

COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 7th October 2020

Ward: Abbey

App No.: 191792/FUL

Address: 71-73 Caversham Road, Reading, RG1 8JA

Proposal: Demolition of former retail warehouse and erection of a mixed-use building comprising 44 residential units consisting of x5 affordable units, 194 sqm of retail floorspace (Use Class A1) at ground floor and associated car parking, cycle parking and landscaping.

Applicant: S2 Caversham Ltd

Extension of time date: 9th October 2020

RECOMMENDATION:

Delegate to the Head of Planning, Development and Regulatory Services (HPDRS) to:

- i) **GRANT** full planning permission, subject to the satisfactory completion of the Section 106 agreement and it being delegated to Officers to satisfactory calculate the sustainability (carbon off-setting) contribution;

The S106 to include the following heads of terms:

- Secure the agreed level of on-site affordable housing (5 units shared ownership) and an off-site commuted sum of £500,000 towards the provision of affordable housing elsewhere in the borough;
- £92,400 Open Space contribution to improve and extend facilities within the Thames Parks;
- Ensure land fronting onto Caversham Road is offered for adoption to provide a shared pedestrian/cycle facility;
- Secure resident access to a car club on site or demonstrate that occupants of the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator;
- Offset the remaining tonnes of CO2 not being captured by the redevelopment as per the Council's Sustainable Design and Construction SPD (2019), estimated to be £3,510 (To be finalised).
- Secure an agreement under Section 278 of the Highways Act 1980, for proposed works affecting the existing highway as shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.
- Secure a construction phases Employment Skills and Training Plan or equivalent financial contribution. As calculated in the Council's Employment Skills and Training SPD (2013).

All contributions payable on first commencement of the development and index-linked from the date of permission.

Or;

- i) Refuse full planning permission if the S106 agreement is not completed and sustainability matters resolved by 9th October 2020 (unless officers on behalf of

the Head of Planning, Development and Regulatory Services Officers agree to a later date for completion of the legal agreement)

Conditions:

1. TIME LIMIT (STANDARD)
2. APPROVED PLANS
3. DWELLING MIX (RESTRICTION)
4. MATERIALS (TO BE APPROVED)
5. SAP ASSESSMENT MAJOR - DESIGN STAGE (TO BE APPROVED)
6. SAP ASSESSMENT MAJOR - AS BUILT (TO BE APPROVED)
7. BREEAM NON-RESI - INTERIM (TO BE APPROVED)
8. BREEAM NON-RESI - POST CONSTRUCTION (TO BE APPROVED)
9. DETAILS OF PHOTOVOLTAIC ARRAY(S) (TO BE APPROVED)
10. SUSTAINABLE DRAINAGE (TO BE APPROVED)
11. FLOOD PROTECTION MEASURES (AS SPECIFIED)
12. LANDSCAPING LARGE SCALE (TO BE APPROVED)
13. HABITAT ENHANCEMENT SCHEME (TO BE APPROVED)
14. NOISE MITIGATION SCHEME (AS SPECIFIED)
15. HOURS OF DELIVERIES/WASTE COLLECTION
16. HOURS OF OPENING/OPERATION
17. MECHANICAL PLANT (NOISE ASSESSMENT REQUIRED)
18. CONTAMINATED LAND ASSESSMENT (TO BE SUBMITTED)
19. REMEDIATION SCHEME (TO BE SUBMITTED)
20. REMEDIATION SCHEME (IMPLEMENT AND VERIFICATION)
21. UNIDENTIFIED CONTAMINATION
22. HOURS OF CONSTRUCTION/DEMOLITION
23. CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)
24. NO BONFIRES
25. CONSTRUCTION DUST CONTROL MEASURES
26. REFUSE AND RECYCLING (AS SPECIFIED)
27. VEHICLE PARKING (AS SPECIFIED)
28. VEHICULAR ACCESS (AS SPECIFIED)
29. CYCLE PARKING (AS SPECIFIED)
30. ACCESS CLOSURE WITH REINSTATEMENT
31. PARKING PERMITS 1
32. PARKING PERMITS 2
33. EV CHARGING POINTS
34. ADAPTABLE UNITS
35. COMMERCIAL USE RESTRICTION
36. EXTERNAL LIGHTING

Informatives

1. Positive and Proactive Working - approval
2. Pre-commencement conditions
3. Highways
4. S106 and S278
5. Terms
6. Building Control
7. Complaints about construction
8. Encroachment
9. Contamination
10. Noise between residential properties - sound insulation of any building
11. Community Infrastructure Levy (CIL)

- | | |
|-----|---|
| 12. | Bats & works to roofs |
| 13. | Parking Permits |
| 14. | Do not damage the verge |
| 15. | Ongoing information conditions |
| 16. | Access construction |
| 17. | Canopies and structures overhanging the highway |

1. INTRODUCTION

- 1.1 The site for which this application relates is 0.16 hectares located immediately to the northwest of the town centre and the railway station. It occupies a prominent corner plot fronting the north/south Caversham Road, part of the town's Inner Distribution Road (IDR). Its north side elevation runs alongside the much quieter east/west Northfield Road. The site is directly opposite the west of the former Royal Mail sorting office site and Vastern Road Retail Park. To the north across Northfield Road is the large red and white Shurgard Self Storage building. To the immediate south is a large low-profile commercial building occupied by PureGym Reading and Dawsons Music and Sound with an expanse of parking to the rear.
- 1.2 Members will be aware of the current major outline application for the redevelopment of the former Royal Mail Group site opposite the IDR at 80 Caversham Road. This neighbouring application involves the demolition of all existing buildings and structures and redevelopment to provide a range of commercial and residential uses, along with associated car parking and public and private open space (182252/OUT). This application includes buildings up to 8-storey in height fronting Caversham Road opposite the site, and importantly follows the previous approval 11/00276/OUT for a similar development in 2012. This live application and former approval seek to fulfil part of the requirement of strategic site allocation CR11e, North of Station, as set out in the Local Plan. In addition, to the northwest and directly next to 80 Caversham Road, is the Vastern Road Retail Park, which also has a live outline planning application. Both these applications are material planning considerations and if implemented, 80 Caversham Road in particular, would have a profound effect on the immediate surroundings of 71-73 Caversham Road itself and the wider area north of the station.
- 1.3 Whilst this stretch of Caversham Road is currently composed of a mix of largely modern and uninspiring commercial buildings to both sides, further west along Northfield Road the character is distinctly more domestic, made up of more traditional Victorian terraces (See Figure 1 Site location Plan below).

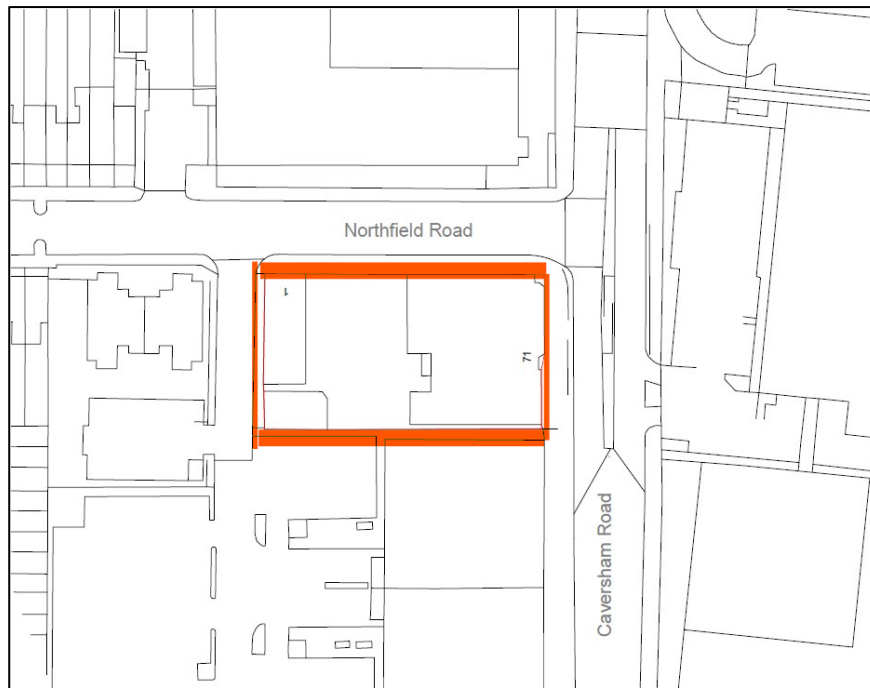


Figure 1 - Site location Plan

- 1.4 The application site is occupied by a two-storey retail warehouse known as 71-73 Caversham Road. To the rear is an area of hardstanding used as a service yard and parking, along with two attached 2.5 storey office buildings to the westernmost boundary (See Figure 2 & 3 below). 71-73 Caversham Road was in use as a hardware/ironmonger's store for 87 years until its closure in December 2018. It is formed of two parallel, linked rectangular buildings with pitched roofs fronting onto Caversham Road. This building has undergone various changes over its lifetime, consisting of extension, alterations, modern replacement windows and doors on the ground floor, whilst several openings have been boarded or bricked up, or covered with metal roller shutters. The smaller buildings to the rear are known as The Brewery and The Malthouse and like 71-73 Caversham Road were both historically former brewery buildings. Both have been in office use since at least the mid-2000s. Beyond these buildings is an access/parking area and a modern three-storey block of flats known as Monmouth Court (See Figure 3 below).



Figure 2 - Aerial view west (Google maps 2020)



Figure 3 - Aerial view south (Google maps 2020)

- 1.5 The parking and service yard between both the main building and the two office buildings is accessed off Northfield Road and currently enclosed by 2.4m high metal gates. The front elevation of the main building has been extended to create a corrugated metal window enclosure which partially obscures the original ground floor elevation at street level. The former customer entrance to the main building is opposite a staggered pedestrian crossing on the IDR (See Figure 4 below).



Figure 4 - Looking west across the IDR (Google Street View 2020)

- 1.6 The buildings on site are not Listed nor are they located within a Conservation Area. However, as a group of buildings they were recently included within Reading Borough Council's List of Locally Important Buildings and Structures in recognition of their local heritage significance. They are therefore defined as Non-Designated Heritage Assets for the purposes of national planning policy, local planning policy and all related guidance.
- 1.7 Prior to the submission of this planning application, the applicant undertook extensive pre-application engagement with officers, was considered by the Design Review Panel and benefitted from public consultation at pre-app and live application stage.

2. PROPOSAL

- 2.1 The application seeks permission for the redevelopment of the eastern portion of the site to provide a total of 44 residential units and 194sqm of flexible commercial space at ground floor. It has been agreed that 5 of these units will be more affordable, shared ownership units. The development will take the form of a new stepped 7 storey building fronting onto Caversham Road. The existing office buildings to the rear (The Brewery and Malthouse) will be retained. The proposal would result in the complete removal of 71-73 Caversham Road fronting the site. A total of 15 car parking spaces will serve both future residents and the existing/proposed commercial uses on site. 8 Spaces would remain available for the existing office uses within The Brewery and The Malthouse to the rear.



Fig 5 - CGI visual of proposal looking southwest

- 2.2 In addition, the proposal will provide 22 two-tier secure bicycle racks (44 cycle spaces in total), 5 Sheffield stands (10 spaces) located externally for visitors and customers but a covered area within the car park, which provide an additional 10 cycle parking spaces for visitors and other users. The development will include individual balconies, terraces, winter gardens and two podium communal roof terraces for residents. To the front elevation onto the IDR the proposal will create a pedestrian colonnade with access to the new flexible ground floor retail unit (see Figure 6 below)



Fig. 6 - Colonnade looking northwest across Caversham Road

- 2.3 Members are advised that the affordable housing offer was formally revised in late August 2020, resulting in the item's deferral from the last Planning Applications Committee. The previously agreed off-site Affordable housing contribution (the equivalent of 15% total provision) was revised upwards to enable a provision to be secured on-site in the form of 5 on-site shared ownership apartments alongside an enhanced off-site financial contribution equivalent to 34%. This is covered in detail later in the appraisal (para 6.1.22

2.4 Submitted Plans and Documentation:

Original proposed plans submitted with application on Nov 2019:

Site Location Plan - 01662_MP01
Proposed Masterplan - 01662_MP02
Proposed Ground Floor Plan - 01662_P01
Proposed Ground First Floor Plan - 01662_P02
Proposed Second Floor Plan - 01662_P03
Proposed Third Floor Plan - 01662_P04
Proposed Fourth Floor Plan - 01662_P05
Proposed Fifth Floor Plan - 01662_P06
Proposed Sixth Floor Plan - 01662_P07
Proposed Roof Plan - 01662_P08
Proposed South and West Elevations - 01662_E01
Proposed East and North Elevations - 01662_E02
Proposed Soft Landscaping Plans - 01662_P10
Height and scale - 01662_SK01
Proposed Sections 1 & 2- 01662_SS03
Proposed Sections 3 & 4- 01662_SS04

2.5 Revised proposed plans received on 3 April 2020:

Site Location Plan - 01662_MP01
Proposed Masterplan - 01662_MP02
Proposed Ground Floor Plan - 01662_P01 Rev P2
Proposed Ground First Floor Plan - 01662_P02 Rev P2
Proposed Second Floor Plan - 01662_P03 Rev P2
Proposed Third Floor Plan - 01662_P04 Rev P2
Proposed Fourth Floor Plan - 01662_P05 Rev P2
Proposed Fifth Floor Plan - 01662_P06 Rev P2
Proposed Sixth Floor Plan - 01662_P07 Rev P2
Proposed Roof Plan - 01662_P08 Rev P2
Proposed South and West Elevations - 01662_E01
Proposed East and North Elevations - 01662_E02 Rev P2
Proposed Soft Landscaping Plans - 01662_P10 Rev P1
Height and scale - 01662_SK01
Proposed Sections 1 & 2- 01662_SS03
Proposed Sections 3 & 4- 01662_SS04

2.6 Revised plans received on 21st August 2020:

GF Plan - Green Wall Location - 01662_JTP_SK19

3. PLANNING HISTORY

7437 Full Planning Permission - STORE FOR CELLULOSE
GRANTED 25 March 1960

13987 Planning Permission - Lean to extension.
GRANTED 09 September 1966

77/01066/00 Planning Permission - NEW SHOPFRONT CENTRAL INFILL LINK
REPLACING EXISTING BUILDING FOR RETAIL & STORAGE.
GRANTED 06 January 1978

95/00345/FD Planning Permission - TO FIT ROLLER SHUTTERS TO FRONT
WINDOWS ON OUTSIDE
REFUSED 15 June 1995

97/00509/AD Advert - FREE STANDING ADVERTISEMENT PANEL SIGN
REFUSED 08 September 1997

4. CONSULTATIONS

4.1 Transport

Full comments received on 30th July 2020 reproduced as follows:

"The Council has received AMENDED PLANS for the above application. The amendments include:

- Enhanced landscaping - Incorporating architectural planters to the parapet edges of the communal terraces, additional tree planting within the car park, additional planting and removal of brick edges to the parking spaces along the western boundary and the incorporation of planters to the window-facing elements of the winter gardens on the eastern facade.*
- A reduction in car parking by 1 space*
- A reduction in retail area from 239m² to 194m² (GIA)*
- A small reduction in residential lobby space at ground floor • Additional CGIs showing the proposed scheme.*

This application is for the demolition of 71-73 Caversham Road, and the delivery of a residential development. The site was formerly occupied by Drews Ironmongers.

The proposed scheme consists of 44no. residential units and a reduced provision of 194m² retail floorspace at ground floor retaining an active frontage to the main road. At upper levels it is proposed to deliver 44no. residential units consisting of 17no. 1-Bedrooms, 24no. 2-bedroom and 3no. 3-bedroom units. It is proposed to retain the existing office buildings on site, within The Brewery and The Malthouse at the rear of the site.

Site and surroundings

The site is located to the corner of A329 Caversham Road and Northfield Road. The pedestrian network surrounding the site has adequate footway and street lighting provision. There is pelican crossing on Caversham Road immediately south of Northfield Road.

The improvements to Reading railway station that were completed in 2014 have enhanced connectivity between the area north of the station and Reading town centre, through the provision of a new underpass. As part

of the Reading railway station northern entrance completion, a signalised pedestrian crossing has been provided across Trooper Potts Way and across the A329 east of the junction, with dropped kerbs and tactile paving. This provides a pedestrian/cycle link to Christchurch Bridge.

The completed Christchurch Bridge across the River Thames is appropriate for cyclists and forms part of the North Reading designated cycle route, enabling a shorter journey time to reach Caversham and other northern suburbs of Reading. It links to National Cycle Network Route 5.

The signalized pedestrian crossing located on Caversham Road adjacent to the site south of Northfield Road, is due to be upgraded to accommodate cyclists as part of a recent application (182252) at 80 Caversham Road. This application is still to be determined but improved access to the north and west for cyclists is a key component to an acceptable development.

In view of these improvements to the Caversham Road crossing, new dedicated cycle facilities are required to fit together existing parts of the cycle network to make it a comprehensive network that allows residents of Reading to utilize cycling as an alternative mode of travel. This is also an important aspect for this development given that the residents will be reliant on alternative modes.

The applicant has submitted a scheme to provide an on-carriageway dedicated cycle link along Northfield Road between the Caversham Road crossing and Swansea Road to the west. This will provide connectivity to the northern entrance of the station connecting access to the town centre to the south and Christchurch Meadows to the north as well providing access to schools, leisure and employment in west Reading (see drawing titled Cycle Route Improvement MBSK200205-01 Rev P3).

In order to facilitate this, land fronting onto Caversham Road adjacent to the pedestrian crossing would need to be offered for adoption to provide a shared pedestrian/cycle facility. The applicant is requested to submit a plan clearly showing the land for adoption to be secured within the S106 agreement.

Access and Parking

Vehicle access to the site is currently provided via Northfield Road. Caversham Road and the surrounding road network all have extensive parking restrictions preventing on-street parking.

The development proposes to consolidate the existing vehicular accesses to the site into a single dropped kerb access. This will provide access to the parking spaces for the development. Any existing disused accesses onto Northfield Road should be stopped up and the footway reinstated to line and level.

It is stated that the proposed reduction in retail floor space will mean less demand for deliveries to the site. To maximise land use on the site, it is proposed that servicing and deliveries will take place from Northfield Road. To allow for this, a new loading bay is proposed along the site frontage, which will require a rearrangement of the on-street parking bays. This process involves changes to the Traffic Regulation Order (TRO)

which will require approval by the Traffic Management Sub Committee (TSUB) and will be subject to statutory consultation. Given TRO's are under separate legislation to the Planning Act there is a possibility they may not be approved. However, any costs associated with the changes to the TRO and on-street signage and markings would have to be paid upfront by the applicant before commencement on site.

The site is located within the Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per unit and 1 space per 10 units for visitor parking. In terms of the commercial uses, the existing office buildings would require 1 space per 100m² (4 spaces) and A1 non-food retail use would require 1 space per 50m² (7 spaces).

There are 24 parking spaces within the gated car park. The Design and Access statement indicates that 15 spaces including 2 accessible parking will be provided for the residential element of the development (a ratio of 0.36 spaces per home); and 8 spaces including 1 accessible parking spaces are provided for the existing offices.

It is noted that the proposed parking provision is below the Council's requirements. However, given the site's close proximity to the centre of Reading, and its easy access to public transport connections and the facilities within the town centre, a lower parking provision can be considered. The surrounding road network all have parking restrictions preventing on-street parking, therefore, a reduction in the parking provision will not lead to on street parking being detrimental to road safety.

The Council's adopted Parking Standards and Design SPD states that developments of more than 10 residential units in the town centre should provide or support a car club on the site, or demonstrate that the development will have access to and the use of a car club on a nearby site. The Transport Statement does not provide any detail regarding the provision or access to a car club. Given that the development has a reduced parking provision, car clubs allow members access to cars and reduce the need to own a car themselves. Therefore, the applicant is requested to address this.

The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. Policy TR5 of the Local Plan also states that "Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point." In view of this, the development must provide at least 3no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. The Transport Statement states that the development proposals include the provision of 3no electric vehicle charging points.

The applicant should be made aware that the appropriate condition and informatives would be applied preventing future occupants applying for resident and visitor permits for the surrounding residential streets where parking is under considerable pressure. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

Cycle parking should be provided as per Reading Borough Council, Revised Parking Standards and Design SPD 31st October 2011. All the cycle parking will be secure and accessible via pin pad-controlled entry points. Additional provision of 5 Sheffield stands located in an external but covered area within the car park, which provide an additional 10 cycle parking spaces for visitors and other users.

The bin store is conveniently located on the ground floor of the site which will provide easy access for refuse collection from Northfield Road. The residential element will generate a requirement for up to 5 4-wheeled recycling bins and 5 4-wheeled general waste bins on a weekly collection. In principle, the layout is acceptable but the Council's Waste development should be consulted to determine whether a weekly collection is feasible.

A Construction Method Statement will be required given the significant remodelling of the site proposed within this application. The proposed work should be in accordance with the Borough's Guidance Notes for Activities on the Public Highway.

Conditions

*C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)
DC1 VEHICLE PARKING (AS SPECIFIED)
DC3 VEHICULAR ACCESS (AS SPECIFIED)
DC5 CYCLE PARKING (AS SPECIFIED)
DC10 ACCESS CLOSURE WITH REINSTATEMENT
DC20 PARKING PERMITS 1
DC21 PARKING PERMITS 2
DC24 EV CHARGING POINTS*

Informatives

*IF3 Highways
IF4 S106
I13 Parking Permits*

S106 Requirements

An agreement under Section 278 of the Highways Act, 1980, will be required with respect to proposed works affecting the existing highway. The Highway works are shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3. "

4.2 Environmental Protection

Full comments received on 3rd December 2019. These have been summarised as follows:

Noise impact on development

The noise assessment submitted shows that the recommended standard for internal noise can be met, if the recommendations from the assessment are incorporated into the design. It is recommended that a condition be attached to consent to ensure that the glazing (and ventilation) recommendations of the noise assessment (and air quality assessment, where relevant) will be followed, or that alternative but equally or more effective glazing and ventilation will be used.

Noise generating development

The noise assessment confirms that sufficient insulation will be incorporated to achieve Building Regulations' standards between the dwellings and also between the commercial use and the dwellings above - assuming a retail use on ground floor.

The noise assessment has included proposed noise limits for the mechanical plant but no full assessment to demonstrate compliance as the plant detail is not yet available. It is therefore recommended Noise Assessment required via condition.

Air Quality - Increased exposure

The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors.

The air quality assessment concludes that the levels of pollutants at the proposed development are not predicted to exceed the limit values therefore mitigation measures are not required.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM_{2.5} and PM₁₀).

The air quality assessment concludes that there will not be an impact on air quality as a result of the development therefore a mitigation scheme is not required.

Contaminated Land

The contaminated land desk study concludes that further investigation is required in the form of a phase II site investigation due to the potential presence of contaminants and exposure pathways, therefore conditions are required to ensure that future occupants are not put at undue risk from contamination.

Light - Security lighting

There is concern about any proposed lighting resulting in loss of amenity to nearby residents. The applicants should be made aware that lighting should be angled appropriately and of an appropriate brightness to ensure that lights are not shining onto neighbouring properties and the area is not

over-lit as this has the potential to result in nuisance or loss of amenity. An informative is therefore recommended.

Construction and Demolition

Recommended conditions to control construction management as with any site of this nature.

Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. This can be secured via refuse storage conditions.

4.3 RBC Heritage Consultant

Comments received on 3rd June 2020. These are reproduced as follows:

Brewery Building

The existing brewery building (71-73 Caversham Road) is in origin a Malthouse building which formed part of Reading's important brewing industry. Located close to the GWR railway goods yard for access to markets it dates from at least 1879 as it is shown on the First Edition OS mapping as 'Malthouses'.

The building proposed for demolition is a two storey malthouse building on a corner plot, which appears to be largely intact although the roof has probably been replaced in corrugated iron. Built of good quality brick with burnt headers in Flemish garden Wall bond, with buff brick detailing over segmental windows and doors. It appears to have 'ghost' sign-lettering at first floor level on Northfield Road.

Proposals

Proposals consist of demolition of the existing Maltings building which is one of RBC's Locally Listed buildings. The proposed replacement building would be a 7-storey building which includes an enlarged ground floor storey which adds to the overall height of the building. The proposed replacement brick building would be a residential-led, mixed-use development.

Discussion

The Brewery building is considered to be an undesignated heritage asset which is defined as:

"Non-designated heritage assets are 'buildings, monuments, sites, places, areas or landscapes identified by local planning authorities as having a degree of significance meriting consideration in planning decisions but which are not formally designated"

(Historic England, Local Heritage Listing Historic England Advice Note 7, p.2).

As noted by Historic England:

In some areas, local planning authorities have created a 'local list' of 'non-designated heritage assets' as suggested in the Government's Planning Practice Guidance (paragraph 39) (Historic England . Local Heritage Listing Historic England Advice Note 7, p.2).

In addition:

Local heritage listing is a means for a community and a local planning authority to identify heritage assets that are valued as distinctive elements of the local historic environment Historic England (Local Heritage Listing Historic England Advice Note 7, p.3).

The building has been Locally Listed due to its age, architectural quality, landmark presence in the streetscene and relationship to one of Reading's historic industries, following advice from Ms. Amber Patrick. Based on Ms. Patrick's research and expertise in maltings buildings, the buildings were Locally Listed, giving it added weight in the planning process. Ms. Patrick is an acknowledged expert on Maltings and the author of English Heritage's Strategy for Historic Industrial Environment Report No.1 : Maltings In England (Patrick, 2004).

Amongst other elements, the building has the following importance which contributes to its architectural and historic value:

- *Historical Association*
The building was built in 1870 by Dowson associated with him until he died in 1900 and association of 30 years. This is considered a direct and prolonged association by any measure. Dowson was prominent locally as a businessman and active in Liberal politics locally.
- *Industrial Importance*
The building was built as an industrial malt-house and its external features of the buildings are mainly unchanged since construction with alterations to the buildings mainly to the internal structure. The buildings construction marked the start of a period of development of the building of the roads and houses which fanned out to the west and north of 71 - 73 Caversham Road and the final period of brewing in the town, one of Reading's principal industries.

The structure clearly relates to its industrial use with the ground floor windows of the 'malthouse' probably 'blind windows' with bins behind for barley storage and with any germination floor separated from these bins. The kiln was in the part of the building on Northfield Road that was demolished and the flat bottomed steep and an adjacent couch frame would have been located at the opposite end of the building. Such features would have been required to conform to the Malt Tax regulations (repealed 1880).
- *Architectural Importance*
The building is representative of a style that is characteristic of Reading. As a maltings building with decorative brickwork, it represents a once widespread Reading style. The buildings also have group value as a survival of whole maltings.

The effect on an undesignated heritage asset should be considered in accordance with paragraph 197 of the NPPF. Substantial harm is a high bar but in this case, the demolition of the non-designate heritage asset, the

proposals would result in 'substantial harm' to the undesignated heritage asset, within the terms of the NPPF. Paragraph 197 of the NPPF which states that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The building, especially along Northfield Road, retains its original character as a maltings building, but has lost part of its setting due to the construction of a group of characterless and soulless modern developments around it. The presence of the building in the streetscene represents a remnant of one of Reading's most important former industries: brewing. The last physical remains of 'industrial Reading' are increasingly being lost, adding to its importance locally.

The proposed replacement 7-storey building would also be out-of-scale with the surrounding buildings and the predominant heights. The townscape to the north of the Railway Station averages 2-3 storeys at most. The replacement building would therefore be harmful to not only the non-designated heritage asset but also to Reading's townscape, due to its uncharacteristic height and incongruity.

Conclusions

As stated in paragraph 197 of the NPPF, the effect of a development on the significance of a non-designated heritage asset should be taken into account in determining the application, based on the scale of the effect on the heritage asset and its significance. The substantial harm to this Locally Listed Building must be taken into consideration in the planning balance and in relation to Reading Borough Policies, in particular, EN1.

4.4 RBC Ecology

Comments received on 12th December 2019 and 30th April 2020. These have been summarised as follows:

The bat survey report (Amphibian, Reptile & Mammal Conservation Limited Species protection and habitat conservation specialists) have been undertaken to an appropriate standard and concludes that the building is unlikely to host roosting bats. As such, since the proposals are unlikely to affect bats or other protected species, there are no objections to this application on ecological grounds.

The proposals however only include very limited soft landscaping and very few trees and it would be preferable if a greater quantity of trees and planting were to be provided. You therefore set a condition to ensure that a detailed landscaping scheme is submitted (and implemented) and should use standard condition L2.

In accordance with paragraph 175 of the NPPF, which states that "opportunities to incorporate biodiversity in and around developments should be encouraged" a condition should be set to ensure that enhancements for wildlife, in particular swifts, are provided within the new development. It is

recommended that a slightly adjusted condition L10 is attached to any consent.

4.5 Natural Environment Team (Landscape)

Final comments received on 19th August 2020:

The site is located on a 'treed corridor', is within a 10% or less canopy cover area (both defined in our 2010 Tree Strategy), is within a low canopy cover Ward (as defined in our 2020 Tree Strategy) and within the AQMA hence sufficient greening of the site is vital.

I note the inclusion of some trees at ground level (Northfield Road only) and the roof terraces/podiums which are positive, but, given the location and height of the roof terraces in relation to the height of the eastern elevation, none of this soft landscaping will benefit Caversham Road as it will not be visible. Caversham Road fronts a main road and a 'treed corridor' where pollutions levels are high (ref policy EN15), therefore the greening of this element by the later inclusion of a green wall at ground to first floor level on the Caversham Road and Northfield Road elevations is positive.

However, I don't think that, given the Council's climate emergency declaration, the proposals are ambitious enough. In addition to the reasons given above, any proposal should respond to this climate emergency declaration and to relevant Local Plan Policies, along with the Sustainable Design and Construction SPD, in maximising green wall provision to meet the requirements of those policies. Further provision would also provide additional biodiversity value, which I note that GS Ecology felt was lacking initially, hence would better meet requirements of the forthcoming 2020 BAP.

I do appreciate that there are many factors that need to be weighed up by both the developer, in making the proposal financially feasible, and by the LPA in balancing competing factors. As such, I understand that the landscaping proposed may be considered as acceptable in that balance.

I note that the DAS states that trees have been included to 'enhance boundaries', however, the only boundary trees are on either side of the entrance in Northfield Road which provides little amenity benefit to the IDR; the visuals indicating small trees and the species mentioned not including any large canopy species.

The DAS mentions use of Cherries, Birch & Parrotia. It should be noted that as a result of work on our revised Tree Strategy, we have undertaken an exercise to determine which genus/species are over-represented in the Borough (on RBC land). Cherries are second on the list (second to Lime) so should be avoided. Our forthcoming revised Tree Strategy and BAP will have an expectation for tree planting to be all wildlife friendly unless heritage, for example, demands exotic species. Any Birches proposed should be native and the Parrotia (chosen only for its appearance) should be replaced with a wildlife friendly species.

A number of layout plans and & Proposed soft landscape plan (indicative) were received on 6/2/20, CGIs received on 9/3/20 and the additional visuals received on 11/3/20, which I assume you will be referring to in the

approved plans list. However, as advised, the Soft Landscape Plan P10 Rev P1 (which is indicative) does not appear to show the proposed green wall at ground level, therefore an amended plan is required so it is consistent with the visuals.

I am not clear at the time of writing whether the application will go to PAC with a recommendation to approve or refuse. If it is to refuse, I assume that no tree/landscape reasons for refusal will be included if you consider there is sufficient greening 'on balance'. If the application is to be approved, please include the following condition, which I have amended to make it appropriate for this site:

- *Landscaping large scale (to be approved)*
- *Habitat enhancement scheme, to include a minimum of 6 swift bricks built into the new building (to be approved).*

Officer comments: A ground floor plan '01662_JTP_SK19 - GF Plan - Green Wall location' was received 21st August 2020 showing the position of the proposed green wall and its membrane thickness - 82mm in the example given. To be clear this plan shows details from Biotecture, one such supplier, and is for reference only to show the position and how the would work with the building. The detailed specification would be secured within the above detailed landscaping condition.

4.6 RBC Access Officer

No comments received.

4.7 Environment Agency

This planning application is for development the Environment Agency do not wish to be consulted on.

4.8 RBC Leisure Team

Comments received on 27th November 2019:

"As with all town centre developments, and this is no exception, there is limited open space on site for residents. The proposed podiums are a positive element of the design, but accepting that the delivery of adequate on site open space is not achievable, we will therefore be seeking an off-site financial contribution in order to mitigate the additional pressure on local parks and recreation facilities as a direct consequence of this development. This is in accordance with the newly adopted Local Plan, Policy EN9: PROVISION OF OPEN SPACE which states that "All new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities."

Policy CC9: SECURING INFRASTRUCTURE in the Local Plan sets out the objectives of securing infrastructure, services, resources and amenities to ensure that developments are both sustainable and that they contribute to the proper planning of the area. It also provides the basis for justifying infrastructure provision as part of development proposals. The added

pressure from an increase in the number of residents moving into new developments increases the wear and tear on the existing infrastructure. In accordance with the policy, the procedure for calculating off-site provision has been established for many years, based on the old Supplementary Planning Guidelines which tabled a summary of S106 requirements including for open space, sport and recreation. The cost of providing suitable facilities was calculated as £2,100 for dwellings up to and including 75m2 and £2,800 for dwellings over 75m2. To this end we believe that a contribution of £2,100 per unit is appropriate and is fairly and reasonably related in scale and kind. It is also directly related to the development. This S106 funding, which equates to £92,400 and which is in addition to CIL funding, would be used to continue to improve and extend facilities within the Thames Parks which are in close proximity to the development."

4.9 Thames Water

No comments received

4.10 Historic England

No comments received

Non-statutory

4.11 Public representations

2 individual letters of objections have been received, summarised as follows:

- Notes this is an important site which marks the transition north of Reading to the river, the Belltower area, and the approach to Caversham.
- The existing brick warehousing is consistent with the surrounding architecture to the west of the site, and has historical value in terms of its consistency with its setting.
- The proposed elevations are non-descript, generic, over-sized, and make no reference to the still intact character of this part of 'Caversham borders'.
- Development is an opportunity to do something more imaginative and architecturally appropriate like retaining the frontage of the existing buildings while building something new behind.
- Concern that the proposed number of storeys will dwarf surrounding low-rise residential buildings.
- A reduction in total height to no more than the Shurgard building on the other side of Northfield Road would seem more appropriate.
- The proposed height of the development would dwarf everything in the area and set a dangerous precedent.
- Not keen on the double height windows for the top two storeys of the proposed development - they seem out of proportion.
- Classical architecture usually sees window heights reduce for the upper floors, and a sudden increase with height seems inharmonious alongside an area with Victorian houses and shops. A better solution might be to keep the height of the upper windows the same as for lower floors or reduce it slightly and have brick arches above the upper windows to give the development more of a feel of a Victorian industrial building. A good example for

comparison is the former Granada studios in a Victorian warehouse in Manchester.

- More use should be made of decorative brickwork or terracotta tiling to break up the design. A good comparison is the terraced houses at 3-13 Northfield Road, which are close to the site.
- The ground floor space would probably work best if designed for multiple smaller mixed-use units rather than a small number of larger retail units - probably by having more smaller windows. This would allow greater flexibility of use for this floor - for example, there might be the option of a cafe, community space and a few small business/craft workshop units.

4.12 Reading Conservation Area Advisory Committee

Comments made on 23 January 2020:

"This application is to demolish the Drews building and replace it with an apartment block with retail at ground floor level rising from five seven floors. The buildings at 1 Northfield Road, currently let as offices would remain.

The Drews building (together with the offices behind) was once a maltings (Dowsons) and has also been used for other commercial purposes including by Smallbones motor engineers who were responsible for the 'SMALLBONES' ghost sign on the Northfield Road.

We object to this application for the following reasons:

1. HERITAGE

1.1 Local Listing

1.1.1 We understand that a nomination has been made for local listing by the Bell Tower Community Association. We fully support this nomination which recognises the importance of the building as a former maltings.

1.1.2 Malting was an important industry in Reading in the eighteenth/nineteenth centuries and this is a significant example in a prominent setting of a small scale maltings. Dowsons provided malt for H & G Simonds from 1872 until the large maltings buildings were built on their brewery site at the end of the nineteenth century (part of one of which remains and is nationally listed - 1155180).

1.1.3 The building should be adapted creatively for commercial/ residential use so that it is retained.

1.2 1 Northfield Road

1.2.1 Any development on the Caversham Road/Northfield Road building should respect and enhance the context of the maltings buildings at 1 Northfield Road which are not part of this application. A building of the height proposed does not do this and moreover devalues the heritage appeal of the properties as offices in the centre of Reading.

2. HEIGHT AND SCALE

2.1 The site is not mentioned as a site for future development on the New Local Plan. The closest to this development are CR11f (West of Caversham Road) and CR11e (North of Station). As this site is on the west of Caversham Road, the expectation for this site can be assumed to be similar.

New Local Plan p147: CR11f This area will be developed for residential with on-site open space. Densities will be lower than elsewhere in the Station/River area to reflect the proximity to low-rise residential areas, and the edge of the site nearest to the areas of terracing will require careful design treatment and respect the historic context of areas to the west.

2.2 We agree with the comments made by CADRA on this point, that any development on this site should not exceed two-three storeys. At two-three storeys Monmouth Court, adjacent to 1 Northfield Road is currently the tallest property on the street. The older terraced properties are only two storey.

3. DESIGN

3.1 The inclusion of random architectural details, such as green tiles and arches, represent only a token nod to the heritage building being replaced.

3.2 The saw tooth roof is out of keeping with the character of the area and jars with the glazing arrangement of the Caversham Road and Northfield Road frontage.

3.3 The five storey block to the rear with winter gardens, although still too tall, is more pleasing.

4. CONCLUSION

4.1 The Drews building should not be demolished but should be locally listed and sympathetically reused as a commercial premises or housing, preferably no taller than the current building.

4.2 This application should be rejected."

Officer Comments: Above comments made prior to revised plans being received in 9th April 2020.

4.13 Caversham and District Residents Association (CADRA)

Comments made on 20th December 2020

"Caversham and District Residents Association (CADRA) would like to comment on the Planning Application proposals for this site as follows:

1) RETENTION OF EXISTING BUILDING

CADRA believe that serious consideration should be given to retaining, converting and possibly extending the existing buildings on the site. We note that the partial retention of the buildings on the western boundary is already proposed. The Malthouse buildings on this site dating from the 1870s are one of the few remaining examples of 19C industrial architecture in this area and the town. They relate to the Brewing Industry, a close part of Reading's identity historically, and for which Reading was renowned. The buildings still form an identifiable unified group with historic value both to the local area and the town.

Although the buildings have been altered in the 20C, both the overall form and much of the detailing is still apparent and this detailing can be repaired/ reinstated. Much of the detailing on the building (for example polychromatic brick detailing) is representative of a 19C style characteristic of Reading, and whilst many domestic examples survive, industrial examples do not. We note the applicants design statement make frequent reference

to the architectural details on the existing building, the most appropriate way to celebrate these would be to therefore retain the existing building.

The massing and scale of the existing building relates well to the scale of the existing residential area to the west of the site and the setback of the upper floors from back of pavement level on the south eastern corner of the site visually eases the turn into Northfield road.

We understand that an application for Local Listing was made in September 2019 and this gives greater detail on the history and value of the buildings on the site which should be taken into consideration.

2) A TRANSITIONAL SITE AND PROPOSED HEIGHT

If the existing frontage buildings are not retained, this site should be treated as a transitional site between the larger scale development some 6-7 storeys of the proposals on the Aviva and Hermes sites on the eastern side of Caversham Road and the predominantly 2 storey development of the residential area around Swansea Road. In CADRA's view, development on this western side of Caversham Road should relate to the 2/3 storey scale of the residential community to which this site relates and none of the sites on this side of the road is appropriate for 7 storey development. We note in the Design and Access statement, in pre application advice the Planning Officer expressed concern about the height of the proposals.

3) BUILDING LINE

The proposals build right up to the back edge of pavement over seven storeys on Caversham Road. Careful examination of the building lines on this and existing adjacent sites indicate a variation in building line to the benefit of space on Caversham Road approaching the roundabout. The main building line, on the southern corner of the Drews site, lines with the adjacent Dawsons/ Pure Gym site but then cuts back at upper level approaching Northfield Road and relates to the building lines of the 19C development beyond the 1970s Shurgard building further down the road. Building seven storeys to the back edge of pavement on this site would be oppressive on this corner and form an unfortunate precedent for other sites likely to come forward on this side of the road.

4) ROOFSCAPE

The saw tooth roofscape proposed on top of the seven storey building seems to be an arbitrary response to a comment from the Design Review Panel, rather than to have any design logic. There do not seem to be precedents for this in the area.

For the above reasons CADRA object to this development.

I hope that these comments are helpful to your consideration of the application.

Kind Regards,

Kim Pearce (on behalf of Caversham and District Residents Association)"

Officer Comments: Above comments made prior to revised plans being received in 9th April 2020.

4.14 Bell Town Community Association

Comments made on 11th March 2020

"Section 4.2.2 of the local plan states: The role of the Local Plan is to proactively conserve and enhance the historic environment and promote its enjoyment. This entails recognition of the value of historic features that are desirable for retention, ensuring that the most valued townscapes and landscapes (e.g. those with national and international designations) are given the highest level of protection and other locally valued assets are recognised, retained and enhanced wherever possible.;"

Given the local listing of building (LL15), the proposed demolition of the building on the corner of Caversham and Northfield Roads would run counter to this objective of the local plan. I would also run counter to the national guidelines as well as EN4 of the local plan cited in the applicant's Heritage and Townscape Assessment. This also means the proposal to preserve the Brewery and Malthouse office buildings is very welcome."

Officer Comments: These comments were made prior to revised plans being received in 9th April

Additional comments made on 27 April 2020:

"I am writing to object to amended planning application No. 191792 (71-73 Caversham Road, Reading RG1 8JA) on behalf of the Bell Tower Community Association.

The proposed changes in no way address the concerns over the height of the proposed tower block or the heritage issues involved in the demolition of a locally listed building. Scaling down the retail area at the same times as reducing parking spaces also does not deal with the problem of the lack of parking for both staff and customers. Below is my original objection:

Section 4.2.2 of the local plan states: "The role of the Local Plan is to proactively conserve and enhance the historic environment and promote its enjoyment. This entails recognition of the value of historic features that are desirable for retention, ensuring that the most valued townscapes and landscapes (e.g. those with national and international designations) are given the highest level of protection and other locally valued assets are recognised, retained and enhanced wherever possible."

Given its local listing (LL15), the proposed demolition of the building on the corner of Caversham and Northfield Roads would run counter to this objective of the local plan. I would also run counter to the national guidelines as well as EN4 of the local plan cited in the applicant's Heritage and Townscape Assessment. This also means the proposal to preserve the Brewery and Malthouse office buildings is very welcome.

In the planning statement the applicant makes much of proposals to develop the former Post Office Sorting Office site (Hermes development Ref. 182252) on the opposite side of the road to 71-73 Caversham Road, saying that the height of the proposed block of flats on the site will blend in with this. However, no permission has as yet been granted for either the Hermes development or the planned re-development of the Aviva-owned site (TGI Friday's, Aldi, etc. Ref. 200328), meaning the planned development might not blend in with what is eventually built on those sites. Little or no regard seems to have been paid to the existing height of buildings on the same side of Caversham Road. There is a strong risk of setting a precedent in terms of

height of buildings, particularly in the context of the potential redevelopment of the Carters site. We would oppose any buildings on the site that are higher than the Shurgard building particularly given the low-rise nature of the buildings in the Bell Tower area to the west of 71-73 Caversham Road because of the overlooking and overshadowing.

The applicant also plans 239 square metres of retail space. There has to be a question mark over the economic viability of this given that no parking provision has been made for either staff or customers.

5. RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which also states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".

- 5.2 The following relevant planning policy and guidance is applicable to the assessment of this application.

5.3 National Planning Policy Framework (NPPF) (Feb 2019)

Section 2 - Achieving sustainable development
Section 4 - Decision-making
Section 5 - Delivering a sufficient supply of homes
Section 6 - Building a strong, competitive economy
Section 7 - Ensuring the vitality of town centres
Section 8 - Promoting healthy and safe communities
Section 9 - Promoting sustainable transport
Section 11 - Making effective use of land
Section 12 - Achieving well-designed places
Section 14 - Meeting the challenge of climate change, flooding and coastal change
Section 15 - Conserving and enhancing the natural environment
Section 16 - Conserving and enhancing the historic environment

5.4 Reading Borough Local Plan 2019

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION
CC3: ADAPTATION TO CLIMATE CHANGE
CC5: WASTE MINIMISATION AND STORAGE
CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT
CC7: DESIGN AND THE PUBLIC REALM
CC8: SAFEGUARDING AMENITY
CC9: SECURING INFRASTRUCTURE

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT
EN4: LOCALLY IMPORTANT HERITAGE ASSETS
EN9: PROVISION OF OPEN SPACE
EN10: ACCESS TO OPEN SPACE
EN12: BIODIVERSITY AND THE GREEN NETWORK
EN14: TREES, HEDGES AND WOODLAND
EN15: AIR QUALITY

EN16: POLLUTION AND WATER RESOURCES
EN17: NOISE GENERATING EQUIPMENT
EN18: FLOODING AND DRAINAGE

EM1: PROVISION OF EMPLOYMENT
EM2: LOCATION OF NEW EMPLOYMENT DEVELOPMENT
EM4: MAINTAINING A VARIETY OF PREMISES

H1: PROVISION OF HOUSING
H2: DENSITY AND MIX
H3: AFFORDABLE HOUSING
H5: STANDARDS FOR NEW HOUSING
H6: ACCOMMODATION FOR VULNERABLE PEOPLE
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE

TR1: ACHIEVING THE TRANSPORT STRATEGY
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
TR4: CYCLE ROUTES AND FACILITIES
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

RL1: NETWORK AND HIERARCHY OF CENTRES
RL2: SCALE AND LOCATION OF RETAIL, LEISURE AND CULTURE
DEVELOPMENT

CR1: DEFINITION OF CENTRAL READING
CR2: DESIGN IN CENTRAL READING
CR3: PUBLIC REALM IN CENTRAL READING
CR6: LIVING IN CENTRAL READING

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

5.5. Supplementary Planning Documents

Sustainable Design and Construction (2019)
Planning Obligations under Section 106 SPD (2015)
Employment, Skills and Training SPD (2013)
Residential Conversions SPD (2013)
Affordable Housing SPD (2013)
Revised Parking Standards and Design (2011)

5.6 Other Reading Borough Council Corporate documents

Reading Tree Strategy (2010)
Reading Open Space Strategy Update Note (2018)
Reading Open Space Strategy (2007)
Waste Management Guidelines for Property Developers, Reading Borough
Council

5.7 Other material guidance and legislation

National Planning Practice Guidance (2020)
The Town and Country Planning (General Permitted Development)
(England) Order 2015
Section 66(1) of the Town and Country (Listed Buildings and Conservation
Areas) Act 1990

Section 72 of the Town and Country (Listed Buildings and Conservation Areas) Act 1990
The Community Infrastructure Levy (CIL) Regulations (Amended 2015)
Department for Transport Manual for Streets
Department for Transport Manual for Streets 2
Berkshire (including South Bucks) Strategic Housing Market Assessment -
Berkshire Authorities and Thames Valley Berkshire Local Enterprise
Partnership, Final Report, February 2016, prepared by GL Hearn Ltd
Technical Housing Standards - Nationally Described Space Standard, DCLG,
2015
Site Layout Planning for Daylight and Sunlight: a guide to good practice (BR
209), P. Littlefair, 2011

6. APPRAISAL

The main matters to be considered are:

- 6.1 Principle of development
- 6.2 Heritage
- 6.3 Design
- 6.4 Natural environment
- 6.5 Sustainability
- 6.6 Amenity
- 6.7 Health and wellbeing
- 6.8 Transport
- 6.9 Environmental Protection
- 6.10 S106/Community Infrastructure Levy
- 6.11 Other matters

6.1 Principle of development

- 6.1.1 Planning law requires that applications for planning permission must have regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the development plan for the area is the Reading Borough Local Plan (2019). At a national level, the National Planning Policy Framework (NPPF) constitutes guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but constitutes a material consideration in any subsequent determination.
- 6.1.2 The NPPF sets out a presumption in favour of sustainable development running through both plan-making and decision-taking. The three dimensions to achieving sustainable development are defined in the NPPF as: economic, social and environmental. Paragraph 11 of the Framework indicates that, for decision taking, where Local Plan policies are up to date: development proposals that accord with the Development Plan should be approved without delay. Both the adopted Local Plan and the NPPF require a positive approach to decision-taking to foster the delivery of sustainable development. These three dimensions of sustainable development are also central to the Council's Local Plan core policy CC1. This which repeats the aims of the NPPF in approving development proposals that accord with the Development Plan. The degree in which this proposal meets the three dimensions to achieving sustainable development will be concluded at the end of this report against the level of Local Plan compliance.

Land use principles

- 6.1.3 The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. This Framework clearly identifies that planning should promote the efficient use and redevelopment of brownfield land.
- 6.1.4 The application seeks the redevelopment of a vacant former ironmonger's (Formerly Use Class A1 and now Class E from 1st Sept 2020) to provide 44 no. residential units and 194m² flexible retail floorspace at ground floor.
- 6.1.5 The site is located within the 'Reading Central Area' and the 'Office Core' as defined by the Local Plan. As mentioned, it is also located on the edge of allocated site CR11e, North of Station. Previously, under the Reading Central Area Action Plan (RCAAP) the west side of the Caversham Road was labelled as 'Transition to zone of low density residential', where specifically reference was made to "*Areas along the western side of Caversham Road have room for improvement in terms of design and efficiency of land use*". Whilst no longer referenced in the Local Plan, the site continues to mark the transition between significant new planned development to the east (North of the Station) and low-rise traditional residential neighbourhood to the west. Therefore, its role as a 'transition zone' would continue. It would also need to ensure that any improvements in terms of design and efficiency of land use are able to take place without constraining and potentially preventing neighbouring low-density sites on the west side of Caversham Road from fulfilling their own development potential in the future

Residential use

- 6.1.6 The proposed development would deliver 44 new homes and therefore based on the proportion of floorspace proposed, would be a residential led scheme. Under core housing Policy H1, housing provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in the Borough up to the end of the Plan period (2036). Furthermore, because of the borough's overwhelmingly urban character, there is a heavy reliance on previously developed land meeting such needs.
- 6.1.7 The site is located approximately 270m from the north entrance of Reading Station, is 30m from the nearest bus stop and approximately a 5mins walk from all main services and facilities offered by a central town location. In this regard the site is recognised as being one of the most sustainable locations in the south east and would be entirely consistent with Council's spatial strategy for new residential development.
- 6.1.8 The proposal would therefore contribute to meeting the Borough's housing need through an uplift of 44 units in a highly sustainable location for new residential development. This accords with the aims of Policy CC6 (Accessibility and Intensity of Development) of the Local Plan and is afforded positive weight in the overall planning balance.

Non-residential uses

- 6.1.9 The proposal would result in the loss of the existing commercial use (vacant hardware store) and replacement with 194sqm of flexible commercial space at ground floor and residential above. The commercial floorspace was revised

down from 239sqm during this application to accommodate the colonnade and additional on-site landscaping enhancements. The site is not located within a defined employment area, primary retail frontage or covered by any policies that seek to protect the existing vacant commercial unit. The existing use of the building could, via current permitted development rights, be converted into a range of other uses including residential via the prior approval process, thereby resulting in the loss of all employment-generating uses on site. Furthermore, it should be noted that from 1st September 2020, the permitted use of the site has changed to Class E (flexible commercial use) which encompasses a much broader category of residential compatible 'commercial, business and service' uses.

6.1.10 Paragraph 121 of the NPPF advises LPAs to take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular LPAs should be supporting proposals which, *"use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres"*. Local Plan Policy RL1 relates to the network and hierarchy of centres and identifies Reading as the regional centre within the area. This policy highlights the need for new development to maintain and enhance the vitality and viability of these centres. This has increased importance following the economic and social consequences of the Covid19 pandemic. Finally, Policy RL2 (Scale and Location of Retail, Leisure and Culture Development) requires provision to be made for up to 34,900 sqm of retail and related facilities up to 2036.

6.1.11 In terms of the equivalence of the replacement commercial floorspace, the current unit has been vacant for 20 months and is recognised as requiring significant investment in order to bring up to a modern occupancy standard, whether for continued commercial use or for an alternative permitted use. Furthermore, any alternative use or conversion would be constrained by the building's existing physical and previously altered form. This relates to the significant amount of support columns within the existing building, which makes the existing floorspace operationally very difficult for prospective retailers.

6.1.12 Following national and local policy support for alternative land uses on unallocated land such as this, the proposed redevelopment of the site to create more flexible and attractive commercial space at ground floor would support continued employment opportunities within both the town centre and Office Core, and importantly assist in the economic recovery and improved future resilience of the borough. Therefore, replacing the existing vacant A1 unit with an enhanced flexible commercial ground floor unit is considered to be a positive element of the scheme.

Housing mix and density

Housing mix

6.1.13 The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. In terms of housing mix, Policy CR6 (Living in Central Reading) supports this and further seeks that residential developments within the town centre area should incorporate a maximum of 40% of 1-bedroom units and a minimum of 5% of 3-bedroom units.

6.1.14 A total of 44 new flats are proposed with the following mix:

- 1 bedroom (2 Person): 17no. (typical size 50m²)
- 2 bedroom (3 Person): 19no. (typical size 61-66m²)
- 2 bedroom (4 person): 5no. (typical size 70m²)
- 3 bedroom (4 person): 3no. (typical size 74m²)

6.1.15 When considered against the requirements of Policy CR6, the following proportions are calculated:

- 1 bedroom units 17 no. = 38.6%
- 2 bedroom units 24 no. = 54.6%
- 3 bedroom units 3 no. = 6.8%

6.1.16 The proposal is therefore compliant in provision of 1-bedroom units (38.6% compared to a maximum 40% required), and the provides a higher proportion of 3-bedroom units than the policy minimum required (6.8% compared to 5% required). Furthermore, the provision of 2-bedroom units is composed of two sizes, 3 or 4 person occupancy. Based on the characteristics of the site and the appropriateness for range of units in such an arrangement, the overall dwelling mix proposed by the development is considered acceptable and in accordance with the requirements of Policy CR6 of the Local Plan.

Density

6.1.17 Achieving an efficient use of the land within the context of any central and sustainably located site is a key priority both at a national and local level. The NPPF states that LPAs should actively *"encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value"*. In general terms, officers support those urban design principles which encourage an ambitious approach to density, as this is beneficial in terms of:

- ensuring efficient use of land
- preventing urban sprawl
- supporting a range of uses
- increasing the viability and hence availability of public transport
- encouraging social interaction.

6.1.18 The spatial strategy for Reading identifies Central Reading as the focus for meeting much of the identified development needs at a medium and high density. The Local Plan identifies the fact that there are considerable areas of underused land around the edge of the centre like those existing plots which front onto Caversham Road that offer an opportunity to accommodate a considerable amount of development at higher densities.

6.1.19 Policy CC6 'Accessibility and the intensity of development' makes the important link between the scale and density of development and its inherent level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. This does not override other considerations but is an important element of meeting the borough's development needs in the most sustainable way. Policy H2 which specifically considers density and mix, requires that the appropriate density of residential development is informed by amongst other things:

- the character and mix of uses of the area in which it is located (including nearby heritage assets);
- its current and future level of accessibility; and
- the need to achieve high quality design and the need to maximise the efficiency of land use.

6.1.20 Within the Local Plan, indicative densities for different areas are set out in Local Plan extract Figure 4.5 (Below). This indicates such a site located within the Town Centre and in such close proximity to the station, would have an indicative density of above 100 dwellings per hectare. It is important to note, no upper limit is provided for the Town Centre, as each application would be considered on a case by case basis and informed in conjunction with other factors.

Figure 4.5: Indicative density ranges (dwellings per hectare)

Town Centre	Urban	Suburban
Above 100	60-120	30-60

6.1.21 The supporting text goes on to acknowledge that the criteria discussed above may indicate that different densities are appropriate, despite the indicative density range indicating otherwise.

6.1.22 Regarding the proposal in question, a density of 275 dwellings per hectare is calculated across the site. Whilst this is considered high-density in comparison to the much lower neighbouring commercial sites to the north and south within the Caversham Road transition zone, the plan recognises the opportunities available to increase density to help to meet identified needs in highly sustainable locations like this. Given the proposed format of development (a single block fronting the IDR and with residential above a ground floor commercial use), such density does not represent any significant conflict with policy or departure from the prevailing density of other existing or recently approved developments fronting onto the IDR to the south. However, notwithstanding the conclusion that such density may be appropriate in this location, this does not negate the need for careful attention to be paid to the existing character of the surrounding area and important issues such as heritage, which will be covered separately.

Affordable housing

6.1.23 Affordable Housing is a key priority within the borough. Policy H3 of the Local Plan (Affordable Housing) seeks to ensure that development proposals of more than 10 dwellings should provide the equivalent of 30% on-site provision of affordable housing. Policy H3 states that where proposals fall short of the policy target as a result of viability, the Council will take an 'open-book approach' with the onus on the developer/landowner to clearly demonstrate the circumstances justifying any lower affordable housing provision. At a national level Paragraph 64 of NPPF requires has an expectation that major housing development secure at least 10% affordable home ownership, unless this would exceed the level of affordable housing required in the area.

6.1.24 The Council's current Affordable Housing SPD (2013) requires that new development should include a range and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs. This is

reflected in the current SPD which identifies a tenure mix of 50% social rent and 50% shared ownership/intermediate housing.

- 6.1.25 The application was accompanied by an Affordable Housing Financial Viability Appraisal (FVA) which demonstrates that the development could not sustain such a policy complaint contribution towards affordable housing. Officers in association with the Council's Valuer explored ways to allow the scheme to either provide some form of contribution or achieve policy compliance over time. In this regard a minimum upfront affordable housing contribution of £250,000 (equivalent to 15%) was offered, along with a late stage deferred payment mechanism.
- 6.1.26 Therefore, whilst this initial affordable housing offer would not have achieved the full local policy compliant level of 30%, a 15% financial contribution up-front with a deferred payment mechanism to recover any increase in value, would not only have exceeded NPPF expectations but would have constituted a reasonable and justified position for the Council. As an agreed and acceptable position, this would have constituted a material public benefit that would have weighed in favour of the scheme, although not in a substantial way.
- 6.1.27 Officers were notified on the 19th August 2020 that the applicant has significantly revised their affordable housing position from that contained within the initial FVA and as described above. This revised approach proposed a mixture of on-site affordable housing provision and off-site financial contribution. This would take the form of 5 on-site shared ownership, and an off-site financial contribution of £500,000. The proposal would represent an on-site affordable provision of 11%, with the off-site financial contribution confirmed as being the equivalent of a further 30%. Taken as a whole, the revised offer was presented to Officers as the equivalent of 41%.
- 6.1.28 A updated FVA was requested and verified by the Council's external consultant Valuer. This confirmed that the offer would be the equivalent of 40% based upon a 100% shared ownership tenure mix, rather than the SPD compliant tenure split. Therefore, whilst broadly correct, if calculated based upon an more desired and compliant tenure split, the whole package would equate to an affordable housing contribution of 34%. See Fig 7 below which shows a breakdown of the original proposal, updated proposal and SPD complaint equivalent.

	On-Site Provision	Off-Site Payment in lieu	Total Affordable Housing Provision
Original Proposal	0 (0%)	£250,000 (equivalent to 15%)	15%
Updated Proposal	5 shared ownership/intermediate units (11%)	£500,000 (equivalent to 30% Shared ownership)	40% Shared ownership
Calculated SPD tenure complaint)	5 shared ownership/intermediate units (11%)	£500,000 (equivalent to 23% 50/50 split)	34% 50/50 split

Figure 7 - Original, revised and calculated affordable housing offer.

- 6.1.29 The Council's Housing Officer and the Affordable Housing SPD confirm that any desired tenure split is largely influenced by the specifics of the site. Anything other than a 30% contribution with a 50/50 split would not comply with the aim of the SPD as a starting point and is therefore reliant upon the viability of the scheme.
- 6.1.30 The Council's consultant valuer confirmed to Officers that the overall revised package could support the delivery of around 15 new tenure compliant affordable housing units within the borough, consisting of 5 shared ownership units on-site, and the remaining split 50/50 off-site. Whether delivered in either tenure, the offer is recognised as a significant improvement on that originally accepted and constitute a substantial public benefit.
- 6.1.31 The Council fully accepts that despite urban design principles requiring affordable housing to be pepper potted within developments, Registered Providers (RP) prefer separate access cores, as this allows them to control service charges. The Housing Officer also supports this view in that separate access, management and service charge arrangements for a RP would in this instance make the inclusion of on-site rental tenures (e.g. social rent) not practically feasible.
- 6.1.32 Whilst the 5 on-site shared ownership housing units proposed are recognised as not being the most in demand tenure type, the Council is now able to secure a significant off-site cash payment which can be converted into a tenure mix that most in need e.g. Social Rent/Affordable Rent. This part of the contribution along with the flexibility it offers is considered to outweigh the risk posed by a reduced proportion of AH of a policy compliant tenure that would prove less attractive to an RP. Either way, both options (40% or 34%) are in excess of the 30% policy requirement of Policy H3 (the shared ownership split notably so) and both substantially exceed the NPPF expectation for major schemes.
- 6.1.33 Notwithstanding the above position, it is necessary to consider whether securing such a greater level of affordable housing is reasonable in the circumstances, bearing in mind Case Law which confirms that a willing applicant does not in itself justify provision of a planning obligation.
- 6.1.34 Paragraph 56 of the NPPF outlines clearly the tests which must be met for a planning obligation to be sought:
- (a) necessary to make the development acceptable in planning terms;*
 - (b) directly related to the development; and*
 - (c) fairly and reasonably related in scale and kind to the development.*
- 6.1.35 Firstly, in considering test (a) as to whether the obligation would be '*necessary to make the development acceptable in planning terms*', there is no disagreement that a degree of harm would be caused as result of this development and that the harm caused would require a significant level of public benefits in order to off-set it. Whilst the specific level of harm caused and the applicable policy tests are discussed in detail under Section 6.2 of this report, the specific wording of Policy EN4 '*Locally Important Heritage Assets*' and Paragraph 197 of the NPPF provide a clear requirement for the LPA consider any relevant counter-benefits to a proposal that would cause harm to a Non-Designated Heritage Asset (NDHA). Specifically, the relevant section of Policy EN4 states:

“Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset’s significance”.

- 6.1.36 In taking a consistent approach with other residential-led schemes in the borough and with the clear intent on seeking policy compliant affordable housing contributions from other live applications in close proximity to this site (80 Caversham Road and Reading Station Retail Park etc.) affordable housing is justifiably held as an important material public benefit of any scheme considered by the LPA. This application is no exception. Policy H3 along with the NPPF requires such benefits to be realised upon the grant of planning permission, and it is considered consistent that Policy EN4 affords the decision-maker the ability to take into account such provision alongside all other benefits, whether below or above policy compliance. Whilst not explicitly stated within supporting text, the wording of Policy EN4 above effectively allows the LPA to secure such benefits in instances where harm is being caused to a Non-Designated Heritage Asset and wider conflict caused against more general heritage policies (e.g. Policy EN1).
- 6.1.37 In returning to test (a) of paragraph 56, it is established that where the proposal conflicts with other policies in the plan, a higher percentage of affordable housing is therefore capable of being justified. This approach is consistent with other examples in the borough where a higher (than policy required) percentage of affordable housing has been secured to *‘make the development acceptable in planning terms’*.
- 6.1.38 In this instance and as described, there is one primary matter which Officers consider justifies the consideration of a higher than 30% affordable housing requirement. This centres on the partial loss of the Locally Listed frontage building at 71-73 Caversham Road. This engages the primary test under Policy EN4 which requires Officers to assess the public benefits of the scheme as whole (See Heritage section below). Officers therefore have a responsibility to fairly consider the value of the raised affordable housing contribution alongside all other benefits and disbenefits under Policy EN4.
- 6.1.39 With regard to test (b) the provision of affordable housing within any residential development is directly related to the development. This is set out in Section 5 of the NPPF *‘Delivering a sufficient supply of homes’*, the general policies within Section 4.4 of the Council’s Local Plan (2019), and the Council’s Affordable Housing Supplementary Planning Document (2013). Affordable housing is most directly related to a residential-led scheme than any other type of development, in terms of its importance in achieving mixed and balanced communities.
- 6.1.40 With regard to the final test which must be met for a planning obligation to be sought (test (C)), this requires any planning obligation to be fairly and reasonably related in scale and kind to the development to which it relates. The overall proportion of affordable housing being offered as part of this residential-led scheme is considered fairly and reasonably related in scale and kind to the development as a whole. With a minimum equivalent of 34% in total (11% on-site), the proportion of affordable housing represents the smaller portion of the overall residential accommodation provided, with 66% remaining as market tenure housing (89% on site). This is a reasonable proposition in the context of the general housing objectives of the NPPF and Policy H3. The proportion of affordable housing offered is also not considered

disproportionate in context to the general requirements of the local plan, nor represents such a level of provision that it would distort the overall nature of the development proposed. The obligation is therefore considered to meet test (c).

- 6.1.41 In accepting that the tests within paragraph 56 of the NPPF are met, an additional factor which must be considered is any perceived risk that by granting a planning permission that secures an above policy compliant amount of affordable housing, the Local Planning Authority exposes itself to the risk that a subsequent Section 73 application could subsequently be submitted with a reduced affordable housing offer as a result of a change in the applicant's circumstances or those on site, with the risk that the Local Planning Authority may be obliged to grant such an application. Officers have considered this possible scenario carefully in consultation with the Council's Planning Solicitor and Valuers.
- 6.1.42 Firstly, it has been agreed between officers and the applicant that the description of development should be amended to include specific reference to the onsite provision of 5 affordable units of which the tenure is to be agreed. Following the *Finney* (Court of Appeal) decision in 2020, the description of original permission can no longer be altered by a Section 73 application or a condition included which purports to alter that description. Therefore, the 11% on-site affordable housing would be secured and would be included within the S106 Legal Agreement. Any intention to alter this on-site obligation would require a whole new (full) planning application.
- 6.1.43 With regard to the off-site financial contribution (amounting to £500,000) this would also be secured via a S106 Legal Agreement relating to the planning permission. Firstly, whilst any subsequent application received would be considered on its own merits, a negative financial position which would come about as a result of such an improved offer is made at the developer's own risk and made under the full understanding that the original and revised FVA information submitted as part of this application is on record (confidentially) and has formed the basis of agreed affordable housing position.
- 6.1.44 Whilst there is no specific policy or guidance preventing the current improved offer being made or accepted, legal advice was sought by officers to establish whether any Section 73 application could result in a reduction of this part of the affordable housing contribution. This advice confirms that the earlier 'intent' of the Council is a material consideration in any subsequent assessment of a Section 73 application. So for example, should Members resolve to grant permission at your meeting, the Committee could reasonably refuse a future application, if the original public benefits of the scheme as a whole diminish to such an extent that they no longer outweigh the harm caused.
- 6.1.45 To summarise, whilst the Affordable Housing offer is the equivalent of 40% as shared ownership tenure, it is more relevant to consider it the equivalent of a 34% policy compliant 50/50 split. Whilst the 11% on site provision of shared-ownership units is not the primary tenure need in the borough, the fact the Council is able to secure commitment from the developer to deliver a significantly greater AH contribution as part of the permission (including the flexibility offered by the £500k) is considered to outweigh the risk posed by a SPD compliant tenure split that may prove less attractive to an RP because of the physical limitation of the proposed building. Either way, both

compliant and non-compliant tenure options are in excess of the Council's 30% policy requirement. As such, this would constitute a significant and tangible public benefit of the proposal and provide a welcome and material contribution to local affordable housing needs in the borough. This would be secured via S106 agreement and be considered as part of the overall planning balance for the scheme in a later section of this report. This does not negate the need for all other matters, including heritage, to be considered in detail.

6.2 Heritage

The building's status

- 6.2.1 England has an established statutory system for the formal listing of buildings of architectural or historic interest. These are buildings which are objectively assessed by Historic England as being of architectural or historic interest and which are then included on the Statutory List under the Planning (Listed Buildings and Conservation Areas) Act 1990. Buildings which are not included in the statutory list are, by definition, not of listable quality.
- 6.2.2 In addition to the above mechanisms, LPAs have their own power to compile lists of individually 'locally listed' buildings which are not of listable quality but are considered of local historic or architectural significance. It is important to note that the inclusion of a building in a 'local list' does not afford it any formal legal protection, has no statutory effect and does not affect the legal status of that building. The Council's Local Plan confirms *"Local heritage assets do not qualify for statutory listing and are not protected from loss in the same way as listed assets"*. It is important to note that such buildings which are located outside of a Conservation Area could also be subject to demolition under Part 11 Class B (demolition of buildings) of the General Permitted Development Order 2015 (as amended) without the express need for planning permission.
- 6.2.3 Whilst not benefiting from any formal legal protection, such buildings are recognised by the NPPF as 'non-designated heritage assets' (NDHAs). Accordingly, the effect any development proposal would have on a locally listed building as an NDHA must be considered carefully and in accordance with local policy and the overarching sustainable development objectives of the NPPF. This approach is consistent with any other building of heritage value that is not afforded legal protection of the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990. The PPG provides a definition of non-designated heritage assets in paragraph 39: *"Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets."*
- 6.2.4 The fact that a building or buildings is included in a 'local list' is considered an important material consideration in the determination of any planning application that relates to development which would affect the building in question, as in this case.
- 6.2.5 By way of background, the Council received a completed local listing nomination from the Bell Tower Community Association. Following an assessment of the buildings under the Council's adopted local listing process, the Council notified the landowner that the collection of buildings on the site were added to Reading Borough's List of Locally Important Buildings and

Structures on 11th February 2020. All buildings on site were considered to meet the adopted criteria. It should be noted that the Council's local listing process is independent of the formal planning application process and is not covered by the Planning (Listed Buildings and Conservation Areas) Act 1990.



Figure 8- Caversham Road and Northfield Road elevations

- 6.2.6 This local listing decision was appealed by the applicant against the backdrop of comprehensive pre-application engagement, independent design review, community engagement and meetings with local Ward Members prior to the local listing nomination being received. The main reasons for the appeal was firstly the applicant's view that the specific building for which this application relates did not possess sufficient heritage significance to warrant local listing, and secondly that Historic England best practice guidance on local listing was not followed.
- 6.2.7 Whilst outside the scope of this planning application and not for debate at Planning Applications Committee, the Council's established Local Listing procedure has been followed and the decision to locally list these buildings has been justified on the historical and architectural merits of the buildings in question, in accordance with the Council's criteria for local listing. As part of this planning application, the LPA has a duty to consider the proposed development's impact on these NDHAs along with due regard to all other material considerations as required by Section 38(6) of the planning and Compulsory Purchase act 2004 and the provisions of the NPPF as stated above.

Policy tests

- 6.2.8 The proposals would involve the complete loss of 71-73 Caversham Road whilst the Malthouse and Brewery building to the rear would be retained in their current form. This constitutes a partial loss of the locally listed

structures. The building being demolished (71-73 Caversham Road) is recognised by Officers as being a notable historic building and inherently contributes to this part of Caversham Road. It is therefore necessary to consider the development proposal against the relevant national and local policy criteria. This primarily consists of Section 16 of the NPPF 'Conserving and enhancing the historic Environment', Policy EN1 'Protection and Enhancement of the Historic Environment' and Policy EN4 'Locally Important Heritage Assets' contained within the Local Plan.

National Policy

6.2.9 Paragraph 197 of the NPPF concerns the effect of an application on the significance of a Non-Designated Heritage Asset (NDHA). It states that such effects *"should be taken into account in determining the application"*. It goes on to qualify that *"In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.

6.2.10 Unlike paragraphs 195 and 196 of the Framework which relate specifically to Designated Heritage Assets (DHA) e.g. Listed Buildings and Conservation Areas, which are concerned solely with the effect of the application on the asset itself, Paragraph 197 calls for the weighing of the application as a whole (including what would replace the NDHA - which is considered later in this report). Furthermore, unlike those tests relevant to a DHA, which impose a presumption against the grant of permission which would cause harm to a heritage asset, Paragraph 197 merely requires a 'balanced judgement' to be made by the decision maker. Unlike those earlier paragraphs and as established by Case Law, Paragraph 197 does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter. This is a matter for the LPA, with Officers required to apply the policy test in Paragraph 197 of the NPPF to this proposal alongside the relevant local plan policies.

Local Policy

6.2.11 Firstly, Policy EN1 'Protection and Enhancement of the Historic Environment' of the Local Plan specifically seeks to ensure that assets on the Local List are protected and where possible enhanced. As a starting point, the policy requires proposals to avoid harm in the first instance. The policy does recognise that should any loss of a heritage asset occur, this must be accompanied by clear and convincing justification, usually in the form of public benefits. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement, which duly accompanies this application.

6.2.12 Policy EN4: 'Locally Important Heritage Assets' is most relevant, as it is the most specific local policy which affects locally important heritage assets. Policy EN4 seeks to ensure that development which specifically affects locally important heritage assets conserve the architectural, archaeological or historical significance of the asset. It is important to note, that like EN1, this policy also recognises that *"Planning permission may be granted in cases where a proposal could result in the loss of a locally important heritage asset"* subject to certain criteria being met. As this proposal results in the loss of part of a Locally Important Heritage Asset, the following tests contained within this policy must be considered and met for any such loss to

be supported. The policy wording contains the following three requirements relevant to this planning application:

1) *"Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance".*

(Officer's emphasis)

2) *"Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals."*

(Officer's emphasis)

3) *"Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality."*

6.2.13 It is clear that Criteria 1) of Policy EN4 must be satisfied before Criteria 2) and 3) can then be considered. The reason being, retention would only ever be 'not important' as described by Criteria 2), if Criteria 1) was satisfied. Furthermore, Criteria 3) references the assessment of any replacement building, which would only be considered if the principle of replacing the building was accepted as part of 1). Paragraph 4.2.20 of the policy's supporting text identifies the preference that such buildings should be reused where possible, and modifications made to reduce carbon emissions and secure sustainable development without harming the significance of them in order to help mitigate against the effects of climate change.

6.2.14 As the proposal results in the total loss of 71-73 Caversham Road, it is necessary to consider Criteria 1) of Policy EN4, and whether the "benefits of the development significantly outweigh the asset's significance" (Officer emphasis). It is therefore necessary to establish the asset's significance prior to considering whether any benefits identified as a whole, significantly outweigh it.

Significance and benefits

6.2.15 In first establishing the asset's significance, it is helpful to consider Annex 2 of the NPPF which provides the following definition of 'Significance'. This is defined as "*The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*". In understanding 'significance', it is also necessary to consider what information is available to inform the LPA conclusion on such matters.

6.2.16 Although the building lies within a prominent position along the Caversham Road and is locally well known, there is no specific reference to the building itself within any adopted development plan documents or adopted Supplementary Planning Document (SPD). As the building is not within a Conservation Area, there is no Conservation Area Appraisal that contains an identification of the building's significance to the area in question. The building is also not located within a distinct character area that benefits from an adopted area design appraisal, nor is there a specific Heritage SPD which

outlines the Council's approach to NDHAs. Alongside national guidance, and general local policy there is a need for officers to consider the information contained within both the local listing entry, applicant's Heritage Statement and Council's Heritage Consultant response in order to inform a view as to the significance of the building and its contribution to the character and appearance of the area.

6.2.17 The Council's local list entry (LL15) states the following:

A collection of buildings at the corner of Caversham Road and Northfield Road, with strong historical/social and industrial connections to the Reading beer industry. The original owner, Henry Pendlebury Dowson, was a notable Reading figure. He was a well-known local businessman and maltster who owned two other malthouses in Reading. The buildings were built for the purposes of malting in the latter part of the Nineteenth Century, but these were later converted to other commercial uses; although the principal structures survive. The buildings contain features notable to the area and the industry such as patterned brickwork and decorative arches and are an important feature in the local townscape.

6.2.18 A Local Listing entry considers buildings under three main categories, historic interest, architectural interest and townscape value. In terms of historical interest, the listing identifies the fact the buildings were clearly owned by a well-known local businessman/maltster (for 30 years), and directly relate the town's industrial heritage (in brewing). In terms of architectural interest, the buildings undoubtedly display a strong sense of their original function, with the facades considered to be of interest and reflective of the town's once extensive and important malting industry (despite having undergone significant alterations). Given the similarities between the buildings on the site, their traditional and industrial character contributes to the architectural value of the buildings as a group.

6.2.19 Finally, in terms of townscape value, the local listing rightly identifies the buildings (in particular 71-73 Caversham Road), as prominent structures when viewed from Caversham Road, and one which is recognisable as having had an industrial use in the past. The prominence of these buildings is brought into sharper relief as they are inevitably viewed in isolation to the more modern and far less pleasing neighbouring commercial buildings built in the late 20th Century. In this respect 71-73 Caversham Road is often referred to as an informal local landmark, primarily with its more recent association with 'Drews' the ironmonger.

6.2.20 The local listing concludes as follows *"Based on evidence currently available, there is considered to be a high level of architectural significance with these buildings dating from between 1840-1913, being substantially complete and unaltered, although accepting that they have been adapted for other uses over the years. The buildings have strong Historical, Industrial and Architectural interest, as detailed above."*

6.2.21 The applicant's Heritage Statement is an extensive document which considers the historic development of the site and surroundings, the form and condition of the building itself, with a detailed assessment of significance and the impact of the proposed development.

- 6.2.22 In terms of the building itself and significance, it identifies the fact that 71-73 Caversham Road contains a number of interesting historic features which are reflective of its former use and age. These consist of bricked/boarded up doorways and window openings, ghost lettering on the Northfield Road elevation spelling 'S-M-A-L-L-B-O-N-E' (the name of the motor engineering company that occupied the site from 1925-1947).
- 6.2.23 The statement also identifies the main alterations which have occurred to the building. These concern the rear elevation of the main building which was wholly rebuilt at some point between 1971-1988 and is characterised by poor-quality brickwork (See Figure 9 below). The building has also experienced the demolition of a large element (approximately one-third), again between 1977-81, and the rebuilding of a large proportion of the interior with a new steel structure and associated re-roofing. In addition, infilling has occurred between the buildings along with the rebuilding of large portions of the interior.



Figure 9 - Rear elevation

- 6.2.24 Of note is the 1980s corrugated metal and glass extension to the front elevation which is of poor architectural quality and detracts from the traditional frontage when viewed along Caversham Road (Figure 8). This is symptomatic of the building having been adapted and used for various purposes throughout its life.

- 6.2.25 With regard to the interior of the building, this unfortunately retains little true sense of its historic architectural character, due to modernisation and adaptation which has come about during intervening 120 years of commercial use. In this regard, the internal structure of the building appears to have been largely or wholly rebuilt, with a steel framed system of new columns and roof trusses, which based on their appearance, are believed to date from the 1960s onwards. This was confirmed during a site visit and the planning history listed in section 3 identifies such alterations.
- 6.2.26 With regard to the smaller Brewery and Malthouse buildings to the rear, the elevations of these rear buildings are less altered than the main building, and their more recent uses as office accommodation appears relatively sympathetic as an alternative sustainable use (See Fig 11).
- 6.2.27 The Council's Heritage Consultant has considered the background evidence for the local listing entry and similarly has relied upon advice provided by Amber Patrick (an acknowledged expert on Malting buildings). These comments restate those elements within the Local listing entry which contribute to its architectural and historic value, namely the historical association of the building and its industrial and architectural importance.
- 6.2.28 As the building is located directly onto a busy stretch of the IDR, the four lanes of continuous traffic do not create the most pleasant human scale environment from which meaningful cultural enjoyment of the buildings can occur. Furthermore, whilst visible from the north and south along this stretch of Caversham Road, the building is a significant distance from any pedestrianised areas, open space or urban squares from which the building's inherent historical value and architectural interest can be appreciated or enjoyed in relation to its original context. Nonetheless, as described above, the building is considered a well-known local landmark and undoubtedly contributes to the character of this part of the town.
- 6.2.29 It must also be recognised that the buildings have spent the vast proportion of their lives (almost 120 years out of a total of 150 years) in wider commercial use rather than as an integral part of the town past brewing heritage. Not uncommon throughout Reading, the buildings themselves are constructed in red brick, with a string course, dentil course or saw tooth detailing under the eaves and decoration around the window openings, as seen. Whilst not architecturally unique this does not detract from the pleasing and locally significant contribution that they make to what is generally considered an uninspiring stretch of Caversham Road. Maltings were once common in the town, but where examples survive, now remain isolated and functionally detached from their original historic purpose. The fact they constitute one of the last physical remains of the town's industrial heritage - which is increasingly at risk of being lost - adds to their importance locally and adds additional weight to their significance.
- 6.2.30 In considering the condition of buildings, observations made when visiting the site and with due regard to the local listing entry and supporting evidence submitted with this application, Officers consider the significance of these buildings to be derived less from their specific historic association with any one person, historical setting or architectural style, but more reliant upon their unique physical presence, visual link with the town's industrial past and the interest they provide to this specific part of Caversham Road. This is further informed by public consultation exercise undertaken as part of this planning application and the how the NPPF's ordinary definition of

‘Significance’. In this regard, the buildings as a cluster and as NDHA are considered to be of high local significance through common association, but lack evidence to demonstrate wider significance given their isolated context and altered condition.

- 6.2.31 Notwithstanding this significance, it remains necessary for the benefits of the development to be identified before an accurate assessment can be undertaken against Criteria 1 of Policy EN4.
- 6.2.32 So far in this report it has been identified that the proposal would provide a suitable form of mixed-use development (land use), an appropriate residential mix and density for the location, and make a substantial contribution towards affordable housing provision within the borough. However, an assessment of character/design, natural environmental credentials, sustainability, amenity and transport is still to be made.
- 6.2.33 Therefore, officers must defer making a full assessment as to whether the benefits of the development (as a whole) would significantly outweigh the asset’s established level of significance as required by Policy EN4 until the end of the report where all the benefits and disbenefits of the proposal are able to be considered in their entirety.

6.3 Character and design

- 6.3.1 One key aspect of considering the proposed development against paragraph 179 of the NPPF and the Local Plan Heritage criteria would be understanding the merits of any replacement building on site. This would include the layout, scale and external appearance of the proposed block in relation to those existing and future surrounding land uses. It should be noted that the views of the Council’s independent Design Review Panel (DRP) were sought at pre-application stage, and this has informed the proposal before you.
- 6.3.2 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 127 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.
- 6.3.3 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 or reinforcing existing features to create a positive and coherent identity that residents and local communities can identify with.
- 6.3.4 Policy CC7 ‘Design and the Public Realm’ sets out the local requirements with regard to design of new development and requires that all developments must be of high design quality that maintains and enhances the character and appearance of the area in which it is located. The aspects of design include: layout: urban structure and urban grain; landscape; density and mix; scale: height and massing; and architectural detail and materials.
- 6.3.5 Any proposal will be considered carefully against this policy, including heights, building lines, and plot coverage, of adjacent sites, taking into

account the existing built form/ footprint. These points will be considered under the following sub-headings.

Layout

- 6.3.6 The proposed development is considered to build on and respect the existing grid layout structure of Reading's central area, providing continuity and enclosure through appropriate relationships between buildings and spaces. In terms of the proposed building, the footprint and frontages continue to align with the historic frontage established by the existing building and those created by neighbouring buildings. The inclusion of a colonnade to the principal elevation provides additional set back and greater pedestrian space from what is recognised as a busy and unpleasant stretch road. As such, this approach to the building frontage is welcomed. On the much quieter Northfield Road, the footprint of the building broadly follows that of the existing vacant building, with small divergences (both within and outside the current footprint) at various points.
- 6.3.7 The proposed layout along with the colonnade along its key frontage is not considered to conflict with the envisaged format of development being brought forward on the Major CR11e site opposite or to the north and south along Caversham Road. Therefore, in this respect the proposal is considered to respond positively to its local context and reinforce the existing grid structure which exists at this part of town as required by Policy CC7, the NDG and NPPF.

Scale

- 6.3.8 Scale refers to perception of size, and this is often understood in relative terms. Generally, there are two types of scale: the general scale, meaning the size of the building in relation to the building next to it; and the Human scale, the size of the building or elements relative to the dimensions of people e.g. entrances and the street scene.
- 6.3.9 As described above, the site occupies a transition zone between much larger scale emerging development to the east (80 Caversham Road site) which proposes 8 storeys and a site frontage onto Caversham Road opposite of over 100m, and contrastingly the more domestic 2-3 storeys residential area to the west. The site is also a prominent corner plot, where the relationship of the building is largely determined by its position fronting onto what is the town main orbital traffic route. When considering the general scale and proportions of this proposal, it is important to acknowledge that the building will be primarily read when approaching from the north/south and from immediately to the west along Northfield Road. In responding to this context, the development proposes 7seven storeys fronting Caversham Road, stepping down to five storeys at the rear along Northfield Road.
- 6.3.10 At seven storeys, the overall height of the new block would signify a visually discernible reduction from the heights envisaged in policy and pending planning applications for the developments sites on the opposite side of the IDR. . However, when viewed along the Caversham Road, this would not amount to a significant difference in overall height between the two sites; nor would it clearly indicate the proposal was within a transition zone to lower scaled buildings to the west. Yet, it is worth recognising that the proposal has a much narrower plot frontage than the pending planning application on the former Royal Mail sorting office site to the east, the

Shurgard Self Storage site to the north or 69 Caversham Road to the south for that matter. Therefore, whilst appearing to a certain extent as a continuation of the scale of the redevelopments opposite (Fig 10 below), officers consider that the overall height of the building would not translate to any significant or extensive increase in built form along Caversham Road itself. In this regard, officers are also of the view that no harmful tunnelling affect would be created because of the narrowness of the frontage and the fact it occupies a corner plot.



Figure 10 - Section of comparable building heights (Approved 80 Caversham Road)

- 6.3.11 To the west, The Brewery and The Malthouse are of a much-reduced scale to both that of the proposed or existing building which front onto the IDR. Considering their position between 71-73 Caversham Road and the three-storey block of flats at Monmouth Court, it is recognised that these buildings experience a far greater degree of visual detachment from the more traditional and extensive terrace rows to the west or the larger lower density commercial buildings which currently occupy the Caversham Road frontage. Beyond Monmouth Court along Northfield Road (approximately 66m from the new development) is the first terrace house. Given the orientation and distance of those more traditional terraces to the west, only the top proportion of the building would be viewed from the rear gardens of certain terraces at a minimum distance of 85m, and likely to be viewed against the backdrop of the much taller and far greater massing of the 80 Caversham Road development along Caversham Road.
- 6.3.12 The western part of the proposed building reduces to 5-storey closest to The Brewery and The Malthouse. This scale responds more directly to a transition to the Monmouth Court flats rather than The Brewery and The Malthouse itself. The transition to The Brewery and The Malthouse is considered rather more abrupt, with a sharp reduction in scale from 5-storeys, to 2.5 storey and then rising slightly to Monmouth Court at three storeys (See Fig 10 above). Officers must consider whether the proposed scale and the stepped approach to the west would offer a positive degree of visual coherence between these buildings.
- 6.3.13 By way of context, when approaching the IDR in Reading from secondary or arterial routes leading into town, the character and role of buildings that front onto the town's main orbital road distinctly change. This can be seen most clearly at the junctions of the IDR with Southampton Street, Weldale Street, Church Street, Castle Hill, East Street and Watlington Street. In overall terms, whilst taller than neighbouring buildings further away from the IDR, the increase in scale of such buildings is considered appropriate in the context of their transitional location, announcing the start of the defined central and office Core, and Town Centre beyond.

- 6.3.14 Notwithstanding this, the more abrupt step down would be noticeable from the quiet and secondary nature of Northfield Road. The traditional relationship 71-73 Caversham Road has with the IDR (as a principal movement corridor in which the most 'trade' would be generated for its former commercial use), does not negate the need for this development to proportionately scale down to the more modest Brewery and Malthouse buildings, which will be separated by an open parking area. The proposal would not result in the most sympathetic transition between these two parts of the site, as the difference in scale (7 to 5 to 2.5 storey) would occur over a small distance and be noticeable when approaching Caversham Road from the west.



Fig 11 - The Brewery and Malthouse buildings looking west

- 6.3.15 The nearest residential terraces are considered to be a sufficient distance from the development site and largely screened by Monmouth Court itself. Furthermore, when viewed in context with the possible development at 80 Caversham Road or the Shurgard Self Storage site (should the site allocation be fulfilled), the scheme is unlikely to be viewed in isolation to those existing adjoining low-density commercial uses in the longer term.
- 6.3.16 Notwithstanding this, the reduction in height to the more domestic-scale Brewery and Malthouse building would make the proposal appear prominent within the street scene of Northfield Road at close proximity but would not introduce an unfamiliar or significantly harmful relationship that is not already found between much larger 'town centre' buildings and smaller more historic buildings, especially when approaching the IDR from quieter secondary routes within the town.
- 6.3.17 With regard to the human scale of the proposal, the ground floor entrances to the commercial unit and residential units are considered well-articulated, with a 1.5 storey colonnade facing both the Caversham Road and Northfield Road. The colonnade successfully defines the building at street level and provides this corner plot with much-needed definition and activity at street level. This creates a degree of local character and distinctiveness, which does not currently exist, and this design feature is welcomed.
- 6.3.18 In conclusion, it is felt that a development of this scale sits comfortably opposite planned redevelopment and is reflective of many such buildings that front onto the IDR. However the relationship to with its smaller and more characterful neighbours to the west (The Brewery and Malthouse) whilst not the most harmonious, is not uncommon and must be weighed in the overall balance. The human scale of the development and the individual site characteristics mean that overall the proposed scale is not considered to cause a significant level of harm to the immediate or wider character of the area.

- 6.3.19 It should be noted that any conclusion regarding scale must be considered in conjunction with the development's overall design and its wider impacts upon affected heritage assets in the planning balance.

Design

- 6.3.20 In turning to the detailed design of the replacement building, the Council's Design Review Panel (DRP) assessed this proposal at pre-application stage. Whilst not Locally Listed at the time, the Panel were considering purely the merits of the replacement building and this has informed the design evolution of the scheme now presented.
- 6.3.21 The Panel accepted that the site is in a low-density commercial area where various sites are presently coming forwards, and an opportunity exists for any replacement building to contribute the regeneration of this part of the town and be 'architecturally significant'. Earlier iterations were not considered to benefit from a compelling design rationale, with a main facade being "*too busy*" and uncomfortable. The DRP recommended a less complex and fussy approach be explored, recommending any worked up proposal references the site's plot width (rather than the pretence of two buildings which previously existed - suggesting the verticality of a residential Victorian or Georgian typology).
- 6.3.22 A 1.5 storey ground floor commercial element was considered to better link its commercial use to those adjoining units to the south and provide better articulation as a plinth for the re-worked upper floors. With a 5-storey middle section and 1 storey top section, the approach proposed was considered better able to accord with the tall buildings policy. By avoiding an oversimplified grid, this was felt to offer the opportunity for improved accommodation and a more defined roofline and silhouette (See Fig 12 below).

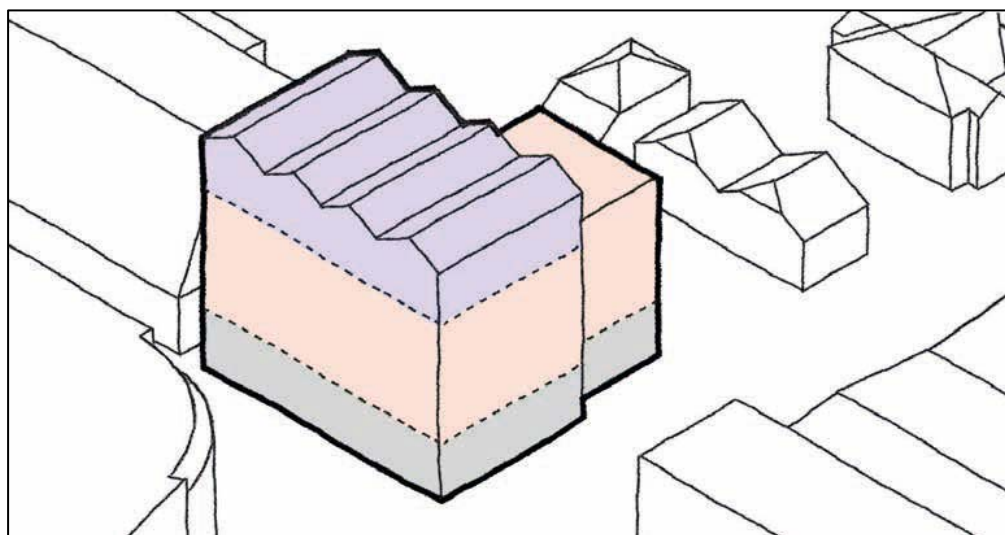


Figure 12 - Showing the distinct base, middle and upper sections to the building

- 6.3.23 The articulated roof (consisting multiple pitches), was considered to create an interesting roofscape to the top section of the building, with symmetrical gable ends creates contextual roofline. This acknowledges the towns past industrial heritage. The grid applied to each primary façade is considered to

respond to massing of the roof and create a pleasing windows alignment (See Fig 13 below). Officers support this robust urban design approach.

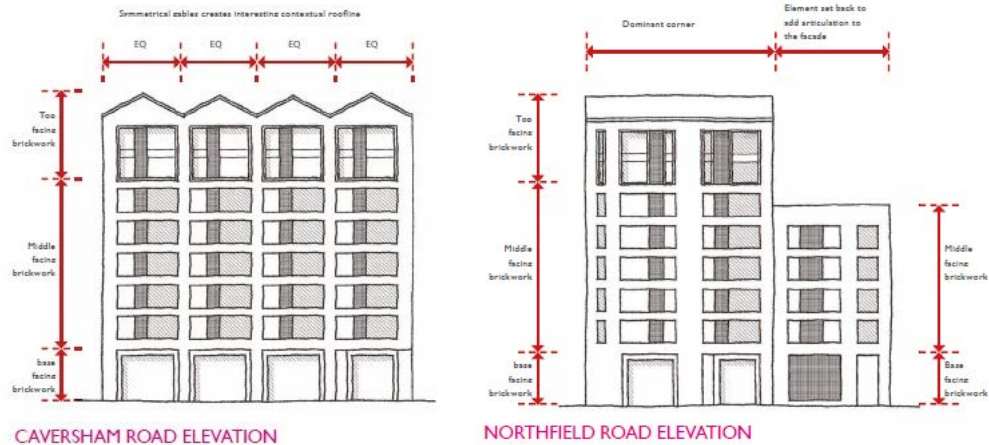


Fig 13 - Showing window alignment and façade treatment

6.3.24 The National Design Guide supports the need for any replacement building to have regard to its context, not only historically, but in terms of occupying a key position fronting onto the town's main orbital/arterial route and is situated a short distance from the commercial core. Currently the surrounding modern buildings are not considered high quality or imbued with a distinctive character reflecting any historic significance. Officers therefore consider replicating any such approach is also not considered good design.

6.3.25 In terms of architectural detailing and the need to bring forward those positive identified features found on the existing building, the green glazed brick arch to the Northfield Road façade is replicated twice in framing the entrances to the new commercial unit. Brick detailing to the former malthouse Building is able to be integrated to the upper floor façade through material treatment, whilst the recessed brick to mock window is replicated successfully on the southern elevation (See Fig 13 above).



Figure 14 - Initial bay detail & material use (view from north and south along of Caversham Road)

6.3.26 In responding to design feedback, the ground floor proportions were taken on board, whilst the use of red brick, a reduced material palette and less fussy articulation was considered to display a much more visually coherent appearance, and one which acknowledged as far as possible on a replacement building of this scale, the site's former historic significance. Two distinct roof

gardens are now included for residents, providing a degree of usable amenity space and adding interest to the rear and side elevation. Overall, the design approach of the current application is considered to successfully respond to the feedback from Officers and the DRP.



Fig 15: CGI of proposed scheme looking south along Northfield Road

- 6.3.27 Further to the above, Officers in conjunction with the Council's Natural Environment Team actively pursued the need to enhance the public realm around the building, providing more opportunity for both human interaction and soft landscaping. To replicate the narrow pinch point currently experienced whilst walking past the site along Northfield Road and into Caversham Road at the pedestrian crossing would not take advantage of the opportunities presented as part of this redevelopment scheme.
- 6.3.28 This led to the introduction of a colonnade around the two principal elevations of the building, framing the commercial entrance and providing welcome relief to the busy Caversham Road. This is not only considered to enliven and enhance what is currently a blank and poorly-surveyed façade to both streets (See Fig 8), but in conjunction with the proposed flexible commercial use, glazed frontage and ambitious green wall framing the colonnade, the development will encourage greater public interaction and reinforce the site's prominent corner plot position. In this respect the development is considered to perform a positive role and replicate the site's current function as a local landmark. This is considered to provide a welcoming intervention on what is currently a busy and unpleasant crossing between the station and the more traditional residential terraced streets to the west.
- 6.3.29 In summary, the design of this replacement building is considered to respond positively to the opportunity created by the immediate area's lack of street activity and seeks to raise design standards through a more distinctive building and ultimately creating a greater sense of place to the junction with Northfield Road and Caversham Road. This approach is also considered to compliment the planned development sites on the opposite side of the IDR.

- 6.3.30 The proposal is considered to represent a robust design overall, and through its articulation and materiality, successfully integrates with both the more modern planned development in the vicinity and that more traditional 'red brick' industrial style of development which currently exists to west. Notwithstanding those concerns identified with regard to the overall scale of the building and neighbouring relationship, the particulars of the proposed design at street level are supported and considered on balance to outweigh the limited harm caused by the transition of the 5-storey element to existing buildings to the west.

6.4 Natural environment

- 6.4.1 The Local Plan recognises the importance of natural features, the valuable contribution they can make to a place and to people's quality of life, especially in a developed urban area like Reading. There is a need for development in such locations to take all opportunities realistically available to integrated additional natural features into the overall design. These include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting etc. This is a key aspect in demonstrating the Council's ambition and commitment to tackling climate change and supported through the Council's Tree Strategy.
- 6.4.2 The current site is occupied by vacant commercial buildings and hard standing. The site contains no soft landscaping or natural vegetation. Considering the site's size and proximity to the IDR, the opportunities for significantly enhanced greening are currently limited. Whilst acknowledging the absence of any ecological and environmental contribution, there is the need to consider how the site's natural environmental role can be substantially enhanced as part of the development.
- 6.4.3 As described above, as a result of engagement with Officers, revised plans were received which included an enhanced landscaping package. This included the incorporation a green wall to the Caversham Road and Northfield Road frontage, architectural planters to the parapet edges of the communal roof terraces, additional tree planting within the car park, additional planting and removal of brick edges to the parking spaces along the western boundary and the incorporation of planters to the window-facing elements of the winter gardens on the eastern facade.

Green infrastructure

- 6.4.4 The proposed green wall would frame the colonnade arches and compliment the enhanced supplemental landscaping to the site perimeter onto Northfield Road (see Fig 16 below)



Figure 16 - Visual of soft landscaping when viewed southeast along Northfield Road.

- 6.4.5 This green wall is considered to be an effective means of improving the sustainability credentials of the building, increasing thermal insulation and providing pollution filtration along the heavily trafficked Caversham Road frontage. Given the limited space between the historical building line the pavement, it is considered a positive and creative way of allowing this site to make a contribution practically and visually to local green infrastructure, where limited opportunities would otherwise have existed given its location, use and any required future density. As described, this feature combined with the extended colonnade, creates welcoming and enlarged public realm around the building. The details of the green wall, alongside its ongoing maintenance, would be secured specifically via an amended landscaping condition and this is considered reasonable.
- 6.4.6 The proposal also seeks to maximise soft landscaping through the provision of two landscaped roof terraces which offer good opportunities for soft landscaping in addition to the site boundary along the Northfield Road entrance. To the entrance are two trees. The overall species mix and ongoing management/maintenance can also be secured via condition.
- 6.4.7 The Council will seek to ensure that hard and soft landscaping is designed in conjunction with the onsite drainage connecting planting pits with the proposed soakaways and drainage systems in this area so that the trees and smaller plants can filter surface water within the site. This will be secured as part of any drainage condition.
- 6.4.8 In considering the level of 'greening' that can be realistically secured on a previously developed site in a central urban location, Officers are now of the view that from a natural environment perspective, the development provides a meaningful contribution to the town's environment and performs a considerably greater role than the existing vacant commercial unit does. The green wall, two landscaped terraces, tree planting and soft landscaping is an innovative and considered package to enhance green infrastructure on this brownfield site in a prominent location on a busy road frontage. This positive contribution is afforded significant weight in the overall balance.

Ecology and trees

- 6.4.9 The Council's Ecologist has raised no objection to the proposal subject to conditions ensuring habitat enhancement measures be secured. Tree planting to the front of the site on highway land (the footway) was explored

at length with the developer and the Council Transport Team, however the technical limitations posed by the proximity to the existing pedestrian crossing with underground and above ground infrastructure along with the narrowness of the footways prevented this from being pursued. However, two trees are proposed to the Northfield Road frontage framing the access into the parking area. In line with the forthcoming revised Tree Strategy and Biodiversity Action plan, tree planting can be secured as wildlife friendly (in line with an appropriately worded condition) to achieve compliance with policies.

Flood risk and drainage

- 6.4.10 Policy EN18 (Flooding) seeks that development should not increase the risk of flooding and that major schemes should include provision of sustainable drainage systems (SuDs).
- 6.4.11 The site is located within Flood Zone 2. As a more vulnerable development in terms of flood risk classification any planning application is required to successfully demonstrate that it has passed the flood risk sequential test. The sequential test seeks to steer new development to areas with the lowest probability of flooding.
- 6.4.12 The Council's latest 'Housing and Economic Land Availability Assessment' (May 2017) (HELAA) notes that 'there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2'.
- 6.4.13 The HELAA and the submitted Sequential Test are felt to adequately demonstrate that there are no reasonably available, sequentially preferable sites within the surrounding area which are at a lower probability of flooding and that would be suitable for the proposed development proposed. On this basis, it is considered that the Sequential Test has been satisfied.
- 6.4.14 A site specific Flood Risk Assessment has also been submitted with this application. All residential accommodation will be located at first floor level and above, significantly above the modelled fluvial flood level. Flood resistance and resilience techniques are recommended to be incorporated at ground floor level and this can be secured via condition. Whilst safe access and egress is not available during a 1 in 100 year plus climate change event, it is recommended that site management and residents sign up to receive free flood warnings from the EA. The residential units at upper floors themselves comprise safe refuge and it is considered that adequate warning will be provided for the retail unit to be evacuated, especially given the proximity of an area wholly outside of the floodplain. Officers recommend that a Flood Management Plan is prepared to detail the actions to be taken before, during and after a potential flood event.
- 6.4.15 As a requirement of the Building Regulations, it is recommended that the ground floor level is elevated 150mm above surrounding ground levels to help mitigate the increase of floodwater from other sources, should an extreme event occur. Officers are able to secure this along with the need to incorporate permeable paving and underground attenuation storage to reduce the surface water discharge rate prior to discharge to the Thames Water surface water sewer. This would be secured via separate conditions.

- 6.4.16 Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the inclusion of surface water attenuation techniques and constitute an improvement to the site's current drainage performance in accordance with Policy.

Leisure and open Space

- 6.4.17 Policy CC9 'Securing Infrastructure' provides the basis for justifying infrastructure provision as part of development proposals. Based on the calculation provided by the Council's Leisure Team, the development is liable for a contribution of £92,400 for improvement and extension of existing facilities within the Thames Parks which are in close proximity to the development.

6.5 Sustainability

- 6.5.1 Local Plan Policy H5 'Standards for New Housing' seeks that all new-build housing is built to high design standards. In particular, new housing should adhere to national prescribed space standards, water efficiency standards in excess of the Building Regulations, zero carbon homes standards (for major schemes), and provide at least 5% of dwellings as wheelchair user units. Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.
- 6.5.2 The applicant has submitted a sustainability and energy report as part of the application which follows the relevant policies and Sustainable Design and Construction SPD guidance applying the recognised energy hierarchy of 'be lean', 'be clean' and 'be green'.
- 6.5.3 The information submitted as part of the application demonstrates that through the measures outlined in the energy strategy, for the residential element of the proposal it is anticipated that a 95.1% reduction in CO₂ emissions can be achieved in comparison to a Building Regulations Part L compliant baseline. In line with the Council's Sustainable Design and Construction SPD (2019), a \$106 contribution will be provided to offset the remaining tonnes of CO₂. This is calculated as £3,510.
- 6.5.4 As the commercial unit will be completed as a 'shell only' assessment, initial simulations show that this could achieve a Building Emission Rate (BER) of 29.5 kgCO₂/m² compared to the Notional Building's Target Emission Rate (TER) of 31.6 kgCO₂/m², leading to a 6% decrease in carbon emissions when compared to a Part L baseline. Should planning permission be granted, agreement of the final level of the carbon off-setting contribution is delegated to Officers to ensure a review of the calculations has been completed.
- 6.5.5 In terms of decentralised energy provision, the applicant has considered a number of measures with a community Air Source Heat Pump (ASHP) system and Domestic Hot Water generation being selected as the most suitable Low and Zero Carbon technology for site. It is important to note that some roof space will be required for the location of ASHPs. Furthermore, roof mounted

Photo Voltaic cells have been determined to be a suitable technology to support the ASHP system in achieving a Zero Carbon strategy.

- 6.5.6 As described, a sustainable drainage strategy (SuDs) has also been submitted as part of the application. No objection is raised by the Local Flood Authority (RBC Transport), subject to conditions to secure a timetable for its implementation and details of management and maintenance of the scheme and its implementation in accordance with the approved details.
- 6.5.7 Officers are satisfied that the proposals demonstrate a good standard of sustainability and in particular the requirement adhering to zero carbon homes standards and therefore the development is policy compliant in this regard.

6.6 Amenity

- 6.6.1 Ensuring a high standard of accommodation is essential to the quality of life of future residents. This is a key element of the vision for the Borough and more important than ever in light of the ongoing Covid19 pandemic which is affecting every aspect of urban life. As described earlier in this report, Policy H5 provides a series of standards which all new build housing should be built to. More generally, Policy CC8 stipulates a number of factors that new residential developments should be considered against to ensure they are not creating unacceptable living conditions, whilst the layout and design of the scheme must have due regard to current nearby and future occupiers.

Privacy and overlooking

- 6.6.2 In terms of overlooking between future units, the layout of the building has been suitably designed to ensure future occupiers will not suffer from any harmful loss of privacy from existing nearby buildings or other units within the scheme itself. The orientation of windows is generally such that opportunities for direct overlooking is minimised, with this only possible at acute angles and commensurate with a central urban location and the type of accommodation proposed. With regard to the nearest residential neighbours, there would be approximately 27m between the eastern frontage of the development and the proposed western frontage of the proposed development (pending planning application) at 80 Caversham Road opposite on the IDR. To the west there would be approximately 35m between the western elevation of the proposed building and the eastern elevation of Monmouth Court. These distances are considered commensurate with the prevailing urban layout and sufficient to ensure no harmful relationship is created or privacy unacceptably compromised.

Daylight/sunlight

- 6.6.3 In terms of light effects of developments, the Building Research Establishment (BRE)110 has guidelines on assessing daylight and sunlight effects of development, which the Council applies flexibly given the high-density prevailing character of the central area of the town.
- 6.6.4 In considering the findings of the Daylight and Sunlight report provided by the applicant's light consultant, the report demonstrates that the majority of rooms will meet the BRE recommendations for Average Daylight Factor and Daylight Distribution or will be within a negligible distance. Where the rooms are below negligible, these rooms are situated on the elevation that

faces the proposed scheme opposite at 80 Caversham Road. In considering the content of this report, Officers support the view that any building proposed for this site will struggle to meet the BRE recommendations on this elevation due to the bulk and massing of the proposed scheme at 80 Caversham Road.

- 6.6.5 Having due regard to the particular location of this urban development and its surrounding constraints, it would achieve daylight/sunlight results commensurate with the area within which it is related. Furthermore, it should be noted that given the sufficient distance to the nearest dwellings to the west, this scheme causes the minimum impact on these receptors. No objection is therefore raised to the daylight sunlight findings. It is also calculated in the Sustainability Statement that 100% of the retail unit will meet the required BREEAM daylighting assessment criteria.
- 6.6.6 In terms of microclimate/wind matters, the proposed development is not more than 7 storeys. As Policy CC8 references new development of more than 8 storeys, it is not considered necessary to test conditions around a proposed building of the scale proposed. It is also notable that the proposed colonnade will provide a pleasing relief to pedestrians in poor weather.

Internal and external living space

- 6.6.7 The internal layout of the proposed units is arranged so as to create an adequate overall standard of living accommodation for future occupiers. Although the internal shape of the southern-most 2-bed 3-person unit is irregular, the overall size of the units as a whole comply with the national space standards, as do the bedrooms, of which the majority include space for storage. Finally, half of all units are dual aspect, with the remainder providing suitable outlook and access to natural ventilation and private external amenity space.
- 6.6.8 With regard to external space, two types of private amenity space are proposed in the development, conventional projecting balconies and integral winter gardens. The projecting balconies are on the quieter south and west facing facades to allow for maximum sunlight, whilst the winter gardens are on the north and south facing facade along Northfield Road and Caversham in order to provide a more usable type of amenity space that is ultimately sheltered from the noise of the road.
- 6.6.9 Winter gardens are enclosed balconies integral to the building. They benefit from floor-to-ceiling external glass walls, normally with adjustable glass louvre panels. In busy locations near traffic noise (as in this case), or where windy, cold and inclement weather occurs, these winter gardens allow future occupants the ability to better control their environment at any time of the year. The proposed winter gardens also have internal glazing which can be opened to allow air flow into adjacent living areas (See Fig 17 below). In the case of this proposal, they would allow occupants to sit out, dry clothes, and grow plants on the busy Caversham Road elevation, at all time of year.

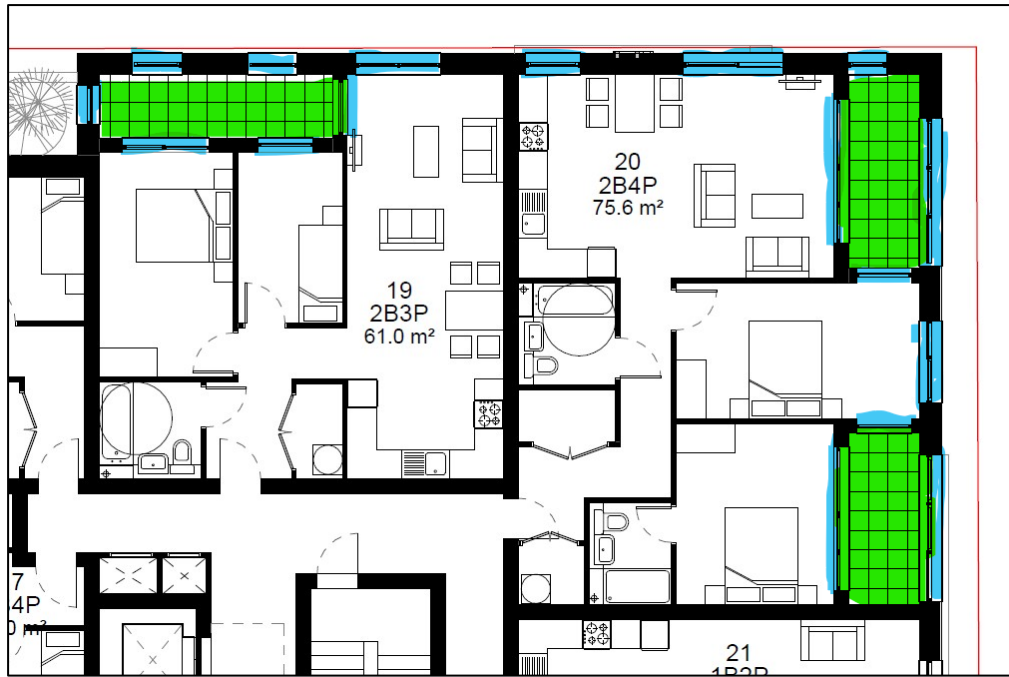


Figure 17 - Typical floor plan showing winter gardens (green) and external and internal glazing (blue)

6.6.10 With regard to communal amenity space, as described above the proposal provides two separate areas. These take the form of a 1st floor shared roof terrace/podium garden of 107sqm and 5th floor shared roof terrace/podium garden of 129sqm (see Fig 18 below). These communal roof gardens allow sitting out, socialising, and general outdoor space for residents. They also offer a safe and pleasant space for residents to relax, work and meet visitors, especially if working from home or to support any unintended or prolonged occupation should the situation require. Detail of the exact arrangement and soft landscaping can be secure via condition.



Figure 18 - Showing 1st and 5th floor roof terrace/podium garden

6.6.11 In summary, the scheme provides a policy compliant range of internal space standards and private amenity provision. Whilst the two communal roof gardens offer additional space to relax, socialise and meet the day to day needs of future occupants.

Accessibility and lifetime homes

- 6.6.12 Policy H5(f) requires that on all developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in Part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.
- 6.6.13 Officers are satisfied that the accessibility/adaptability of the units can meet these requirements. To ensure these units are provided and maintained as such, a compliance condition is recommended to state that a policy compliant proportion of wheelchair user dwellings are ready prior to first occupation and are retained as such thereafter.
- 6.6.14 In providing Reading's residents, particularly those in most need, with access to high quality housing that meets their requirements and safeguards their quality of life, the overall quality and standard of accommodation strongly supports the requirements of Policy H5. Accordingly, the quality of the accommodation provided is a key tangible planning benefit in the overall planning balance of considerations for this proposal.

6.7 Health and wellbeing

- 6.7.1 The current Covid19 pandemic has highlighted the critical role our urban environment has on the way we live and work. It also highlights how, as a Local Planning Authority, supporting well planned development can have a huge impact on peoples' health, wellbeing, safety and overall comfort. In addition to the above discussion on amenity, the Council has an obligation to consider the following health and wellbeing topics in relation to any new development.
- 6.7.2 Maximising exposure to natural daylight, providing users with an external view and connection to nature are crucial measures in supporting the mental wellbeing of occupants and supported strongly by Policy CC8 'Safeguarding amenity'. As described, for an urban location all proposed flats have access to natural light, and outdoor space, with the smallest 1-bedroom flats benefitting from multiple windows and winter gardens serving bedrooms and living areas. Larger 2/3 bedroom flats have access up to 6 windows (many with dual aspect) along with private balconies/terraces. This access to private and communal outside space would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation should the situation require. The development will maximise the use of natural daylight and reducing the need for artificial light by occupants through generous amounts of glazing.
- 6.7.3 In recognition of the challenges presented by climate change and with due regard to the Council's recently declared climate emergency, extreme temperatures can also have an immediate and detrimental effect on health and wellbeing of residents. Effectively controlling and regulating temperature both in warmer months and those colder months is crucial in maintaining a healthy and comfortable environment which is supported by Policy CC3: 'Adaptation to climate change'. The proposed glazing has been specified to have a G-value of 0.5 which will prevent excessive solar gains, with the majority of units having an east/west principal elevation to avoid

excessive heating. Winter gardens and private balconies provide the opportunity for natural ventilation to habitable rooms.

6.7.4 Crime and the fear of crime also have a major impact on quality of life and the wellbeing of a building occupants. Enabling occupants to feel safe and secure is therefore essential to successful, sustainable communities and is supported by Policy CC7 'Design and the public realm'. The proposed development provides natural surveillance of streets and open spaces between buildings, with the retail entrance and residential lobbies covered by CCTV services and audio/visual entry system. The car park security gate will have security access systems to avoid any intruders entering and all the cycle parking will be secure and accessible via pin pad-controlled entry points. Notwithstanding this, a pre-commencement (barring demolition) condition would still be considered necessary to secure full and precise details of how the development will achieve the Secured By Design Award, to demonstrate the measures detailed to date are fully designed and incorporated into the scheme and retained/maintained thereafter.

6.7.5 As described earlier in this report, green infrastructure and access to green space provides benefits not only to the natural environment, but to the building's occupants. Introducing design elements within a building which supports human interaction with nature can lead to the promotion of a healthy lifestyle through the promotion of exercise, opportunities for relaxation and subsequently reducing stress levels. This development provides all flats with private amenity space in the form of winter gardens, balconies, private roof terraces, and additional access to larger communal roof terraces. This offers the opportunity for fresh air, small scale horticulture, drying of clothes and importantly ventilation of internal spaces. This would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation by residents should the situation require. Accordingly, the above health and wellbeing factors are considered key material planning benefits which must be afforded weight in the overall balance.

6.8 Transport

6.8.1 With regard to cycle infrastructure, the signalized pedestrian crossing on Caversham Road adjacent to the site south of Northfield Road is proposed to be upgraded to accommodate cyclists as part of the pending planning application at 80 Caversham Road. Improved access to the north and west for cyclists is a key component of this adjacent application.

6.8.2 This current application includes a scheme to provide an on-carriageway dedicated cycle link along Northfield Road between the Caversham Road crossing and Swansea Road to the west. This will provide connectivity to the northern entrance of the station connecting access to the town centre to the south and Christchurch Meadows to the north as well providing access to schools, leisure and employment in West Reading. In order to facilitate this, land fronting onto Caversham Road adjacent to the pedestrian crossing would need to be offered for adoption to provide a shared pedestrian/cycle facility. This can reasonably be done via a S106 agreement.

6.8.3 An agreement under Section 278 of the Highways Act, 1980, will also be required with respect to proposed works affecting the existing highway. The Highway works are shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.

- 6.8.4 Vehicle access to the site is currently provided via Northfield Road. Caversham Road and the surrounding road network all have extensive parking restrictions preventing on-street parking. The development proposes to consolidate the existing vehicular accesses to the site into a single dropped kerb access. This will provide access to the gated parking area.
- 6.8.5 To maximise space on site, servicing and deliveries will take place on Northfield Road via a new loading bay along the site frontage. This will require a rearrangement of the on-street parking bays through a Traffic Regulation Order (TRO) which will require approval by the Traffic Management Sub Committee (TSUB) and will be subject to statutory consultation. Given TROs are under separate legislation to the Planning Act there is a possibility they may not be approved. However, any costs associated with the changes to the TRO and on-street signage and markings would have to be paid upfront by the applicant before commencement on site.
- 6.8.6 The site is located within Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per unit and 1 space per 10 units for visitor parking. There are 24 parking spaces within the gated car park. The revised proposal indicates that 15 spaces including 2 accessible parking will be provided for the proposed residential element of the development (a ratio of 0.36 spaces per home); and 8 spaces including 1 accessible parking spaces are provided for the existing offices.
- 6.8.7 The proposed parking provision is recognised by the Transport Team as being below the Council's requirements. However, given the site's close proximity to the centre of Reading, and its easy access to public transport connections and the facilities within the town centre, a lower parking provision can be supported in this location and is consistent with meeting the Council's Climate Change obligations. The surrounding road network all has parking restrictions preventing on-street parking, therefore, a reduction in the parking provision will also not lead to on street parking being detrimental to road safety. Parking permit restriction conditions would be applied.
- 6.8.8 The Council's adopted Parking Standards and Design SPD states that developments of more than 10 residential units in the town centre should provide or support a car club on the site or demonstrate that the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator and agreement has been reached for provision or access to a nearby car club to be secured via the S106 agreement.
- 6.8.9 Policy TR5 of the Local Plan states that *"Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point."* In view of this, the development must provide at least 3no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. The proposals include the provision of 3no electric vehicle charging points and this could be secured via condition.

- 6.8.10 All the proposed cycle parking will be secure and accessible via pin pad-controlled entry points. Additional provision of 5 Sheffield stands located in an external but covered area within the car park, provide an additional 10 cycle parking spaces for visitors and other users.
- 6.8.11 Finally, with regard to refuse and waste, the proposed bin store is considered to be conveniently located on the ground floor of the site which will provide easy access for refuse collection from Northfield Road. Therefore, from a transport perspective, no objections are raised to the highway safety, access or parking elements of the scheme. It should be noted that the identified cycle infrastructure improvements to Northfield Road (to be secured via a S106 agreement) are also a wider public benefit of the proposed development.

6.9 Environmental Protection

- 6.9.1 No significant vibrations, dust, fumes or smells are envisaged should the development be implemented and built. During the demolition and construction phase, the Environmental Protection observations (see section 4, from paragraph 4.6.1, above) require a demolition and construction method statement condition to confirm such matters. These measures will primarily protect existing nearby occupiers. However, should some future occupiers move into properties prior to the completion of all works they will be protected too. The Environmental Protection observations also dictate the requirement for the standard series of contaminated land conditions to be secured, which will protect future occupiers from these potential risks. Separate to Planning, the proposed works are also required to be in accordance with the Borough's Guidance Notes for Activities on the Public Highway.
- 6.9.2 With regard to noise, the submitted noise assessment shows that the recommended standard for internal noise can be met if the recommendations are incorporated. The noise assessment also confirms that sufficient insulation will be incorporated to achieve building regulations between the dwellings and also between the commercial use and the dwellings above. These matters are to be secured via condition.
- 6.9.3 The proposed development is located within an AQMA that is identified as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors, i.e. Residential flats. The submitted Air Quality Assessment (AQA) concludes that the levels of pollutants at the proposed development are not predicted to exceed the limit values therefore mitigation measures are not required. The AQA concludes that there will not be an impact on air quality as a result of the development therefore a mitigation scheme is not required. The Council's Environmental Protection Team do not object to these conclusions.
- 6.9.4 Finally, the submitted contaminated land desk study concludes that further investigation is required in the form of a Phase II site investigation due to the potential presence of contaminants and exposure pathways. Conditions are therefore recommended to ensure that future occupants are not put at undue risk from contamination should development proceed.

6.10 S106/Community Infrastructure Levy

6.10.1 The proposals would be liable for CIL and the liability is projected to be £591,000. Albeit this may decrease in practice as the applicant could apply for relief on the on-site affordable housing units and or deferral of payment as permitted under new legislation enacted because of Covid19.

6.10.2 A construction phase Employment Skills and Training Plan would also be secured via the section 106 legal agreement as per the Council's Employment Skills and Training SPD. This could be in the form of a site-specific plan or equivalent a financial contribution. As such, the S106 will secure this in a flexible manner covering both options.

6.10.3 With regard to a planning obligation, a Section 106 Agreement would be required to secure the following heads of terms as described in this report:

- Secure the agreed level of onsite affordable housing (5 units shared ownership) and an off-site commuted sum of £500,000 towards the provision of affordable housing elsewhere in the borough;
- £92,400 Open Space contribution to improve and extend facilities within the Thames Parks
- Ensure land fronting onto Caversham Road is offered for adoption to provide a shared pedestrian/cycle facility;
- Secure resident access to a car club on the site or demonstrate that the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator.
- Offset the remaining tonnes of CO2 not being captured by the redevelopment as per the Council's Sustainable Design and Construction SPD (2019), estimated to be £3,510 (To be finalised).
- Secure an agreement under Section 278 of the Highways Act 1980, for proposed works affecting the existing highway as shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.
- Secure a construction phases Employment Skills and Training Plan or equivalent financial contribution. As calculated in the Council's Employment Skills and Training SPD (2013).

6.10.4 Policies CC9 (Securing Infrastructure) and DM3 (Infrastructure Planning) allow for necessary contributions to be secured to ensure that the impacts of a scheme are properly mitigated. It is considered that each of the obligations referred to above would comply with the NPPF and Community Infrastructure Levy (CIL) in that it would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development.

6.11 Other matters

Equalities Impact

6.11.1 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups as identified in the Act have or will have different needs, experiences, issues and priorities in relation to the particular planning application. Therefore,

in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

Representations

- 6.11.2 All matters raised are considered to be covered within the Appraisal section above.

7. CONCLUSION

- 7.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), an assessment to be made in accordance with the development plan unless material considerations (which include the NPPF) indicate otherwise.
- 7.2 In returning to Paragraph 197 of the NPPF, there remains the need for the effect of the proposal on the significance of a NDHA to be taken into account in determining the application. It makes it clear that for applications that directly or indirectly affect such assets it will be necessary to carry out a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset. As has already been noted, Policy EN4 contains the primary criteria such a proposal must meet alongside wider heritage policies within the Local Plan and NPPF. Both Policy EN4 and the NPPF contains the need to have regard to the overall public benefits of the development in undertaking this balanced judgement. The established degree of heritage significance meriting consideration in this proposal is also material consideration.
- 7.3 As described in paragraph 6.2.33, it is therefore necessary to return to the benefits and disbenefits of the proposal in their entirety in undertaking an accurate assessment against Criteria 1 of Policy EN4. These have been considered under the three dimensions of sustainable development, economic, social and the environmental. As heritage relates to the historic environment, heritage and will be considered under 'environmental' dimension as consistent with case law.

Economic

- 7.4 During the construction phase, the proposed development would clearly contribute to and encourage associated economic activity within the borough by directly sustaining jobs in the construction industry. This would be supported further by a construction phase Employment Skills and Training Plan which can be secured via the Section 106 legal agreement.
- 7.5 The proposal would replace an existing vacant commercial unit that would require significant investment to be brought up to modern occupancy standard and an attractive commercial proposition. The more flexible and commercially attractive space created at ground floor as a result of this scheme would support continued employment opportunities within the Town Centre and Office Core, complimenting surrounding future planned non-commercial uses. Through redevelopment of such vacant and under-utilised land, the site would also make an important and positive contribution to the economic recovery of the borough throughout and following the Covid19 pandemic.

- 7.6 In the longer term, future occupants of 44 new dwellings will contribute to the viability and vitality of businesses in the town centre at a time where the economic health of the High Streets is a key Council priority. Other related economic benefits include CIL contributions, the matters set out in the S106 Heads of Terms, as well as the award of new homes bonus payments, business rates and Council Tax receipts to the Council. The development would therefore clearly perform a positive economic role.

Social

- 7.7 In terms of the social role, the proposal will undoubtedly fulfil one of the NPPF's core aims to 'boost significantly the supply of housing' and deliver a wide range of homes of different types and tenures. The proposal would contribute to meeting the Borough's identified housing need through an uplift of 44 units, and of a mix and density appropriate to its highly sustainable location.
- 7.8 The proposal also makes significant affordable housing contribution of a minimum of 34%. This is above policy compliance and substantially in excess of the offer agreed and accepted originally by Council Officers. Ensuring a supply of good quality, secure and affordable housing to meet identified local housing needs is a key priority for Reading Borough Council as highlighted in the Council's Homelessness Strategy 2016-2021, Local Plan, and corporate objectives. This development would therefore make a welcome contribution to improving access to local affordable housing to meet local needs and would constitute a significant and tangible public benefit. It would clearly maximise the benefits of the proposed development in delivering sustainable development, but also in supporting the provision of sustainable communities within Reading Borough in an evidenced and justifiable way consistent with the NPPF.
- 7.9 In design terms, by introducing a colonnade along Caversham Road and Northfield Road, the scheme will provide much needed visual uplift to what is a busy and often unpleasant junction, allowing better natural surveillance and activity along what is currently a series of inactive frontages. The proposal also presents an appropriate layout and design quality. In terms of scale, the replacement building is recognised as being of notably greater scale than those existing traditional buildings to the western boundary. However, the evolving nature of the townscape to the north of the Station and juxtaposition which is often experienced between much smaller historic buildings and larger more modern buildings is not uncharacteristic around the town main orbital route, and considered with the design benefits as a whole, it is not considered to translate to any significant level of harm given the degree to which the site is already compromised by surrounding and planned development.
- 7.10 Finally, in terms of health and wellbeing, the current Covid19 requires Local Planning Authorities to actively ensure new development maintain peoples' health, wellbeing, safety and overall comfort. As described, the development is considered to create a good quality level of residential accommodation that would not prejudice or prevent future occupiers from enjoying a good quality of life, hinder any recovery from respiratory illnesses, or make any unintended or prolonged occupation by residents difficult should the situation require. Accordingly, the above health and wellbeing factors are considered key material social benefits.

- 7.11 In light of the above, the development would clearly perform a positive social role, fulfilling a range of key Local Plan Policy and wider social objectives.

Environmental

- 7.12 Firstly, with regard to the natural environment and the role this development will play in meeting the challenge of climate change, it is recognised that new purpose-built mixed-use development would inherently meet an enhanced level of sustainability than existing through compliance with the Council's enhanced energy efficiency and sustainability standards. Through the efficient use of previously developed land, the development will also meet the Council's spatial strategy for the location of new development by reusing land of low environmental value.
- 7.13 In terms of sustainable transport and supporting the Council's key objective of reduced car usage and improved air quality, the proposal would provide improved and more desirable cycle facilities for residents and the wider public. Through a S278 agreement, the development allows new dedicated cycle infrastructure on Northfield Road to connect existing parts of the cycle network to thereby contributing to a comprehensive network in the town. An agreement to secure membership of a car club for residents is also a positive aspect given that residents will largely be reliant on alternative and more sustainable modes of travel. These are additional wider public benefits which fulfil the environmental dimension of sustainable development.
- 7.14 The introduction of a significantly greater level of on-site planting, a green wall and two roof terraces, would provide a visual and environmental uplift to the site and the immediate area, thereby allowing the redeveloped site to confidently perform a far greater environmental role than it does at present.
- 7.15 With regard to the historic environment it is necessary to return to whether the proposal satisfies the policy test set by Criteria 1 of Policy EN4 of the Local Plan. This involves an assessment of whether the benefits of the development would significantly outweigh the asset's significance.
- 7.16 As described, the NDHA is afforded sufficient local significance to be listed as one of the boroughs 'Locally Important Buildings and Structures' and the report fully recognises that the proposal would result in the complete loss of 71-73 Caversham Road. The development would therefore substantially harm 71-73 Caversham Road by virtue of its removal and further compromise the setting of the remaining NDHA buildings in the identified cluster. The development would detach them further from their former industrial relationship and reducing their isolated contribution to the area.
- 7.17 In considering 'significance', the public consultation exercise undertaken as part of any application (neighbour letters and site notice) proves a useful indicator of value alongside the submitted documentary material with the application. Public consultation is a fundamental aspect of the planning process and provides the opportunity for those affected by a development to consider what is proposed, and how it will affect them. As described earlier in this report, two separate letters of objection were received from individuals in addition to those received from the Reading CAAC and CADRA objecting to the proposal for the reasons given in Section 4.4.

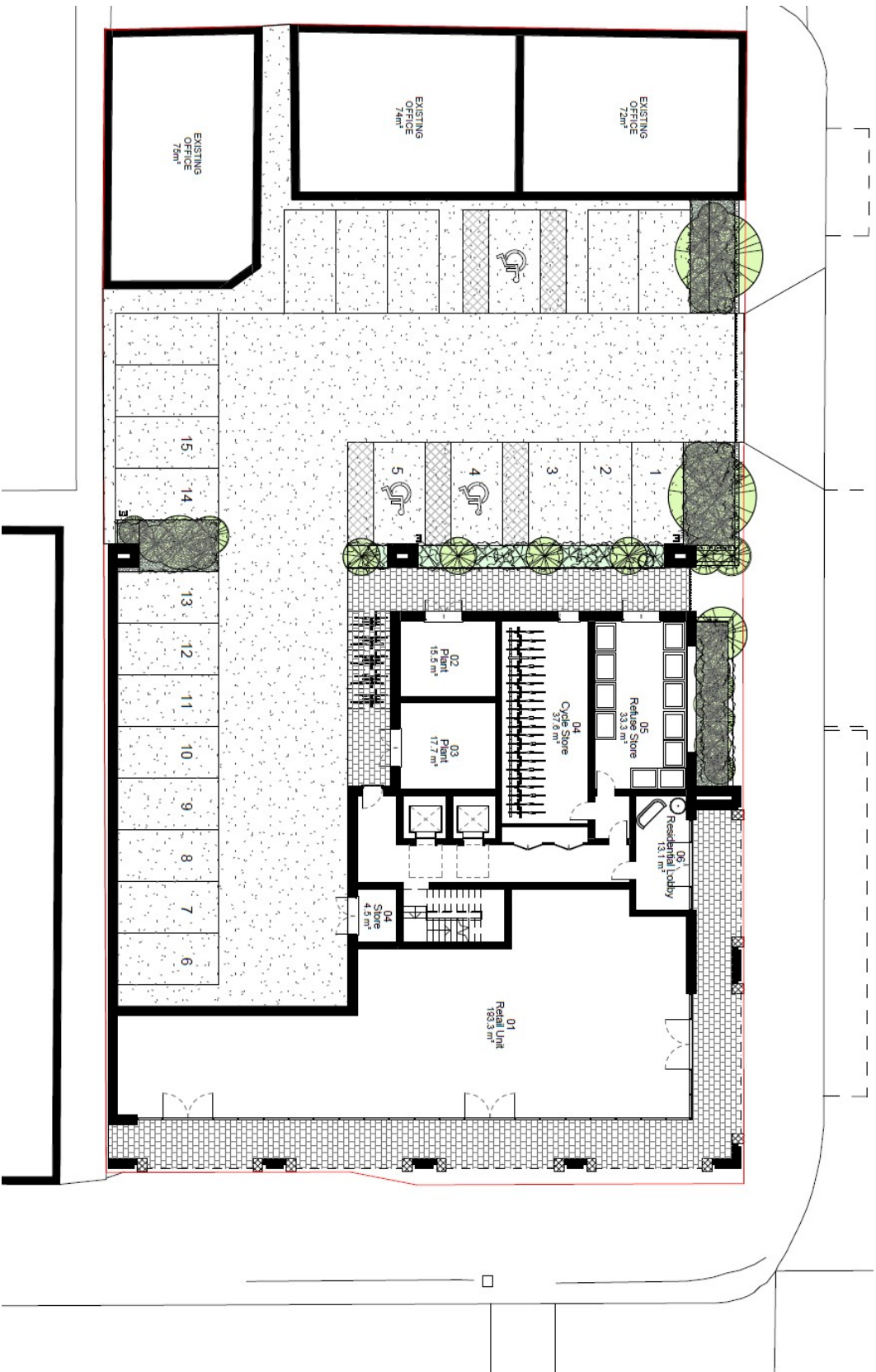
- 7.18 For what is a densely populated inner urban area, it is clear from the amount and nature of representations received by the Council, that whilst valued, there was little overwhelming public sentiment that the building itself being replaced had a significant level of inherent cultural or historic value to individuals within the local community. Those views expressed through public consultation and through enquiries with the Council focused more on its status as a local landmark through its past association with a much loved hardware store (Drews), rather than its specific architectural value or historic relationship with Henry Pendlebury Dowson and the town's former brewing heritage.
- 7.19 This is maintained by the fact that there is no specific reference to the building itself within any adopted development plan documents, adopted SPD, nor is it within a Conservation Area. As described, the building's location fronting onto one of the town busiest orbital roads prevents meaningful cultural enjoyment of the building by the local community.
- 7.20 Notwithstanding this, and as informed by the Council's Heritage consultant, and the local listing entry, the proposed development would result in the loss of one of the few physical remains of the town's industrial heritage in this part of town. This adds to its importance locally and adds additional weight to the NDHA's significance as a whole. As described in Section 6.2, this identified level of significance is prevented from being at the 'upper end' on the spectrum of local 'significance' given the supporting evidence submitted with this application, the condition of building and the limited role it currently performs.
- 7.21 It is now necessary to return to the tests imposed by Criteria 1 of Policy EN4 of the Local Plan and revisit the benefits of the development as a whole. This also fulfils the requirement of Paragraph 197 of the NPPF, which requires a balanced judgement to be made by the decision maker.
- 7.22 Earlier in this report it was identified that the proposal would provide a supported form of mixed-use development (land use), an appropriate residential mix and density for the location, and importantly, make an overwhelmingly positive contribution towards affordable housing provision within the borough. It has now been established in the above sections that the overall design of the replacement building, its natural environmental credentials, sustainability, amenity and outcomes would themselves result in compliance with the Local Plan and sustainability objectives of the NPPF and result in significant and wider ranging public benefits. Therefore, such a balancing exercise can now be undertaken as benefits and disbenefits of the proposal have been identified.
- 7.23 The overwhelmingly positive economic, social and natural environmental benefits of the development are considered (in the overall planning balance) to significantly outweigh the heritage significance of 71-73 Caversham Road and the loss of one of the existing three buildings which make up this NDHA as a whole. As the overall public benefits of the proposal are considered to significantly outweigh assets identified significance, the development is considered to pass the test imposed by Criteria 1 of Policy EN4.
- 7.24 In satisfying Criteria 1) to Officers' satisfaction, Criteria 2) and 3) can then be considered. In accepting retention is no longer 'important' as implied by Criteria 1, the wording of the policy Criteria 2) requires recording of the heritage asset should be undertaken and submitted alongside development

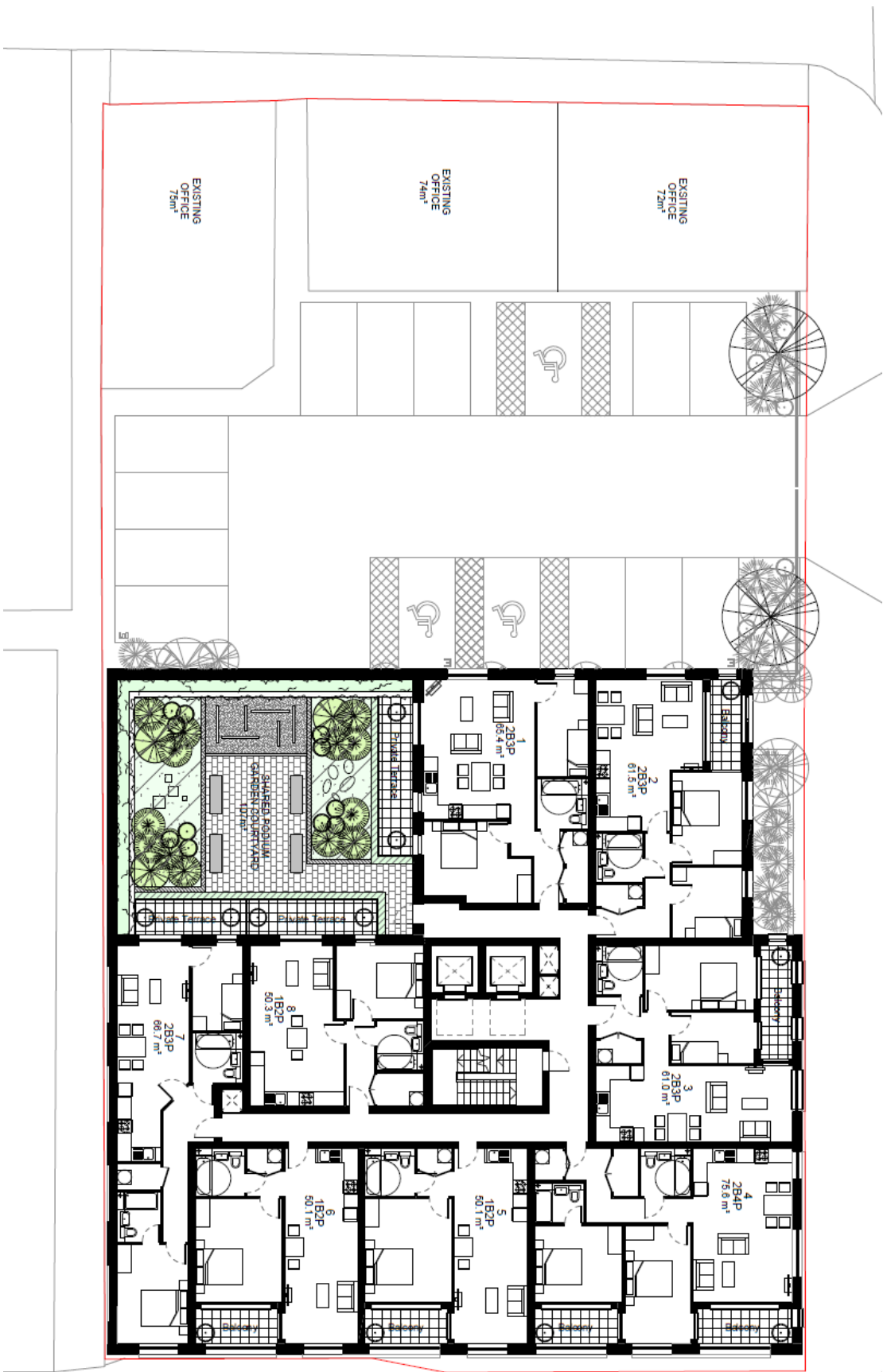
proposals. This has been done to a satisfactory standard as part of the applicant's Heritage Statement. Finally, Criteria 3) requires that replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. Section 6.3 of the above report identified those elements of 71-73 Caversham Road which "*draw upon heritage elements of the previous*" to the satisfaction of the LPA.

Summary

- 7.25 As described above, the proposed development provides notable and tangible benefits, fulfilling many aspects which contribute to achieving the three dimensions of sustainable development. These three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 7.26 Having regard to the harm outlined above and the conflict with both Policy EN1 and EN4 of the Local Plan, it is concluded that the adverse impacts of this proposed development would be significantly and demonstrably outweighed by the benefits, when assessed against the relevant policies in the Framework as a whole. This conclusion means, insofar as the heritage balance is concerned, that there are over-riding public benefits from this proposal to justify a partial loss of the non-designated heritage asset on the site, as discussed earlier.
- 7.27 Therefore, when applying an overall critical planning balance of all material considerations presented, the application is recommended for approval, subject to the recommended conditions, completion of a S106 Legal Agreement and S278 Agreement as set out in this report.

Case Officer: Brian Conlon





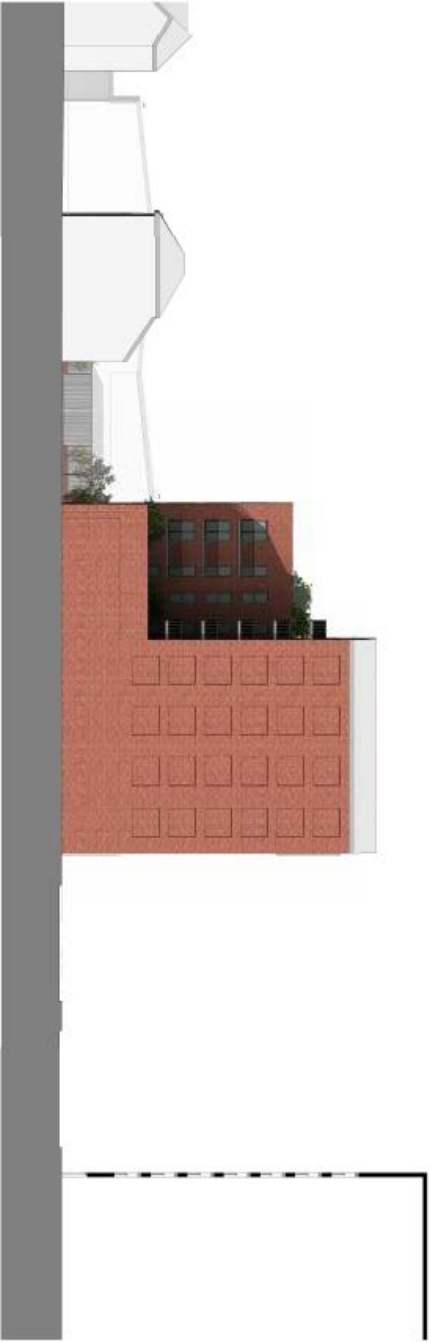




Proposed East Street Elevation



Proposed North Street Elevation



Proposed West Street Elevation

