

3 March 2023

West Berkshire District Council  
Planning Policy Team  
Council Offices  
Market Street  
Newbury  
RG14 5LD

Dear Sir/Madam,

## **West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation**

We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.

In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.

### **Background to Green Park**

Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.

Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.

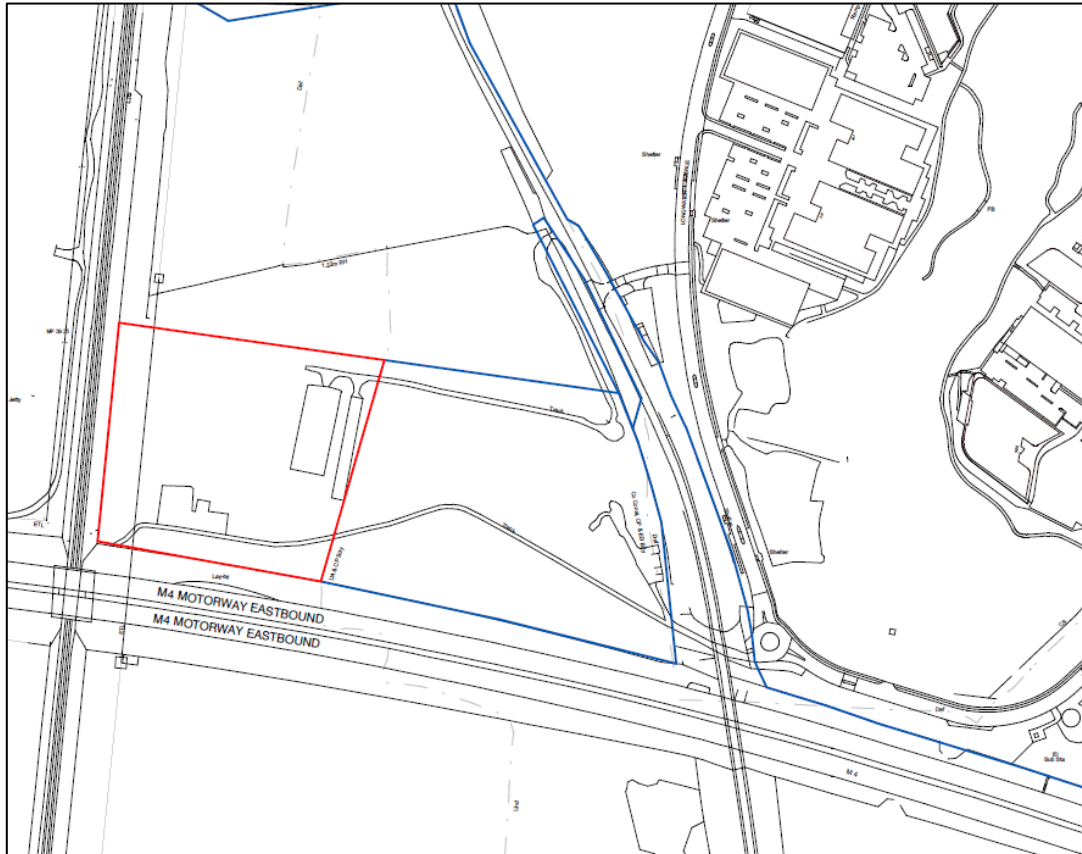
Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.

The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more about our global network of member firms. Real Estate Services regulated by RICS.

respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).



*Figure 1 - The Site (the red line shows the land under GPR's ownership within the boundary of West Berkshire Council. The blue line shows the wider extent GPR's ownership (Source: Scott Brownrigg)*

## Previous Response to Regulation 18 Draft Local Plan

On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:

- Requested that Green Park was included as a Designated Employment Area;
- Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park;
- Requested support for Data Centres; and,
- Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ).

## Local Plan Regulation 19 Response

### Policy SP21: Sites Allocated for Employment Land

Policy SP21 identifies three sites that are well established employment areas and sets out that their importance to the local economy will be recognised by classifying them as Designated Employment Areas.

The majority of Green Park falls within the administrative boundary of Reading Borough Council and is designated as a Core Employment Area in the adopted Reading Borough Council Local Plan. As a result, GPR consider it appropriate for the area identified above, the Site, to be classified as a Designated Employment Area to reflect its existing approved office uses. GPR reiterates its request that Policy SP21 be amended to include Green Park and for the Site to be allocated as a Designated Employment Area.

In accordance with Paragraph 24 of the National Planning Policy Framework, which sets out the need for Local Planning Authorities to cooperate with each other on strategic matters crossing administrative boundaries, GPR considers that classifying the Site as a Designated Employment Area would provide continuity to the existing Core Employment Area which falls within the boundary of Reading Borough Council.

The Employment Land Review (ELR) which supports the LPR identifies that a minimum of 50,816 sqm of office floor space will be required over the plan period. Classifying the Site as a Designated Employment Area will support cases where suitable office and business uses come forward for this area of Green Park and will help provide a future pipeline of employment land to meet longer term demand. This will allow for the sustainable growth of office and business space at an existing and well-established employment location. In particular, the imminent opening of Green Park Railway Station makes it a very sustainable location for a Designated Employment Area.

### Policy SP20: Strategic Approach to Employment Land

Policy SP20 states that new office development outside of town or district centres and the defined Designated Employment Areas will be required to address the sequential test. GPR would like to reiterate that this creates a potential barrier to the long-term investment and sustainable growth of Green Park should it not be defined as Designated Employment Area.

The Policy also states that development proposing a loss of business development outside of a Designated Employment Area will be required to justify the loss of floorspace with marketing evidence. GPR emphasises that flexibility is needed to provide sustainable business development that will allow proven employment sites to meet the demands of the market. GPR requests that a point is added to the policy to state that subsidiary uses to existing or new business development would not face the same sequential test even if they fall outside a Designated Employment Area.

In considering the aims of the proposed policy, and as proposed previously, GPR requests that Green Park is classified as a Designated Employment Area. It is also important that the LPR does not restrict business development coming forward in suitable locations outside of Designated Employment Areas as currently defined, which as currently drafted would include Green Park. The Park's clear success to date as a proven business park shows that business-related development in this area would be entirely appropriate and should therefore be encouraged.

GPR previously requested that Policy SP20 be updated so that a further sentence is added to prioritise office development *“in a suitable location adjacent to existing and established office or business locations.”* GPR therefore supports the updated LPR’s inclusion of *“support for redevelopment and regeneration of existing employment sites for business uses”* and requests that this addition and its overarching principle is maintained in the next draft of the LPR.

GPR considers that it is important that the LPR recognises the benefits of providing supporting subsidiary uses such as small-scale retail or hotel to business development locations. These can support the continued economic function of existing and future employment areas, allow the most efficient use of land, and support travel which is less reliant on unsustainable modes. As seen in the previous representations issued in response to the Regulation 18 consultation, GPR again requests that a supporting note is added to Policy SP20 to confirm that supporting subsidiary uses such as small-scale retail or hotel use are appropriate for new office development. The success of existing supporting uses at Green Park, such as the creche facility, demonstrate how subsidiary uses can support its position as a premier office location.

GPR previously requested that Data Centres be included as an appropriate business development. These facilities are increasingly vital in supporting the needs of companies working at the forefront of digital innovation and can respond well to otherwise constrained locations. Green Park would be a suitable location for Data Centres support the existing and future businesses in Reading and the wider Thames Valley. Whilst Data Centres have been listed as a business use in relation to the requirement for BREEAM assessments in supporting text of Policy DM4, GPR continues to request that Policy SP20 is also updated to include Data Centres as an appropriate business use.

#### Policy SP4: Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield

Policy SP4 identifies Green Park within the Burghfield Atomic Weapons DEPZ. It is stated that residential development within this zone is likely to be refused planning permission, especially if the Office for Nuclear Regulation (ONR) objects to the development. It also identifies that any new development in the DEPZ that could lead to an increase in non-residential populations will be considered in consultation with the ONR. GPR notes the updated maps to take account of the revised consultation zones as of March 2020. The Site is also now located in the 12km consultation zone for the AWE Aldermaston which requires consultation for major hazard facilities and military uses.

GPR recognises the need to consult the ONR for non-residential planning applications within the DEPZ. However, subject to appropriate emergency planning, it is not anticipated that non-residential development would have a significant impact on the off-site emergency plan for AWE Burghfield. Furthermore, it is considered that employment uses identified in either extant planning consents or established business park locations should also still be recognised as appropriate for further development of the same use. GPR therefore reiterates its request that clarification is added to Policy SP4 that although the ONR will be consulted, it is unlikely this will restrict non-residential development in the DEPZ subject to appropriate consideration of emergency planning.

GPR notes that the ONR consultation zones will be reviewed every three years. In discussions with West Berkshire previously, it has been noted that there would be the publication of guidance for developers to refer to in relation to the consultation process and timescales with regard to applications impacted by the AWE facilities and related DEPZs. GPR requests an update on this guidance and that its principles are included within the Local Plan.

## Policy DM42: Transport Infrastructure

Policy DM42 identifies the types of transport infrastructure that new development will be expected to make a contribution towards. As covered in GPR's previous representations, GPR wishes to reemphasise the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park. This is vital to supporting West Berkshire and the wider Thames Valley area as it continues to grow as an important employment location. GPR continues to request that an additional bullet point is included in Policy DM42 as follows: *"Improvements to the M4 motorway and strategic road network in the Thames Valley"*.

Policy DM42 also states that travel activity will be expected to be minimised by the design of developments to support low levels of travel and be reached by local journeys. GPR is supportive of this part of the policy's aspirations but would like to highlight that the reach of employment parks can extend to further authorities and that their locations are often in order to attract tenants wishing to attract high quality employers and employees. Therefore, requiring a sole focus on local journeys could prevent the sustainable growth of employment sites.

## Policy DM6: Water Quality

Policy DM6 requires proposals for built development to be *"at least 10 metres away from the top of the bank of the nearest watercourse or main river, providing or retaining a natural/semi-natural habitat buffer"*. GPR recognises the importance of protecting the quality and biodiversity of watercourses. However, a blanket buffer zone of 10 metres is restrictive to sustainable development and does not allow flexibility to promote high quality development that can enhance the biodiversity and quality of watercourses. GPR notes that in the supporting text there is a reference to the Strategic Flood Risk Assessment (2021) which states that no development should be within 10 metres from the top of a main river, but then recommends that this is applied to all watercourses.

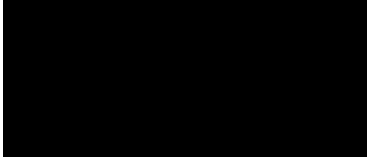
The majority of the built plots in Green Park are located close to Foudry Brook, with some, including 100 Longwater Avenue, close to this 10 metre distance. These have successfully mitigated any risk of flooding and have been found acceptable in planning terms. GPR therefore recommends that given the recognition that the requirement mostly applies to main rivers, additional flexibility is incorporated for smaller water bodies, especially where it can be demonstrated that flood risk can be adequately mitigated.

## **Summary**

In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.

We look forward to receiving confirmation of receipt of these representations and request to be kept informed on progress of the next stage of the plan process. Should you wish to discuss any of the matters above, please do not hesitate to contact [REDACTED]

Yours faithfully,



Deloitte LLP