consistent take up, lack of industrial development and the redevelopment of aging stock to residential which has gradually eroded the supply of available space.*

- *The limited current supply of comparable units - just 19 units are currently available within the 2,000sqft-10,000sqft size band, many of which are older second hand units requiring investment. It is also notable that none are located in the North Reading submarket that will be served by the proposed development.*

- *The lack of new / modern stock which is reportedly forcing some local occupiers to look for space in neighbouring towns such as Wokingham, Bracknell and Theale.*

- *The limited pipeline of new industrial floorspace within comparable size bands, with all but one pipeline scheme (at Rose Kiln Court in South Reading) catering for occupiers seeking larger premises in excess of 10,000sqft*."

5.56 There is a clear, compelling and evidenced need for employment development within Reading. This carries substantial weight in the decision making process.

Summary of Compliance with Paragraph 127 of the Framework

5.57 It is clear that the site, in control and ownership of the Applicant, has not come forward for residential uses as allocated within the Plan since its adoption in 2019 (over 5 years), with the evidence base not expecting the delivery of the site within the adopted Plan Period.

5.58 The Applicant has made representations to the emerging Local Plan Partial Update Regulation 19 consultation, emphasising the site is not suitable to come forward for residential uses, as exemplified by the supporting viability statement submitted alongside this application.

5.59 There is no reasonable prospect that the site will be delivered for residential uses.

5.60 The Local Plan and emerging evidence base makes clear the existing difficulty in identifying additional land to meet Reading's need for "significant levels" of employment floorspace. Meeting these needs will require new sites to be identified, which has not been done, but also requires those employment areas which genuinely have a future for employment use continue to provide space for employment uses (Paragraph 1.7 of the Employment Area Analysis).

5.61 There is a clear and compelling employment need within Reading.

5.62 The proposed development plainly meets the tests laid out by paragraph 127 of the Framework.

The Existing Use of the Site

5.63 It is established and settled law that a fallback position is capable of comprising a material consideration in the determination of a planning application. The Council is obliged to have regard to the fallback position in order to take account of what the applicant is lawfully able to do without a further planning permission being granted. This is important in ensuring that planning decisions are grounded in reality.

5.64 The relevant questions to consider[3] are:

(1) Is there a legal fallback use/development that can be implemented without a new permission

(2) Is there a real prospect of the use/development taking place and if so, how does it compare to the proposed scheme

5.65 Real prospects have been defined by the courts as only comprising a 'possibility' – a low bar test.

5.66 The existing buildings and areas of hardstanding within the application boundary are within employment use and indeed are operational as per planning permission ref. 211761 regarding the eastern half of the site. This cleared area of hardstanding remains in use for open storage and car parking, compatible with the uses on site and surrounding industrial context. Indeed, there has been no dispute regarding the accepted and existing use of the site for these purposes and no enforcement proceedings have taken place regarding the lawful use of this land for commercial purposes. This is the baseline position.

5.67 As noted above, there is no intention of bringing the site forward for residential purposes. Should this application not proceed, the application will remain in employment use.

5.68 The legal fall back is therefore a compelling consideration of substantial weight. When approached through an assessment of the fallback position, the real choice is between

[3] R v SoS Environment Exp. PF Ahern (London) Ltd 1998

the continuation of lower quality commercial uses or the proposed high quality development.

The Economic Benefits

5.69 The application is supported by an Economics Benefit Statement prepared by Turley Economics.

5.70 The EBS considers the economic impacts across both the "local impact area" (Reading Borough) and wider impact area "wider south east region"). In assessing current market conditions regarding warehousing and industrial uses, the EBC identifies a variety of market conditions resulting in a strong unmet demand and need for the type pf units proposed through this development:

- Lack of new / modern stock that meets the efficiencies and sustainability credentials sought by occupiers
- Limited supply of units of comparable floor space proposed through this development
- Redevelopment of ageing industrial floorspace to residential uses eroding the supply of available space

5.71 In respect of the benefits of the proposed development, it is estimated that the development can provide up to 78 FTE jobs once complete and operational, subject to the end-occupier.

5.72 The proposed development will also generate a positive GVA impact across Reading and the wider economy, with the development expected to generate £3,500,000 GVA in Reading each year during its operation, rising to a net contribution of £5,850,000m within the wider south east region.

5.73 In addition to the above, it is likely that the development could generate a £200,000 uplift in business rate revenue per annum, contributing towards the delivery of public services and enable investment in maintaining and enhancing infrastructure within the locality.

5.74 The economic benefits carries substantial positive weight in the decision-making process.

6. Site Suitability

6.1 Within this section, we consider the technical elements of the proposals within the context of adopted planning policy to demonstrate compliance with the proposed development.

Daylight/Sunlight

6.2 Policy CC8 (Safeguarding Amenity) highlights that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of access to sunlight and daylight and other considerations.

6.3 To accompany this submission, a Daylight and Sunlight report has been commissioned ad undertaken by Right of Light Consulting. This report has been conducted and written in accordance with Building Research Establishment Guidelines entitled 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022)'.

6.4 This review takes account of existing and consented residential properties to understand the potential daylight and sunlight changes that the proposed development will have ensure that they still retain the highest expectation for natural light.

6.5 The report concludes that there will be limited impacts to the surrounding residential properties, with this limited to a number of isolated windows, which are typically minor and considered acceptable given the dense, urban nature of the site.

6.6 The overall impact of the scheme on the surrounding residential properties and amenity areas, and overall high level of compliance with BRE recommendations, is wholly acceptable in terms of daylight and sunlight.

6.7 The proposed development accords with the requirements of Policy CC8 in this regard.

Highways and Accessibility

6.8 Policy TR1 (Achieving the Transport Strategy) states that all development proposals should make appropriate provision of works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling.

6.9 The application is supported by a Transport Statement prepared by Stunt Consulting. The Transport Statement (TS) has been prepared following pre-application advice from the RBC Highway Team to inform the content / scope of transport related documents to be submitted with a planning application submission for the development proposals. T

6.10 The TS confirms that access to the existing site provided from Meadow Road leading into service yard and car parking areas of the respective units. Utilising the TRICS database, the TS identifies that at peak capacity, the site would generate c. 36 two-way movements during the AM peak hour of 0800-0900 and a further 26 two-way movements during the PM peak hour of 1700-1800.

6.11 It is recognised that there are a number of on-street car parking restrictions in the immediate vicinity of the site, including single yellow, double yellow lines and permit holder only parking restrictions to control vehicle movements

6.12 The proposed development will provide a total of 40 parking bays, of which 11 will be designated accessible bays (at a ratio of 1 per Unit) in accordance with RBC's Parking Standards SPD. The development will also make provision for 11 dual EV Charging points, enabling a total of 22 vehicles to be charged across the site.

6.13 Existing parking control measures will be retained, with vehicular access to the east of the site prevented save for access for emergency vehicles. The site has strong accessibility to residential populations within Reading through walking, cycling, as well as Reading Station less than 900m from the site, and 300m from the closes bus stops (with five different bus routes available running every 30 minutes).

6.14 The TS confirms that a sizeable proportion of future site workers could reside within walking distance and thus not depend on a private motorcar to get to work. In respect of anticipated vehicle movements, the TS confirms that the proposed site would generate in the order of 23 two way vehicle movements during the AM peak hour of 0800-0900, a reduction of 13 movements from existing peak occupancy conditions, and 12 two way vehicle movements during the PM peak hour of 1700-1800 (a reduction of 14 movements from existing).

6.15 Swept Path Analysis demonstrates how articulated vehicles measuring up to 16.5m have been tracked both internally and from the site access onto the external road network

6.16 Raised bollards operate at the southern end of Milford Road and the eastern end of Meadow Road, preventing any through traffic from the industrial area to the residential areas located further south and to the east on Addison Road. This will be retained in order to preserve the transition character of the site and the separation of industrial and residential traffic movements to preserve the amenity of surrounding uses.

6.17 The development proposals directly accord with the Parking Standards SPD and Policy TR1 in ensuring adequate and safe access to the site by all modes of transport.

Flood Risk and Drainage

6.18 The NPPF requires that 'all plans should apply a sequential, risk-based approach to the location of development' so as to 'avoid where possible, flood risk to people and property', with a requirement for a 'sequential test' to be applied to ensure that new development is steered to areas with the lowest probability of flooding' (i.e., Flood Zone 1).

6.19 Policy EN18 (Flooding and Sustainable Drainage Systems) in the Adopted Local Plan outlines that all major developments must incorporate sustainable drainage systems (SUDS) as appropriate and in line with the Government's Technical Standards. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects.

6.20 The application is supported by a Flood Risk Assessment and Drainage Strategy prepared by Baynham Meikle.

6.21 In regards of drainage, proposed building roofs are to discharge into the main drainage system. Stormwater proposed within car parking and service yard areas will be collected via a combination of linear slot/channel drains and road gullies. Permeable paving has also been proposed within the car parking bays of unit 10-11, west of the site.

6.22 The levels within the car park and service yard areas will be designed such that the critical 100 year plus climate change storm events are contained above ground, but safely within the site boundaries without risk to surrounding properties, the building or that restricts access / egress

6.23 The foul drainage network will be required to service wastewater from the industrial units. Two individually operating foul networks have been proposed for the site. The proposed foul network strategy is to be connected via gravity. Units 1-7 will outfall into the existing sewers located along Addison Road whilst units 8-11 will outfall into the existing sewer along Meadow Road.

6.24 The eastern half site has been assessed as part of the Council's Strategic Flood Risk Assessment (Levels 1 and 2) to support its emerging allocation. The SFRA notes that "*none of the site is located in Flood Zone 3a or 3b with the majority of its area falling in Flood Zone 1". Whilst access routes to and from the site are located within Flood Zone 2 and the design flood extent, development is already established in the area and "it should not be a barrier to development*".

6.25 The proposed use is categorised as a "less vulnerable" use as defined in the Flood Risk Vulnerability Classification, rather than the 'more vulnerable' use of the site for residential dwellinghouses as allocated within the adopted and emerging development plan.

6.26 Notwithstanding this, a in line with the sequential approach identified within the adopted Development Plan and the Framework, a Flood Risk Sequential Assessment has been prepared and supports this application. This demonstrates that the site is the most sequentially preferable for the proposed development.

6.27 The proposed development is in accordance with EN18 (Flooding and Sustainable Drainage Systems) and the requirements of national policy.

Air Quality

6.28 The development site is located within an identified Air Quality Management Area and as such needs to demonstrate compliance Policy EN15 (Air Quality). Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. It is acknowledged that the site lies in close proximity with the IDR, a major transport route through and across Reading.

6.29 The application is supported by an Environmental Air Quality Assessment prepared by Quantum Air. A desktop assessment confirms that measured concentrations of

pollutants have not recorded any exceedances against mean national air quality objectives between 2018 – 2024, with all predicted levels modelled to 2030 comply with target limit values.

6.30 Proposed traffic arising from the proposed development has been found to have unlikely detrimental pollution impact upon the local road networks and ambient levels of air quality and comply with Institute of Air Quality Management guidance figures.

6.31 The AQA concludes that, through good practice and implementation of appropriate mitigation measures, which can be secured via an appropriately worded planning condition attached to any formal consent, that the release of dust during construction and operational phases would be effectively controlled and mitigated, with resulting effects considered to be 'not significant'.

6.32 The proposed development can therefore demonstrate accordance with Policy EN15 and the impacts of the proposed development on air quality receptors have been identified as "no significant".

Noise

6.33 Policy CC8 (Safeguarding Amenity) explains development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of noise and disturbance and other consequent factors.

6.34 The application was supported by an Environmental Noise Impact Assessment prepared by Quantum Acoustics. This report acknowledges that noise disturbance from reversing alarms, especially at night, is a common issue for residential areas. The proposed development proposes the use of broadband alarms because they are safer and quieter, especially in noise-sensitive environments. The control and operation of heavy duty machinery and loading and unloading of materials.

6.35 Through the implementation of suitable mitigation measures, it is predicted that internal operation noise levels comfortably sit within acceptable range, with the external envelope of the proposed units comprising insulated cladding and roller shutter doors located on façades facing away from residential properties. As such, noise breakout from internal activities is not considered to be an issue.

6.36 The Report has considered the potential change in road traffic volumes to be 'negligible' in respect of traffic noise, and in terms of operational noise, the impacts from HGV and LGV manoeuvring and loading/unloading activities have been identified as not significant during daytime and unlikely to be significant at night due to the infrequency of intensive use.

6.37 The submitted noise assessment concludes that the proposed development complies fully with noise related national and local policy, namely Policy CC8 and that any mitigation can, if deemed appropriate, be impose by way of suitably worded planning condition.

Energy and Sustainability

6.38 The adopted Local Plan at policies CC2 (Sustainable Design and Construction), CC3 (Adaptation to Climate Change), CC4 (Decentralised Energy) provides the policy requirement in relation to energy generation and waste.

6.39 Policy CC2 (Sustainable Design and Construction) requires that all major conversions to residential are required to meet the most up to date BREEM 'Excellent' standard, where possible. Furthermore, stated in Policy CC4 (Decentralised Energy) any non-residential development of over 1,000 sqm shall consider the inclusion of decentralised energy provission, within the site.

6.40 Paragraph 4.1.4 of the Local Plan states that:

"*For a number of uses, including offices, the requirement to achieve 'Excellent' ratings is unlikely to significantly affect viability. However, some types of development, such as industrial uses, warehouses and schools might find it more difficult to meet these standards. In these cases, developments must demonstrate that the standard to be achieved is the highest possible for the development,* ***and at a minimum meets the BREEAM 'Very Good' standard***."

Our emphasis

6.41 With regard to waste minimisation at Policy CC5, appropriate measures will be put in place to ensure more sustainable approaches to waste management in relation waste storage and recycling. Measures will be agreed with the occupiers of the proposed development, prior to occupation.

6.42 In relation to the construction phase, a site waste management plan will be prepared. This will set out how waste will be managed, reduced, reused, or recycled. This can be controlled via planning condition.

6.43 An Energy Statement prepared by Shepherd Brombley Partnership has been prepared to fully address the requirements of Policy CC2 (Sustainable Design and Construction) and the Sustainable Design and Construction SPD.

6.44 The buildings will be incorporated with roof mounted photovoltaic (PV) arrays on all of the proposed units in combination with air source heat pumps to provide heating/cooling within ancillary office areas in respective units where this applies.

6.45 Further, the Applicant is committed to securing Energy Performance Certificate (EPC) Rating A+ in all of the respective units through the detail design and construction phases.

6.46 At this stage in the development process, BREAAM pre-assessments indicate how the proposed development units achieve at least BREEAM Very Good in accordance with the requirements of Policy CC2(Sustainable Design and Construction) and is supporting text. A detailed summary of credits targeted through each assessment is provided within the Energy Statement.

Ecology and Trees and Biodiversity Net Gain

Ecology and Trees

6.47 Policy EN12 (Biodiversity and the Green Network) of the Adopted Local Plan explains that 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.

6.48 This application is supported by a Preliminary Ecological Assessment (including Bat Building Inspection) prepared by Phlorum Consultants to demonstrate the scheme's compliance with adopted policy EN12 (Biodiversity and the Green Network).

6.49 The report identifies that the built-up habitats in the immediate surrounding area provides poor quality habitat for commuting and foraging bats and other protected species (namely amphibians, reptiles badgers), and that subject to the implementation of the recommended measures for habitat retention, creation and enhancement, no reduction in the ecological interest of the site or its surrounds is likely to arise as a result of the proposed development.

6.50 Notwithstanding this, it is acknowledged that in order to avoid any potential impact on breeding birds, the demolition of buildings should be undertaken outside the main bird nesting season which runs from March to August.

6.51 New development offers the opportunity for habitat enhancement in accordance with national and local planning policy.

6.52 Policy EN14 (Trees, Hedges and Woodlands) outlines 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. 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.

6.53 The submitted Landscape Statement identifies the substantial soft landscape improvements proposed, which includes the provision for tree retention and planting of new trees, including along the street frontage and within areas of public realm to enhance the character and appearance of the area.

Biodiversity Net Gain

6.54 With regards to the biodiversity, gains are considered achievable through the inclusion of features for bats / breeding birds on buildings and existing trees, use of fruit and nut producing species and nectar rich species and log and brash piles around scrub edges and on rooftops for invertebrates, amphibians and reptiles.

6.55 The application site comprises previously developed land with little on-site vegetation or features supporting habitats. Appropriate mitigation measures, including but not

limited to a Construction Environmental Management Plan, can be secured via condition, that centre on the sensitive removal of vegetation and careful timing of works, to be implemented to safeguard faunal species during relevant site clearance works, whilst a sensitive lighting scheme will be implemented to minimise adverse effects on bats. Long-term opportunities will be maintained, if not enhanced, under the proposals through new landscape planting, and provision of nest/roost boxes

6.56 The proposals have sought to minimise impacts on biodiversity and subject to the implementation of appropriate avoidance, mitigation and compensation measures, with the accompany Biodiversity Net Gain Assessment concluding that the Site is capable of achieving a net gain of 44,141.10%, significant in excess of the minimum 10% net gain in biodiversity across Habitat and Hedgerow units.

6.57 It is considered that the proposals can demonstrate accordance with Policy EN12 of the adopted Local Plan.

Archaeology

6.58 As part of this submission, due consideration has been given to adopted policies EN1 (Protection and Enhancement of the Historic Environment), EN2 (Areas of Archaeological Significance).

6.59 Policy EN2 (Areas of Archaeological Significance) of the Adopted Local Plan states that applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record. This will require an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined.

6.60 This planning application submission is accompanied by an Archaeological Desk Based Assessment, which demonstrates compliance with Policy EN2 (Areas of Archaeological significance).

6.61 The ADBA confirms that there are no nationally significant designated heritage assets are no Historic Environment Record entries relating to the site, such that any archaeological remains, if present, are most likely to be of low significance.

6.62 It is noted that there is the potential archaeological remains have survived, but have not yet been fully excavated, but that the construction of the proposed development will cause neither a significant nor widespread impact to levels below the existing 'made ground' by virtue of previous development of the site.

6.63 The proposed development therefore demonstrates accordance with Policy EN2.

Ground Contamination

6.64 Policy EN16 (Pollution and Water Resources) sets out development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment,

human health, buildings, and the wider environment, during demolition and construction phases as well as during the future use of the site.

6.65 The application is supported by a Desk Study Preliminary Risk Assessment Report prepared by Jomas. The report confirms that borehole records show the site comprise Made Ground, overlying Langley Silt, Kempton Park Gravel and Chalk Formation deposits

6.66 The preliminary risk assessment considers the site as having a "moderate to low risk" noting the potential presence of asbestos within the existing buildings on site, but acknowledges that there should be no risk to end users from asbestos within the fabric of the existing building if the potential asbestos containing materials are removed by suitably qualified and experienced specialists under controlled conditions.

6.67 In respect of the construction phase, the applicant is committed to preparing and submitting a construction management plan prior to commencement of development which will provide details of the procedures to be undertaken during the demolition and construction phases to ensure there is no adverse impact upon the groundwater environment, human health and the wider environment. The proposed development is therefore considered to be in accordance with Policy EN16.

Lighting

6.68 Policy CC8 (Safeguarding amenity) asks that development not cause a detrimental impact on the living environment of existing residential properties including, but not limited too, artificial lighting.

6.69 An external lighting strategy has been prepared by SB Partnership outlining good practice measures and outlines a suitable approach for the proposed lighting for the site for the purpose of safety, security, wayfinding and amenity.

6.70 The proposed external lighting scheme comprises a mixture of building mounted and column mounted luminaires to illuminate the access road, on-site car parks, service yard areas and paths.

6.71 The strategy has been intended to set out a minimally obtrusive approach to the lighting, whilst ensuring it is necessary and considers the sensitivity of nearby human, environmental and ecological receptors in line with policy and best practice and British Standards for Lighting of Work Places (BS12464-2) and Design of Road Lighting (BS5489-1). All lighting is proposed as 'night time friendly' with 0% upward light ratio with glass fronts to reduce visibility of light source and glare.

6.72 Further, the proposed strategy makes allowance for adjustable time control with programmable sensor to 'dim' the light or 'switch off' luminaries when the car park and service yards are not in use, and only illuminating when motion is detected.

6.73 The proposed development can therefore demonstrate compliance with Policy CC8 in ensuring that effective and efficient lighting controls are available to ensure the safe and successful operation of the development to increase safety and security of the premises and operation without detriment to the residential amenity of adjoining properties.

Summary

6.74 The application is supported by a comprehensive set of supporting application documents which demonstrate the Sites suitability and deliverability, which demonstrates that there will be no adverse impacts arising from the proposed development. It should be approved without delay.

7. Draft Heads of Terms

7.1 The Applicants are committed to agreeing appropriate and proportionate Heads of Terms with Reading Borough Council at the appropriate time once the contributions required associated with the application proposals are understood.

7.2 The Applicant will commit to providing planning obligations in association with the proposed development where they satisfy all of the tests set out in Regulation 122(2) of the Community Infrastructure Levey Regulations 2010 (As amended) and are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonable related in scale and kind to the development.

7.3 Discussions with relevant officers on the above will continue during the application determination process such that an agreement can be reached by the time this application is reported to Planning Committee.

8. Planning Balance

8.1 This Section of the Planning Statement considers the 'planning balance' and its role in assessing the Proposed Development in favour or against the granting of consent on this site.

8.2 Paragraph 11 of the Framework sets out circumstances where the presumption in favour of sustainable development should be applied through the decision-making process.

8.3 In line with paragraph 11(c) it is considered that the proposals should be approved without delay given they accord with relevant policies within the Development Plan.

8.4 Within the context of paragraph 11(c), the Court of Appeal judgment in Cornwall Council v Corbett[4] highlights that conflict with a particular policy within the Development Plan, does not necessarily equate to a failure to comply with the development plan as a whole nor deprive a proposal of the statutory presumption in favour of the development plan. This is particularly relevant where there are other policies within the Development Plan which are strongly in favour of the proposals, given planning policies "*can pull in different directions*"[5].

8.5 Through this Statement and the supporting technical material, the only policy conflict arising from the proposal relates to the non-delivery of an allocated site for residential development.

8.6 Paragraph 85 of the Framework confirms that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

8.7 Further, Paragraph 127 recognises that planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified need.

8.8 The application site is a logical location for commercial development as it is well-related to the existing Core Employment Area along Richfield Avenue and the Strategic Road Network around Reading.

8.9 The Applicant recognises that the proposed development does not accord with Policy WR3b, however as this Planning Statement establishes, the weight to be afforded to that conflict is only limited.

[4] *R (on the application of Corbett) v Cornwall Council [2020] EWCA Civ 508*
[5] *R v Rochdale Metropolitan Borough Council, ex parte Milne [2000] EWHC 650*

8.10 This specific and limited policy conflict should be assessed against the proposed compliance with the Development Plan as a whole, with significant weight given to the proposals compliance with policies

- EM1 (Provision of Employment
- EM4 (Maintaining a variety of Premises)

8.11 It is considered the development complies with the development plan as a whole and the presumption in favour of sustainable development under paragraph 11 (c) should be applied.

8.12 Should decision-makers consider the scheme is in conflict with the Development Plan as a whole due to conflict with WR3b, and the allocation of half of the site for residential uses, it is the Applicant's position is that planning permission should still be granted. That perceived conflict is limited (to the allocation of the site for residential uses) and there are other material considerations identified throughout this statement that indicate that planning permission should be granted. These include:

- Paragraph 127 of the Framework – the proposal complies with the two limbs of paragraph 127 in that:
  - there is no reasonable prospect of the site coming forward as envisaged by the sites allocation for residential purposes; and
  - The proposed development meets an identified need for employment floorspace, with there being no cogent plan within the adopted or emerging Local Plan to meet this need.

8.13 The legal fall back – should this application not be approved the site will remain in lawful employment use in any event. The real choice is between lower quality employment use continuing or this high quality proposed development.

- The proposals deliver significant economic benefits

8.14 Furthermore, the Framework provides guiding principles for the assessment of sustainable development including economic, social and environmental discussions (paragraph 8).

8.15 These objectives should not be taken in isolation and decisions need to take local circumstances into account so they respond to different opportunities for sustainable development in different areas. There is not a fixed UK standard and therefore each proposed development has to be individually assessed in its own context. A summary is set out below against each objective.

Sustainable Development Dimension	Turley Comment
Economic	• The redevelopment of the site has the potential to provide c. 78 direct FTE jobs on-site. • Development can generate up £5.85m GVA impact each year across the South East, of which £4.15m within Reading Borough. • Development likely to facilitate further 60 direct and indirect 'induced' jobs across the South East of which 30 FTE likely within Reading Borough. • Provision of modern, sustainable and efficient employment floorspace that meets an identified need within the Borough.
Social	• The development of the site will bring benefits in terms of additional employment floorspace to the meet the Borough's employment needs • The development will provide a mix of premises, including premises for start-up and market units • A well-designed development that accounts for the transitionary character of the surrounding commercial and residential areas • Use of a contextual material palette to add visual interest
Environmental	• Provision of employment opportunities within walking and cycling distance of sustainable travel nodes and residential areas in Reading Town Centre • Commitment to securing 10% biodiversity net gain, with the BNG Report demonstrating a 44141.10% biodiversity increase from the proposals • Potential for habitat creation and enhancement • Target at least BREEAM very good and EPC Rating A+ for the new buildings • Re-use of brownfield land to meet an identified need

8.16 As demonstrated in the table above, the proposals will deliver a range of benefits of substantial, significant and modest weight, including economic and environmental benefits as well as importantly addressing the ongoing need for commercial development within the Borough including an area allocated for such purposes (and intensification of uses).

8.17 The adverse impacts of the proposals are limited to a technical policy conflict with the hypothetical delivery of a residential allocation.

8.18 The planning balance clearly weighs in favour of the scheme and planning permission should be granted.

9. Conclusions

9.1 Full planning permission is being sought in respect of the following proposal:

Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping

9.2 As demonstrated within this Planning Statement and the Design and Access Statement, which is also submitted in support of the application, the proposed development will provide a sustainable commercial development space, which sensitively responds to the surrounding context of the Site.

9.3 Consultation has been undertaken with the local community in respect of the planning application. Details of the engagement activities undertaken are provided in the accompanying Statement of Community Engagement. In addition Applicant entered in pre-application discussions with the local planning authority, and engaged pro-actively with the emerging Local Plan Review to assert the appropriate development uses of the site.

9.4 The proposed development aligns with national planning policy in relation to the following:

- **Brownfield Site** – one of the core planning principles of the Framework is to encourage the effective use of previously developed land. The Site is considered an extremely effective use of the Site, providing intensified employment uses where it is most needed.

- **Sustainable Location** – the Framework states that the presumption in favour of sustainable development is the objective of the planning system. The location of the site, adjoining the Town Centre will minimise the need for vehicle trips (both by private car and on public transport) and provide further connections to the strategic road network and commercial nodes, including London Heathrow and Gatwick Airports and wider South East / South West. The location is in very close proximity to residential areas creates a unique pool and attraction for everyday services and facilities required by future employees;

- **Supporting Economic Growth** – the application will help to achieve the desired economic growth in Reading and support its role as the employment centre in Berkshire, and its role as one of the economic powerhouses in the UK.

- **Energy Efficient Design** – The proposed buildings are designed to achieve BREEAM 'Very Good' as a minimum, being of energy efficient design and materials and taking a proactive approach in mitigating and adapting to climate change.

- **Speed of Delivery** –the proposed development, with details provided in full, is considered viable, achievable and deliverable early within the emerging Local Plan Review period.

9.5 The range of studies that have been undertaken to support this planning application are all summarised in Section 6 of this Statement and the accompanying reports. These demonstrate that a high quality development will be achieved at the Site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case.

9.6 It has been demonstrated that this proposal and Site is suitable for development. Furthermore, the submission of this application demonstrates that the site is available, achievable, and deliverable.

9.7 There are no reasons why the development could not be delivered or substantial progress made with its delivery within five years from the grant of permission and the site is therefore achievable. This proposal makes a significant contribution towards the housing and employment supply position in the Borough and this should be afforded substantial weight in the determination of this application.

9.8 It has been clearly demonstrated that there is no harm as a result of the proposals which would significantly and demonstrably outweigh the substantial benefits which would be achieved. The proposals should be granted permission in accordance with the presumption in favour of sustainable development.

Appendix 1: Relevant Planning Policies

Local Plan (November 2019)	
Policy Name	Summary of Wording
CC1: Presumption in Favour of Sustainable Development	Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.
CC2: Sustainable Design and Construction	Proposals for new development, including the construction of new buildings will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards,
CC3: Adaption to Climate Change	Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements; Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings, and streets and to help to connect habitat. All development shall minimise the impact of surface water runoff from the development in the design of the drainage system.
CC4: Decentralised Energy	Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq. m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision
CC5: Waste Minimisation and Storage	Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling, and composting.
CC6: Accessibility and the	The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.

intensity of development	
CC7: Design and the Public Realm	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, including: • Layout: urban structure and urban grain; • Landscape; • Density and mix; • Scale: height and massing; and • Architectural detail and materials Will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: • Character - a place with its own identity and sense of place • Continuity and enclosure • Quality of the public realm and provision of green infrastructure and landscaping • Ease of movement and permeability • Legibility - clear image and easy to understand • Adaptability – capable of adaptation over time • Diversity – meets a wide range of needs. Developments will also be assessed to ensure that they: • Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm; • Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion; • Address the needs of all in society and are accessible, usable, and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily; Are visually attractive as a result of good high-quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping. Applications for major developments, or other relevant developments, should be accompanied by a design and access statement
CC8: Safeguarding Amenity	Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: • Privacy and overlooking;

	• Access to sunlight and daylight; • Visual dominance and overbearing effects of a development; • Harm to outlook; • Noise and disturbance; • Artificial lighting; • Vibration; • Dust and fumes; • Smell; • Crime and safety; or • Wind, where the proposals involve new development of more than 8 storeys. The position of habitable rooms, windows and outdoor living spaces will be particularly important.
CC9: Securing Infrastructure	Proposals for development will not be permitted unless infrastructure, services, resources, amenities, or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.
EN1: Protection and Enhancement of the Historic Environment	All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.
EN2: Areas of Archaeological Significance	Applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record. This will require an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined. Planning permission will not be granted in cases where the assessment of the archaeological impacts is inadequate. Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed unless there is clear and convincing justification in the form of overriding public benefits.
EN12: Biodiversity and the Green Network	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

EN14: Trees, Hedges and Woodland	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 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.
EN15: Air Quality	Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account: • Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality; • Whether the development is within, or accessed via, an Air Quality Management Area; and • Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated.
EN16: Pollution and Water Resources	Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise, or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation.
EN17: Noise Generating Equipment	Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.
EN18: Flooding and Sustainable Drainage Systems	Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards.

EM1: Provision of Employment	Provision will be made for a net increase of 53,000-112,000 sq m of office floorspace and 148,000 sq m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.
EM2: Location of New Employment Development	Major office development will take place in the centre of Reading and along the A33 corridor. Other major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas. Core Employment Areas include EM2g: Richfield Avenue
EM3: Loss of Employment Land	Within the Core Employment Areas, the overall level of employment land should be maintained.
EM4: Maintaining a variety of premises	A range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. In particular, the overall level of start-up and grow-on space should be maintained and, where possible, increased, and any loss of small units should be offset by new provision. Subject to these considerations, proposals for redevelopment of older industrial units for more flexible employment premises will be acceptable.
TR1: Achieving the Transport Strategy	Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans. All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application
TR3: Access, Traffic and Highway-related Matters	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.
TR4: Cycle Routes and Facilities	Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of

	new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable
TR5: Car and Cycle Parking and Electric Vehicle Parking	Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
WR3: Other sites for development in West Reading and Tilehurst	WR3b 2 Ross Road and Part of Meadow Road Development for residential. Development should: • Take account of access restrictions on surrounding streets and ensure that residential access is generally separated from accesses to commercial areas; • Include all parking requirements within the site to avoid exacerbating parking issues on existing streets; • Ensure appropriate separation or buffers between residential and industrial areas, to improve the relationship between the two uses in the local area; • Address air quality impacts on residential use; • Address noise impacts on residential use; • Address any contamination on site; • Ensure appropriate back-to-back separation from existing residential; • Take account of the potential impact on water infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and • Address flood risk issues arising from a Flood Risk Assessment

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Appendix 3: Design and Access Statement to application 25/1191

DESIGN AND ACCESS STATEMENT

MEADOW ROAD
READING
RG1 8LB

JULY 2025
REV 0

V7

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13.0 SUMMARY

Version: 0
Version date: July 2025
Comment Final Report

1.0

INTRODUCTION

This Design and Access Statement Document has been prepared on behalf of CBRE Investment Management and V7 Asset Management to engage with Reading Borough Council to support the redevelopment of 0.89 hectare of employment land at Meadows Road, Reading.

The proposal is to redevelop land which currently consists of two employment buildings, one of which is split into two units of varying uses, and the other building, known as Talbot House, situated on the eastern portion of the site is currently being used as a bus depot. The site previously occupied an employment building to the southwest portion of the site and the is site is currently used for open storage of buses.

The site previously housed a third industrial building, an aged employment building fronting Meadows Road, which was demolished in 2019.

The proposal is for the demolition of the existing structures on the site, and the development of flexible employment floorspace totalling circa 4,300m2 GEA of modern, flexible Class, E(g)(ii) research and development, E(g)(iii) industrial process, B8 Storage and Distribution and B2 General Industrial uses, offering employment floorspace with ancillary office accommodation in a range of sizes that meets modern market requirements.

The proposed redevelopment will consist of 4 buildings, subdivided into 11 units with ancillary office accommodation, service yards, car parking and associated landscape.

This design and access statement document should be read in conjunction with the other documents that have been prepared to support this submission.

The process of design is discussed throughout this document following the headings identified in CABE guidance for assessing proposals in terms of design and the integration of access, these headings are as follows:

USE: Establishes the proposed use of development, how it will fit in with and support the local area.

LANDSCAPE: Explanation of how a landscape concept can be incorporated into the scheme and how it has influenced the scheme design.

AMOUNT: Identifies the amount/density of development being proposed and why it is appropriate.

LAYOUT: Explanation of how the site can be successfully developed and how it will work and fit in with its surroundings.

SCALE: Refers to the size of buildings and spaces, showing why those sizes are right for the site and how they relate to existing buildings.

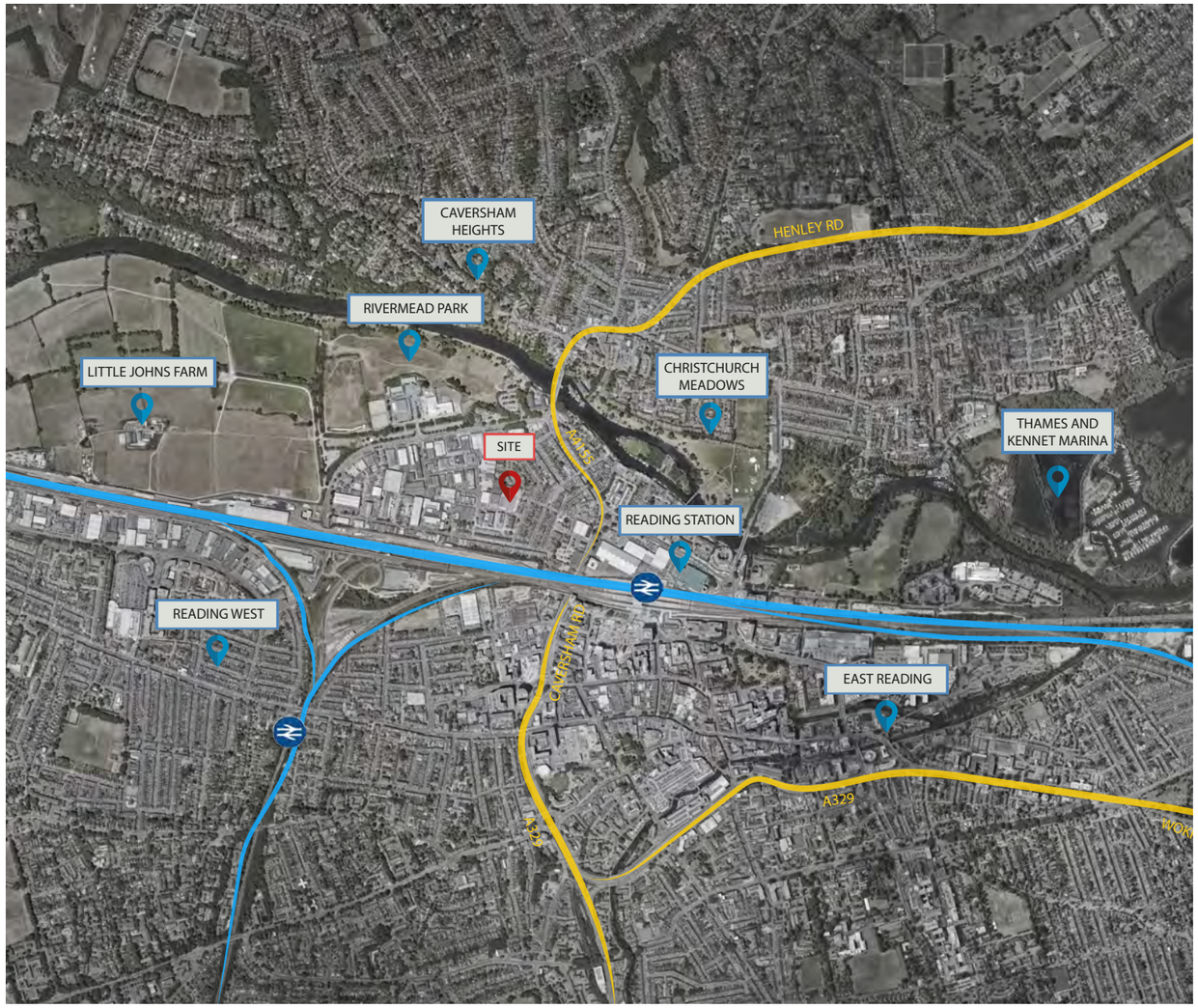
APPEARANCE: Explanation of what the development will look like and why it is appropriate for the setting.

ACCESS: Proposals for pedestrian, vehicular and transport links and inclusive access.

In addition to the CABE headings we have also added two further key heading in order to better explain the applicants vision in respect of;

SECURITY: An overview of the security measures.

SUSTAINABILITY: An overview of sustainable design measures and how the applicant's vision for a net zero carbon development can be realised within the scheme.



LOCATION DIAGRAM
Google Earth, 2025

2.0

LOCATION & SETTING

The application site sits on the eastern edge of the Richfield Avenue Employment Area and currently accommodates active employment uses.

The site sits within a wider industrial and employment context embedded within the Reading town centre.

The site benefits from nearby transport links, with bus stops less than 0.2 miles from site, and Reading Train Station 0.40 miles from the site. The site is well located and benefits from good access, situated adjacent to the A329 and A33, leading towards the M4 Junction 11, with links into London.

The site is accessed to the south from Meadow Road by means of a one way road and to the east from Ross Road, both roads fed from the A4155.

The site currently consists of two employmnt use buildings and open sorage which are currently dated and do not meet current institutional requirements sought after in the modern letting market.

Both of the buildings are occupied. One building is split into two units, both with lease events that will trigger in the near future. The other building and associated open storage areas to the front is leased on a short term basis.

Both buildings on site are dated and do not meet the demands of the modern employment market, they do not meet current EPC and sustainability standards.

The application site is L shaped, with the length being more prominent to the site, with the width varying on each end of the site. The site is relatively flat with no noticeable falls spanning throughout, the site levels are consistent with its surroundings and tie into the Meadow Road levels.

Whilst being situated within an employment context, to the immediate north of the site are the rear gardens of residential properties and an existing play area to the residential area adjacent to the site. Further north are a mix of uses, such as employment buildings, car showroom dealerships, hotels and leisure centres. The River Thames runs to the north of the site, with residential estates such as Caversham Heights situated beyond the river.

To the immediate east of the site are residential properties, with the rear gardens facing the site. The site is bounded by a combination of fences and solid brick walls to the rear of the gardens. The properties include a number of new terraced developments recently completed, known as The Printworks. Residential properties extend beyond the east, with a mixture of uses embedded into the estate, including a 3-storey self storage facility and clusters of industrial and employment buildings. Further east, beyond the A329 is the Reading Town Centre, incorporating a mix of uses including; retail parks, office tower blocks and wide host of employment buildings.

The Printworks residential development wraps around the south of the site, facing Meadow Road. The properties are a mix of multi-storey apartment accommodation and houses separated by soft landscape fronting Meadow Road.
To the southwest sits dated employment buildings forming part of the Richfield Avenue Employment Area, these are adjacent to the new residential development. The Cross Country Rail line site south of the site. Beyond the track are a combination of employment and industrial buildings, embedded within residential estates. Residential estates continue to follow further south.

Directly to the west of the site, adjacent to Milford Road, are a large number of employment and industrial buildings of varying scales, the site sits on the edge of an industrial setting. Further West, beyond the employment area, is Little John's farm, land used for both agricultural use as well as host for Reading Festival. Further west is an abundance of agricultural land and residential development, split apart from north to south by the River Thames.

The site currently has employment uses with dated buildings that do not meet modern requirements. The site sits on the edge of the Richfield Avenue Employment Area and will be heavily influenced by the surrounding employment buildings. It is envisaged the site will provide a modern enhancement to the dated employment stock, contributing a high quality environment for business use.

LOCATION DIAGRAM
Google Earth, 2025

N

2.0

LOCATION & SETTING (CONT.)

1: EMPLOYMENT BUILDINGS ALONG MILFORD ROAD BACKING ONTO DENBEIGH PLACE

2: VIEW OF THE EXISTING SITE LOOKING DOWN DENBEIGH PLACE

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(Google Earth, 2025)

5: RESIDENTIAL BUILDINGS ALONG ADDISON ROAD
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2.0

LOCATION & SETTING (CONT.)

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14: EXISTING EMPLOYMENT BUILDINGS ALONG MILFORD ROAD
(Google Earth, 2025)

15: EXISTING EMPLOYMENT BUILDINGS ALONG MILFORD ROAD
(Google Earth, 2025)

3.0

PRE-APP RESPONSE

A pre-application proposal was submitted in September 2024, with feedback and advice received in January 2025. The advice given was in respect of land use principles, layout, scale and design, transport matters, sustainability and ecology.

Proposed buildings will be of a residential scales, and offer higher quality aesthetic, using sustainable materials that compliment the existing nearby buildings, ensuring the proposals are wholly suitable to the sites context and positively contribute to the locality.

LPA feedback highlighted concerns for the proposed site becoming a rat run for vehicles travelling between Meadow Road and Addison Road. The pre-application plans had shown this road to be open, however the proposal addresses these concerns by incorporating a new security gate and fence that will be locked at all times and only to be opened in an emergency to gain access or escape the site. The proposal also incorporates a raised arm barrier to the main access off of Meadow Road that will cater for units 1-9, which will limit vehicles entering the site other than for the site itself, positively conforming to Policies TR1 and TR3 of the Local Plan.

The LPA raised further concern regarding transport issues and vehicle manoeuvrability. The proposed layout has been designed and coordinated with transport consultants and a transport assessment will be submitted as part of the planning application. The transport assessment, and vehicle tracking undertaken, demonstrates that the proposed layout provides adequate road widths and turning radii for a range of vehicle sizes. Swept path analysis has also been undertaken which takes into account on-street parking bays on Meadow Road, demonstrating large HGV vehicles can efficiently turn in and out of the site entrance.

There were concerns regarding the close proximity of existing residential properties to the northern, eastern and southern boundaries of the site. The proposed layout positions buildings away from residential boundaries, providing generous buffers which allow for landscaped screening.

A sightline section demonstrates that the proposed buildings are of an acceptable distance to not obstruct nor impact the daylight and sunlight of existing residential properties. The rear of these proposed buildings do no contain any windows. These are blank elevations with some interest by using contrasting colours and textures, highlighting that no residential properties are overlooked.

LPA feedback raised concerns on noise impacts of the development. The layout and orientation of the building forms have been considered and configured to ensure that yards and operational areas do not face the surrounding residential uses providing inherent mitigation to noise impact. An environmental noise assessment has been undertaken to establish the existing ambient and background noise levels. Potential change in road traffic volumes would have a negligible change in traffic noise levels, concluding no adverse impact on existing dwellings in the vicinity. Operational noise have been identified to be insignificant during day and night operation, complying with noise related national and local planning policies.

The scale of the development was of concern, relating to the proximity to residential areas along Addison Road and Denbeigh Place. The proposed layout demonstrates the buildings have been set back from residential boundaries with suitable landscape buffers. Units 4-7 are positioned further away to the boundary than the existing building. The proposed units are of a residential scale in term of height and massing, and the proposed embeds itself within its surrounding context. The proposals demonstrate consideration of Policies CC7 and CC8 of the Local Plan, as the units are of an appearance that tie in with the local character and use similar materiality, whilst enhancing the locality with strengthened street scenes and landscaped amenity space. The application is supported by a daylight and sunlight report, which will demonstrate how the proposals sympathetically respond to their surroundings.

The proposals take consideration of Poly EN14 and proposes a well considered tree planting approach. There is a lack of landscaping on the existing site. The proposal incorporates landscaped screening along the boundaries and along the internal roads to enhance biodiversity on a site that is currently heavily hardscaped.

The LPA raised concern relating to other transport matters and the distance between dropped kerbs along Milfor Road in order to access the service yards to Units 10-11. The proposed layout provides safe crossing for pedestrians along Milford Road, and significantly reduces the distance between the existing dropped kerb by more than half. The proposal still provides suitbale and sufficient width for vehicle access and manouvrebility.

Conclusion:
The proposed development has taken into consideration the LPA comments and concerns relating to the land use, scale, natural environment and transport matters.

The proposed development demonstrates that it has been well considered to ensure it sits sympathetically within its context and positively responds to its residential boundaries.

The proposed buildings are of a residential scale and do not obstruct neighbouring views, whilst the building appearances have been carefully selected to tie in with the local character.

The acesses into site, road widths and radii have been designed to ensure suitability of a range of vehicle sizes, allowing for efficient manouvrebility and access from both Milford Road and Meadow Road. Safety and security concerns are addressed through the provison of secure gated access into site, mitigating concerns of the site being used as a rat run.

Feedback from the LPA has been adressed to ensure the viability of the scheme and to provide a high quality flexible employment scheme which will positively contribute to its locality and to Reading.

4.0

USE

The proposed development sits on the eastern edge of the Richfield Avenue Employment Area which consists of a heavily industrial identity.

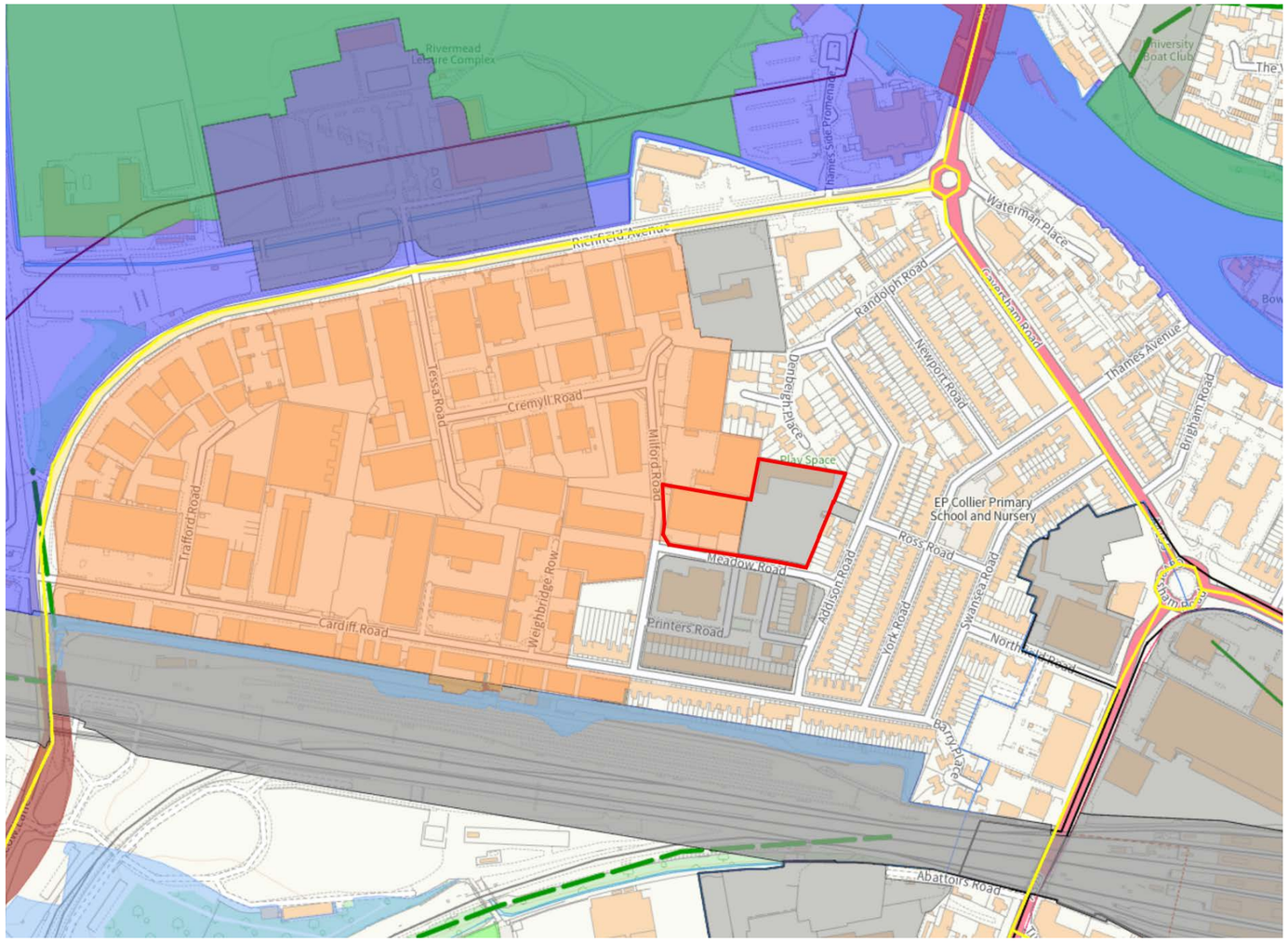
The application site currently occupies two employment buildings, both of which are currently occupied. One building is split into two units occupied by a brewery and tap house, and a card manufacturing company. The other building located to the north east of the site is currently being used as a bus depot. The site previously occupied an additional employment building of an industrial typology, demolished in 2019.

The two buildings have an approximate GIA total of circa 4,700m^2. The footprint of the previous third building was approximately 2,400m^2 prior to demolition.

The proposal consists of an industrial development of 11 units of varying sizes totalling circa 4,300m^2 GEA. The proposal offers a mix of sizes that primarily focus on small scale start-up and 'step up' units. The development seeks a flexible range of uses, falling within the E(g)(ii) research and development, E(g)(iii) industrial process, B8 Storage and Distribution and B2 General Industrial uses, offering employment floorspace with ancillary office accommodation.

The proposed development will provide a flexible range of employment uses that will meet modern market demands. The range of employment uses on offer will accommodate a range of potential occupiers, making it a highly adaptable and attractive development.

It is acknowledged that the eastern portion of the site sits within an allocated development site referred to as WR3b. Given the surrounding context of the site, it is anticipated that a development of flexible employment uses will be appropriate to the area, supporting the economic development of the area and providing new jobs to local residents.



USE ALLOCATION PLAN
EXTRACTED FROM READING BOROUGH COUNCIL POLICY MAP

N

- Core Employment Area
- Major Landscape Feature (Thames Valley)
- Green and Public Space
- Allocated development

5.0

AMOUNT

The site is approximately 0.89 hectares in size, accommodating two existing buildings of active employment use with an approximate GIA of circa 3,660m2 and 1,030m2 respectively. Building 1 is divided into 3 units, one having 3 floors of usable area. Building 2 is a single unit with a small mezzanine.

The existing buildings do not meet institutinal standards in terms of modern servicing requirements, such as service yards are not adequate sizes, and buildings considered over developed for the site.

The existing site consists of the built form, hard-standing, with access into the occupied units from Meadow Road leading into service yard and car parking areas.

The eastern building is accessed from Meadow Road with a second access point from Ross Road, and consists of concrete hard standing which currently serves as service yards and car parking areas.

A part of the site, approximately 0.30 hectares fronting Meadow Road, is currently hard-standing as a result of the previously demolished building in its place. This is used as an active employment use and is used as a bus depot.

The current employment stock within the immediate surroundings and designated employment area is dated and does not meet modern institutional requirements for flexible employment uses.

Existing employment buildings surrounding the site range from single storey heights to three storeys.

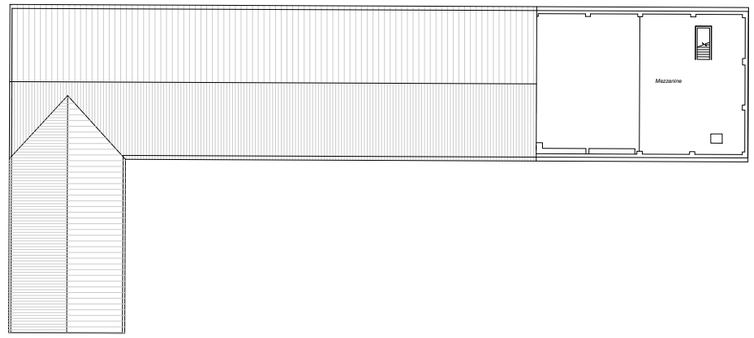
The site is fronted by a new residential development along Meadow Road, consisting of a range of house types, from small scale terraced blocks, to semi detached properties. The residential development also includes residential blocks spanning up to 4 storeys in height.

The development seeks to make use of dated land to provide high quality employment floor space with ancillary office accommodation, service yards, car parking and associated landscape to offer a high quality scheme.

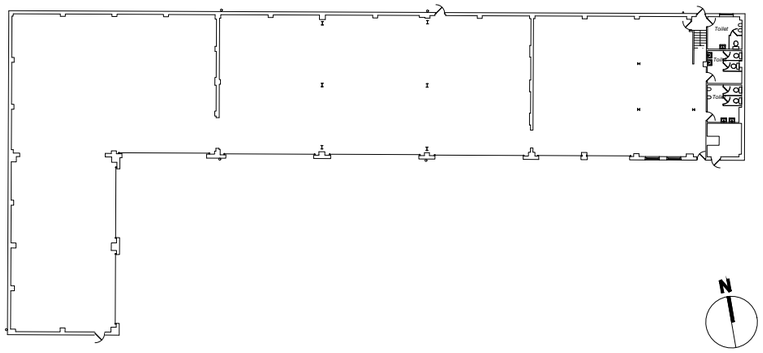
Existing Floor Areas (GIA)				
Building 1				
	Ground	First	Second	
U1	1026	816	678	
U2	552			
U3	585			
TOTAL	2163	816	678	**3657**

Building 2		
Ground	First	
915	112	**1027**

EXISTING BUILDING AREAS

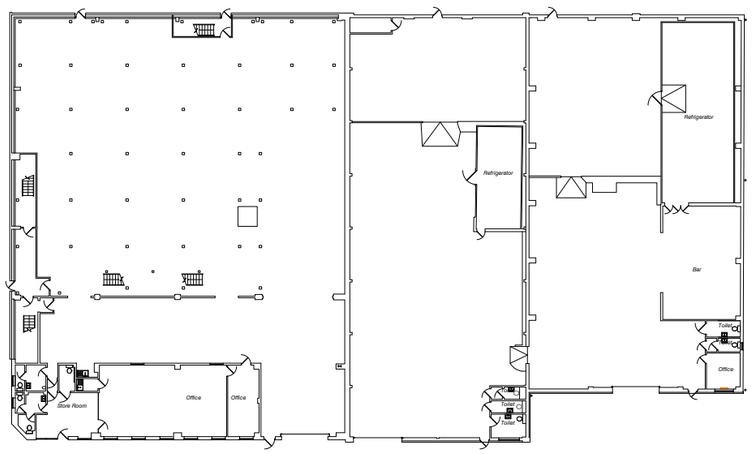


FIRST FLOOR PLAN



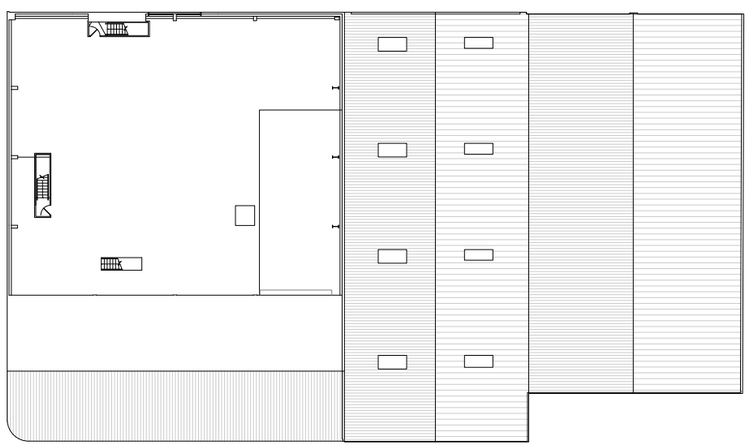
GROUND FLOOR PLAN

EXISTING FLOOR PLANS - BUILDING 2



GROUND FLOOR PLAN

FIRST FLOOR PLAN



SECOND FLOOR PLAN

EXISTING FLOOR PLANS - BUILDING 1

5.0

AMOUNT (CONT.)

The proposal is for the demolition of the existing buildings on site and the development of 4 buildings split into 11 units of varying sizes totalling approximately 4,300m2 GEA of modern flexible floor space. As such the applicant wishes to seek a flexible planning consent for use class E(g)(i)office, E(g)(ii) research and development, E(g)(iii) industrial process and B8 Storage and Distribution, meeting the demands of occupiers in the modern market.

The total footprint of the proposed development will provide an intensification of employment floorspace when compared to the existing building footprints on site.

By providing a mixture of unit sizes, this would help the existing employment area to thrive with a diverse range of unit sizes. Commercial agency advice has been sought to inform unit sizes to meet current market demands.

Whilst there is no guidance in respect of what constitutes an appropriate level of density for industrial development, the scheme will need to achieve a satisfactory balance of industrial floor space to office content, extent of service area, ancillary parking, external areas and building height, which are considered to generate a development which will function as intended.

The proposed site coverage is circa 44% based on GIA floorspace, representative of a well considered development which suits the practical requirements for external service yards, car parking and circulation.

The proposed buildings and respective units offer a good range of sizes between approximately 180m2 to 930m2 GEA, which would create different unit sizes to meet the needs of a range of occupiers.

The proposal can generate a range of 69 to 104 potential new jobs according to the HCA Employment Density Guide (3rd edition, November 2015), providing an enhancement to the local economy.

Car parking has been provided in accordance with the Reading Borough Local Development Framework, with a site wide provision of 40 car parking spaces, including 11 accessible parking bays, one for each unit, located close to building entrances.

Buildings will be serviced with yards of commercially viable depths appropriate to the unit sizes to provide safe and secure operational areas with the ability to accommodate efficient HGV manoeuvrability. Yard depths will range from 12m for the smaller Units 1-9, and a minimum of 20m in front of loading areas for Units 10-11, in order to allow for vehicle parking.

The development will consider sustainable transport measures and include the provision of electric vehicle charging points and ducting for the future provision of electric charging points. A minimum 10% of spaces providing an active charging point is required as per Local Plan Policy TR5.

A total provision of 11 double electric vehicle charging points are incorporated into the site plan to serve 22 vehicles. All remaining car parking spaces are to be provided with ducting for the future provision of charging points, providing 100% of spaces with active and future facilities for charging electric vehicles.

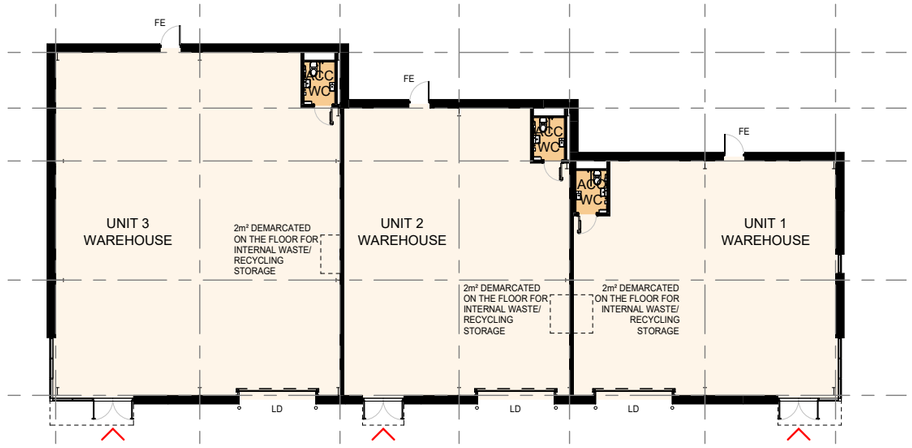
The proposal considers active travel and accommodates a total of 24 cycle spaces throughout the site. These are provided in Sheffield cycle stands located within close proximity to the buildings.

It is considered that the proposal seeks to make the best use of the site for employment uses that meet current market demands.

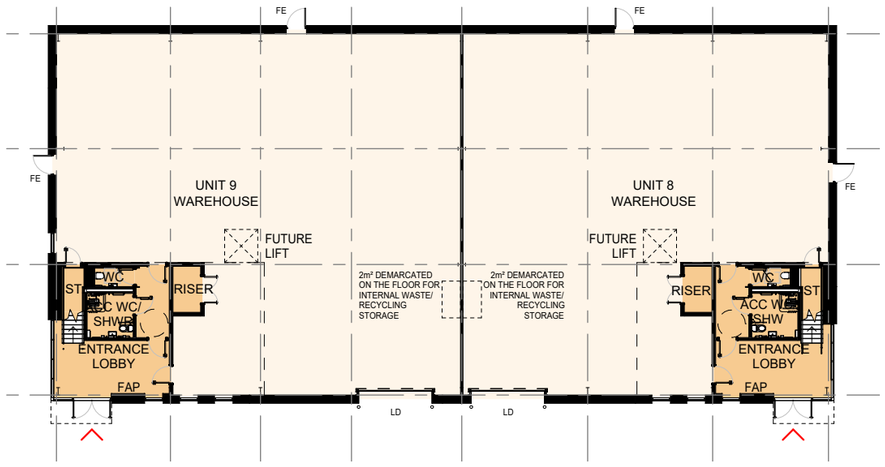
The proposals demonstrate that a scheme based on flexible employment uses can provide an efficient design and make good use of the land, to provide potential for a more diverse range of local jobs and to retain the attractiveness of the locality.

Proposed Floor Areas	
UNIT	Total GEA (m²)
1	184
2	188
3	287
4	206
5	192
6	205
7	225
8	499
9	551
10	820
11	936
TOTAL	4,293

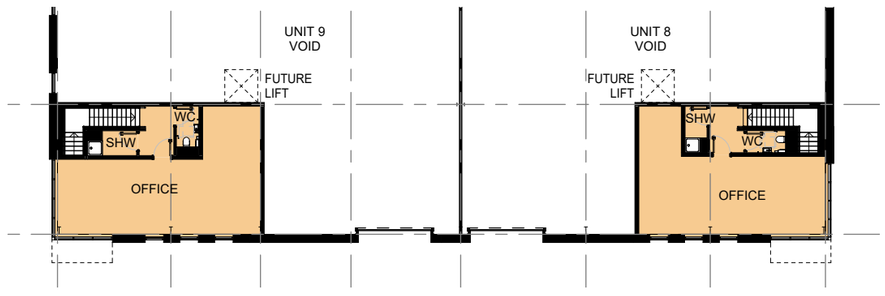
PROPOSED BUILDING AREAS



PROPOSED GROUND FLOOR PLAN: UNITS 1-3



PROPOSED GROUND FLOOR PLAN: UNITS 8-9



PROPOSED FIRST FLOOR PLAN: UNITS 8-9

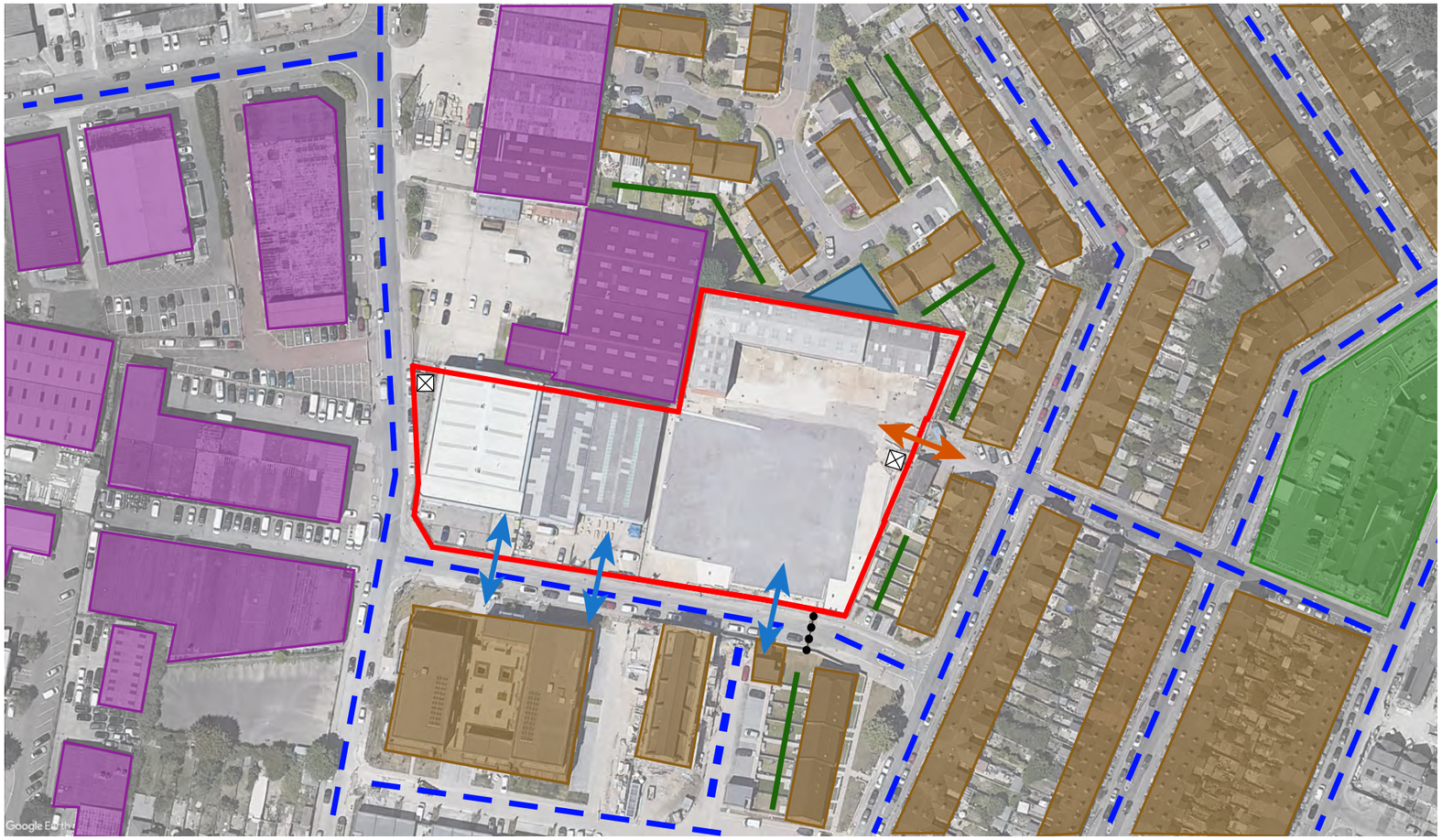
6.0

LAYOUT

Constraints:

The site is located on the eastern edge of the Richfield Avenue Employment Area which consists of a heavily industrial identity. The eastern portion of the site sits within a housing site allocation, referred to as site allocation WR3b under policy WR3.

- The site is neighboured by sensitive residential uses to the northern and eastern boundary.
- Recent residential properties face the site to the south, along Meadow Road. 4 storey flats front the corner of Meadow Road and Milford Road.
- Existing industrial and employment uses sit to the east of the site, which will remain in operation during the development of the site.
- The site is currently occupied. One building divided into two units has minimal land to the fronts. The second building, the smaller of the two has a vast amount of hard-standing as a result of a previously demolished building. This is being used as a bus depot.
- The existing buildings on site, occupied, are dated and beyond their serviceable lifespan and do not meet the current requirements or sustainability criteria for a modern development.
- Currently site access is limited and not very legible. With an existing access from Ross Road currently blocked off and unused. Access to the occupied units on site are inefficient and lack good manoeuvrability and legibility. There is limited operational yard depths for no current space for HGV turning.
- Access is limited along Meadow Road, and mostly used for on street car parking.
- Existing substation compound on the north west corner of the site and another by the access from Ross Road to remain as they supply the neighbouring properties.



CONSTRAINTS DIAGRAM

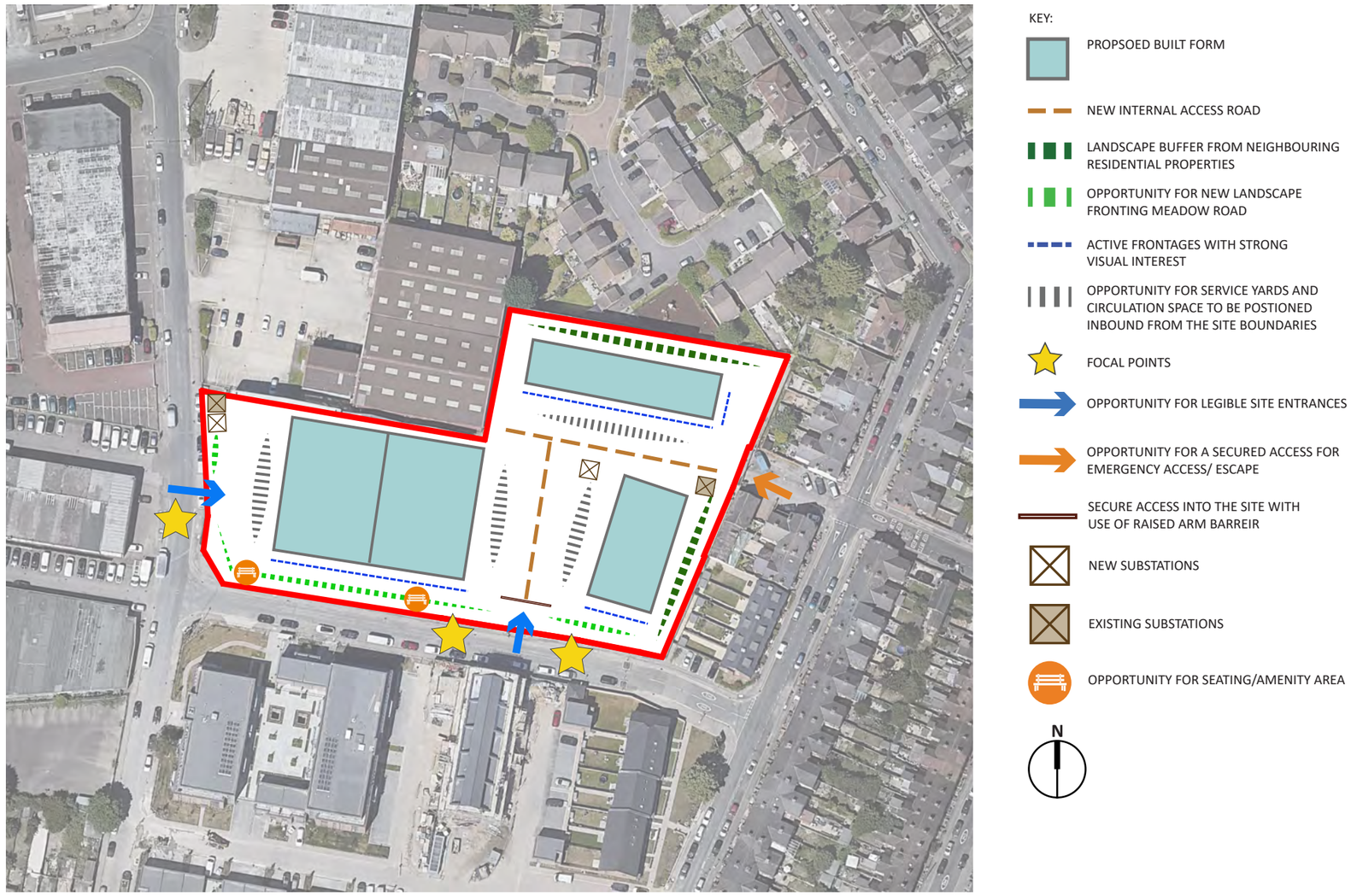
6.0

LAYOUT (CONT.)

Opportunities:

The redevelopment of a dated employment site to provide a high quality and attractive development that meets the demands for a range of occupiers in the modern employment market.

- The development will provide modern and flexible employment floorspace to modern institutional requirements.
- The replacement of buildings that are not attractive to current letting standards due to their age and lack of sustainable criteria i.e EPC and BREEAM ratings.
- Development of a site of a good density, to intensify the employment footprint on site to provide economic opportunity.
- The creation of approximately 69 - 104 new jobs based on HCA Employment Density Guide, to provide new employment opportunities to the local area.
- Development of modern and attractive buildings that are sympathetic to their surroundings, with strong sustainability credentials.
- Provision of legible site access throughout the site, incorporating existing roads and utilising key focal points to create new site entrances.
- The enhancement of the access and legibility through efficient through roads linking the site boundaries.
- Promotion of safe and legible pedestrian routes through the provision of footpaths leading into unit entrances.
- Promotion of biodiversity through the inclusion of soft landscaped areas throughout the site.
- Sympathetic location of buildings on site with landscape buffers to residential boundaries.
- Promotion of green travel through provision of active electric vehicle charging points and ducting for future installation of further charging points.
- Cycle parking across the site to cater for all the units.
- Security gate and fence to be installed and locked at all times, except for emergency access or escape. Eliminating any concerns for a rat-run being created from Meadow Road to Addison Road via Ross Road.
- Amenity seating areas to be installed facing Meadow Road.



OPPORTUNITIES DIAGRAM

6.0

LAYOUT (CONT.)

The proposed layout seeks to make an efficient use of the site, intensifying the employment footprint on the site to create an attractive and high quality environment that sits efficiently within the industrial context.

The site access creates an efficient route through the site which considers vehicle manoeuvrability and turning.

It is proposed that the majority of the units will be accessed from the south of the site, on Meadow Road, with an internal access road leading towards Units 1-9 respectively. A raised arm barrier with ducting provided for future automation is proposed to be installed on this access point.

The existing access to the east, from Ross Road will be locked at all times with the use of a security gate and it is only to be used in the event of an emergency. This existing access being closed off will also prevent disruption to its neighbouring residential properties.

A new vehicular access will be created off of Milford Road for units 10 and 11. The proposed width is to be adequate to allow sufficient space to manoeuvre and access the building. The access will provide safe crossing through a pedestrian priority with dropped kerb access, in which the distances between dropped kerbs have been significantly reduced by more than half the existing kerb alignment.

The layout of the buildings and their respective loading and car parking areas have been positioned to front the internal access road, to allow for efficient manoeuvrability, turning and general circulation throughout the site. The building positions means they screen activity from the service yards and reduce the massing of the built form by providing separation between buildings. This also offers the opportunity to provide soft landscape screening creating a high-quality backcloth to the development

The built form and building footprints have been positioned inwards of the boundaries and its surrounding neighbouring buildings. Moving the footprints in bound will mitigate any daylighting or overshadowing of the existing buildings surrounding the site, and allows for the opportunity to provide screening through the provision of soft landscaping and tree planting.

The proposed building for Units 1-3 are positioned in a similar position to the former building demolished in 2019. Units 4-7 have been positioned and set back further than the existing building to the north of the site.

Pedestrian access has been considered with the integration of footpaths throughout the site, linking into Meadow Road and Milford Road. The proposed footpaths provide safe pedestrian routes into each unit.

The development responds to the surrounding employment and residential developments in which the buildings face onto the access roads, with circulation being provided through the site, effectively splitting the built form to create links and circulation.

The layout and orientation of the building forms have been considered and reconfigured to ensure that yards and operational areas do not face the surrounding residential uses providing inherent mitigating to noise impact. Access and parking along Meadow Road would not be affected.

Double yellow lines through the site will help manage traffic and parking. The use of a barrier and locked gates to Ross Road means the site will only be used by authorised vehicles .

High quality ancillary office accommodation, and key focal points have been highly considered in order to provide an attractive development that responds well to its locality. Key focal points are located facing Meadow Road, to respond to the residential developments.

Office accommodation and entrance points are positioned to overlook car parking and service yard areas, to provide natural surveillance and a safe and legible environment within the site.

The proposal offers the opportunity to intensify the landscape within the site, providing soft landscaped areas fronting Meadow Road and Milford Road to promote a high quality environment.

Soft Landscape is provided to the northern and eastern boundary, setting the buildings inwards of the site and serving as a natural screen from the adjacent residential properties.

Contrasting hard surfacing such as block paving, brushed concrete and tarmacadam will be used to add contrast and visual interest which will provide clear legibility between public and private spaces.

The proposal has considered the surrounding residential context and will not impact the wider area in terms of noise, visibility and overshadowing.

The development will be a positive contribution t the existing street scene, tying into the existing industrialised context whilst being sympathetic to its residential neighbours. The scheme will be of an attractive and high quality institutional standard that will attract occupiers falling within the Class E and Class B use categories.

PROPOSED SITE LAYOUT

7.0

EXISTING SCALE

The application site is approximately 0.89 hectares in size and is occupied. The buildings on site are of a dated industrial typology and cover a total GIA of circa 4,700 m2 of employment floorspace.

The existing buildings on site span circa 62m(L) X 35m(W) and 66m(L) X 26m(W). Existing employment use buildings surrounding the site are similar in scale and proportion.

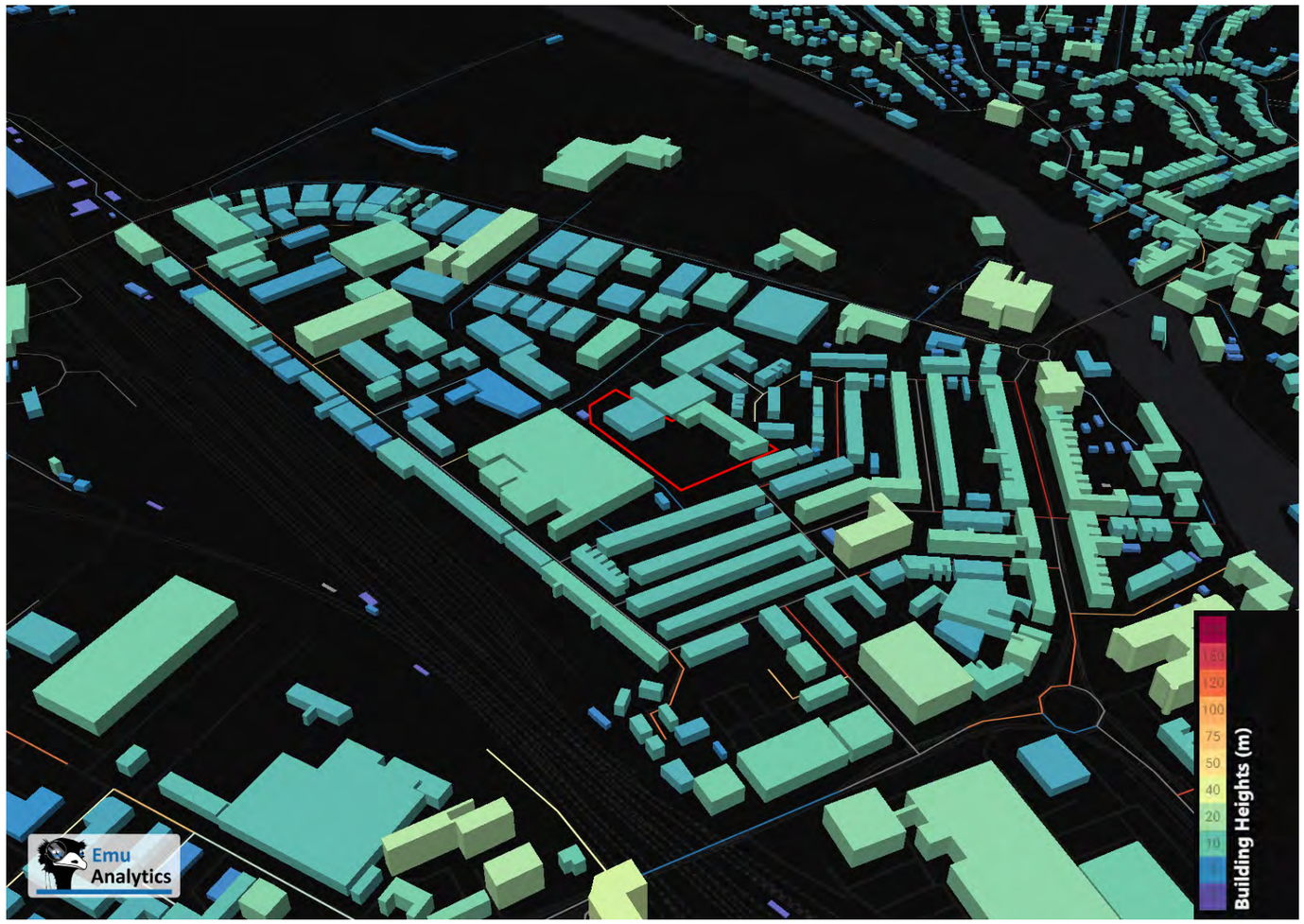
Existing buildings on the site have a ridge height of circa 10m, commensurate of the surrounding two storey industrial and employment stock surrounding the site. The site sits opposite from a three storey employment building spanning circa 11m, however sits appropriately within its context.

The site is fronted by the Meadow Road residential development, with a range of unit sizes and heights. The development consists of small scale two-storey terraces embedded centrally of the development, spanning circa 6m in height. 4 storey high apartment buildings face Meadow Road, providing a domineering street scene with heights spanning up to circa 14m.

Buildings further west of the site, still within the employment area, gradually become larger in size, with more squared proportions spanning circa 75m(L) X 60m (W) and rectilinear arrangements spanning up to 100m(L) X 30m(W) .

The proposed development would generate approximately 4,300m2 GEA of modern flexible employment floorspace. The development offers an intensification of floorspace, with footprints spanning from 40m(L) X 18m(W) for Units 1-3, and 42m(L) X 35m(W) for Units 10-11.

The proposals have been considered to be sympathetic to the sensitive residential surroundings, as such, the proposed building footprints are smaller to those employment buildings surrounding the site.



EXISTING BUILDING HEIGHTS DIAGRAM
INFORMATION EXTRACTED FROM EMU ANALYTICS

7.0

EXISTING SCALE (CONT.)

AERIAL PHOTOGRAPHS

7.0

PROPOSED SCALE

The proposed development will sit appropriately within its surrounding employment and residential context. The proposed buildings are of a residential scale ranging in height from 8.5m to 10.5m to the top of ridge.

The buildings are appropriately positioned so that the smaller buildings with lower ridge heights sit adjacent to residential boundaries to the north and east whilst the larger and taller buildings site to the western boundary, facing Milford Road and the remaining employment area.

Building layout and orientation has been considered to positively respond to its surrounding context, with the building footprints set back further away from boundaries than the current buildings on site.

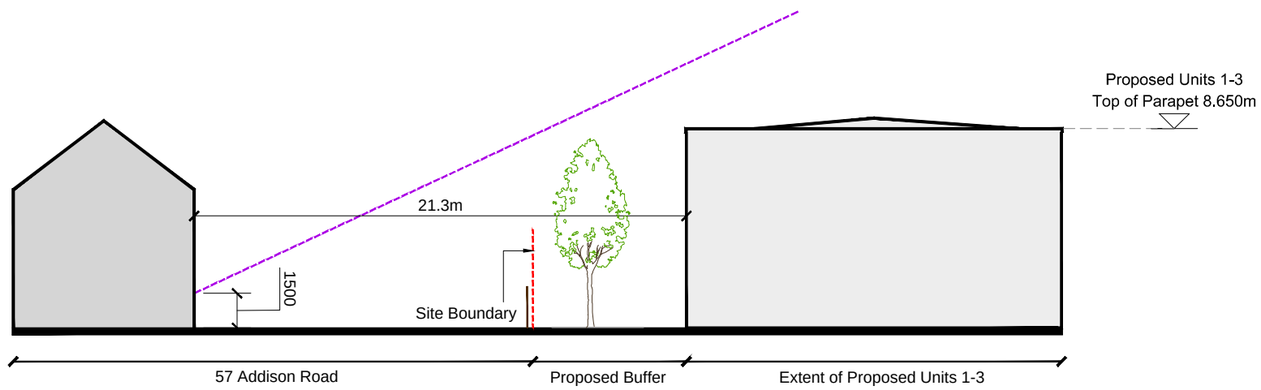
The proposed buildings will make use of low pitched roofs to the main part of the building to reduce mass and scale, with clear internal haunch heights of 7m and 7.5m, which are optimum heights for racking efficiency for units of this size, making the functional space highly flexible. Units 1-7 are proposed to have a haunch of 7m, which allows flexibility for future expansion as the height is adequate for installation of a mezzanine if desired.

The buildings also make use of low parapets and concealed gutters, not only creating a modern aesthetic but reducing the overall apparent mass of the buildings with parapets being lower than the building ridges.

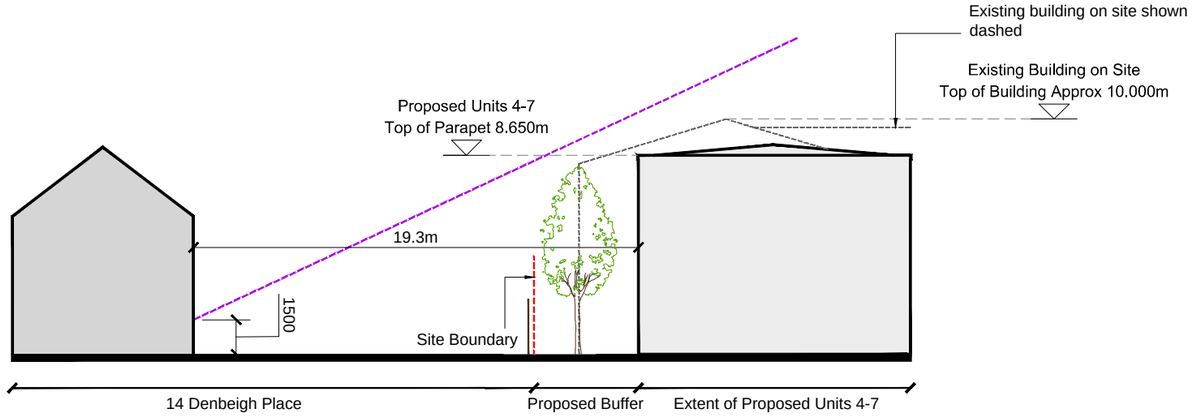
A combination of cladding colour and materiality will be introduced to break up the visual mass of buildings, especially facing residential properties.

Given the existing industrialised context, and the scale of new residential development, the proposed scale of the development is wholly appropriate and sympathetic to its surroundings, creating a positive addition to the street scene.

The proposed buildings sit comfortably within the size and height range of its surrounding context, and have been carefully positioned so that they do not create any visual issues or overshadowing.



SIGHTLINE SECTION THROUGH DENBEIGH PLACE DEMONSTRATING THE PROPOSED DEVELOPMENT WILL NOT CREATE VISUAL ISSUES



SIGHTLINE SECTION THROUGH ADDISON ROAD DEMONSTRATING THE PROPOSED DEVELOPMENT WILL NOT CREATE VISUAL ISSUES

7.0

PROPOSED SCALE (CONT.)

AERIAL MASSING STUDY OF THE PROPOSED DEVELOPMENT WITHIN ITS CONTEXT

7.0

PROPOSED SCALE (CONT.)

AERIAL MASSING STUDY OF THE PROPOSED DEVELOPMENT WITHIN ITS CONTEXT

8.0

LANDSCAPE

This sections aims to describe the landscape proposal as part of the planning applications submission to Reading Borough Council in support of the land's redevelopment.

The site is located on the eastern edge of the Richfield Avenue Employment Area, within a larger central Reading industrial and employment zone. The location of the site is characterised by its predominantly industrial nature with existing landscape areas fronting residential properties on Meadow Road and existing landscape to the rear garden space for the residence on the eastern part of the site.

The site currently accommodates two buildings, with the majority of the area consist of hard surface with low level weeds to western boundary of the site.

The landscape proposal prioritizes consistent integration with the existing landscapes adjacent to Meadow Road's residential properties and incorporates a landscape buffer zone along the south-eastern boundary visually mitigating the impact on adjacent residential properties. The landscape proposal is an essential part of the proposed development.
A series of landscape features incorporate throughout the site and link together with the landscape feature along the site boundaries. It creates a visually appealing and cohesive environment, effectively integrating the new development into the existing public realm.
The landscape proposal enhances way finding and creates a high quality thoughtfully landscape setting that benefits its users.

The landscape strategy aims to provide the following improvements:

- To increase the biodiversity of the site,
- To integrate new development into their surroundings,
- To attract the existing wildlife by providing the ecological enhancement in form of bat, bird boxes and loggers for the site,
- To contribute positively to the street scene,
- To improve the site's aesthetics, functionality, and sustainability in the new development,
- To implement site boundary screening,
- To provide a landscape that facilitates easy navigation for both pedestrians and vehicles.

This is achieved by implementing the following concepts:

- To integrate native species that contribute to a border diversity of habitat types and support a more extensive range of species.
- To provide a new habitat which have a naturalistic appearance,
- To thoughtfully consider the site's future use and establish appropriate new settings for its built form.
- To provide the landscape treatment to the amenity space creating a social space for the future users during work hours,
- To establish a landscape buffer zone comprised of native shrubs and tree plantings.
- To create a legible and accessible landscape on either side of the internal road, including car parking and a footpath.
- To create a landscape that visually separates pedestrians and vehicle users





EXAMPLES OF PRECEDENT IMAGES

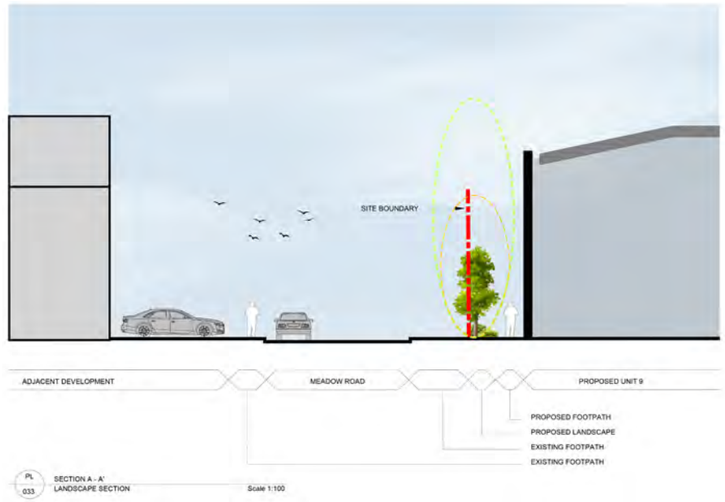
8.0

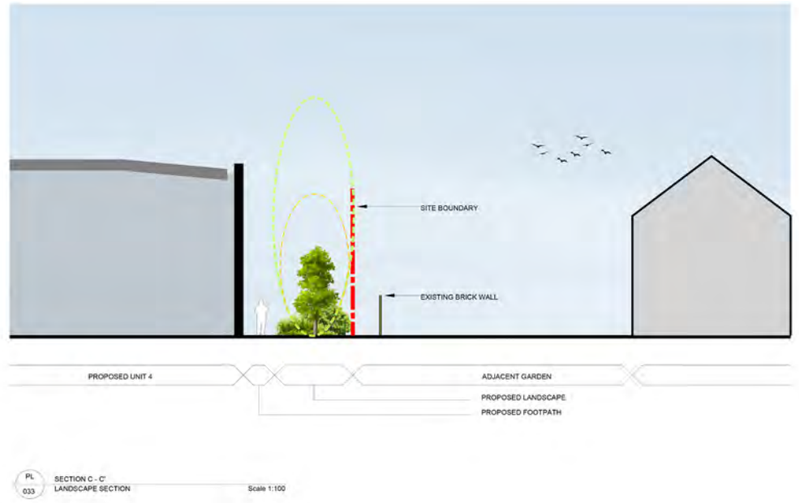
LANDSCAPE (CONT.)

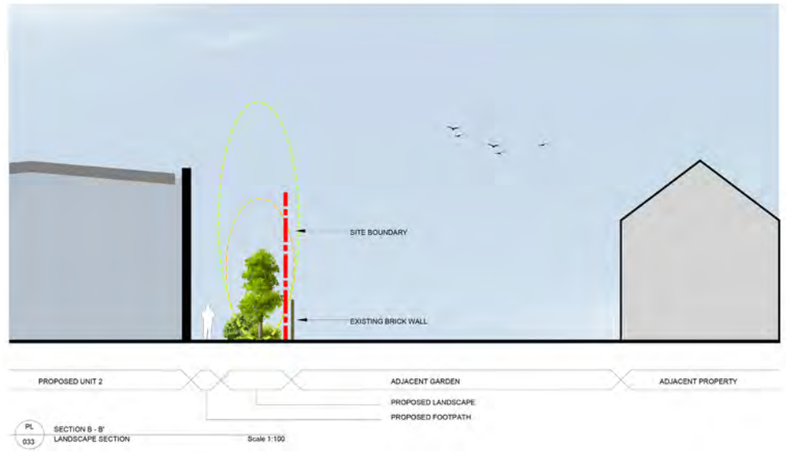
The landscape buffer along the southern and eastern boundaries will be essential in mitigating the visual impact on residential properties. It will include a mix of native shrubs, EG9 grass mixture for hedgerows and woodland. Strategically placed tree planting will help to soften the building's appearance. The use of native species will enhance the biodiversity of the site. A native hedge will effectively screen the new development from the neighbouring industrial area and create wildlife corridors, connecting with existing ecological networks.
The native shrub mix and EG9 grass mixture will further set back the building, increasing the distance from adjacent properties.

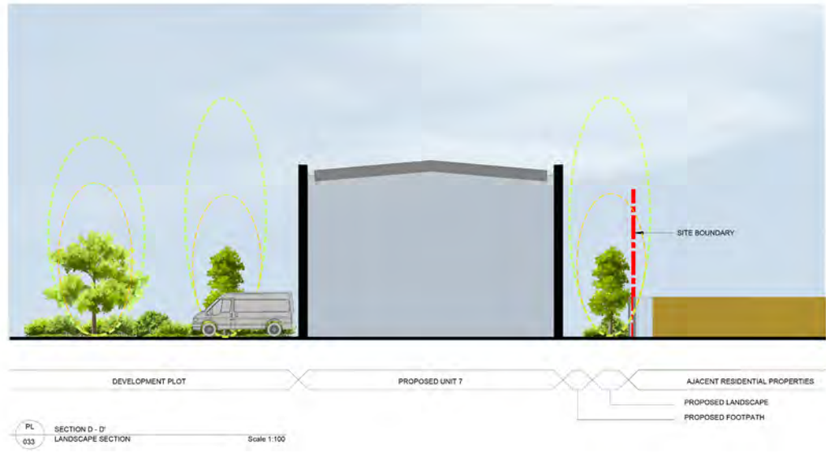
The landscape treatment along Meadow Road and at the entrance will create an appropriate sense of arrival and enhance the street scene. This area will be treated with urban tree planting under planted with ornamental shrubs and species-rich lawn turf on either side of the internal road. A species-rich lawn that incorporating a variety of native species will create a crucial habitat for the wildlife on the new development. The urban tree planting along Meadow Road will mitigate the building's visual impact and enhance its aesthetic appeal.
The landscape treatment, including a privet hedge and ornamental shrubs, will be implemented in the amenity area to enhance user experience. Benches will be integrated into the setting, ensuring convenient and clear access from the existing footpath.

The Milford Road landscape treatment will use low-growing evergreen shrubs and the privet hedge to create a clear separation between pedestrian and vehicular areas. It will create a coherent, and easily navigable landscape for the new development. The native shrub mix will be provided at the rear of the yard, supporting diverse species and enhancing overall site biodiversity.

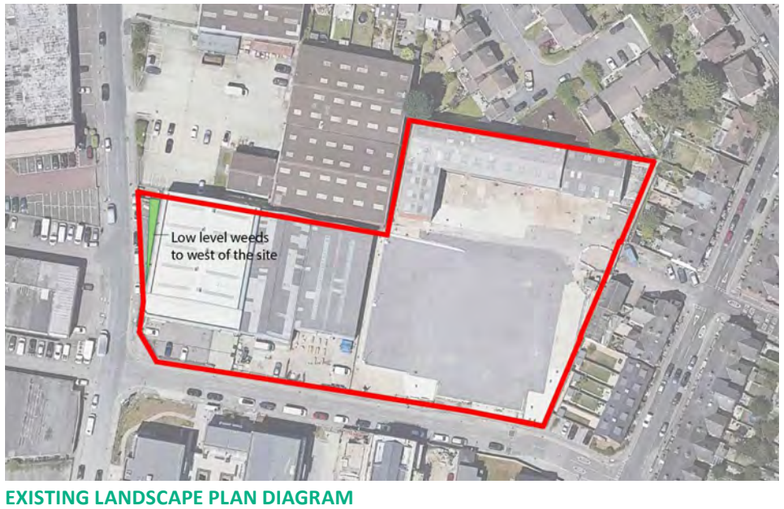




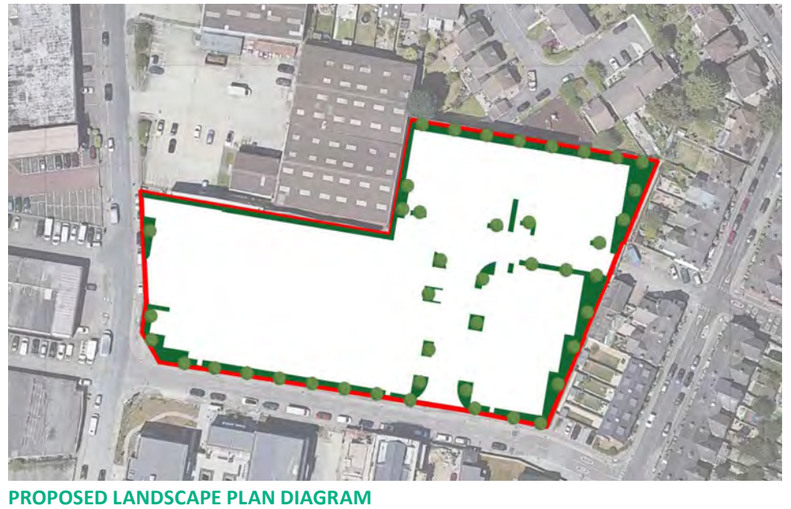




PROPOSED LANDSCAPE SECTIONS



EXISTING LANDSCAPE PLAN DIAGRAM



PROPOSED LANDSCAPE PLAN DIAGRAM

9.0

APPEARANCE

The existing employment and industrial buildings in and around the site are of an industrial typology and maintain a similar appearance to one another.

Buildings surrounding the site consist of primary brickwork and profiled metal cladding. Existing employment buildings are simple in appearance with limited visual interest or contrast.

The existing employment buildings primarily adopt gable end roofs, with no parapets. Roof pitches are in varying directions which creates a sporadic street scene.

The newly developed residential buildings make use of brick work arranged in contrasting colours. Windows and openings are in a vertical arrangement, providing a modern tone to the development. They consist of a range of roof types, including gable ended and hipped roofs. However the majority of the residential buildings have parapet roofs, most notable on the 4 storey blocks along Meadow Road, this creates a consistent and modern street scene.

The proposal will seek to provide a modern and attractive development of an industrial typology which is suitable to a range of occupiers and suited to modern business needs.

The proposals will incorporate a palette of materials which will include profiled metal cladding and brickwork which will contrast in colour and texture, reflecting the materials of both residential and industrial aesthetics of the surrounding areas.

Large expanses of glazed features and curtain walling has been carefully designed to unit entrances and office areas to provide a good degree of visual interest and natural surveillance. Office areas are positioned to address the main approaches to the development.

Glazing will be accentuated in a vertical arrangement, in order to positively respond to the recent residential properties facing Meadow Road, to tie into the overall street scene.

The proposed materials have been sympathetically selected to contrast in terms of colour and texture, to create visual appeal and to also enhance legibility of the buildings to create a market leading and high quality development with a contemporary aesthetic.

Brickwork has been introduced to office areas to provide legibility and interest to core focal points throughout the scheme. Brickwork commensurates the materiality and aesthetic adopted on the residential properties surrounding the development, in order to ensure a cohesive appearance that ties into its locality.

Metal profiled cladding is provided to operational areas, with a contrasting band to the top of the buildings, branching down in areas to break up the mass of the building and provide further visual interest throughout the development.

A neutral palette of greys and feature brickwork provides a strong aesthetic that will avoid fashion and will not prematurely date.

A neutral palette of greys and feature red brickwork provides a strong aesthetic that will avoid fashion and will not prematurely date.

A full palette of materials proposed is:

- Profiled metal cladding: Vertically Laid - Anthracite Grey RAL 7016
- Profiled metal microrib cladding: Horizontally Laid - Metallic Silver
- Red/Orange toned Brick Slips, inkeeping with the surrounding brick buildings
- Profiled metal cladding: Roof - Goosewing Grey RAL 7038
- Aluminium Framed Windows and Entrance Doors - Anthracite Grey RAL 7016
- Proprietary framed glazed canopies over building entrances - Anthracite Grey RAL 7016
- Steel personnel Doors - Anthracite Grey RAL 7016
- Steel sectional overhead loading doors - Anthracite Grey RAL 7016
- Steel bollards - Yellow

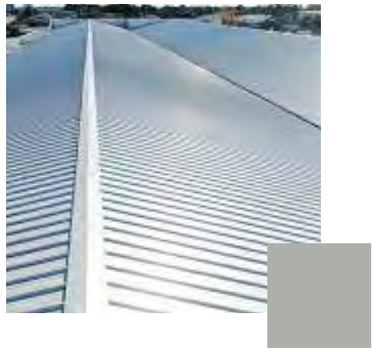
The intended materials palate and desired aesthetic is illustrated through the imagery on the right hand of this page.

The proposed scheme will be of an industrial typology, offering modern and contemporary accommodation that will attract industry leading occupiers in the current market.

EXAMPLE IMAGERY OF HIGH QUALITY AESTHETIC TO BE ACHIEVED FOR THE PROPOSED DEVELOPMENT

VERTICAL PROFILE CLADDING
ANTHRACITE GREY RAL 7016

HORIZONTAL PROFILE CLADDING
METALLIC SILVER



BUILT UP PROFILED ROOF CLADDING
GOOSEWING GREY RAL 7038

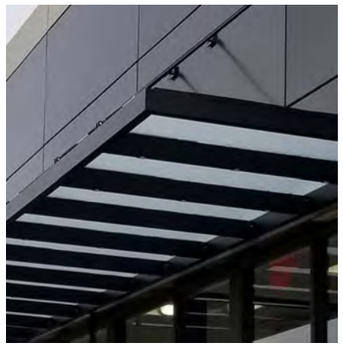
FULL HEIGHT GLAZING

RED/RED ORANGE BRICK SLIPS

VERTICALLY EMPHASISED GLAZING

SECTIONAL OVERHEAD DOOR
ANTHRACITE GREY RAL 7016

STEEL PERSONNEL DOOR
ANTHRACITE GREY RAL 7016



PROPRIETARY GLASS CANOPY
ABOVE ENTRANCE DOORS

9.0

APPEARANCE (CONT.)

ILLUSTRATIVE 3D VISUAL OF THE SITE FROM THE SOUTH EAST

ILLUSTRATIVE 3D VIEW OF THE SITE LOOKING FROM THE SOUTH WEST

ILLUSTRATIVE 3D VIEW OF UNITS 10 & 11 FROM MILFORD ROAD

9.0

APPEARANCE (CONT.)

PROPOSED ELEVATIONS UNITS 1-3

PROPOSED ELEVATION UNITS 4-7

MATERIALS KEY

1. METAL PROFILED CLADDING VERTICALLY LAID (ANTHRACITE GREY RAL 7016)
2. METAL PROFILED MICRORIB CLADDING HORIZONTALLY LAID (METALLIC SILVER)
3. RED BRICK SLIPS
4. BUILT UP PROFILED ROOF (GOOSEWING GREY RAL 7038)
5. ALUMINIUM FRAMED ENTRANCE DOORS POWDER COATED ANTHRACITE GREY RAL 7016
6. ALUMINIUM FRAMED WINDOWS POWDER COATED ANTHRACITE GREY RAL 7016
7. CERAMIC BACKED GLAZED PANEL
8. LOADING DOORS (INSULATED) ANTHRACITE GREY RAL 7016
9. BOLLARDS YELLOW
10. STEEL PERSONNEL DOORS ANTHRACITE GREY RAL 7016
11. PROPRIETARY CANOPY ABOVE UNIT ENTRANCE
12. SIGNAGE ZONE NOTE: SIGNAGE ZONE SHOWN INDICATIVELY ONLY
13. UNIT NUMERALS NOTE: NUMERALS SHOWN INDICATIVELY ONLY. ACTUAL NUMBERING AND APPEARANCE MAY DIFFER.

9.0

APPEARANCE (CONT.)

PROPOSED ELEVATION UNITS 8-9

MATERIALS KEY

1. METAL PROFILED CLADDING VERTICALLY LAID (ANTHRACITE GREY RAL 7016)
2. METAL PROFILED MICRORIB CLADDING HORIZONTALLY LAID (METALLIC SILVER)
3. RED BRICK SLIPS
4. BUILT UP PROFILED ROOF (GOOSEWING GREY RAL 7038)
5. ALUMINIUM FRAMED ENTRANCE DOORS POWDER COATED ANTHRACITE GREY RAL 7016
6. ALUMINIUM FRAMED WINDOWS POWDER COATED ANTHRACITE GREY RAL 7016
7. CERAMIC BACKED GLAZED PANEL
8. LOADING DOORS (INSULATED) ANTHRACITE GREY RAL 7016
9. BOLLARDS YELLOW
10. STEEL PERSONNEL DOORS ANTHRACITE GREY RAL 7016
11. PROPRIETARY CANOPY ABOVE UNIT ENTRANCE
12. SIGNAGE ZONE NOTE: SIGNAGE ZONE SHOWN INDICATIVELY ONLY
13. UNIT NUMERALS NOTE: NUMERALS SHOWN INDICATIVELY ONLY. ACTUAL NUMBERING AND APPEARANCE MAY DIFFER.

PROPOSED ELEVATIONS UNITS 10-11

10.0

ACCESS

The proposed scheme is intended to provide a fully inclusive environment which will be designed in compliance with current British Standards and Part M of the Building Regulations.

The new development will provide car parking in compliance with local authority standards and include accessible parking in compliance with current British Standards provided at 5%. This is met with one disabled parking bay per unit, totalling 11 disabled bays and 29 standard parking bays.

Car and cycle parking for the proposal meets local authority parking standards as a minimum. Cycle storage will be provided in suitable locations for use of all the units.

A total provision of 24 cycle parking spaces are proposed throughout the development, provided in secured and covered shelters. Units 1-9 are provided with 2no. Secure covered cycle shelters each with 4no. Sheffield cycle stands, providing a total of 16 cycle parking space. Both units 10 and 11 are provided each with 4no. cycle parking spaces provided by 2 no. Sheffield cycle stands in a secure covered shelter.

Electric car charging points will be provided across the site in accordance with BREEAM requirements. The proposal fulfils this amount with a total of 11 double charging points with ducting to be installed for future provision of additional charging points for the remaining parking spaces.

The proposed buildings will be provided with accessible WC's and showers suitable for wheelchair users and provision will be made for future passenger lifts to be installed by end users.

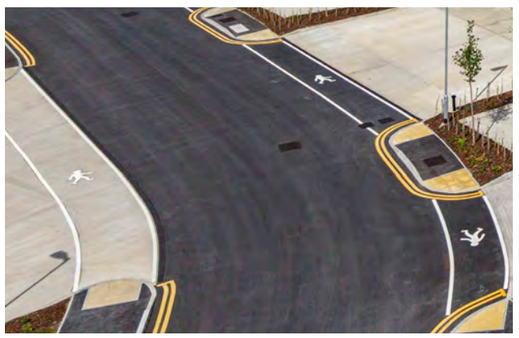
All accommodation stairs will be designed to cater for ambulant disabled persons.

Site signage will be controlled so that the way finding through the estate is clear and legible.

The proposal includes access from the existing access roads, which will incorporate new pedestrian footpaths with dropped kerbs and tactile paving at crossing points to create pedestrian priority routes throughout the site.

ACCESSIBLE PARKING

SHEFFIELD CYCLE STANDS



PEDESTRIAN PRIORITY ROUTE

11.0

SECURITY

Consideration has been given for access and movement to create well-defined routes and entrances that provide convenient movement throughout the development, without compromising security. A security needs assessment has been undertaken and the development responds to the requirements set out in this document.

All publicly accessible spaces have been orientated to ensure that they are all overlooked.

Public and private realms will be clearly defined and legible through the incorporation of soft landscaping and contrasting surface finishes.

The proposed buildings have been positioned to feature active frontages that will provide a sense of safety achieved through a level of human activity throughout the day.

The buildings have been designed with the office accommodation to the front overlooking internal access road and main estate roads, to maximise natural surveillance.

An appropriate lighting strategy will be implemented throughout the development, to ensure lighting overspill is minimised and that the buildings and external areas are well lit to deter potential intruders and create a safe environment.

The units will have a primary entrance into the building, with conduit being provided to allow for electronic access in the future. The building units have been designed with the option for a reception area suitable for manned access, which will assist in providing additional security for the units.

Windows are located to the front and side of the office area at both ground and first floor level. All ground floor windows will meet the requirement of LPS 1175, LPS 1270 and BS EN 356:2000 glass in building - security glazing - resistance to manual attach to P1A.

Proposed cycle racks and shelters will be installed close to the buildings if fitted externally. Other units will have cycle storage facilities inside the warehouse.

2.4m high weldmesh fencing is to be installed to the boundaries with a security gate installed on the eastern boundary where there is an existing vehicular access from Ross Road.

A raised arm barrier is to be installed on the entrance from Meadow Road, which will enable the site occupiers to control vehicle access.

COVERED CYCLE SHELTER

WELDMESH FENCING

12.0

SUSTAINABILITY

The development has taken a holistic approach to the integration of sustainable design from inception, focussing on reducing carbon emissions and will target a minimum BREEAM rating of 'Very Good'.

The environmental performance of the new building, particularly with regard to CO2 emissions, will aspire to exceed the national standards set by the current Building Regulations. The building will achieve a carbon emission reduction improvement over and above the building Regulations Approved Document L2A requirements. The development aspires to meet an EPC A rating with a pathway to EPC A+ and net zero.

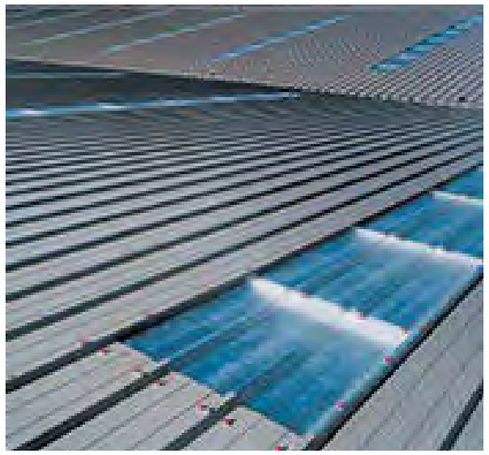
The following design principles will be considered in the development of the scheme:

a. Minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems, incorporating air source heat pumps, as well as PV panels positioned on roofs.
b. Avoiding the internal overheating that contributes to the urban heat island effect.
c. Efficient use of natural resources (including water), making the most of natural systems both within and around buildings.
d. Minimising pollution (including noise, air and urban run-off).
e. Minimising the generation of waste and maximising reuse or recycling.
f. Avoiding impacts from natural hazards (including flooding).
g. Ensuring the development is comfortable and secure for users, including avoiding the creation of adverse local climatic conditions.
h. Sustainable procurement of materials, using local suppliers where feasible.
i. Promoting and protecting biodiversity and green infrastructure.

The design will also incorporate the following sustainable features:

a. Finely tuned building fabric to reduce energy loss, high efficiency fittings to reduce energy demand and the inclusion of renewable energy technologies to achieve a reduction in carbon dioxide emissions.
b. Where possible, materials will be specified in line with the building LCA benchmarks to conform with BREEAM UK New Construction 2018.
c. Water conservation achieved through low use fittings and sanitary ware.
d. Rainwater harvesting.
e. Surface water drainage achieved using SUDs techniques.
f. Minimal environmental impact including noise and air quality through design of layout and building fabric.
g. Measures to minimize the generation of waste through construction and maximise reuse or recycling by providing adequate room for waste treatment.
h. Inclusion of a Travel Plan, cycle parking and shower facilities as well as connectivity to the footway & cycleway network to encourage the use of alternative modes of transport.
i. Enhanced biodiversity value through increased areas of tree planting and areas of soft landscape.
j. Air quality improvements through extensive tree planting, electric car charging, car share, improvement to public transport & pedestrian points and on-site renewable energy generation.

ENHANCED BIODIVERSITY



OPTIMISED ROOF LIGHT AREA

PHOTOVOLTAIC PANELS

BREEAM®
delivered by bre

BREEAM UK NEW CONSTRUCTION 2018

13.0

SUMMARY

This document has demonstrated that the proposed scheme has been well considered and will provide a high quality and attractive addition to the surrounding employment stock, and an overall holistic environment that responds well to its immediate context through a modern flexible employment offering.

The resulting scheme has been thoroughly assessed against the following criteria:

USE:
The proposed development is located within an industrial and employment setting and would be wholly compatible within its locality. There is a demonstrable demand for modern employment uses, and the proposed development would provide flexible and high quality workspace in a range of unit sizes that meets modern market demands.

The development is for 4 buildings split into 11 units, seeking flexible E(g) and B8 use classes that would support the adjacent employment area and offer the potential to intensify the employment opportunities on site.

AMOUNT:
The scheme delivers a realistic quantum of employment space that is sensitive to the location, without compromising operational practicalities, with employment uses retained and intensified on and existing employment site

The proposal will create employment opportunities and could employ between 69 FTE to 104 FTE new jobs (based on HCA guidance) dependant on the final use, which will enhance the local economy.

LAYOUT:
The layout is clear and legible, creating a safe and secure working environment whilst responding to the surrounding uses.

The layout has been carefully considered to respond to its surroundings and be sympathetic to its residential neighbours. Buildings have been set inwards of the site boundaries to ensure the proposals do not cause overshadowing or visual issues to its neighbours.

Proposed road accesses are legible and provide an efficient route through the site, the circulation and movement of vehicles has been shifted inbound of the site to ensure that service yards do not overlook onto Meadows Road.

SCALE:
The proposed development in terms of scale and mass would be commensurate with the existing buildings in the wider area and would meet current market demands. The scale and mass of the proposed development is considered appropriate for the site context.

The density of development is a realistic quantum of employment space that does not compromise planning policy or operational practicalities and be attractive to potential occupiers, whilst intensifying the existing employment uses.

The scale of the proposals have been carefully considered to respond to its neighbouring residential uses. The proposals demonstrate, through sightline studies that the building forms will not cause visual issues to its surrounding context.

LANDSCAPE:
Soft landscape enhancements will provide a cohesive thread throughout the development. To enhance legibility and provide an attractive backcloth to the scheme.

A well considered landscape scheme will create a sense of arrival, provide a formal appearance and legibility, separating public and private spaces.

The landscape scheme has considered the neighbouring residential buildings, offering buffers to boundaries to set the built form inbound of the site.

APPEARANCE:
The design of the scheme will be sympathetic to the industrial building and residential typologies and create a modern high quality scheme which will be both aesthetically pleasing and distinctive.

Office areas will be high quality with glazed features located at key points, to provide visual interest and a high quality appearance providing legibility and natural surveillance.

ACCESS:
The scheme will be designed to be fully inclusive for all and provide occupiers the flexibility to adapt to future requirements.

SUSTAINABILITY:
The scheme will be designed from the outset to deliver a highly sustainable development, incorporating renewable technologies such as photovoltaic panels as well as meeting the stringent requirements of BREEAM to achieve a minimum rating of 'Very Good'.

The scheme has been carefully designed to become a high-quality project, which will be both practical for its intended industrial use as well as being distinctive to its surrounding residential context. The proposal will positively contribute to the economy of the local area, using high quality architecture and urban design that responds directly to the site context.

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