

DELEGATED OFFICER REPORT



WOKINGHAM
BOROUGH COUNCIL

Application Number:	250415
Site Address:	Shinfield Park, Whitley Wood Lane, Shinfield, Wokingham, RG2 9FW
Expiry Date:	14/10/2025
Site Visit Date:	28 March 2025
Proposal: Full application for the proposed redevelopment of the site for flexible employment use (Use Class E(g)(ii)-(iii)/B2/B8) together with servicing areas, parking, landscaping and other associated works, including demolition.	

PLANNING POLICY	
National Policy	National Planning Policy Framework (NPPF)
Core Strategy (CS)	CP1 – Sustainable Development CP3 – General Principles for Development CP4 – Infrastructure Requirements CP5 – Housing Mix, Density and Affordability CP6 – Managing Travel Demand CP7 – Biodiversity CP8 – Thames Basin Heaths Special Protection Area CP9 – Scale and Location of Development Proposals CP15 – Employment Development
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development Limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and Construction CC05 – Renewable Energy and Decentralised Energy Networks CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB11 – Core Employment Areas TB12 – Employment Skills Plan TB20 – Service Arrangements and Deliveries for Employment and Retail Use TB21 – Landscape Character TB23 – Biodiversity and Development TB24 – Designated Heritage Assets TB25 – Archaeology
Joint Minerals and Waste	DM1 - Sustainable Development DM2 - Climate Change – Mitigation and Adaptation DM3 - Protection of Habitats and Species DM9 - Protecting Health, Safety and Amenity

Plan (JMWP)	DM10 - Flood Risk DM12 - Sustainable Transport Movements
Wokingham Borough Local Plan Update (LPU)	SS1 – Sustainable development principles SS2 – Spatial strategy and settlement hierarchy SS3 – Development within or adjacent to major and modest settlements SS7 – Development in the vicinity of Atomic Weapons Establishments SS8 – Meeting our employment needs CE1 – Design principles for efficient buildings CE2 – Environmental standards for non-residential development CE4 – Supporting a circular economy CE5 – Embodies carbon CE6 – Reducing energy consumption in existing buildings CE7 – Low carbon and renewable energy generation C1 – Active and sustainable transport and accessibility C2 – Mitigation of transport impacts and highway safety and design C3 – Active travel C4 – Green and blue infrastructure and public rights of way C5 – Parking and electric vehicle charging ER1 – Core Employment Areas ER2 – Employment uses outside of Core Employment Areas ER4 – Employment and skills plans H2 – Presumption against residential losses FD1 – Development and flood risk (from all sources) FD2 – Sustainable drainage NE1 – Biodiversity and geodiversity NE2 – Biodiversity net gain NE3 – Thames Basin Heaths Special Protection Area NE4 – Trees, woodland, hedges and hedgerows NE5 – Landscape and design DH1 – Place making and quality design DH2 – Safeguarding amenity DH4 – Advertisements and signage DH5 – The historic environment DH6 – Archaeology HC5 – Environmental protection HC6 – Air pollution and air quality HC7 – Light pollution HC8 – Noise pollution HC9 – Contaminated land and water HC10 – Odor, fumes and dust
Other	National Planning Policy Guidance (NPPG) Borough Design Guide Supplementary Planning Document 123 List Sustainable Design and Construction Supplementary Planning Document South of M4 SDL SPD Shinfield Neighbourhood Plan

PLANNING HISTORY

Application No.	Description	Decision & Date
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001991	Proposed erection of building for b1 use with related alterations to access and car parking.	Approved 11/04/2001
062435	Proposed erection of a building to provide additional office accommodation.	Approved 05/04/2006
081258	Proposed erection of a building to provide additional office accommodation. (renewal of consent F/2006/6836)	Approved 31/10/2008
110624	Proposed variation to condition 1 of planning consent F/2008/1861 to allow the retention of the existing modular building for a further 10 years.	Approved 09/12/2011
213196	Application to vary conditions 1, 3 and 4 of planning consent 110624 (VAR/2011/2182), which relates to 'the variation of condition 1 of planning consent 081258 (F/2008/1861) for the proposed erection of a building to provide additional office accommodation'. Condition 1 refers to the retention of the existing modular building for a further 10 years, and the variation is to enable the retention of the temporary building for a further 3 years. Conditions 3 and 4 relate to the habitat management and travel plans and the variation is to provide amended plans.	Approved 19/01/2022
220928	Application for a certificate of lawfulness for the proposed replacement of 3no. boiler flues to the main roof.	Approved 18/05/2022
250188	Prior approval submission for demolition of 1 no. office building down to basement level plus demolition of 2 no. bungalows and ancillary buildings down to ground level.	Prior Approval Approved – 18/02/2025
250277	Screening Opinion application for an Environmental Impact Assessment for the proposed redevelopment of Shinfield Park.	Replied (No EIA required) – 19/02/2025

CONSULTATION RESPONSES

Internal

WBC Environmental Health – No objection subject to conditions
WBC Drainage – Request Additional Information (information provided and conditioned)
WBC Highways – Request Additional Information (Information provided and conditioned)
WBC Growth & Delivery (Planning Policy) – No response received
WBC Economic Prosperity & Place (Community Infrastructure) – Obligation secured
WBC Landscape and Trees – No objection subject to conditions
WBC Public Rights Of Way – No response received
WBC Emergency Planning – No objection
WBC Built Heritage Officer – No objection subject to conditions

WBC CIL – Advice provided WBC Cleaner and Greener – No response received WBC Ecology Newts – No objection WBC Sustainability – No objection subject to conditions WBC Ecology – No objection subject to conditions
External
Woodland Trust – No response received Office for Nuclear Regulation – No objection Natural England – No objection Southern Gas Networks – No response received Thames Water Utilities Ltd – No objection Reading Borough Council – No objection Berkshire Archaeology – No objection Forestry Commission – No objection West Berks Emergency Planning Officer – No objection Royal Berkshire Fire & Rescue – Comments provided Active Travel England – No objection AWE Burghfield – No objection Berks, Bucks & Oxon Wildlife Trust – No response received Crime Prevention Design Advisor – Advice provided SSE Power Distribution – No response received

REPRESENTATIONS

Parish/Town Council	Shinfield Parish Council raised an objection to the application on the following grounds: • The site is unallocated and may be required for housing (<i>Officer note: this is not a material planning consideration</i>) • The building's historic merit should be listed. • Alternative uses suggested that do not form part of the submission (<i>Officer note: this is not a material planning consideration</i>) • Concerns arising from the design of the buildings. • Loss of a brutalist landmark. • Lack of need. • Unsuitably located for development. • Increase in traffic volumes. • Concerns the proposal does not enhance the character of the area.
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	• Lack of catering/ café • Invalid travel plan. However, notwithstanding the concerns raised above, Shinfield Parish Council consider if the following were provided by the applicant, the scheme would be acceptable: A Section 106 agreement is made which:- • Fully funds safety improvements on the B3270 leading from the site to the M4 junction including traffic signals/roundabout to the junction of Whitley Wood Lane and the B3270. <i>(Officer note: This would fail to meet the CIL 122 tests, as it is disproportionate to the scale of development)</i> • Commits the developers granting free use of car parking between 18:00 and 24:00 to Shinfield Players on required evenings. <i>(Officer note: This would fail to meet the CIL 122 tests, as it is unrelated to the development)</i> • Allow the site car parks to be used out of hours for the football park and ride. <i>(Officer note: This would fail to meet the CIL 122 tests, as it is unrelated to the development)</i> • The developers offer WBC and Reading buses the option to reinstate the X3 express shuttle with a terminus in the development. <i>(Officer note: This would fail to meet the CIL 122 tests, as it is disproportionate to the scale of development)</i> • The developers make a substantial donation to the Shinfield Players Theatre as a fund for its redevelopment to include an area for community use. <i>(Officer note: This would fail to meet the CIL 122 tests, as it is unrelated to the development)</i> Along with the obligations above, Shinfield Parish Council requested planning conditions to:- • Maintain the footpath through the site during the construction and future use of the site. <i>(Officer note: all land within the applicant's ownership will be subject to a construction management plan, and further improvements to the right of way are secured via condition).</i>
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	• Prevent encroachment on any mature or veteran trees with full root protection systems to be approved by WBC. • Restrict the presence of catering vans to less than 1 hour per day in defined spaces, ie no trailers or caravans, with the site owner responsible for managing rubbish. <i>(Officer note: there is sufficient space on site for catering vehicles and restricting types of vehicle would fail to meet the 6 tests within the planning practice guidance).</i> • Restrict operational use between 21:00 and 19:00 due to the close proximity of residential properties adjacent to the site. • Restrict access to and from the site to Reading via the A33 only with no access the site via the Shinfield Road. <i>(Officer note: this would fail to meet the 6 tests established within the NPPG).</i>
Ward Member(s)	Councillor Jacqueline Rance objected to the application, making the following comments: <i>“On behalf of the residents I object to this development which should be listed given its historic design and position. The building appearance could be kept by using it as a hotel, or a conference centre, hotel, healthcare centre and housing. Surely there are enough similar empty properties near rather than using this building for industrial units. The building is so near J11 of the M4 and the added traffic will certainly overcrowd that area where traffic volumes have massively increased.</i> <i>The B3270 leads from the building towards a very dangerous junction with Whitley Wood Lane. The increase in volume necessitated by this proposal will ensure more accidents. There is a wonderful vista of mature woodlands and trees of an historic nature, and the proposal will do nothing to enhance. Shinfield Players is a local theatre producing superb productions and needs the use of a car park unencumbered. There does not appear to be restaurant facilities on the site, therefore operatives will leave the site during the day as well as arriving in the mornings, and leaving at the end of the working day, which means even more traffic.”</i> Cllr Andrew Gray raised an objection to the application, making the following comment:

	<i>"I object to the following application for reasons of traffic intensity, noise pollution, safety of residents and the proposed change of use.</i> <i>- The B3270 is already a busy and congested road. Converting this site to industrial units will only make this worse. Updates to the junction on Whitley Wood Lane/B3270 must be considered as part of traffic planning strategy.</i> <i>- The proposed change of purpose is ambiguous. The current office space is used broadly within daytime hours. The proposal to move to 24/7 working would be very damaging for the local residential community. Limiting the timing of industrial activity should be considered in this application so residents are not adversely affected.</i> <i>- There is the presence of asbestos in the current building and there are a number of residents who live very close to the site. The impact assessment does not take into consideration the risks of those living closest to the site, only that it will not impact significant numbers.</i> <i>The proposed changes to the site are too different from its current use and will not work with the residential community close by. The scope of the use must either be significantly limited otherwise it will have significant impact on the lives of those living in Shinfield Park."</i> Councillor Vishal Srinivasan raised an objection to the application, leaving the following comment: <i>"Traffic and Highway Safety Concerns</i> <i>The traffic modelling provided by the applicant relies on outdated, pre Covid data, whereas the Transport Assessment Report (using Wokingham Borough Council's Strategic Traffic Model) forecasts significant increases in vehicle flows. The report states that under the "2026 'With Development'" scenario, "peak-hour delays are forecast to rise by 1–2 minutes at key junctions." This means that crucial routes—such as Whitley Wood Lane and the B3270—will experience considerably higher volumes, leading to longer queues and potentially hazardous conditions for both motorists and pedestrians.</i>
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	<i>Furthermore, the report's sensitivity analysis indicates that even modest increases in trips can "push junctions to or beyond their capacity," thereby undermining the current assumptions made in the planning submission. Such increased delays, combined with the prioritization of vehicles exiting the new development, will severely impact residents' ability to leave the area during peak times.</i> <i>Noise and Environmental Impact</i> <i>The noise generated by the ongoing demolition is already intrusive. I am deeply concerned that this level of noise will not only persist but will intensify as additional traffic (including lorries and delivery vehicles) enters the area. The report highlights that increased traffic volumes are associated with "sustained operational delays," which can contribute to higher ambient noise levels. This ongoing noise not only deteriorates the quality of life but also negatively impacts property values in our neighbourhood.</i> <i>Parking and Access Issues</i> <i>Although the proposal asserts that parking provision is sufficient, our local streets are already under strain. The report notes that mismanaged increases in vehicle trips can lead to spillover effects on adjacent roads, resulting in illegal on-street parking and further congestion. With projected traffic increases of approximately 7–8% during peak periods, routes like the B3270 may experience even more severe congestion, thereby reducing safe and reliable access for residents.</i> <i>Applicability to Shinfield Park</i> <i>The data from the Transport Assessment Report is particularly relevant to our area. The projected increases in peak-hour vehicle flows and the resulting delays directly underscore the risk that our local road network—especially around Whitley Wood Lane and the B3270—will be overwhelmed. Without updating the traffic model to reflect current, post Covid travel behaviour, the true impact on our highway network is being grossly underestimated.</i> <i>Conclusion and Request</i> <i>In light of these issues, I respectfully urge the planning committee to:</i> <i>1. Re-assess the Traffic Impact: Update the traffic modelling using current, post Covid data. The report clearly</i>
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	<i>demonstrates that “peak-hour delays are forecast to rise by 1–2 minutes at key junctions,” which is unacceptable for local residents.</i> <i>2. Mandate Robust Noise Mitigation Measures: With demolition noise already affecting every room in my house, a comprehensive noise reduction strategy (such as installing sound barriers and enhanced landscaping) is essential to safeguard residents’ health and property values.</i> <i>3. Review Parking and Access Provisions: Ensure that the increased vehicle flows do not spill over onto residential streets, thereby compromising the safety and accessibility of our community during peak periods.</i> <i>Without these essential revisions, the redevelopment will likely compromise the safety, health, and quality of life for local residents. In which case I would have no choice but to object to the current proposal and request that these material concerns be fully addressed before any planning decision is finalised.”</i> Cllr Pauline Jorgensen (Ward Member for Hillside, outside of the Shinfield Ward) made the following comments: <i>“I am concerned about this application for the following reasons:</i> <i>- The proximity of houses in Shinfield Park in particular to the warehouse to the right of the site, there is likely to be considerable noise and nuisance and in particular if this does get approved reversing horns should be switched off</i> <i>- The access to the M4 via Whitley Wood is already a busy road, the junction with Whitley Wood Lane is inappropriate for HGVs.</i> <i>- There seems to be little demand for this sort of warehouse, there is one about 500 yards away where Autotrader was based which has never been occupied since it was constructed.”</i>
Neighbours	Objections have been received from 66 residents (some commenting multiple times), on the following grounds: • Site better suited to residential development or an

	alternative use. • Air quality harms • Noise harms • Harm to biodiversity/ protected species • Harm to the landscape and its character • Harm to the character of the area • Increase in traffic movements • Air pollution • Increase traffic/ congestion • Loss of local landmark • Heritage harm from loss of building • Disruption during construction and operation • Concerns with demolition (asbestos) • Insufficient parking provision • Insufficient provision of services • Unsustainably located in terms of public transport • Errors in submitted travel plan • Inadequate noise assessment • No affordable housing provision with a commercial development. • Concerns raised on consultation span (<i>Officer note: all consultation was carried out in accordance with national and best practice guidance, and no decision has been made inside of the statutory consultation period</i>). • Harm to neighbouring amenity arising from the 24-hour use. • Industrialisation and loss of green space
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	• Safety risks arising from construction and operation.
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APPRAISAL
Site Description: The application site is located to the north of the M4 motorway and Lower Earley Way, sitting to the west of the Black Boy roundabout (B3270). There is a landscape buffer to the M4 motorway to the south-east of the site which is designated as countryside, however, the site itself is located entirely within the major development location of Shinfield (north of the M4). Adjacent to Shinfield Park, Nore's Hill Local Wildlife Site wraps broadly around the southern, western and northern boundary. Taken together, the landscaping features that surround the site provide a strong verdant backdrop to the site which is unique given the existing building's scale and lawful function, creating a 'campus' identity. Whilst the existing building is located on the edge of settlement and provides limited transition to designated countryside (instead marking a neutral/ harmful landmark in this location), along with the local wildlife site, the site's adjacent landscape features lend themselves to a campus feel providing a buffer between Lower Earley, Whitley Wood and Shinfield. Within the site itself, the core employment space is provided within a building that was first occupied in 1982. The building used to serve the function of county hall for Berkshire but has since been occupied by Foster Wheeler and more recently, Wood PLC prior to them vacating the premises in late 2024. Given the age and location of the building, the level of use has been declining over many years. It is also recognised that there are better located and more suitable modern buildings available for office use locally. Shire Hall (being the existing building) has a distinctive brutalist design being predominantly concrete and is distinguished by seven hexagonal outcrops framing a central core of which is the tallest section. This is relatively centrally located on the plot and is clearly visible from the B3270, prominent from the adjoining PRow and obliquely from the M4 over the treetops given its height. There are ancillary buildings located within the red line (namely 2no. bungalows) together with surface car parking which are proposed to be demolished under prior approval application 250188. It is understood that the temporary building on the northwestern extent of the site has been demolished and works have recently commenced pursuant to application 250188. There are also multiple off-line, rain fed ponds located within the site which contribute towards the unique campus feel. Footpath 10 (the PRow referred to above) is located to the north of the site and transects the site's curtilage, wrapping around the existing car park and hard surfacing. The site is accessed by the Lower Earley Way B3270 which quickly connects the site

to the wider strategic transport network (namely the M4). The site has well defined internal roads that connect to the Lower Earley Way and the access is shared by the former 2no. residential bungalows at Shinfield Park.

Proposal Description:

The proposal is for the redevelopment of Shinfield Park, comprising of 6 units labelled 1, 2, 3a, 3b, 4 and 5 following the demolition of Shire Hall and 2no. uninhabited bungalows. For clarity, the proposed use classes proposed by the applicant to be considered within this submission are as follows:

- Use Class Eg (ii) is defined as: the research and development of products or processes, or
- Use Class Eg (iii) is defined as: any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit
- Use Class B2 – General Industrial is defined as: use for the carrying on of an industrial process other than one falling within the uses described in Class E.
- Use Class B8 – Storage or Distribution is defined as: Use for storage or as a distribution centre.

In combination, the use classes identified above form a flexible employment use which alters the existing and lawful office use (albeit currently un-occupied). Whilst not strictly mentioned within the description of development, it is noted that ancillary office use is proposed to fall alongside those uses specified above. Given this use is ancillary and complementary to those uses listed above, it does not strictly require feature within the description of development.

Following the demolition of the existing Shire Hall building, 6no. flexible employment units are proposed to be constructed on the existing extent of previously developed land. These are of high-quality design and are of a scale commensurate to the size of the site, ranging across the site to provide a degree of variety.

The choice of materials over the 6no. units proposed are modern and contemporary design comprising a mixture of glazing, steel and timber elements which has been informed by a thorough analysis of the site's constraints and through proactive discussion with the LPA. It is considered that designs put forward for consideration are high quality in relation to commercial development and would not cause harm to the character of the area, particularly considering the quality of the existing structure.

The layout of the site reflects pre-application discussions and marks an improvement in the character and appearance of the area, particularly through sensitive design and siting in relation to surrounding viewpoints of which at current fall on the dilapidated existing building. No objections have been raised by officers on these grounds.

Landscaping has been well considered across the scheme with a strong emphasis to the planting and drainage features. A green spine including the provision of 'rain

gardens' is proposed to interweave throughout the development with a sufficient belt of green buffering provided, improving ecological permeability and visual perception of the site. No objections from Trees and Landscape or WBC Ecology have been received.

The setting of the adjoining PRoW will be improved when contrasted against the existing situation, enhancing the buffer to the surrounding ancient woodland which again helps integrate the proposals into their surroundings. Further enhancements to the PRoW itself are secured via condition.

Car parking is also integrated into the landscaped areas with 250 spaces to serve the development. Cycle parking has also been considered, and secure cycle parking spaces will be provided which is sufficient for the indicated quantum of development including electric cycle parking secured via condition. Access to the site is via the B3270 with a visually improved access proposed to the east of the site, with numerous active transport connections and public transport options adjacent to the site.

A robust drainage strategy accompanies the application, which effectively manages surface water flow and reduces any perceived flood risk. On the contrary it effectively self-serves any increase in impermeable area and provides a betterment on the existing situation.

The units are well contained and separated away from residential dwellings to the north and west. Mitigation measures are secured by planning condition along with decibel emission limits to safeguard neighbouring amenity. Furthermore, the proposal would not significantly harm air quality with mitigation measures secured by condition throughout the construction and operational phases of development. No objections have been received from WBC Environmental Health.

The proposals achieve a betterment in on-site biodiversity net gain, with those habitats lost as a part of the development being reasonably mitigated and benefitted in combination with off-site net gain arising from trading units. The proposals do not harm any protected species on site and provide species specific enhancement and sensitive lighting strategies. These matters are secured by condition. No objections have been received from WBC Ecology, Natural England or WBC Ecology Newts.

Principle of Development:

Section 38(6) of The Planning and compulsory purchase Act 2004 requires that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise. Within the Wokingham Borough the adopted Development Plan comprises the Core Strategy (CS) and the Managing Development Delivery Local Plan (MDD), which are read alongside the NPPF and various Supplementary Planning Documents (SPD).

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham

Borough will be approved without delay, unless material considerations indicate otherwise.

The site is located entirely within settlement limits and as such the development should be acceptable providing that it complies with the principles stated in the Core Strategy. Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale of activity, mass, layout, built form, height, materials and character to the area in which it is located and must be of high quality design without detriment to the amenities of adjoining land uses and occupiers.

Policy CP9 of the Core Strategy and CC02 of the MDD Local Plan states that proposals will be permitted within development limits where the scale of the application reflects the facilities and services within the settlement. The development plan steers most developments to sustainable settlements with the best services, facilities and infrastructure. The definition of development limits recognises the consistent approach in planning to identify appropriate and sustainable areas for development.

The site is located within a Major Development Location wherein CC01 is relevant, namely that policy compliant development within these locations will be approved without delay. Development in this location is therefore acceptable in principle subject further policy considerations, end use and other material considerations.

CP9 of the Core Strategy aims to promote development within these established development locations given the presence of high-quality services to support an element of choice for future occupiers. Supporting paragraph 4.52 of the Core Strategy outlines major development locations as *“those with the greatest range of facilities and services which also allow residents the greatest choice in modes to access them. It is it within the development limits of these settlements where major development (including urban extensions within these limits) would be acceptable”*. The proposal complies with the Council’s spatial strategy in principle, in this respect.

Furthermore, Policy 1 of the Shinfield Neighbour Development Plan (NDP) outlines that *“In Shinfield Parish, development within the Development limits (as illustrated in Fig 2), will be supported; development adjacent to the Development Limits will only be supported where the benefits of the development outweigh its adverse impacts.”* As shown in the figure below, the site in its entirety is located within the NDP’s suggested settlement limits which align with the Council’s own MDD and thus complies with its provisions:



Figure 1: Settlement Limits Extract

Industrial Need and Supply:

The Development Plan approach to development for employment use as stated within Core Strategy Policy CP15 is to provide for future employment needs in the borough through retaining the Core Employment Area's and encouraging their continued intensification by supporting development for Class B and Class E(g) uses (pre- amended to the Use Class Order).

Policy CP15 seeks to retain employment space within the borough. The proposed redevelopment would result in 20,400m² of flexible employment gross internal area, however, would result in the loss of the formal existing office floorspace of circa 23,730m² (excluding ancillary space such as existing restaurants, plant rooms, basement parking etc). The total existing floorspace (including ancillary spaces) sits at c77,642m² which will be lost as a part of the development, however, this wider figure does not reflect the formal employment space, of which a net loss of c3,330m² will result.

CP15 supporting paragraph 4.71 supports the re-use of existing employment sites for other uses in locations where there is a demand for alternate uses and/or lack of demand for business uses, providing no net loss in employment floor space results. In the case of the proposal, notwithstanding the loss of office floor space, demanded employment floor space would be seen to increase (those use classes proposed), which tempers the harm associated with a net-loss in employment floorspace and in combination is afforded positive weight when engaging the planning balance. It is further of note that limited demand for the full extent of the formalised office space

dictated its lack of viability for retention, with the most recent occupiers only utilising part of its floorspace. In this respect, the existing building and associated use did not make the most efficient use of the land and its conversion to modern office requirements is simply not viable

In addition to the quantitative aspect of the policy, CP15 also includes a qualitative element: *“Provision will be made for a range of sizes, types, quality and locations of premises and sites in order to meet incubator/start up, move on, expansion and investment accommodation needs and having regard to the needs of specific sectors of the business community.”*

It is pertinent to consider the wording within supporting paragraph 4.70 of CP15. This states a *“good supply of a range of sizes, types and location of available sites and buildings is a pre-requisite to a thriving economy”*. In combination with the provisions of the adopted Development Plan, the current Employment Land Needs Review by Stantec outlines a significant industrial floorspace need within the Borough of circa 53 hectares as an aspirational target.

Policy SS8 of the emerging local plan (whilst afforded limited weight at this time) bolsters the view of CP15, stating *“The sustainable growth of office and industrial space will be supported to meet the diverse needs of the local economy. The appropriate intensification, redevelopment and upgrading of existing sites and premises will be encouraged and supported to ensure the efficient use of land, help meet future demands and respond to modern business needs.”*

Policy 11(2) of the Shinfield Neighbourhood Plan outlines that *“In cases where new development would result in the loss of commercial premises that fall under Classes A and B of the Use Classes Order (2005), and where planning permission is required for the change of use, proposals may be supported where they demonstrate that the commercial use of the premises is no longer viable (e.g. through continued vacancy and evidence of competitive marketing for an appropriate time period, at an appropriate price, and in an appropriate location).”*

This Employment Land Needs Review outlines broad locations for new employment land, with two potential sites being identified within the brief that have been assessed as potentially suitable for employment uses in the council’s Housing and Economic Land Availability Assessment (2021). However, even in combination, those two sites identified would make up a modest portion of the overall need, requiring the LPA to consider alternative suitable options (preferably within settlement). It is further noted that additional recently commenced developments such as the Boundoak Industrial Estate contribute to this supply, however, there remains a notable shortfall to meet the borough’s overarching aims for the required level of floorspace. This view is bolstered by paragraph 4.124 of the Employment Land Needs Review (ELNR) which states there could be scope for future industrial development to capture demand for businesses. In principle, the proposal strongly contributes to the borough’s need through the provision of 6 units of mixed scale, in 5 buildings, forming a dedicated campus style development in a highly sustainable location, within an existing, underutilised employment site.

Whilst Industrial development in this location would at least in part come at the cost of

existing office space and result in an overall net loss of internal floor space, it is acknowledged within the ELNR that the borough has a surplus of offices (indicating a preference of selective release), many of which have fallen into disrepair further to being left vacant. In this case, the redevelopment of this office to meet modern office standards would prove difficult and unviable, and demand has been limited to retain the existing, lawful use of the site. Thus, whilst numerically the net loss in employment floorspace weighs against the proposal on balance, the efficient use of the site to provide a response to more modern demand tempers this weight.

Notwithstanding the loss of c3,330m² of formal employment space which weighs against the scheme on balance and forms face conflict with CP15, the provision of significant useable employment floorspace on a currently underutilised site is development plan and Framework compliant given its sustainable location within settlement limits. Furthermore, the degree of office space lost considering the findings within the ELNR reflect modern dictation of supply and demand and thus tempers weight afforded against the scheme.

Previously Developed Land:

The proposal would utilise previously developed land to provide the redevelopment and re-use of an employment site. The Framework has an in-principle presumption in favour of development within brownfield sites as detailed within paragraph 89 which states *“The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”* The proposal aligns with this aim of the framework, as the site is sustainably located, within a major development location and predominantly comprises of previously developed land.

Turning to decision making, the Framework outlines in paragraph 125(c) that planning decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”*.

As outlined above, the site is located solely within a major development location and the Wokingham Borough has an overarching need for industrial floorspace which the proposal will notably contribute towards. Furthermore, the proposal results in no substantial harm considering the existing land use (to be discussed in the body of this report) and in fact constitutes a benefit to the character of the area. Accordingly, the proposal complies with paragraph 125 of the framework which weighs substantially in favour of the development proposed in principle.

Efficient Use of Land:

Paragraph 87 of the NPPF acknowledges that planning decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- a) clusters or networks of knowledge and data-driven, creative or high technology*

industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);

Whilst the nature of the end users for each unit are not known at this time, the uses consented include research and development as well as mixed industrial processes. Units in a prime and sustainable location, within close proximity to other knowledge clusters (Green Park and Thames Valley Park) provide the opportunity to offer support to the growth of the knowledge industry. The proposal complies with part a of paragraph 87.

b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and

The proposal includes storage and distribution operations on site, and given the site's location adjacent to a major transport network (the M4) the site is well located for the efficient handling of goods to support the national supply chain. The site's location in such close proximity to the M4 further reduces the need for carbon generating journeys through settlement, instead offering near direct access from the motorway. The proposal complies with part b of paragraph 87.

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

The proposal is located on a site historically tied to employment which is currently underutilised, unoccupied and unviable to continue (with respect to market demand and historic under-occupation). In the context of the Wokingham borough, the site is of local economic importance given its former ties with Berkshire County Council and its scale as an employment site. The modernisation of the site to provide for the diverse requirements of industry within the borough complies with part c of paragraph 87.

Paragraph 129 of the NPPF outlines that decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.*

The proposals meet an identified need for flexible commercial (and principally industrial) floorspace, are informed in scale and location by local market conditions, are sustainably located and complementary to the character and appearance of the area. The proposal complies with paragraph 129 in this respect and constitutes an efficient use of the land which weighs in favour of the grant of planning permission.

Minerals and Waste:

The Central and Eastern Berkshire Joint Minerals and Waste Plan (Joint Plan) was adopted by Wokingham Borough Council on 19 January 2023. The Joint Plan identifies site allocations and extensions to help provide a future supply of sand and gravel extraction. However, despite these allocations, there remains a shortfall of supply during the plan period. The policy response to address the shortfall is the identification of a 'Minerals Safeguarding Area' (MSA), where Policy M2 of the plan applies, and also an 'Area of Search' where Policy M4 applies. This approach is to demonstrate the potential for, in effect, windfall provision within the Plan area.

Policy M2 aims to seek to protect mineral resources against unnecessary sterilisation by non-minerals development. The application covers an area approximately 5.5 ha in size and this 3ha threshold is reflected in the supporting text under Policy M2, which states *"A minimum plot size of 3 hectares will apply in the safeguarding process to avoid repeated consideration of prior extraction where this can be assumed to be uneconomic, due to the small size of the parcels of land involved."*

Whilst the northern part of the site contains sharp sand and gravel deposits, the site does not fall within the designated Minerals Safeguarding Area. Considering the site's limited incursion into an area of sharp sand and gravel deposits, existing land use and the limited size of the site allocated for mineral safeguarding (thus failing to meet the criteria of Policy M2), extraction would not be viable and the proposal does not stand contrary to the JMWP.

Local Plan Update (eLP):

A Revised Growth Strategy for the local plan was consulted on between 21 November 2021 and 24 January 2022, which proposed an alternative strategy for delivering growth in the borough due to the complexities regarding the deliverability of Grazeley garden town and following legislative changes to the emergency planning requirements around AWE Burghfield.

Considering the eLP's stage of preparation, it is not considered to hold substantive weight at this time. This is explored in greater detail below:

In considering the weight to be given to Wokingham Borough Council's emerging Local Plan Update (LPU), it is necessary to refer to the National Planning Policy Framework (NPPF 2024), Paragraph 49 states that decision-makers may give weight to emerging policies according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);
- The degree of consistency of the relevant policies in the emerging plan with the NPPF (the closer the policies are to the Framework, the greater the weight that may be given).

Stage of Preparation

Regulation 19 version of the LPU was published and subject to consultation in September-November 2024. The Regulation 22 plan was submitted to the Secretary of State for independent examination in February 2025, and two Planning Inspectors have been appointed to examine (EiP) the plan. The examination of the local plan is ongoing, and the council responded to initial questions and requests from the Inspectors, though Hearings have yet to commence.

As seen in High Court judgements, even when an emerging plan is at an advanced stage, it may still attract limited weight if further consultation and modifications are required, and the Inspector has yet to issue a final report. Wokingham's LPU has several stages yet to be completed, including the examination hearings and main modifications stages, which restricts the weight that can currently be afforded to non-substantive.

Unresolved Objections

The plan has been submitted with an accompanying Regulation 22 Consultation Statement. Appendix 15 to the Regulation 22 Consultation Statement sets out the main issues raised in representations to each policy and area of the LPU Proposed Submission Plan and the council's response. This can be used to understand the scale of objections and so inform the weight that might be applied. These vary across policies and thus as relevant, LPU policies and their relevant weight are explained throughout this report.

Consistency with the NPPF

Although Officers are confident that the emerging LPU, and its policies align with the NPPF, the degree of consistency has not yet been tested through examination and cannot be guaranteed. As per other cases, consistency with the NPPF is only one factor, and its relative importance depends on the extent to which the LPU impacts the planning balance in decision-making.

LPU Policy SS2 Spatial Strategy and Settlement Hierarchy is relevant to this application and it placed the application site within settlement limits and acknowledges the benefits of utilising suitable previously developed land. LPU Policy SS2 states that:

"The distribution of growth will be based on the following actions:

a) *Making the most efficient use of available and suitable previously developed land within defined settlements;*

b) *The sustainable extension of defined major and modest settlements;”*

The LPA acknowledge that at this stage, there are unresolved objections on substantive grounds pursuant to LPU policy SS2 (detailed within the regulation 22 document) and as such limited weight against the scheme should be afforded given its conflict.

Whilst afforded limited weight at this time, the proposal complies with SS2 of the LPU.

LPU Policy SS3 Development within or adjacent to major and modest settlements outlines *“Within major and modest settlements, development proposals in addition to those specifically identified as allocations or areas of change in this plan, will be supported in principle.”*

Whilst afforded limited weight at this time, as SS3 is directly linked to the provisions of SS2, the proposal complies with SS3 of the eLP, as the site is located suitably within a major settlement.

Net Loss of Residential Dwellings:

The site area as identified by the submitted red line incorporates two un-occupied residential dwellings towards the northern boundary. The application proposes to demolish these to provide space for unit 5.

CP3 of the Core Strategy states *“Planning permission will be granted for proposals that... i) Do not lead to a net loss of dwellings and other residential accommodation or land”*.

Policy H2 of the LPU further echoes the provisions of CP3 of the Core Strategy, in that the loss of residential dwellings will not be permitted, however, it is acknowledged that this is afforded limited weight at this time.

Further Policy 11 of the Shinfield Neighbourhood Plan notes that commercial development will only be acceptable, where it does not result in the loss of dwellings.

This restriction within both the current and future local plan creates a presumption against the loss of residential dwellings, and therefore, though currently un-occupied, the proposed loss of 2no. residential dwellings (or even the residential land considering the extant prior approval for demolition) is a disbenefit of the scheme. The loss of 2no. dwellings further stands contrary to the Government’s objectives of significantly boosting the supply of housing within the UK.

Whilst this element of the proposal marks a disbenefit, considering the notable benefits afforded to both the local and national economy, this matter must be considered within the overall planning balance.

Economic Prosperity:

One of the three pillars of sustainability falls within economic benefits, which the proposal would significantly contribute towards. Paragraph 85 of the NPPF acknowledges *“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.”*

Policy CE4 of the emerging local plan states *“In order to understand and reduce the lifecycle impacts of development, development proposals which demonstrate compatibility with, or furthering of, a strong circular economy in the local area will be supported in line with wider sustainable development objectives.”*

The proposal would generate up to 558 full time equivalent jobs, as well as those within the construction and demolition phase. The development during its operational phase would also be responsible for business rates, which at the scale of the units proposed would be significant in the context of the borough. Once occupied, the site could generate up to £25.8m operational GVA per annum (based on 558 FTE) excluding the additional GVA contribution via construction and demolition which significantly weighs in favour of the application on balance.

Conclusion – Principle of Development:

Whilst the proposed development would result in the loss of 2no. residential dwellings contrary to both local and national policy as well as reduce the GIA of employment floorspace on site, the proposal would make efficient use of previously developed land and provide notable industrial floorspace in a sustainable location, of which there is demonstrable need within the borough, supporting thriving industry. Use of the site for flexible commercial purposes reflects a pragmatic approach to best and most efficiently utilising previously developed land in the context of modern demand, creating an outlet to support the borough’s valuable knowledge clusters within a close proximity.

The application site is further within settlement limits on an existing employment site and would decrease trip generation over the lawful office use, capitalising on the site’s location adjoining a major motorway and strategic transport network. It is noted that the refurbishment of the existing building to bring it to modern office standards would be unviable, nor demanded at this time, which is a material consideration. Failure to provide a modern response to the market’s existing needs would render the existing site underutilised and subject to anti-social behaviour. Instead, this application would provide modern adaptable commercial buildings and secure significant local employment (c558 FTE), contribute to the borough’s growing economy and work towards strengthening the borough’s knowledge cluster.

Furthermore, the proposal would benefit the local transport network, sensitive landscape adjoining and provide notable biodiversity benefits as well as wider community benefits in improvements to the PRoW and bus service adjoining.

It is considered that the principle of redeveloping Shire Hall with a mix of E(gii-iii), B2 and B8 units is acceptable and the application is supported on this basis subject to

material considerations that may dictate otherwise as commented on below.

Locational Sustainability:

Policies CP1, CP4, CP6, CP9 and CP11 of the Core Strategy permit development where it is based on sustainable credentials in terms of access to local facilities and services and the promotion of sustainable transport.

Policy 4 (part 2) of the Shinfield Neighbourhood Plan outlines that all development proposals must make the fullest possible use of public transport, walking and cycling to schools, work place and local amenities, through measures such as (but not limited to):

- The provision of additional pedestrian footpaths and cycle routes
- Accessibility improvements to bus stops from existing developments,
- Real time travel information at bus stops
- Practical walking routes from developments to public transport, schools, work places and local amenities with proper footpaths, street lighting and safe crossing points.

Expanding on this, paragraph 4.57 in the Core Strategy aims to prevent the proliferation of development in areas away from existing development limits as they are not generally well located for facilities and services and would lead to the increase in use of the private car.

LPU Policy C1 outlines that development proposals must support the delivery of active and sustainable transport measures. It further states that development proposals should prioritise travel by active means (including walking, cycling and wheeling), public transport, and incorporate inclusive infrastructure which provides connections to and within the development. This should focus on making the most efficient use of existing highway, including, where appropriate, reallocation of space to more sustainable modes.

LPU Policy C3 states that *“development proposals must promote sustainable transport by prioritising active travel, including walking, wheeling, and cycling”*. The aim of this policy is to prioritise the pedestrian environment within the new development through the creation of a high-quality public realm and maintaining and enhancing existing pedestrian/ cycle access points.

The site is sustainably located in terms of access to public transport and for pedestrians / cyclists and is in a well-suited location for the anticipated use(s) given the site's close proximity to the M4 motorway. This will benefit the end user(s) and create direct access to the wider strategic road network, likely preventing journeys through built up areas and perceived harm to neighbouring amenities via congestion. As identified above in the principle of development section, this holds positive weight in favour of the development.

With respect to staff accessing the site, there are 10 bus stops within 500 metres of the site (as the crow flies) and 2 bus stops within 500 metres walking distance (circa 460 metres). Whilst this exceeds the 400-metre suggested walking distance, policy CP6 of the Core Strategy outlines that people are more likely to walk a slightly further distance for a better service. In this instance, as the bus stops are a mere 60 metres in excess of the required distance, it is not considered this would be a determinative factor in preventing the use of public transport, particularly given the quality of the adjoining services and frequency of service. The user experience of these services are to be upgraded in line with S106 obligations as detailed below.

The 3 Leopard bus service, serving the Ducketts Farm bus stops (north and south) is classed as a 'good service' as per CP6 in line with its frequency and extent, which in this case is 4 buses per hour throughout the day between Arborfield Green, Reading and Wokingham and 2 buses per hour in the evening. Whilst these bus stops do utilise a desirable service, they are of relatively low quality and do not feature a shelter or any real time information. To provide a higher quality experience for users of public transport, particularly inviting those employees envisaged to work at Shinfield Park to utilise them, a planning obligation has been secured. This secures enhancements via financial contribution to these two stops (Ducketts Farm North and South) which take the form of shelter and real-time updates (digital screen). Furthermore, to ensure the high-quality public transport service is utilised a travel plan obligation has been secured via S106. This directly links to the requirements of Policy 4 of the NDP as well as CP6 of the Core Strategy.

Turning to additional public transport services, whilst additional stops are noted along Whitley Wood Road, at c700 metres walking distance these are beyond the recommended walking distance and furthermore require using the steep footpath to access them. Whilst the 2no. stops at Ducketts Farm to be enhanced provide a more likely destination for future employees, enhancements to the public right of way within the site have been secured by planning condition which will go some way in making the existing pathway that is of relatively poor quality (lack of surveillance and even surfaces) more desirable to use, promoting connection to Whitley Wood and beyond (including Reading's Cycle Network).

The LPA notes that the site was formerly served by a limited service via the 603 park and ride, with four buses formerly running in the morning towards the park and ride and 4 in the evening towards Reading. Investigation into this route was pursued by the applicant through liaison with the bus operator in relation to relocating the internal bus stop within the scheme. Further to discussions, the operator confirmed that the process of amending the route of the 603 had already commenced and therefore, they did not require or wish it to be relocated. Accordingly, not pursuing this matter further does not form objection, particularly as those active stops closest to the site are due to be upgraded following financial contribution from the applicant (via planning obligation).

It is noted that several comments have been received concerning the provision of an on-site food truck to serve the development. Adequate space is retained on site within both the amenity area as well as the overflow car park that could facilitate this. As this is ultimately a demand led service, it would not be reasonable to formally secure as a planning condition as it would be both unenforceable and unnecessary. This

said, its use on site is encouraged demand permitting, which in turn could have sustainability benefits in reducing the need for a modest number of employees to travel for lunch.

Overall, the site is sustainably located, within reach of significant residential developments and suitable for the intended use, which in turn reduce trip generation and the distance required to be travelled to reach the strategic road network. Appropriate and proportionate enhancements have been secured to the local public transport network as well as footway network, which bolster the services available for end user(s) and their likelihood to be relied upon in accordance with the NPPF. The site's location for the intended use(s) is a matter that weighs positively in the planning balance and is compliant with the development plan.

Character of the Area:

Policy CP1 of the Core Strategy states that permission will be granted for developments that maintain and enhance the quality of the environment and encompasses sustainable values.

Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale, mass, layout, built form, height and character of the area and must be of high-quality design. The Borough Design Guide SPD requires that development contribute positively towards and be compatible with the historic or underlying character and quality of the local area.

Furthermore, Policy 2 of the Shinfield NDP outlines 9 development criteria that factors into positive design that is acceptable. These are as follows:

- 1) Use of quality materials that complement the established built environment around the development site;
- 2) Compatibility with the scale and features of existing buildings in the locality;
- 3) Creation of suitable site layout that provides sufficient spacing between buildings to maintain privacy and amenity for any new and existing residential properties;
- 4) Allowance of appropriate space for hard and soft landscape works, particularly at settlement boundaries, in the public realm and along designated green routes and green route enhancement areas;
- 5) Provision of appropriately high quality and high specification sustainable landscape works and tree planting, particularly at settlement boundaries, in the public realm and along designated green routes and green route enhancement areas (existing and proposed);
- 6) Where appropriate, provision of suitable and unobtrusive storage facilities for refuse and recycling; and
- 7) Design of road and service layouts to ensure the sustainable retention, where

appropriate, of existing landscape features, including trees and historic landscape features, and to allow space for new sustainable landscape works without the need for maintenance and upgrades to services damaging landscape works, as they mature.

8) Relevant adopted Village Character or Design Statement

9) Designing out opportunities for crime and anti-social behaviour.

Paragraph 135 of the Framework acknowledges that planning decision should ensure development:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 12 of the NPPF 'Achieving well-designed places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high-quality places. Paragraph 130 of the NPPF includes the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

The Government's National Design Guide 2019 (NDG) is clear that well-designed places contribute to local distinctiveness. This may include introducing built form and appearance that adds new character and difference to places.

R9 and NR5 of the Borough Design Guide SPD note that height, bulk and massing should respond to the local context and the prevailing heights in the area.

LPU Policy DH1 outlines that all new development must be of high-quality design to endure over the lifetime of the development and create a strong sense of place. It outlines numerous requirements for development including reinforcing sense of place, respects the local character of the area, embraces opportunities for innovative design and optimises the efficient use of land. It further echoes other parts of the LPU such as achieving sustainable, accessible and landscape appropriate development.

Principally attributing the above policies to the application site, the proposed development takes inspiration from the site's existing commercial, campus style character, further proposing form that complements the surrounding landforms such as ancient woodland, a public right of way and the levels drop between the site itself and Lower Earley Way. This creates a unique identity for the site, in that whilst the use is very much urban, its design is very much landscape led which is supported by the LPA in principle.

The strong landscape led emphasis on the site layout provides a peripheral green spine that internally connects to intersect the built form proposed on site, with belt of greenspace providing a visual and spatial buffer around the site, connecting it positively in spatial terms to the surrounding ancient woodland. Furthermore, this buffers the otherwise hardening elements of the proposal (the built form) which are inevitable with the development of this scale and nature.

When comparing the landscape layout and design in comparison to the existing site, substantial benefits are noted with the addition of notable 'breathing space' for the built form which does not exist at current (bar the south-eastern boundary to be retained and enhanced) with the brutalist form encapsulated in much hard surfacing. Whilst the existing building groups density, the proposal spreads form relatively evenly across the site, providing an outlet for meaningful and useable landscaped space, rather than the tokenistic and limited buffer than exists at current, which is further strengthened by the proposed development.

Officers have proactively worked with the applicant on the design of the buildings and layout but acknowledges that design to some degree is a subjective matter, and notes numerous neighbour objections as well as those put forward by Ward Members and the Parish identify the existing building's positive design qualities. Whilst it is the LPA's view that brutalist landmark design is relatively unique within the Wokingham borough, considering the site's location surrounded in a relatively sensitive landscape, it is considered the high-quality units put forward form a more modern and appropriate design solution to this location, particularly as the layout proposed creates more 'room' for meaningful buffering. Again, it is noted that the existing building is not viable to retain for office use given its design and location and therefore a new use needs to be achieved.

Six units spread over five buildings are proposed, integrated sporadically, but logically into the site to provide pocket areas of use and the valuable breathing space as mentioned above. This has caused the buildings to sit relatively close to the site boundaries and roadway to the east and west, however, considering the positive elevational design to be discussed later in this report and bolstered tree planting on their periphery, the proposals would integrate more seamlessly into their environment, providing pleasant views from the B3270. This is shown below in figure

1:



Figure 1: Proposed Masterplan

Unit 1

The largest building proposed (unit 1) is centrally located within the site to provide a focal point to structure the other units around. Unit 1 is circa 128 metres in length, 57 metres in width and 14.5 metres in height to ridge (excluding plant).

The positioning of unit 1 centrally is logical as it mimics the location of Shire Hall as existing but provides a centralised building at a lesser height wherein it will be less prominent in the landscape, but still visible as a positive design feature in the street scene. The building itself has been orientated to be north-west and south-east facing to reduce the perception of bulk and mass from the access point (the 57 metre width visible, as opposed to the length) and oblique views from the surrounding roadway. Notwithstanding, as the building is angled it provides a strong sense of legibility within the site (without constituting a new landmark), visually linking with the site's commercial and campus identity. Location of unit 1 is such orientation is of appropriate scale, mass, bulk and height for its location, thus in compliance with Core Strategy CP1 and CP3, the NPPF, NDG as well as the provisions of the borough design guide.

Turning to the plot's overall layout, the applicant has proposed a modest linear park running along the principal elevation, which successfully buffers the lower stories proposed as well as provides a softer transition from the access road to the building. Further, unit 1 has been designed to provide a fully glazed frontage that wraps

around the corners to the eastern and western elevations, thus activating frontages with improved natural surveillance over the public realm. This is a notable benefit of the design which is not afforded by the existing building on site.

The design of the southern elevation has a two-fold positive impact, as utilising a lighter colour of banding and additional glazing reduces the perceived bulk and height of the proposal. This is particularly valuable considering unit 1's visual interaction with the existing street scene and provides a positive visual impression when traversing the street scene and entering the site.

Combined with the increased glazing and lighter coloured parapet banding, the proposal outlines the use of vertical timber fins which not only break up the width and mass of the proposal, but provide architectural interest to the site's north, south and east elevations. This visually ties into the site's landscape surrounding and blends the transition favourably from built form to surrounding greenspace. This does contrast against the existing brutalist form, however, is considered a benefit given the site's sensitive surroundings as well as staying 'true to form' reflecting contemporary campus design as seen successfully elsewhere within the borough (Thames Valley Science Park).

Unit 2

Unit 2 is located at the western extent of the site, directly adjacent to ancient woodland and PRow. The building itself is of a more modest scale than unit 1, at c64 metres in length, c50 metres in width and c12.5 metres in height to ridge (excluding plant). This has been successfully integrated into its landscape setting, with a lower AOD proposed than the road facing buildings as well as lower height successfully grades the built form down into the undeveloped ancient woodland, without significant changes in scale/ overall footprint.

Unit 2 has been sited sensitively, falling outside of the ancient woodland buffer zone which is the site's most sensitive feature. This plot furthermore retains the peripheral belt of greenspace surrounding the site, without detriment to the natural surveillance afforded by the anticipated nature and level of activity.

Given Unit 2's location directly adjacent to the site's most valuable and sensitive natural feature, the applicant has worked closely with the LPA to reduce the parapet level by 1.5 metres, further adding to the graded form across the site from east to west. This is not only spatially and aerially perceivable, but would be perceivable at street level, providing a strong softening backdrop of valuable landscape features (the ancient woodland). The residual building is of appropriate scale, mass, height and bulk and is of high quality design in accordance with CP1 and CP3 of the Core Strategy, the NPPF, NDG as well as the borough design guide.

The principal 'campus' facing elevation has been designed to feature points of architectural interest alike to the other units on site, providing vertical timber fins, subservient glazing and a mixture of cladding insofar as not to detract away from the scenic beauty of the surrounding landscape. This positively ties Unit 2 into the surrounding site's identity. The western, ancient woodland facing elevation has been designed to be relatively blank with the use of silver cladding. Whilst an element of the plant may be visible from elevated views to the north, at street level this will not

be perceived by users of the adjoining PRow.

Considering the existing views from the PRow are relatively poor (falling on a car park, low quality ancillary buildings and formerly on temporary buildings of low architectural merit), the location of unit 2 has an overarching positive impact on users of the PRow, furthermore, enhancing the perception of safety through 24-hour occupation.

Units 3a and 3b

Turning to units 3a and 3b within building 3, these are well set into the site, notably buffered and provide successful integration into the landscape. They are the most modest units afforded on site, likely to benefit more SME's at c31 x 32 metres and c12.6 metres in height respectively (c62 metres in width and 64 metres in length for all of building 3). The variety in scale provides an more interesting 'on-the-ground' experience for end users and positive visual contrast.

Whilst not necessarily as sensitive as the siting of unit 2, this location on site is sensitive in its own right, given to the existing mixture of blue and green infrastructure in its periphery. The applicant has successfully both retained and enhanced the mixture of natural infrastructure, permitting end users to benefit from outdoor space and attractive views of the retained and enhanced ponds. The orientation of the building behind unit 4 will hinder clear views from the surrounding roadways and building 3 is only likely to be appreciable from inside of the site with oblique and only filtered views of its roofscape afforded from Lower Earley Way.

Units 3a and 3b have a symmetrical principal elevation which faces the remainder of the campus, tying in with its coherent identity. This utilises corner, wrap around glazing with timber framing. This positive element is reinforced by contrasting darker cladding which mitigates bulk and massing concerns. The rear elevation facing the greenspace is relatively blank with the use of silver cladding which blend the units into the landscape, without detracting away from its natural beauty.

The service yard of Units 3a and 3b are internally facing, with access provided within the principal elevations. Whilst if Unit 3 was more prominently located, inevitable commercial paraphernalia may be visible, hindering the desirability of the green route, the applicant has demonstrated protected walkways to access the surrounding greenspace. This is of an appropriate scale, bulk, mass and height for this location and thus is in accordance with CP1 and CP3 of the Core Strategy, the NPPF, NDG as well as the borough design guide.

Unit 4

Unit 4 is proposed to be sited on the southern edge of the site, set back from the B3270 by circa 26 metres and further secures its visual and spatial buffering by retained and additional tree planting. Unit 4 is proposed to be of flat-roofed parapet form which successfully buffers the plant machinery on its rooftop, this sits at a height of c12.5 metres (excluding plant), length of 55 metres and width of 40 metres.

The form would create a positive frontage facing elevation of sleek and high-quality design, partially ode to consistent design throughout the site to bolster its strong identity. Alike to the other units, unit 4 features a significant proportion of corner

glazing with vertical timber finials with matching signage indicated. This would be visible from users of the B3270 going south. Alternatively, the southern elevation (only obliquely visible from road users using the B3270 going north) has a larger glazed proportion with vertical timber finials. Where the site is less visible from the public realm, the applicant has set the servicing and HGV access. This is of an appropriate scale, bulk, mass and height for this location and thus is in accordance with CP1 and CP3 of the Core Strategy, the NPPF, NDG as well as the borough design guide.

The orientation of unit 4 reduces the extent of elevation visible along road frontage, this is partially due to the levels change between the FFL of unit 4 and the B3270. This successfully limits the perception of bulk from the street scene and further ties the building into the remaining built form on site. It is noted that at current particularly given the existing setback of Shire Hall, that the road frontage features poor natural passive surveillance, a positive feature of the proposed scheme is positioning the building to overlook the road frontage, creating an active edge where it did not formerly exist.

Unit 5

Unit 5 sits in a north-east/ south-west orientation, and would to some degree be visually prominent from Lower Earley Way and Whitley Wood Lane, however, the submitted street scene sketched drawings show that this visibility would be a positive of the proposal, as opposed to a negative as it strengthens the campus feel of the site (which respects the historic and underlying character of the area) and further provides a strong boundary to respect the proposed access point. This relationship is shown below in figure 2.



Figure 2: Street scene sketch units 1 and 5.

When assessed in the context of the site and intended function, Unit 5 has been well designed and of appropriate scale for its corner and prominent location with respect

to road fronting views. The siting and orientation of unit 5 as well as its positive relationship with unit 1 creates an avenue style entrance that buffers the principal and periphery elevations as shown above.

Unit 5 is sensitively sited given its proximity to residential dwellings to the north, circa c41.5 metres away at the closest point (No.21 Cirrus Drive). It has been orientated in such a way to prevent perceptual overbearing impacts to the closest residential dwellings (sitting side-on to the BS327) that may arise if a similar position was adopted to that of Unit 1. This orientation reduces Unit 5's perceived bulk and mass from the perspective of residential dwellings and reduces interactions with day-to-day operations given the location of the service yard and relatively blank elevation facing north. Whilst this relatively blank elevation of Unit 5 may be obliquely visible from neighbouring dwellings at some distance (notwithstanding screening present on site) which reflects existing views afforded to Shire Hall of greater scale than the proposal, given its separation, buffering and reduced height when contrasted to Unit 1 at 12.8 metres (top of parapet) it visually assists in grading down built-form, from the application site to the three storey residential dwellings of reduced scale whilst retaining its own individual campus identity.

Unit 5 will be accessed by an improved roadway from the south which has successfully facilitated the reduction in levels. This reads less bulky in the context of the street scene (principally from the B3270) yet remains of sufficient scale to contribute to a positive sense of place which bolsters the site's campus identity.

In terms of design, unit 5 proposes large glazed elements which creates a positive active frontage and natural surveillance on site where it does not exist at current. It is noted that Unit 5 provides additional vertical glazing with timber accents break up the both the horizontal and vertical mass as viewed from Whitley Green Lane.

Alike to Unit 1, a lighter colour banding has also been introduced to the parapet, reducing the perceived height of the building and tying in better with its surroundings. The residual form is of high quality design, of architectural interest and a positive urban design feature in its location, particularly ode its is relationship with unit 1. This is compliant with CP1 and CP3 of the Core Strategy, the NPPF, NDG as well as the provisions of the borough design guide.

Signage:

Coherent signage is indicated to feature on all of the units, creating a mutual identity between buildings which are further intrinsically linked through their external appearance. These are internally facing and reinforce the site's campus character, a positive feature in this location which pays respect to the existing land use, albeit demonstrates how 'campus' form and urban design has developed from the initial construction of Shinfield Park and present.

Green Spaces and Linear Parklets:

The applicant has proposed the addition of a central and peripheral green link surrounding the site. This is a positive feature for end users and furthermore provides acknowledgement of the site's landscaped surroundings. Campus style development of industrial nature rarely features such positive softening features, which compliments the site's unique nature.

Useable landscaped space is proposed to the west of the parking area, north of Unit 5, north of Unit 1, south-west of Unit 4 and south-west of Units 3a and 3b. These are all (bar the landscaped space north of Unit 5) interconnected by protected footpaths that run aligned to the roadway. This green-link features dedicated crossing points for attractive useability in future.

Whilst not directly accessible for pedestrians, the applicant has proposed to create its own belt of greenspace surrounding the site which visually and spatially separates the site from the B3270 and residential form to the north, further bolstering its own individual identity as a campus.

Levels and Earthworks:

Within this submission, proposed levels have been submitted alongside the proposed earthworks. Whilst this does notably change the appearance of the site, it positively creates visual points of interest which adds to positive interaction with the character of the area and further bolsters the site's individual identity.

The variety in levels proposed complement the parklets and the appearance of varied landforms which flow positively, complimenting the site's otherwise graded approach in connecting to the more sensitive area of the site to the north.

Parking:

The car parking areas are shown to be set into the site, reducing the visibility of the commercial paraphernalia associated with the intended use. The site has been designed with the main parking area to the north to reduce the impact of the development on the neighbouring residential properties. Great thought has been put into a well-designed layout that minimises views into the less desirable service yards. The only exception to this is Unit 4, of which parking court and service yard would be directly adjacent to the site boundary and Lower Earley Way. This said, whilst spatially this appears to be visible from the public realm, notable tree planting and the site's elevated position would hinder clear views, combined with the notable verge that separates this to the roadway.

Conclusion:

Overall, both in design and character terms, the proposed development has been well thought through in terms of response to the local context and how this links to the operational needs of the building. The design and landscape approach is considered robust and the complex should be highly regarded once completed as unique in its nature. The proposal is fully compliant with the Wokingham borough design guide, Core Strategy Policies CP1 and CP3, the NPPF, NDG as well as the provisions of the Shinfield Neighbourhood Plan.

Neighbouring Amenity:

Policies CP1 and CP3 of the Core Strategy seek to ensure that development is brought forward with minimal impacts on existing residents and the design principles are further amplified in the Borough Design Guide Supplementary Planning Document. DH2 of the emerging local plan bolsters this approach.

Furthermore paragraph 135(f) states that planning decisions should ensure that developments *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...”*

Paragraph 198 of the Framework also acknowledges that planning decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Two applicable points are specified:

“a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”

Policy 11 (c) of the Shinfield Neighbourhood Plan outlines that commercial development will be acceptable where the proposals will not result in an unacceptable loss of amenity for neighbouring land uses.

Officers note the concerns of residents and some members, including more recent correspondence, and have worked with the applicant to review and reduce the impacts from the development on the neighbouring residential properties and area in general, in terms of the building’s location, scale and bulk, orientation, overall layout and the operation of the units and consider the resulting development to be policy compliant in this regard. Accordingly, given the site’s proximity from neighbouring dwellings (c41.5 metres at the closest between Unit 5 and No.21 Cirrus Drive building to building), boundary landscaping and careful design, there are no objections raised on overlooking, overbearing or overshadowing.

Noise:

CC06 of the MDD Local Plan outlines that development proposals must demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed) from noise impacts in line with Appendix 1 of the MDD. Noise impact of the development must be assessed. Where there is no adverse impact (No Observed Effect Level) then noise will not be a material consideration.

CC06 goes on to acknowledge that where there is an adverse effect (Lowest Observed Adverse Effect Level to Significant Observed Adverse Effect Level), then:

- a) The development layout must be reviewed. Where this results in there no longer being an adverse impact then design and mitigation measures should be incorporated accordingly.
- b) Where there is still an adverse impact then internal layout must be reviewed. Where this results in there no longer being an adverse impact then design and

measures should be incorporated accordingly.

- c) Where there is still an adverse impact then physical mitigation measures such as barriers/mechanical ventilation must be reviewed. Where this results in there no longer being an adverse impact then design and mitigation measures should be incorporated accordingly.
- d) Where there is still an adverse impact and the development falls within the significant observed adverse effect level then planning permission will normally be refused.

Policy HC8 of the emerging local plan outlines that development proposals must demonstrate how noise impacts have been addressed, to protect sensitive receptors, including existing and proposed dwellings. It goes on to state that the noise impact of the proposed development must be assessed. Where there is no adverse impact (no observed effect level), noise pollution will not be a material consideration.

The PPG provides general guidance on the effects of noise exposure, relating directly to people's perception of noise and linking them to the no observed effect level (NOEL) where the level of noise is not of notice. The PPG further outlines that as exposure to noise increases, the lowest observed adverse effect level (LOAEL) follows, with maximum exposure and harm fallings under a significant observed adverse effect level (SOAEL).

As the proposed use(s) function over a 24-hour period and is within a reasonable proximity to residential dwellings, the LPA must ensure a NOEL is achieved throughout operating hours to avoid any express mitigation measures. This is to secure a development that has no significant and detrimental impact on noise sensitive receptors, in this case, those most closely residing at the Shinfield Park residential development to the north.

When assessing the acceptability of a proposed noise sensitive development, the Council will determine the effect of noise from any adjacent and nearby sources will have on the noise sensitive receptors (NSRs) taking into account both daytime and night-time noise levels. In this instance, as above, the NSRs fall on the residential dwellings north, west and south-west of the application site as shown in figure 3 prepared by the applicant below:

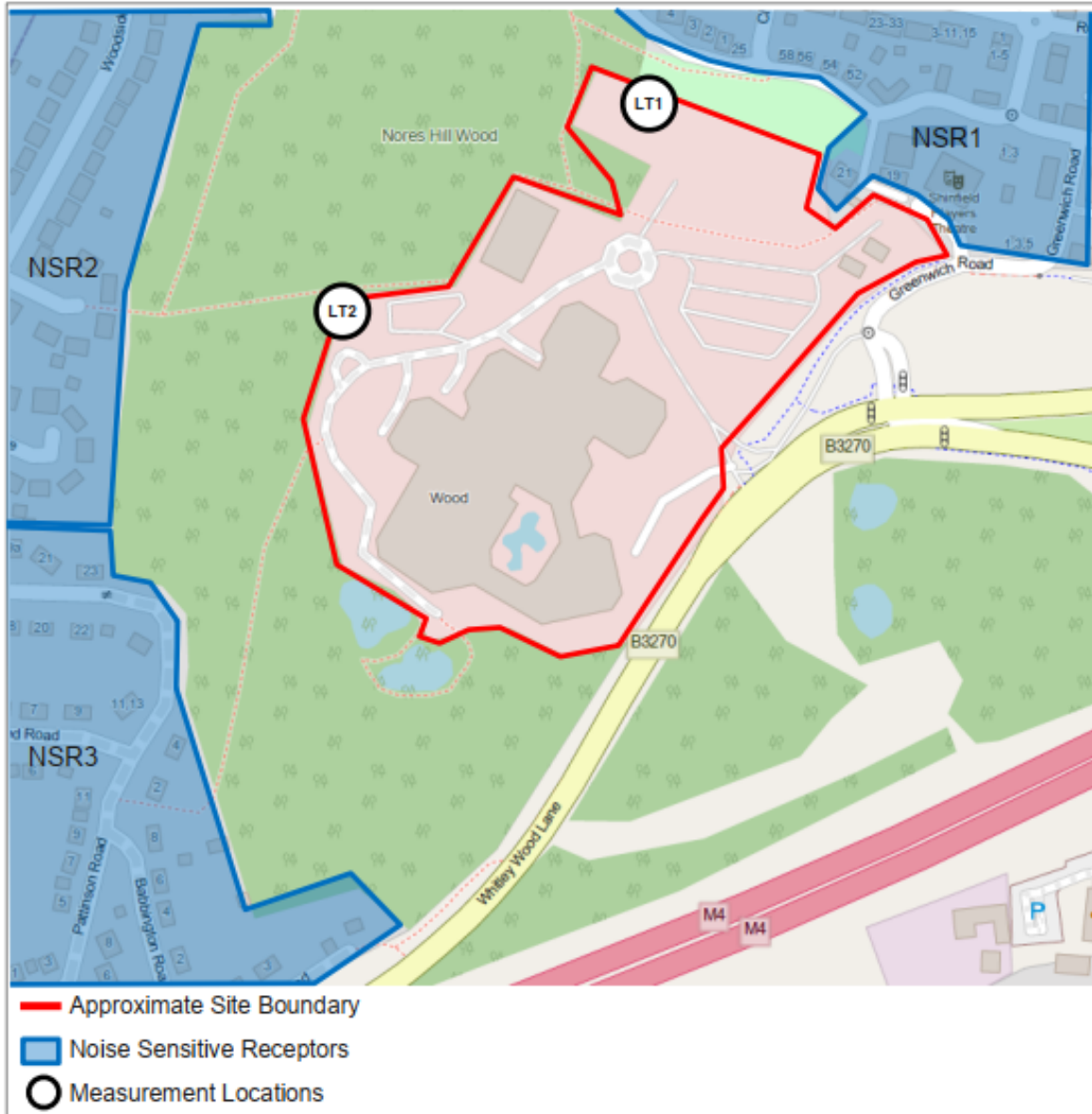


Figure 3: Map of NSRs

As figure 3 above shows, the site is located on the edge of existing residential developments, and although there is a buffer to the development to the west and to the north, there are a number of properties to the north which are adjacent the site. It is noted concerns have been raised by objectors in that the introduction of an industrial form of use on the site could increase noise and disturbance over the proposed hours of operation.

A noise and acoustic report has been prepared by the applicant in support of the application to serve as a framework BS4142 compliant assessment for the site's existing baseline as well as that projected to occur once the units are occupied.

Concerns have been raised by objectors with respect to the validity of this assessment as well as minor typographical errors noted within (reference to M5 as opposed to M4 on one occasion and Figure 8, appendix D should be titled Lar,15 mins), however, no objections have been received by WBC Environmental Health on

substantive grounds which otherwise raise concerns with the validity of the assessment. Further to identifying these errors, the applicant has provided corrected versions which are publicly visible on the planning portal and make no amendments to the conclusions within.

The Council's internal specialist within the Environmental Health team suggests full compliance with BS4142:2014 (or objection would have been raised given the nature of the proposal) subject to the inclusion of a condition to secure unit specific management plans which limit and mitigate against any potential adverse noise created by the development, including those with varying tonal qualities. The suggestion of this condition has been accepted by the applicant. It is further noted that the updated consultation response from WBC Environmental Health requested a further condition limiting HGV movement, however, a reason was not provided for this suggestion within the submitted consultation memo. Thus, this would fail to meet the relevant tests established within the framework as monitoring this would be unenforceable, nor proven to be necessary to limit noise impact (classified as a NOEL).

The LPA note that the amount of noise generated from the flexible employment use can vary, dependent on future occupiers (though controlled under separate legislation), as well as which use within the description of development they operate under. As such, worst-case scenario assessments have been adopted within the framework noise assessment, which still results in a NOEL.

The framework assessment prepared by the applicant indicates that the rating level associated with the operation of the proposed development will fall 6 dB below the LOAEL (forming a NOEL) as defined by the LPA as the worst-case scenario. As such, in line with CC06 of the MDD Local Plan, as a NOEL (no observed effect level) is evidenced, CC06(3) is not relevant and the proposal complies with the development plan subject to the unit specific management plans secured.

This approach raises no objection with WBC Environmental Health, subject to the inclusion of a pre-occupation planning condition to secure unit-specific supplementary noise management and mitigation plans. There are no objections to the proposed 24-hour function subject to compliance with the requirements of this condition. It should also be noted that imposing restrictions on hours of use upon the site would effectively render the development unattractive and unviable to business, which in turn would prevent the most efficient use of the land in line with the NPPF.

Lighting:

HC7 of the emerging local plan states *"Development proposals that include outdoor lighting should be sensitively designed and appropriately located to avoid obtrusive light, such as excessive glare and intrusive live spillage, and protect the amenity of immediate and wider neighbouring residential properties (both existing and proposed)."*

An external lighting strategy report has been submitted in the support of the application, which covers the entirety of the site. The strategy takes assesses the sensitivities of the area, light sensitive species that may be present in surrounding vegetation, and the occupants of the houses to the north of the site basing the

assessment on the proposed 24 hour operation.

This report in neighbouring amenity terms outlines that the lighting used will be low intensity where near to sensitive receptors and ensure no spill into neighbouring properties. Whilst No.21 and 23 Cirrus Drive would likely obliquely have sight of 2no. low lumen (90) lights labelled 'G1P', these would not feature light spill into their rear amenity areas.

Furthermore, existing vegetation facing the rear of these properties exist in the applicant's ownership which are subject to a retention condition. This would further provide screening to any views of the lighting proposed, which regardless of screening would not detrimentally harm neighbouring amenity given its location, distance and luminescence.

Flexible and adaptable lighting is proposed across the majority of the remainder of the site, with the access roads and parking areas for example benefitting from column lighting that includes automatic presence detection with automatic dimming controls.

Whilst the lighting strategy has been prepared to a high standard that is acceptable to ensure no sensitive receptors are impacted by the development, a lighting design condition has been secured (albeit on ecological grounds). This said, in neighbouring amenity terms, if a similar approach is adopted to that proposed within the submitted lighting report it is likely to be acceptable.

Built Heritage:

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that development must ensure the preservation of any nearby listed building, including its setting, Section 16 of the NPPF requires consideration of the harm to the significance of a designated heritage asset and Policy TB24 of the MDD Local Plan requires the conservation and enhancement of Listed Buildings, Historic Parks and Gardens, Ancient Monuments and Conservation Areas, including their views and setting.

Policy TB26 of the MDD Local Plan allows development to Buildings of Traditional Local Character, Areas of Special Character and Areas of Special Landscape Importance where it will retain and enhance the traditional, historical, local and special character of the building or area and its setting.

Policy DH5 of the emerging local plan states that development proposals should conserve and, wherever possible, seek to enhance, the archaeological, architectural, artistic or historic interest of all heritage assets, including the contribution made by their setting.

Shire Hall, the Brutalist former County Civic Centre was designed by the County Architect Richard Paul, Shire Hall was conceived following the reconfiguration of regional administration with the Local Government Act of 1972.

Construction work commenced in 1976 taking five years to complete with the building officially opened by the late Queen in April of 1982. With only a few exceptions, post-

war civic buildings were designed in some form of Brutalist fashion– to a lesser or greater degree - as the style was seen as being municipally ‘pure’ and without unnecessary frippery or ornamentation of the past, an allegory for post- war positivity and efficiency.

Having a varying degree of historic interest is not necessarily a prerequisite for preservation, it can be more about recognising the values of the site and treating it accordingly. It is recognised that from a heritage perspective the building would be practically unviable to retrofit to suit the proposed use(s). Changes in demand for commercial space and other social economic factors have bearing on a site’s current and future function. All this considered, whilst it is accepted there is a degree of historic interest in the building, no objection is raised to its demolition.

Designated Heritage Assets:

With respect to the proposal’s impact upon the nearest designated heritage assets– the Grade II listed Lodge to Meteorological Office to the northeast and Lane End Farmhouse to the southeast – both these building’s settings have been so heavily compromised by development, that arguably little/no significance is now drawn from their setting. Given this, no harm would occur to their significance through the proposals. Similarly, other assets within the vicinity which have a potential degree of intervisibility (for example the Grade I St. Mary’s Church in Shinfield) arguably their setting is negligibly impacted or marginally enhanced through the reduction in overall height and concentrated mass.

In this regard, no objection is raised to the application from a heritage perspective. As noted above, given there is local interest in the building, a recording condition has been secured.

Highway Access and Parking Provision:

The NPPF seeks to encourage sustainable means of transport and a move away from the reliance of the private motor car. Core Strategy policies CP1, CP4, CP6 and CP10 broadly echo these principles and indicate that development should mitigate any adverse effects on the existing highway network. Where this is not possible, the NPPF sets a high bar to constitute detrimental harm within paragraph 116, vouching *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*

To manage and where required mitigate highway impact, paragraph 118 of the NPPF states *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”*

Policy 4 of the Shinfield Neighbourhood Plan requires development to provide good accessibility by car, cycle and foot and ensure highway safety. Encouragement of use of public transport is also promoted.

Policy 11(d) of the Shinfield Neighbourhood Plan outlines that commercial development will be acceptable where the proposal will not cause an adverse impact on highway safety.

To inform the scope of materials prepared in support of the application, the applicant undertook extensive engagement with WBC Highways via the Planning Performance Agreement process in accordance with paragraph 40 of the NPPF. Within this process, WBC Highways confirmed the scope of modelling, transport assessment and access provision which informed those documents submitted in support of the application. It is however noted, that notwithstanding the above, a request for additional information was received by the LPA from the LHA on 28/08/2025. Following receipt, a meeting was held between the LPA, LHA and applicant and an update subsequently submitted by the applicant to address those points of clarity requested.

Parking

Policy CC07 and Appendix 2 of the MDD Local Plan stipulates minimum off street parking standards, including provision for charging facilities.

Policy 5 of the Shinfield Parish Neighbourhood Plan further sets out parking standards. These are in line with WBC standards (referenced above) and well set out with good surveillance to parking courts.

It is proposed that there will be 226 parking spaces allocated on site. With the inclusion of 24 overflow spaces this would increase to 250 spaces. The level of parking for each unit is set out below:

Unit	M2 GIA	On Plot Parking	Overflow	Total
1	8,114	19	65	84
2	3,862	45	/	45
3a	1,119	12	/	12
3b	1,119	15	/	15
4	2,655	37	/	37
5	3,531	14	19	33
Overflow	/	/	/	24
Total	20,400			250

The spaces themselves are 5m x 2.5m and there is ample space behind for safe manoeuvring.

It is proposed that there would be 14 disabled spaces on site spread around the six units. This exceeds standards and is acceptable in line with the standards outlined within Appendix 1 of the MDD Local Plan.

Whilst initially WBC Highways raised concerns with the 2 spaces at the end of the parking area for plot 1 as egress from these spaces would require a long reversing distance, the applicant provided an explanatory note which provided details of swept

path showing cars could manoeuvre out of the spaces not requiring a long reversing distance. This is acceptable.

WBC Highways have acknowledged that car share bays were mentioned in the travel plan but have not been indicated on the parking plans. This is because the quantum of car share bays are logically to be determined by each individual occupier of each unit. As the provision of parking is in excess of standards, it is anticipated that should demand exist for these specialist bays these will not detract away from unit-specific parking provision which remains adequate. It is further considered that units wishing to partake in a car share would likely have less demand for individual parking.

Table 5.5 in the transport statement sets out a parking accumulation assessment which is agreed by WBC Highways. Further to consultation, WBC Highways concluded that there is ample parking on site for the proposed land uses and little risk of overflow parking occurring in any neighbouring residential streets which was a matter raised in objection by numerous residents.

Parking Topography

It is noted that the topography of the proposed car parking locations (including gated access to yards) were matters queried by WBC Highways in their response dated 28/08/2025 despite FFL and levels being included within the submission. The applicant has provided a comparative table which shows the existing and proposed levels, which clearly outlines that there will be no implications on circulation, movement or parking. These are acceptable and are shown below:

Unit	Height AOD (m)						
	FFL	Service Yard			Car Park		
		Max	Min	Change	Max	Min	Change
1	73.90	73.90	72.95	0.95	73.90	73.55	0.35
2	73.80	73.80	73.13	0.67	73.74	73.40	0.34
3A	73.50	73.50	73.02	0.48	73.43	73.08	0.35
3B	73.50	73.50	73.02	0.48	73.92	73.29	0.62
4	73.90	73.90	72.95	0.95	73.90	73.55	0.35
5	76.00	76.00	75.33	0.67	76.00	75.33	0.67

Unit	Height AOD (m)						
	FFL	Yard Access			Car Park Access		
		Right	Left	Change	Right	Left	Change
1	73.90	72.84	72.84	0.00	74.07	73.16	0.91
2	73.80	73.49	73.20	0.29	73.35	73.13	0.22
3A	73.50	73.02	73.02	0.00	73.02	73.02	0.00
3B	73.50	72.96	73.02	-0.06	72.84	73.00	-0.16
4	73.90	72.84	72.84	0.00	74.07	73.16	0.91
5	76.00	76.08	75.65	0.43	76.08	75.65	0.43

WBC Highways further requested the potential inclusion of a condition to permit security gates being permanently open, however, this would fail to meet the relevant 6 tests established within paragraph 55 of the NPPF. This is because it would be unreasonable to negate the purpose of having gates for security purposes, failing to account for the potential variety of operating hours. This condition would further be imprecise as it was outlined that application of the condition would be case-by-case but no further assessment provided. Finally, the condition would be unnecessary considering the levels proposed permit adequate circulation and access. No objections are raised on this basis.

HGV Parking

The LPA note that WBC have no published standards for lorry parking for employment use. Further to consultation, WBC Highways accepts that the 14 loading bays are sufficient for HGV parking in the quantum of development proposed.

With reference to the submitted transport statement, there would be 26 loading doors proposed which are logically set throughout the site to cater for the maximum amount of HGVs predicted at the site at any given time.

In terms of HGV parking provision, the applicant has put forward industry standard evidence that equates to a ratio of 1 HGV space for 500sqm. Considering the scale of the GIA put forward, 43 spaces (2 above evidenced industry standards) are suggested across the site within the addendum transport statement. Figure 4 shows their anticipated locations below, and whilst not secured by planning condition (given the worst-case scenario adopted below) this indication is acceptable for the proposed quantum of development and would not lead to further parking on internal estate roads.



Figure 4: HGV parking locations (indicative)

Cycle Parking

Referencing WBC standards, there should be a range of between 134 and 101 cycle parking spaces between office and the other employment land uses. It is proposed that there would be 104 cycle parking spaces spread throughout the site with access to charging facilities. This level of cycle parking spaces are spread throughout the site at each unit which is an acceptable middle ground. The level of cycle parking is acceptable subject to a monitoring of the use of the cycle spaces within the Travel Plan and that if demand warrants it, more spaces are provided.

The cycle parking for plots 2, 3A, 3B and 5 are close to the main access into the buildings which provides easy access and positive natural surveillance. For plots 1 and 4 highways initially recommend that these be moved closer to the respective accesses into the buildings, however, within the transport statement addendum prepared by Iceni, it has been clarified that both stores feature direct access and are inspired by the site's layout. This is acceptable.

It is further noted that the introduction of visitor's cycle parking was requested by WBC Highways, however, considering the nature of the use, the units are unlikely to

receive a guest population significant enough to warrant this. A planning condition has been appended to the recommendation ensuring cycle parking is delivered in accordance with the approved plans, with outlet provided for electric cycle charging to incentivise this active transport method.

Motorcycle parking

Under Borough standards for any employment use there would need to be 9 motorcycle spaces provided. Over the entire site, a total of 15 spaces are proposed which is acceptable. Whilst it is noted that the masterplan key does not directly annotate motor cycle parking, figure 3 of the submitted transport statement addendum clarifies their precise location.

Electric Vehicle Charging

The Borough standards on electric vehicle charging have been replaced by Building Control Standards, Approved Document S. It is proposed that there would be across the site 45 active and 205 passive spaces which is acceptable.

Access

It is proposed that the existing access from Lower Early Way and from Whitley Wood Lane would be retained. Due to the change in land use which reduces trip generation away from that tied with the lawful office use, there would not be a highway impact linked to retaining this access point. Notwithstanding the access being utilised by larger vehicles than those generally associated with day-to-day operations of an office, swept paths and tracking show sufficient space for safe access and manoeuvring of even the largest vehicle entering the site.

It is noted that WBC Highways within their recent response dated 28/08/2025 outlined concerns with the fire safety access. Appendix A4 of the submitted transport statement identifies potential fire routes utilising suitable access routes to some buildings. Whilst concern was raised that these utilise pedestrian access points in part, the applicant has confirmed that the fire access to all units have been designed in accordance with design requirements of Building Regulations Part B. All proposed fire escape routes are a minimum of 2m wide and run around the perimeter of the units, which are of even ground. There is no objection in respect to emergency service access and no objections are raised in this respect.

Transport Statement and Trip Rates

The Borough's VISSIM model has been used to assess this application in air quality and noise terms, however, modelling was not undertaken by the applicant with respect to traffic assessment considering the notable reduction in trips proposed. With respect to traffic generation, the applicant has utilised the rates of the existing use as advised by WBC Highways during the pre-application process which is appropriate considering the nature of the development. Where necessary, the relevant AQM and NIA reports have been updated following subject specific modelling inputs, however, as above, considering the proposal marks a reduction in trip rates it is not considered necessary or justified to request further traffic/ junction

modelling.

Trip rates for an industrial estate have been calculated from TRICS database, a nationally recognised body for highway statistics as this is the category most suited for this development. The TRICS assessment was undertaken based on all sites in England in a similar suburban or edge of town location and of a similar size. The applicant has outlined that no adjustments were made to select only sites with lower trip rates and the only criteria applied was to ensure that they were comparable with the previously established office use. The data obtained from TRICS is therefore considered to provide a robust trip generation dataset. Based on this land use and those most comparable examples utilised, the level of traffic associated with the new development would be less than that of the extant use of around 150 and 130 two-way trips in the AM and PM peak hour respectively.

Unlike the existing office use where the morning and evening peak would be significantly higher, with respect to HGV journeys the level of two-way movements are relatively consistent throughout the majority of the day with an estimated 9 to 12 two-way trips per hour between 08:00 and 16:00. Outside of these times there will be fewer HGV movements. It is noted that the maximum in/output of HGVs differ within the submitted transport statement to that within the noise assessment (which indicates a maximum of 13 HGV two-way trips), however, this is not significant enough to warrant a departure from the conclusions reached, nor would a two-way trip ratio of 13 HGVs make the development unacceptable in planning terms.

It is noted that objections have been received outlining trip generation will be greater than existing, however, in the context of an unoccupied building this is to some degree inevitable. When assessed against the fallback position (namely an office occupier utilising the site), accepted by WBC Highways, the overall trip rates generated by the development (including HGVs) would be notably less than existing in the quantum of uses projected.

It is noted that within the consultation response dated 28/08/2025, Highways formed an alternative view to that previously expressed and agreed, advising that the proposal should be considered using local traffic model with respect to traffic assessment notwithstanding the above. It was further implied that additional Highway works would be required to mitigate the development's impact, however, specific details of these have not been provided. This is explained within their response to be informed by the proposal's scale, nature and via parking utilisation informed by the 'The Wokingham Strategic Traffic Model (WSTM)' in combination with predicted increases in traffic flows arising from future development. However, the updated Highways response does not refer to the agreed lawful extant use of the site (namely its potential for full occupation) and its historic contribution to the highway network (with respect to trip generation).

Highways further recommended that a Transport Assessment would be required in place of a Transport Statement informed by VISSIM and micro-simulation in combination with interim improvements to the Black Boy Roundabout. However throughout the discussions, it has been accepted that the proposed development would be expected to generate fewer trips than the previous established use and, as such, no junction assessments nor improvements were required or requested.

Whilst the LPA note additional strategic modelling has been prepared by the LPA pursuant to the Local Plan Update, the evidence base submitted for examination takes account of the site as an established employment location. Furthermore, whilst Officers are confident with the progress and conclusions reached by the LPU (including pursuant VISSIM modelling), paragraph 49 of the NPPF dictates that limited weight is afforded to its provision given its stage of preparation (in accordance with the *West Oxfordshire* judgement) and thus significant improvement works are not reasonably justified although acknowledge Highways concerns about future traffic growth and potential impacts on the local network. However as advised given the Local Plan Update status, it has not been through examination and therefore holds limited weight. Thus, additional traffic growth from future development cannot be considered as part of this assessment as it would not meet the planning determination tests and as such, highway works suggested would not be fairly and reasonably related in scale and kind to the development considering a net reduction in trips, nor is directly related to the development.

Regardless, even when adopting a cautious stance (hypothetically), WBC's own traffic model illustrates that the flexible use proposed would achieve a net reduction in trips using the Black Boy roundabout (WBC Highways principal area of caution). This is illustrated below in a table below, which shows the difference in the number of trips between the 2040 No Dev Ref scenario and the two Proposed scenarios for 100% B2 use and 100% B8 use for all links closest to the site, which will represent all trips associated with the development (including impact on the Black Boy Roundabout):

Location	B2		B8		Average	
	All vehs	HGVs	All vehs	HGVs	All vehs	HGVs
B3270 West of site access	273	7	-302	0	-15	4
	0	0	-103	15	-52	7
	273	7	-405	15	-66	11
B3270 East of site access	221	0	-250	0	-15	0
	-169	0	-96	0	-133	0
	52	0	-346	0	-147	0
A327 Shinfield Lane North of Black Boy Roundabout	-88	0	-44	0	-66	0
	66	0	-74	0	-4	0
	-22	0	-118	0	-70	0
B3270 east of Black Boy Roundabout	7	15	-140	-7	-66	4
	-66	-15	192	7	63	-4
	-59	0	52	0	-4	0
A327 Shinfield Lane South of Black Boy Roundabout	-162	7	-1,562	-15	-862	-4
	22	-7	-273	7	-125	0
	-140	0	-1,834	-7	-987	-4
A327 Eastern Relief Road	29	0	-96	0	-33	0
	37	0	-29	0	4	0
	66	0	-125	0	-29	0
Total	280	29	-2,394	-22	-1,057	4
	-110	-22	-383	29	-247	4

	169	7	-2,777	7	-1,304	7
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The submitted transport statement, in combination with further information and detailed discussions provided by the applicant robustly demonstrates that the proposals will not have a severe impact on the highway network, on the contrary, it can be argued that the proposal marks a demonstrable improvement on those matters tied to the extant land use which could be lawfully resumed.

The submitted information further demonstrates that the proposals would have a reduced number of vehicle movements when compared with the extant trips for the AM peak and PM peak. As such, the proposals are not expected to have a detrimental impact on the local highway network. It further demonstrates that the proposed parking and loading dock provision should be sufficient to accommodate demand and the maximum accumulation likely to arise is lower than the number of car parking spaces and total loading docks to be provided on site. As such, there should be no overspill onto the surrounding highway network as a result of this. Accordingly, given the proposal results in a reduction of trips, sufficient parking and sustainable transport alternatives, it is considered that no further modelling works or local junction improvements are required to mitigate this development.

Walking and cycling

Within the application site, there is a 2m wide pavement with crossing points which is acceptable to promote a safe and accessible walking environment. It was clarified within the submitted transport statement addendum that tactile paving and dropped kerbs will be opted for, and designed as a part of the detailed design stage. This matter can be covered on planning grounds within the submission of hard landscaping details.

Site Roads

The main route through the site appears to be over 7m in width until it passes the entrance to unit 5. The width reduces up to the overflow car park which logically acts as a natural traffic calming measure. The secondary road which provides access to Units 2 to 4 and the service yard for Unit 1 is approximately 7m in width. The secondary road meets the main site road at a priority junction.

All estate roads are to remain private, under the management and ownership of the applicant. This matter is secured by planning obligation and condition to secure road design, management, maintenance and implementation.

Swept paths

Swept paths for a variety of vehicles of different dimensions have been submitted which are acceptable. These detail the full access and egress, being utilised by the largest vehicle (assuming an artic HGV). This details that both the existing access point and internal estate roads are sufficient in scale and design to safely accommodate the quantum of vehicles utilise it.

Visibility Splays

As the site benefits from a suitable existing access, visibility splays are not required for this part of the site. However, WBC Highways requested details of the anticipated visibility splays of the service yards for drivers, pedestrians and cyclists. These were provided in Appendix A4 of the transport statement addendum (I00363_05B), which are acceptable and reflect the masterplanned layout on site. These do not need to be revisited as suggested by WBC Highways within their most recent responses dated 28/08/2025.

Delivery and Servicing Plan

A framework delivery and servicing plan has been submitted which is acceptable. It is acceptable that each occupier of the site will produce their own version of the document, and this has been secured by planning condition.

Occupiers of each unit are responsible to ensure that all deliveries are only undertaken in their own servicing yard. No deliveries will be allowed on the site roads which is acceptable. It is further acceptable that all occupiers would need to adhere to the final version of this document and monitored accordingly.

Travel Plan

A framework travel plan has been submitted which is acceptable. Initial travel plan targets have been included which have been based on 2011 census data. This is acceptable as travel surveys would be undertaken once the site has been occupied as a post-permission matter.

The framework travel plan identifies a Travel Plan Co-ordinator which is appreciated. This role would need to have sufficient time and budget. The funding of the co-ordinator and the travel plan would be the occupiers of the units. Furthermore, an initial Action Plan has been submitted which is acceptable.

A planning obligation has been agreed between the LPA and applicant, which requires the application to complete and submit a final travel plan based on the framework travel plan prior to occupation. This obligation further requires the applicant to pay the council a travel plan monitoring fee prior to occupation. Whilst concerns were raised with respect to the framework travel plan by residents with respect to typographical errors, it is sufficient to determine the application and outline all principles to be secured within the future final travel plan.

Construction Method Statement

It is noted that there are concerns with the impact of the redevelopment from residents and members. A framework construction environmental management plan has been submitted which is acceptable at high level. It is proposed that the construction period would be 18 months, over which time the objective of the document will be monitored. Demolition, which is already underway, is covered by a separate plan.

Considering the scale of development and sensitive nature of the land adjoining the

site, a CEMP has been conditioned requiring the applicant to prepare a document covering the following points prior to commencement (excluding demolition):

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements)
- d) Mitigation recommendations MC1 to MC6, MC8 to MC9, and MC11 to MC13 from the submitted Ecological Assessment (Aspect Ecology, ref: 6856 EcoAp vf CK/BB/DS, February 2025).
- e) The location and timing of sensitive works to avoid harm to biodiversity features.
- f) The times during construction when specialist ecologists need to be present on site to oversee works.
- g) Responsible persons and lines of communication.
- h) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- i) Use of protective fences, exclusion barriers and warning signs.
- j) the parking of vehicles of site operatives and visitors.
- k) loading and unloading of plant and materials (including times, these should be in line with permitted hours of work).
- l) storage of plant and materials used in constructing of the development.
- m) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, (where appropriate).
- n) wheel washing facilities and an area cleaning regime.
- o) measures to control the emission of noise, dust, and dirt during construction,
- p) air quality mitigation measures listed in Section 6 of the Air Quality Statement prepared by Stantec May 2025 (referenced 333101463)
- q) method of recycling/disposing of waste resulting from demolition and construction works.
- r) asbestos survey results and if present a safe removal and disposal plan to be submitted.

- s) methods for communicating with local residents

Subject to this detail being adhered to via a planning condition, no objections are raised with respect to construction management.

Public Rights of Way:

Public Right of Way – Footpath – SHIN10 runs from Railton Close between property No4 and 5, E and N side Shire Hall to 83270 S of Meteorological Centre and Shinfield Players Theatre.

The PRow is detailed as the orange line below:



Figure 5: Footpath SHIN10 (shown in orange)

Policy C4 of the LPU states *“Development proposals must integrate with the Public Rights of Way network to promote connectivity and contribute towards the delivery of prioritized routes in the council’s rights of way improvement plan where appropriate.”*

The proposal will enhance the existing PRow through the greater provision of natural and passive surveillance and as such has not received any in principle objections from WBC PRow. Further improvement works have been secured by planning condition which include the surfacing and widening of the PRow within the application site to improve its desirability as an active transport access route for occupiers of the site.

Whilst the LPA note that the most recent Highways response dated 28/08/2025 requested further works to the public right of way (including diversion) to permit formalised use of the adjacent cycle way which connects to the PRow. Further to assessment of the proposed obligation in line with S122 of the CIL regulations, it is considered to fail three of the three tests and thus is not appropriate to apply. It is

also considered that works to the PRow through the ancient woodland subject to significant protection might cause harm to the ecology of the protected area, and may be impossible to deliver given the requisite buffer zones identified within the Standing Guidance, although this has not been assessed.

Although beneficial with respect to access provision, significant PRow works, including potential re-diversion, as well as operational development to facilitate this would not be required to make the development acceptable in planning terms, as the site proposes a reduction in trips in comparison to the existing use and furthermore seeks to bolster the site's sustainability credentials. Furthermore, both bus stop, travel plan implementation and footpath enhancements in combination with both electric vehicle and cycle parking are otherwise secured via planning obligation and condition which are proportionate enhancements considering the scale of development. Greater works would not be fairly related in scale and kind with the quantum and nature of development proposed, nor are justified within the response. In combination with not being necessary to make the development acceptable, nor fairly related in scale and kind, Highways state the enhancements requested are informed the LCWIP.

The LCWIP (and the extant ROWIP) does not specifically outline potential upgrade/improvement of the PRow and associated operational development within an ancient woodland as a preferred aspirational strategy due to its sensitivity, rather is an interpretation of *"Where there is not enough space for segregated cycle facilities, reduce the speed limit to 20mph and introduce traffic calming, whilst also introducing shared use paths for pedestrians and cyclists"*, a wider aspiration outlined within the LCWIP. Furthermore, no mention to FP10 improvements are contained within Wokingham's ROWIP (2020-2030) and thus does not form one of the *"prioritized routes in the council's rights of way improvement plan where appropriate"* as suggested by C4 of the LPU. Accordingly, the requested works/obligation have not been demonstrated to be directly related to the development, particularly considering the proposal will result in the reduction of trips and contributes to sustainable transport modes elsewhere.

Sustainability:

Core Strategy Policy CP1(12) states that development should contribute towards the goal of reaching zero-carbon developments as soon as possible by:

- a) Including appropriate on-site renewable energy features; and
- b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

Policy CC04(2a) of the MDD Local Plan (as clarified by the WBC Climate Change Interim Policy Position Statement, 2022 (CCIPPS)). This policy requires non-residential schemes over 100m² G.I.A. to achieve BREEAM "Excellent" certification.

Policy CC04(2b) of the MDD Local Plan requires statutory requirements on efficient

water consumption to be met or exceeded.

Policy CC04(3) of the MDD Local Plan requires incorporation of suitable waste management facilities on-site, including recycling.

Policy CC05(2b) of the MDD Local Plan (as clarified by the CCIPPS) - requires demonstration through modelled Building Emission Rate of a minimum 10% carbon reduction relative to Target Emission Rate/s (TER/s) arising from the version of the Building Regulations extant at time of application.

Policy 3 of the Shinfield Neighbourhood Plan outlines that all development should seek to achieve the highest levels of sustainability through the provision of renewable energy, passive energy retention/ gain, sustainable transport and recycling.

Policies CE1 and CE2 of the emerging local plan outline principles for carbon reduction on non-residential buildings, including design and layout matters.

The application is accompanied by an Energy and Sustainability Strategy prepared by consultants MBA Consulting Engineers and drawings authored by Chetwoods.

The Sustainability & Energy Statement states that the scheme will incorporate a solar panels across the roof areas of six units. The combined photovoltaic array having estimated output around 216.9 kWp, and that air source heat pumps with reverse operation capacity will provide space heating and cooling to the units. The heat pumps will be installed in internal plant area for Unit 1 and externally either on the roof or at ground level for the other units.

Through these measures, alongside building fabric enhancements and application of passive design principles, the development is expected to achieve a site-wide average reduction in regulated emissions (weighted by unit area) of 12.4% compared with the baseline of the Part L 2021 notional TER.

The as designed BRUKL output documents include generated estimates for the quantum of energy displacement that should be achieved by the notional building through generation by on-site photovoltaic panels. For each unit, the estimated generation capacity of the array outlined in the strategy exceeds the notional generation:

Unit	Notional PV generation (kWh/m ² _{GIA} /year)	Estimated PV generation (kWh/m ² _{GIA} /year)	% improvement (estimated/notional)
1	2.34	9.11	289%
2	1.90	10.69	463%
3A	2.48	11.06	346%
3B	2.59	10.27	297%
4	3.19	11.80	270%
5	1.63	10.83	564%

Table 11 of the Strategy demonstrates that each unit is expected to provide between

10.3 and 11.2% of its annual regulated energy demand through on site renewable energy generation provided by the PVPs. When combined with the displaced heating energy generated through the ASHPs, this rises to between 20.4 and 26.8% for each unit as shown in Table 12.

It should be noted that ASHP can be considered renewable energy generation at high operating efficiencies despite having an operational energy demand and the portion of energy considered as renewable has been properly calculated using the equation provided in the Renewable Energy Directive 2009/28/EC/EP.

The approach to renewable and low carbon technology is feasible, suitable for the proposed development, well evidenced and adequate in generation capacity to comply with WBC sustainable development policies.

Passive design measures

Glazing ratios are not provided however it is evident from plans that entrance areas of each unit are highly glazed, in particular, the South Elevation of Unit 1 contains over 380 m² of double height glazing.

Brise-soleil and solar control glass (G-value 0.3, VLT 0.60) are proposed to mitigate overheating risk while allowing for optimal natural daylighting. Translucent (G-value 0.35, VLT 0.46), triple-skinned non-fragile factory-assembled GRP rooflights are to be provided to a minimum of 15% of the roof area of each building.

Roof plans do not include the positions of solar panels or air source heat pumps therefore this information must be supplied in order to discharge the suggested renewable energy condition.

The scheme will employ dynamic thermal modelling, and as set out in the BREEAM Pre-Assessment, the model will be run at design Stage 4 to show a pathway for thermal comfort compliance based on the climate change projections, with both available credits under Issue Hea 04 targeted. This modelling positively contributes to the overall sustainability of the development. It is recommended that local climate projections under high warming scenarios are used for this modelling.

The ventilation strategy incorporates MVHR and comfort cooling via reverse operation of ASHPs serving office areas, with natural ventilation serving the warehouse spaces. This strategy will ensure adequate air quality in the building which is specified with a high level of air tightness.

Heat loss form factor (HLFF). From examination of the drawings, the proposed units are simple and rational in form, contributing to a reduction of heat loss through the building envelopes.

The Energy Strategy provides fabric performance targets for the specification as follows:

Building element	Unit	Part L 2021 limiting value	Best practice value	Specified value
External wall	W/m ² .K	0.26	0.12	0.26
Sheltered wall	W/m ² .K	0.26	0.12	0.26
Floor	W/m ² .K	0.18	0.10	0.18
Roof	W/m ² .K	1.60	1.00	1.60
Vertical windows	W/m ² .K	1.60	0.80	1.60
Roof lights	W/m ² .K	2.2	1.0	1.30
Personnel doors	W/m ² .K	1.60	0.80	1.60
Vehicle doors	W/m ² .K	1.60	0.80	1.30
Air permeability	m ³ /h.m 3 @ 50 Pa	8.00	<1.00	2.50

Table 1 demonstrates that the proposed buildings make no improvements to the limiting values imposed by Part L of the Building Regulations with the exception of air permeability. The Energy Strategy states that *“Based on the final use of the development (warehouse) the U-values cannot be lowered further as lower U-values will result in higher construction thickness which are difficult to construct. This will in turn have major embodied carbon implications which Wrenbridge (FRELD Reading) LLP is committed to reduce.”*

Whole life impacts

The Strategy states that the applicant is committed to reducing embodied carbon, however whole life impacts are not considered in the Strategy. No mention is made of responsible materials sourcing, any lifecycle assessment or application of circular economy principles relating to the construction of the new development or deconstruction of the existing buildings on the site. The development proposals would benefit from consideration of these issues.

The commitment to achieve estimated average of 12.4% reduction in operational regulated emissions through the use of low and zero carbon technologies relative to the Part L baseline, and a minimum BREEAM certification of 'Excellent' is compliant with WBC MDD CC04 Part 2 (a).

Application of the standard condition ensuring that the provision for onsite renewable energy is delivered at the level described is recommended. To discharge this condition, details of the specified models of exhaust air heat pumps and photovoltaic panels should be provided along with operating efficiency and generation capacity, and plans showing the proposed installation locations of each.

Water efficiency is not covered in the Energy Strategy.

No proposed flow rates for water appliances are provided therefore below table is

provided for information on best practice.

Fitting type	Non low-flow consumption	Best practice consumption
WC	5 - 9 L	< 4 L
Shower	13 L / minute	6 L / minute
Handwash basin taps	8 L / minute	2 L / minute
Sink taps	10 L / minute	4 L / minute
Dishwasher	1.25 L / place setting	< 0.7 L / place setting
Washing machine	14 L / kg	6 L / kg

Application of the standard condition ensuring water efficiency measures are specified at detailed design stage in accordance with the details supplied in the Energy Statement is recommended.

In summary, the application shows a policy compliant approach to the reduction of operational emissions. This approach benefits from an excellent level of on-site energy generation from photovoltaic panels as well as reductions in heating and cooling emissions via provision of ASHPs. The BREEAM Pre-Assessment shows the development to be on track for its targeted minimum certification level of 'Excellent'.

No objection is raised to approval of this application subject to the application of the conditions to secure BREEAM compliance as well as a scheme of carbon reduction of 10%.

Flooding and Drainage:

Policy CC09 of the MDD Local Plan requires consideration of flood risk from historic flooding. The site and access are located within Flood Zone 1 and the proposal represents no additional flood risk or vulnerability. It is therefore acceptable in terms of Policy CC09.

Policy CC10 of the MDD Local Plan requires sustainable drainage methods and the minimisation of surface water flow.

Policy 8 of the Shinfield Neighbourhood Plan states that no development will be permitted which reduces the ability of the site to alleviate flooding, or which results in increases in surface water run-off rates that would have a detrimental effect off-site, unless suitable mitigation is put in place.

Policy FD1 of the emerging local plan update states *“Development proposals must take into account at all stages of development, and at the appropriate stage of the planning application process, all sources of flood risk, including historic flooding, current and future impacts of climate change, and cumulative impacts. Development proposals must be consistent with national policy and guidance and demonstrate how they have used, and where relevant comply with the site specific recommendations of, the Strategic Flood Risk Assessment (SFRA) to help determine the suitability of the proposal.”*

The development site is situated in Flood Zone 1, which is categorized as having a low probability of flooding, with less than a 1 in 1000 annual risk of river or sea flooding.

In support of the application, the applicant has prepared a flood risk assessment which appropriately notes that the sequential and exception tests are not required for the development due to its location in this low-risk zone.

Regarding surface water flooding, the site is predominantly at a very low risk, though some isolated areas in lower-lying car park sections are identified as having medium to high risk. The proposed measures, including reprofiling the site and installing a new underground drainage system, are set to mitigate these risks by improving water runoff management.

The drainage strategy proposed in the FRA follows the Development Plan by limiting post-development surface water flows to greenfield rates. This approach, combined with the use of Sustainable Drainage Systems (SuDS) like geo-cellular attenuation tanks and permeable paving, ensures effective management of surface water and prevents downstream flood risks.

Subject to compliance with the submitted flood risk assessment secured by condition, no objections are raised on drainage or flooding grounds.

Landscape and Trees:

Policy TB21 of the MDD states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. In addition, proposals shall retain or enhance the condition, character and features that contribute to the landscape.

Paragraph 135(c) of the Framework acknowledges that planning decisions should ensure developments are *"sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change"*.

Policy 6 of the Shinfield Neighbourhood Plan states that new build development will be acceptable where it retains hedgerow with an appropriate buffer zone, provide landscape enhancements and protect ancient woodland and local wildlife sites.

LPU Policy D1 requires proposals to *"respect, and where appropriate, enhance the character, distinctiveness and identity of Wokingham's varied urban and rural landscapes, settlements, buildings, and spaces."* It specifically requires proposals to respond positively to local context, including landscape character, topography, and views, and to integrate effectively with existing patterns of development and landscape features.

LPU Policy NE5 seeks to protect and enhance landscape character and quality across the Borough. It requires development to be informed by, and responsive to, the Wokingham Borough Landscape Character Assessment and any relevant Valued

Landscape Assessments. It states that proposals should “*Protect and, where possible, enhance the existing landscape character and distinctiveness of the area, including its key characteristics, features, and views*” and “*Avoid unacceptable adverse impacts on the landscape, including cumulative impacts.*” Where adverse impacts are unavoidable, appropriate mitigation and, where necessary, compensation will be required.

CC03 of the MDD Local Plan (criterion 2(e)) requires development proposals to incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme

Overall, the approach to the landscape design with its strong linkages across the site utilising the spaces around and between the units and connecting to the ponds are strongly welcomed.

The site is located with Wokingham Borough Landscape Character Assessment – Area J3 ‘Spencer’s Wood Settled and Farmed Clay’, a moderate quality landscape of moderate condition and modest capacity for change. The site is adjacent to the countryside.

Key Characteristics includes the following that relate to the site;

- Small scattered mixed deciduous woodland blocks and copses including some of ancient origin, many designated as LWS, most located on the steep west and south facing slopes of the ridge.
- Remnant parkland at Shinfield Grange, Loddon Court, Shinfield Lodge, Stanbury Park and Highlands. A number of these are clustered along the top of the ridge overlooking the clay lowlands of Grazeley to the west. These parklands contain BAP priority habitat lowland wood pasture and parkland and ancient woodland. Visually prominent parkland veteran trees include many Wellingtonias, there is a prominent avenue of these trees along the drive to Wellington Court, originally the Stanbury Park estate.
- Sense of elevation from the ridgeline and good views over surrounding lowlands including to the Loddon valley and over West Berkshire.

Of the Valuable Landscape Attributes :

- Remnant historic parklands and visually prominent parkland trees, including many Wellingtonias, especially the avenue of this species which provide time- depth, visual diversity and a sense of orientation to the landscape.
- Small-scale woodlands provide visual diversity in the landscape, as well as ecologically important habitats.
- Woodlands are subject to spread of pathogens and effects of climate change, as well as effects of lack of replacement/successional planting.

The Landscape Strategy is to conserve and enhance the rural character of the

agricultural landscape. The key aspects to be enhanced and actively managed are the pattern of hedgerows, remnant parkland, trees and avenues, views to the Loddon Valley and west Berkshire, the rural character of the lanes, and the GHQ Stop Line. There are opportunities for woodland planting to integrate the M4, busy roads and expanding urban fringes of Reading, in particular around the expanding settlements of Shinfield, Spencers Wood and Three Mile Cross as part of the South of the M4 SDL.

In terms of development, the aim is to conserve the rural character of the landscape and gaps between settlements while maintaining the integrity of settlement identity.

The Proposed Site Layout Masterplan shows a final layout of the buildings which has taken on board the previous comments from the Council during the design process.

Sketched sections in Section 6 of the DAS show the arrangement of the landscape buffer to the B3270 and includes the re-orientation and reduction of the building frontage of Unit 4 facing the B3270.

The buffer zone to the ancient woodland is clearly shown at its 15m width – except where the position of the high voltage cable for 80m approximately along the northern side of Unit 1 is located and will be retained through a part of the buffer zone as shown on Dwg. Ref. 5704-CA-ZZ-00-DR-A-00051-P6 10.4.25 Proposed Site Layout masterplan. All other development in the Veteran Tree Buffer zone is to be removed which is a benefit of the scheme.

The parapet heights of the building are reduced which virtually screens the buildings in medium and long distance views around the site where they appear to merge into the surrounding wooded landscape, grading the form from the built up major development location to the more sensitive landscape.

The Overall Landscape Reference Plan includes the landscape layout, arrangement and hierarchy of hard materials, and hierarchy of landscape spaces and treatments, including a SuDS train which extends from the north of the site towards the retained ponds in the SW (offsite).

Hard materials include concrete to service yards, black bitumen for access roads, a black bitumen with limestone chippings to footways. 'Doorsteps' spaces are block paved in stretcher bond, car parking bays comprise of a permeable block paving laid in herringbone, and maintenance footways in concrete flag paving. Self-binding gravel to informal paths. The existing PRow where it runs through the site will be made good and hedgerow planting enhanced. Sudpave 40 permeable pavers sown with a flowering lawn mix to overspill parking to the north of the site will help to temper the amount of hard surfacing in this large area that backs onto public open space between the site and existing residential. These details are secured by planning condition.

Regarding the soft landscape design, large areas of proposed woodland planting with native understorey is proposed around the site which will contribute to replacing trees lost to development along with the specimen trees located elsewhere across the site. More formal hedges using Portuguese Laurel and Hornbeam maintained at 1.2m high

are proposed within built development. Native species hedgerow is mostly located in the northern part of the site screening the PRow from service yards where existing trees will also contribute to the screening. The specific details and planting mix are to be secured by landscape condition.

Rain Gardens are included as features in the landscape design which link the buildings together providing a continuous landscape structure and attractive frontages to the different building units. The northern edges of the site transition from the wooded PRow into the site as open meadow mixes starting with a hedgerow mix close to the ASNW / Woodland followed by swathes of wild flower mix and native shrub mix towards the buildings including some scattered tree planting that concentrates around the staff amenity area and goes onto the provide further landscape links across the site.

Whilst further details are secured by condition, the landscape strategy and planting mix indicated is of high quality and notably contributes to the site's successful integration into its more sensitive periphery. No objections were raised by WBC Trees and Landscape on this basis, subject to conditions.

Arboricultural Information

CC03 of the MDD Local Plan requires development to protect and enhance the borough's green infrastructure network, retaining its high quality green infrastructure.

An Arboricultural Impact Assessment (AIA) – Aspect Arboriculture Document Ref. 12218_AIA.001 Feb, 2025 was received with the application and identifies trees for retention and removal, and trees where excavation within their root protection areas is unavoidable to implement development suggests an approach for mitigation to manage the impact. In some cases areas of existing hard landscaping will be returned to soft landscaping. Table 2 in the AIA lists the trees where supervised excavation is required, where Cellweb is proposed, where hard surface and hard surface to soft is proposed. Some fencing is located within the RPA such as the Paladin fencing – mitigation will be required for types of fencing as appropriate.

The Tree Survey Schedule includes 158No. trees, 15 groups of trees, 2 hedges and 1 area of woodland. Of this number 41 individual trees will be removed including 1 Cat. 'A' tree, 33 Cat. 'B' trees, 8 Cat. 'C' trees, and parts of the W1 woodland that surrounds the site to the NW, W and SW.

Part of G10 will be removed , and all of G15 which are 'B' cat. All of the 'C' cat. Groups. (5No.) will be removed.

The removal of 41 individual trees is an improvement on the previous number of 69 trees that had previously been identified for removal during pre-application stage.

The survey includes 1 Veteran tree T18 Oak which is an offsite tree to the west of the site and a 15m buffer zone will be applied to this tree. In addition to T18, there are other high quality trees identified across the site 3 No. Field Maples which are memorial trees (T66-T68), and 3 No. Silver Maples(T90-T92), also memorial trees of high commemorative value. There are several London Plan trees (T85-92) of which

trees T85-T87 are companion trees of high collective value. T88 is a stand alone specimen and T89 which is the dominant component of the collection. Of these T87, T89 will be removed.

T153 is an Oak with a 1250mm girth categorised A2 and a prominent boundary feature – why is this not recognised as a Veteran tree when it has features of veteranisation?

T157 and T158 are both 'A' quality trees within the W1 woodland which will be retained. Prominent boundary trees along the northern edge of the site and the southern edge of the ASNW woodland have been identified with letters A-Z of which A,C,D,P will be removed – small insignificant trees within the mix, which constitute the removals within W1 identified in the AIA.

Trees are retained in key locations such as the northern overflow car park, and the ASNW woodland to the NW, W , SW. Trees on the approach road will be largely retained and subject to a lot more tree planting, Screening trees to the SE and SE of Unit 5 that help to maintain the character of the surrounding landscape are retained.

The existing trees can be divided into 2 groups; the ASNW and those trees associated with it, and the internal trees which are associated with development of Shire Hall, the existing building on site. Half of the species comprise of English Oak, London Plane, Field Maple, and Silver Maple. These trees contribute to the site amenity and cultural character. Most of the trees associated with Shire Hall cannot be retained with the proposed layout. But there are many new trees included in the soft landscape scheme, and areas of woodland, that builds on the existing woodland character and introduces a new scheme to complement the proposed building layout. 289No. new specimen trees are proposed and many others within the proposed woodland. In addition to mitigation works proposed, some pruning work is also required.

WBC Trees and Landscape accept that the number of trees being removed has reduced from 69 to 41 and many more trees are proposed within the new scheme of which there will be 289 specimen trees at a mixture of specifications including; Extra Heavy Standard, semi-mature, Multi-stem, Advanced Heavy standard.

All of these trees (to be secured at conditions stage) will require planting and maintenance in accordance with BS8545:2014 in order that they can thrive and realise the vision of the landscape scheme. The maintenance schedule must be extremely vigilant and a very tight regime of watering and care carried out.

Further arboricultural and tree protection information are secured by planning condition.

Landscape Character:

Turning to landscape character, WBLCA J3 :LCA – 'Spencers Wood Settled and Farmed Clay' has a medium sensitivity.

WBC Trees and Landscape agree with the selection of the Landscape Receptors in relation to the site and the assessment of their sensitivity to the development

proposed as well as with the evaluation of the existing building on the site and its function as a landmark building but also that Shire Hall is a stand alone building in the context of the immediate site and its surroundings.

The site is located completely in J3 LCA Spencers Wood Settled and Farmed Clay – however there are views from the neighbouring higher value LCA of River Loddon Valley, as well as the medium value Grazeley Farmed Clay Lowland, but the long distance views are of the landmark building and the new development will only be visible in closer views.

The boundaries and name of the 'River Loddon Valued Landscape' has changed and is now the 'Ridge and Rivers Valued Landscape' (Valued Landscapes Assessment 2024) with the adjustment to the boundary there is some limited visual impact of the Loddon River Valued Landscape but these views are distant and transient from PRoW SHIN30 and mostly screening by intervening vegetation. Views are grouped at up to 100m from the site, 100-500m and over 500m.

WBC Trees and Landscape concur with the assessment of the Visual Receptor Sensitivity, with those of high sensitivity being users of PRoW SHIN10 which passes through the site and has views of and is within the ASNW, and users of PRoW in publicly accessible land passing through the River Loddon Valued Landscape and the Ridges and Rivers Valued Landscape.

There are 9 Accurate Visual Representations (AVRs) which include 4 rendered AVRS for site context photos 1, 2 and 18, and there are 4 wireline AVRs which are for site context 4,7,8,11,14,15. Rendered AVRs show Yr. 1 and Yr. 15 planting.

The Overarching Landscape Design Principles are set out in Section 6 of the Design and Access Statement and demonstrated on Figure RG-LD-100: Overall Landscape Reference Plan. In order to implement the principles there are strategies for key areas of the site which include; Built form, Site frontage, Access Gateway and Central spine, Linear Park, Northern Car Park, PRoW corridor and Green Edges.

In conclusion, WBC Trees and Landscape support the application and agree with the assessment of sensitivity of the landscape receptors and the significance of effect of them at Year 1 and Year 15. The choice of viewpoints and the sensitivity of the visual receptors at Year 1 and year 15 provide a balanced a reasonable span that is sufficient to gauge levels of impact. With respect to landscape character, the proposed development will lead to tangible long term benefits on the character and features of the Site and the character and general amenity of the local area.

Air Quality:

Paragraph 199 of the NPPF states *"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the*

plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”

As a part of the Local Plan update Wokingham (in conjunction with West Berkshire) have prepared an Air Quality Action Plan (AQAP). This has been produced as part of the Council's statutory duties required by the Local Air Quality Management framework. It outlines the action the Council will take to improve air quality in Wokingham Borough Council (WBC) between 2017 – 2026.

The site itself is not located within Air Quality Management Area, however, is located approximately 500 metres west of the site within Reading (around the M4). By way of context, at present, WBC has declared one AQMA due to exceedances of the annual mean NO₂ NAQO.

The applicant has prepared an air quality management plan informed by the VISSIM modelling carried out during the application process. This identifies that the proposed development is considered to be in accordance with the requirements of the NPPF, and relevant local and national planning policy and guidance regarding air quality. No objection has been received from WBC Environmental Health on its provisions.

To approach the submitted assessment in more detail, the submitted report outlines that the construction works have the potential to create dust and that mitigation measures should be adopted to reduce PM₁₀ concentrations dust nuisance. With mitigation in place the construction impacts are judged as not significant. These are secured both through a specific air quality management condition as well as that within the CEMP.

Concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted for a number of worst-case locations representing 7 existing properties adjacent to the road network. The significance of any potential impacts to air quality are limited in accordance with the criteria outlined in the EPUK/IAQM guidance (EPUK/IAQM, 2017), namely due to their proximity to the existing transport network.

Mitigation measures to reduce the impacts of the proposed development on air quality

concentrations are not required, but additional transport related mitigation measures, contained within the Framework Travel Plan for the Proposed Development, will be employed to reduce emissions, and thus mitigate air quality impacts resulting from the Proposed Development. This matter is secured by planning condition.

Contamination:

Policy HC9 of the emerging local plan states that development proposals on or near sites which are known, or suspected to be potentially contaminated, or proposals for sensitive land uses, will only be supported where it can be demonstrated that the following sensitive receptors would not be exposed to levels of potential contamination that would give rise to unacceptable risks or harm to health, or other adverse impacts.

The site does not show as having any historic land contamination on WBC's internal GIS mapping (figure below), however, considering the former land use and the earthworks required to facilitate the development, an unexpected land contamination condition has been appended to the recommendation for the avoidance of doubt.

Atomic Weapons Location:

Policy TB04 of the MDD allows development in the vicinity of the Atomic Weapons Establishment at Burghfield but only where the increase in density can be safely accommodated. The site is within the inner/middle/outer zone, which is within 3km – 5km from the establishment. Policy TB04 states that further details are required where an employment use can accommodate more than 500 people can be accommodated on the site (above an existing use, referring to additional people).

Policy SS7 of the emerging local plan builds on this, in stating *“Development proposals within consultation zones surrounding AWE Burghfield and AWE Aldermaston as set by the Office for Nuclear Regulation or other relevant national and local agencies, and exceptionally beyond, will be managed in the interests of public safety, emergency response, and national security and defence requirements.”*

No objections have been received from WBC Emergency Planning, the AWE or the ONR as the proposed flexible employment use would not increase the number of employees on site above the threshold identified above (in accordance with TB04).

Archaeology:

Policy TB25 of the MDD Local Plan requires the retention of archaeological sites in situ.

The submitted Heritage Desk-Based Assessment prepared in support of the application outlines that there have been deep basement impacts causing ground truncation widely over the Shire Hall area and note that mapping shows significant changes in earthworks in the northeastern area, during its RAF period of use.

Berkshire archaeology outline that notwithstanding the above, there may be a small remaining area of potential for intact archaeology in the north/northwest, however the current proposals do not impact this area, other than minor landscaping. Therefore, archaeological mitigation is not currently required for this site.

Ecology:

Policy TB23 of the MDD Local Plan requires the incorporation of new biodiversity features, buffers between habitats and species of importance and integration with the wider green infrastructure network. This has been amplified by the Climate Change Interim Policy Position Statement Wokingham Borough Council dated December 2022.

CP7 of the Core Strategy outlines that sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and

inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

CP7 goes on to state that development;

- a) *Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or*
- b) *Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or*
- c) *That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:*

- i) *Mitigation measures can be put in place to prevent damaging impacts;*

Or

- ii) *Appropriate compensation measures to offset the scale and kind of losses are provided.*

Policy 7 of the Shinfield Neighbourhood plan requires new development to provide biodiversity enhancements and habitat provision (where practical).

Policy NE1 of the emerging local plan states;

“Development proposals should protect and enhance biodiversity and/or geodiversity features of conservation value and implement appropriate conservation management. The degree of protection will be proportionate to the status of the site or species in terms of its international, national and/or local importance.

2. Development proposals should demonstrate through a suitable level of ecological survey information and assessment how they conserve and enhance biodiversity and/or geodiversity including their long-term management.”

Thames Basin Heaths SPA

The proposed development does not result in a net increase in dwellings within the linear mitigation zone so does not need to be assessed for likely significant effects on the Thames Basin Heaths SPA via the recreational pathway.

However, it is relevant to consider whether the project, alone or in combination, could result in likely significant effects on the Thames Basin Heaths SPA via the air pollution pathway. In particular, whether it will result in an increase in road traffic that will result in pollution of the SPA. There is no fixed zone of influence for the Thames Basin Heaths SPA for this pathway although typically a distance of 10km from the boundary of an SPA is used. As this application site is approximately 6km distant it is appropriate to consider whether traffic modelling is showing a risk.

Further to some clarity requested by WBC Ecology in relation to potential air quality impacts on the Thames Basin Heaths SPA, the applicant's Air Quality Consultant has confirmed that the proposed development is expected to generate 1,558 average annual trips which include 136 HGVs.

It is expected that 10% of the generated development trips will distribute along roads to the south of the M4, totalling 156 AADT including 14 HDVs. These trips will distribute across multiple routes and therefore the majority are unlikely to travel along links adjacent to the SPA. As there is no credible risk for a significant change in movement, no significant adverse air quality effects on the SPA are anticipated. There is no objection in this respect.

Biodiversity Net Gain

Policy NE2 echoes the mitigation hierarchy established within the Environment Act, in stating *"All development proposals should demonstrate a minimum biodiversity net gain of 10% (unless specified in another site allocation policy) calculated via the most up-to-date national biodiversity accounting metric and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off-setting where appropriate."*

This application is supported by a Biodiversity Net Gain Assessment report (Aspect Ecology, ref: 6856 BNG vf CK/BB/DS, February 2025) and accompanying plans and statutory metric (calculation iteration: vf). Line by line comments have been made within the planning authority comments column in a copy of the statutory metric. Further to review, WBC Ecology recommend that the local planning authority can agree the baseline habitats and conditions as described and quantified in iteration vf.

Comments regarding the detail of the post development scenario described in the metric have not been given as approval of that detail is resolved via the statutory condition, should permission be granted. However, it is relevant to consider the strategy for delivery of habitat biodiversity net gain at this point.

The applicant proposes to deliver a unit net gain on-site via creation of medium distinctiveness habitats. These make a significant contribution to the biodiversity target and therefore WBC Ecology recommended that on-site monitoring of biodiversity net gain delivery is secured via a combination of conditions (securing a Habitat Management and Monitoring Plan - HMMP) and a planning obligation (to monitor the HMMP). This has been agreed by the applicant.

The BNG assessment recognises that trading rules cannot be met via on-site delivery. Considering the development proposals and the habitat types that are showing a shortfall, WBC Ecology are of the view that a reasonable attempt to follow the mitigation hierarchy has been taken and it is acceptable for the trading rules to be satisfied by securing off-site unit delivery.

Although the BNG post-development detail is not a matter to prevent determination of the application (being a conditioned matter). WBC Ecology do recommend that the applicant reviews the individual trees scoring within the metric. The 274 trees are densely planted and only those that are expected to be retained for the full 30 years

should be counted. Further, the individual tree planting to the north-west the upper car park, north of unit 1, and west of units 2 and 3 might well be at a density whereby the habitat should be recorded as woodland rather than individual trees over grassland. The landscaping details secured by planning condition must reflect this advice above, and tie in to the conditioned HMMP detail.

Ancient Woodland and Veteran Tree

The site is recognised as being adjacent to ancient woodland (to the north-western boundary) and close to a veteran tree (within blue line land to the west of units 2 and 3). WBC Ecology and WBC Trees and Landscape are satisfied that these have been accurately plotted by the applicant within submitted plan 6856/ECO3 so relevant buffer zones for irreplaceable habitat can be calculated. It is noted that during pre-application discussion it was agreed that the GIS mapping used to plot the location of the ancient woodland (Magic Maps) did not reflect the facts on the ground nor historic mapping, identifying that the ancient woodland boundary is to the north/north-western side of the public footpath delineated by a chain-link fence serving the PRow.

Levels changes are proposed to the site and thus it is relevant to consider whether a buffer zone larger than 15m is required to the ancient woodland adjacent to site. The application has submitted additional information to consider the potential for levels changes to alter groundwater and surface water flow into/across the ancient woodland (TRC, 11 February 2025). Looking at this alongside information about the existing surface water drainage, WBC Ecology are of the view that the changes in levels are unlikely to result in adverse impacts via additional drainage of the ancient woodland site. Therefore, a 15 metre buffer zone is acceptable.

Local Wildlife Sites

The submitted Ecological Assessment recognises that there are two local wildlife sites adjacent to the site – Shinfield Park Nore's Hill and The Grove. WBC Ecology concur with the assessment that the proposed development will not result in direct loss of local wildlife site extent.

The Ecological Assessment makes mitigation recommendations to reduce the pollution risk to the local wildlife sites – see MC1, MC2, and MC3 in section 6 of the assessment. The detail and implementation of these mitigation measures have been secured via a Construction Environmental Management Plan (CEMP) condition.

Whilst concerns were initially raised by WBC Ecology concerning the loss of the pond arising from implementation of the proposed drainage strategy, further survey work by the applicant has revealed that these are off-line ponds as existing fed solely by rainwater. Thus, implementation of the proposed drainage strategy will not result in the loss of this wetland habitat.

Habitat of Principal Importance

An Ecological Assessment has been submitted in support of the application which has been reviewed by WBC Ecology. Within, the Natural England Priority Habitat Inventory has included some parts of the developed site that do not qualify as lowland mixed deciduous woodland. The mapped extent of lowland mixed deciduous woodland given in the Ecological Assessment is more accurate having been

assessed on the ground.

The proposal would still result in the loss of a small area of lowland mixed deciduous woodland habitat of principal importance (measured as 0.015ha) in order to accommodate Unit 4. Further to proactive discussion and works between officers and the applicant, WBC Ecology can recommend that the iterative design process has sought to apply the mitigation hierarchy and, under the process set out in local plan policy CP7, it is reasonable to consider the compensation stage for this loss.

The proposed landscaping as indicated includes woodland planting around the northern edge of the site. This is in a good location in principle to strengthen the woodland connectivity between Nore's Hill ancient woodland and a fragment of woodland to the east of the application site. Finer details including species will be secured by planning condition. This approach is supported by WBC Ecology.

This woodland planting in combination with the off-site delivery of lowland mixed deciduous woodland biodiversity net gain units provides sufficient compensation for the 0.015ha loss of lowland mixed deciduous woodland in the south-western corner of the site. The mitigation hierarchy has been successfully by the applicant, insofar as to avoid any conflict with CP7 of the Core Strategy.

Protected Species

Bats

Further to review of the submitted ecological report and survey, WBC Ecology recommend that the applicant has supplied sufficient survey information for the local planning authority to be able to consider the likely use of the site by this species.

The static detector records indicate that the main building on site is unlikely to be used as a hibernation roost. The building assessments and emergence surveys indicate that the buildings on site are unlikely to contain bat roosts which is agreed by WBC Ecology.

The assessment of roosting potential in trees identified T48 as having an I-type potential roosting feature. Contrary to paragraph 5.3.32 of the Ecological Assessment, this tree is indicated for removal in the Arboricultural Impact Assessment (Aspect Arboriculture, ref: 12218_AIA.001, February 2025). Given that it is an I-type potential roosting feature and a number of bat boxes are proposed, WBC Ecology consider that no further survey work is required prior to determination. However, mitigation measures for bats during the removal of this tree are secured in detail via a CEMP condition.

Paragraphs 5.3.26 to 5.3.29 evaluate the static detector survey results to indicate that an assemblage of bats of district significance is present locally. The category of significance 'district' is introduced by the applicant's ecologist – the Bat Mitigation Guidelines referenced only giving thresholds by which to consider an assemblage as of county/regional/national importance. The known range of bat species means Berkshire is not a good fit for the Southern England scoring for bat assemblage, particularly in relation to the county significance threshold.

The recorded presence of Serotine and Barbastelle (both assessed as Vulnerable in

England under IUCN guidelines) makes me think that the adjacent local wildlife sites are probably of county significance for bat foraging and commuting. However, WBC Ecology accept that the detector evidence shows that the use of the application site for foraging and commuting by bats drops off around the existing built form.

To avoid harm to the important foraging and commuting features locally, a sensitive lighting strategy is required to ensure that the woodlands and ponds surrounding the site are not subjected to significant additional artificial light – which would make these features less suitable to light sensitive bat species. Paragraph 5.3.28 picks up on this need and references an Indicative External Lighting Layout (Drawing No. 24114-MBA-EX-SP-DR-E-0001). An External Lighting Strategy Report (MBA Consulting Engineers, version: Rev PL2, February 2025) has been submitted and this contains the above referenced drawing.

Broadly, the lighting strategy takes on board the majority of lighting recommendations given in mitigation measure MC10 in the Ecological Assessment. However, WBC Ecology note that schedule in the drawing does not specify a back light shield for column C1. Accordingly, whilst the lighting strategy is of positive merit overall, a lighting for light sensitive species condition is applied to resolve the final detail of external lighting.

Dormouse

Further to receipt of sufficient survey effort, WBC Ecology can recommend that the local planning authority can be confident that this proposal is unlikely to adversely impact this protected species.

Reptiles

Based on the evidence submitted, WBC Ecology recommend that the local planning authority can be confident that this proposal is unlikely to harm protected reptile species and is unlikely to adversely impact the local conservation status of reptile species of principal importance.

Breeding Birds

Subject to reasonable avoidance measures applied during construction – secured via a CEMP condition – I can recommend that the local planning authority can be confident that this proposal is unlikely to harm breeding birds or adversely affect the conservation status of bird species of conservation concern recognised as breeding locally.

Species Specific Enhancements

Paragraphs 6.2.7 to 6.2.12 of the Ecological Assessment make recommendations for enhancements for faunal species that can be incorporated into the development or within the part of the local wildlife site within blue line land. Under paragraph 187 of the NPPF and local plan policy TB23, it is appropriate for the local planning authority to seek delivery of these enhancements in the course of the development. This detail and delivery of these enhancements has been secured via an appropriately worded condition.

Employment Skills:

Policy TB12 of the Wokingham Borough Council MDD, requires planning applications for all major development (both commercial and residential) in Wokingham Borough to submit an employment skills plan (ESP) with a supporting method statement. This is echoed by emerging local plan policy ER4.

ESPs are worked out using the Construction Industry Training Board (CITB) benchmarks which are based on the value of construction. Planning applicants will need to submit an estimated construction value for the development or this value can be calculated using the proposed floor space in the planning application and applying BCIS industry standard build costs (£1025 m²).

Alternatively, in place of an ESP, TB12 (and ER4) can be satisfied through the provision of an Employment Skills Contribution (ESC). The “Employment Skills Plan Guidance for Developers - Wokingham Borough Council” provides guidance and justification of this. The contribution amounts are based on the CITB baselines and the cost to Wokingham Borough Council of delivering skills and employment support equivalent to the ESP.

Using the overall value of developing the site and the CITB benchmark tables (outlined with the document mentioned above) the number of employment outcomes arising from a development is calculated. The cost to Wokingham Borough Council to produce an employment outcome (apprenticeship start or jobs created) as specified in the benchmarks is £3750. The off-site financial contribution is derived by multiplying this cost by the number of outcomes (apprenticeship start or jobs created) specified for the Employment Skill Plan for the development.

The provision of either an Employment Skills Plan, or an Employment Skills contribution has been secured via planning obligation which is agreed by the applicant.

Planning Balance:

Economic:

The proposal would give rise to significant economic benefits in the form of creating c.20,400 sqm GIA additional flexible industrial development of which there is demonstrable and pressing need within the Borough. This single development would address almost 4% of the total need over the plan period providing over 2 of the 53 hectares identified. Whilst it is noted that there is a reduction in net employment floor space in general (from 23,730m² of office use) which does form a face policy conflict, it is tempered given the overarching need for the floorspace proposed and the reality bringing the site up to modern office standards is likely to be unviable.

Furthermore, the proposal would potentially generate up to 558 jobs (FTE) once operational. This is a stark contrast to the existing un-occupied building. Officers note that additional temporary jobs and associated GVA also generated during the construction and demolition phase which all weigh positively in favour of the development.

Once occupied, the site could generate up to £25.8m operational GVA per annum, part of which would be expenditure in the local area and some of the business rates

generated would directly support the Council's own initiatives. Further value will be added within the demolition and construction phases of development.

The site would efficiently utilise an un-used, increasingly derelict parcel of land by addressing a pressing local need for industrial floorspace. This is supported by both local and national policy and reflects a pragmatic approach to address modern needs.

The above matters align with the economic objective of the Framework and holds substantial weight on balance.

Environmental:

Significant benefits to the site's character and appearance are proposed in demolishing the existing brutalist building and replacing them with positive built form with grouped identity. This creates a high-quality campus style development which positively interacts with both the B3270 and the surrounding ancient woodland, offering a graded and sensitive approach to development.

A reduction in trip rates when contrasted to the existing office use, will contribute in decreasing congestion along with B3270 via improvements of local public transport networks (upgrading bus stops), promoting active transport via travel plan (secured via S106) and improving the adjoining public right of way.

Notable landscaping is proposed to strengthen the site's relationship with the street scene, furthermore creating useable, interconnected and unique green-spaces (including the provision of rain-gardens) that will be at the benefit of future occupiers. By enhancing existing blue infrastructure on site, more attractive and varied open spaces are provided which in turn acts as a visual and spatial break in form to the north and south of the site.

The above matters align with the environmental objective of the Framework and holds significant weight on balance.

Social:

The proposal would result in the net loss of two uninhabited dwellings, of which there is presumption against in both local and national policy.

As above the proposal would provide significant opportunities for local employment, including through employment skills initiatives.

The proposal contributes to improving the public right of way via condition and publicly accessible public transport services via planning obligation, also improving the perception of safety for users of the footpath via improved natural surveillance. It further incentivises active and public transport measures through a site-specific travel plan which will be monitored by planning obligation.

The proposal would increase the scale of activity on site which when combined with positive design features significantly improve natural surveillance on site creating a perception of safety for land users and those adjacent. This decreases any potential for anti-social behaviour on or adjacent to the site.

Notwithstanding the loss of two dwellings, the above matters in combination align with the social objective of the Framework and holds moderate positive weight on balance (tempered from significant owing to the modest loss of residential land arising from the demolition of 2 no. bungalows).

Conclusion:

On balance, while there are limited adverse impacts, namely the loss of two dwellings and a decrease in net employment floorspace, these are clearly outweighed by the proposal's substantial economic, environmental, social and design benefits. The scheme is considered to accord with the development plan when read as a whole, and no material considerations indicate otherwise.

It is therefore recommended that planning permission be granted, subject to the conditions and obligations set out in the accompanying decision notice.

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL liable, the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing the assumption of liability notice is a statutory requirement to be completed for all CIL liable applications.

The Public Sector Equality Duty (Equality Act 2010): In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that persons with protected characteristics as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts as a result of the development.

RECOMMENDATION	
Conditions agreed:	Yes
Recommendation:	Approval subject to conditions (as detailed on the decision notice) and the following planning obligations (as detailed in the accompanying S106 legal agreement): - Bus Stop Improvement Contribution - Employment Skills Plan/ Contribution - Estate Roads (Management) - Travel Plan - BNG Monitoring
Date:	14 October 2025
Earliest date for decision:	9 June 2025

Recommendation agreed by: (Authorised Officer)	Connor Corrigan 
Date:	14 October 2025

PLANNING CONSTRAINTS/STATUS

- Major Development Location
- Shinfield Park, Nore's Hill Local Wildlife Site Consultation Zone
- Footpath 10 crosses through the site towards the northern car park
- Close to Reading Borough Boundary
- Affordable Housing Thresholds
- Bat Roost Habitat Suitability
- Scale and Location of Development Proposals
- Great Crested Newt Consultation Zone
- Ground Water Zones
- Nuclear Consultation Zone – Outer Zone
- Minerals Safeguarding Area to the north of the site
- Landscape Character Assessment Area
- Thames Basin Heaths SPA Mitigation Zones
- Parts of the site are subject to surface water implications
- Ordinary Watercourses Consultation Zone