

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 1st March 2023

Ward: Thames

Application No.: 220922/FUL

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

Proposal: Partial demolition of former retail warehouse and erection of a mixed-use building comprising 29 residential units, retail floorspace (Use Class E(a)) at ground floor and associated car parking, cycle parking and landscaping (amended description).

Applicant: S2 Caversham Ltd

Date Valid: 22/08/2022

Application target decision date: Originally 21/11/2022, but a formal extension of time for the determination of the application has been agreed until 24/03/2023

26 week date: 20/02/2023

RECOMMENDATION

Delegate to the Assistant Director for Planning, Transport and Public Protection (AD PTPP) to (i) GRANT full planning permission subject to the satisfactory completion of a Section 106 legal agreement or (ii) to REFUSE permission should the Section 106 legal agreement not be completed by 24th March 2023 (unless officers on behalf of the AD PTPP agree to a later date for completion of the legal agreement).

The Section 106 legal agreement to secure the following:

- On-site provision of 8 Shared Ownership Affordable Housing units (6x1-bed units at first floor level and 2x2-bed units - one each at ground and first floor level), together with a cascade mechanism that should any Affordable Housing Units have not been disposed of to a Housing Association (HA) or Registered Provider (RP) within certain times and under certain circumstances, the applicant shall give notice to the Council to seek a Housing Association or RP, or for the Council to purchase the affordable housing units. Within certain times and under certain circumstances, should the Council not exercise this option the affordable housing contribution transfers to a financial contribution towards affordable housing elsewhere in the Borough (as per the policy requirements, with the amount totalling £585,344) and the on-site units are no longer required to be provided as on-site affordable units.
- A payment-in-lieu commuted sum financial contribution towards affordable housing of £58,400.
- Should the application site subsequently be extended/altered to create further residential units then contributions towards affordable housing would apply on a cumulative basis.
- Public Open Space financial contribution of £60,900.
- Employment, Skills and Training - The production, implementation and monitoring of an Employment and Skills Plan (ESP) for the Construction phase of the development. Or, in the event that the developer chooses not to provide the ESP themselves, a financial contribution commuted sum, calculated to be £6,621.83 using the SPD formula will be secured in lieu of an ESP.
- Car club provision, so future residents have access to and the use of a car club either on-site or as part of an existing provision nearby to the site in Central Reading.

- Highways works under Section 278 of the Highways Act 1980 with respect to proposed Cycle Route Improvement works affecting the existing highway on Northfield Road (see figure 9 below).
- Zero Carbon Offset financial contribution, as per the Sustainable Design and Construction SPD 2019. If zero carbon is not achieved the scheme must instead achieve a minimum of a 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus provide a financial contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/tonne over a 30-year period).
- Contribution towards monitoring costs plus a separate commitment to pay the Council's reasonable legal costs in connection with the proposed S106 Agreement will be payable whether or not the Agreement is completed.
- Any unexpended contributions to be repaid within ten years beginning with the start of the Financial Year after the final obligation payment for each obligation is received. In accordance with Policy CC9.
- Indexation - All financial contributions to be index-linked from date of permission unless expressly stated otherwise.

And the following conditions to include:

1. *Time Limit - 3 years*
2. *Approved plans*
3. * Demolition works not to be undertaken before a contract for site redevelopment, as per submitted and approved details to LPA.
4. * Pre-commencement level 2 photographic recording of existing buildings for the Historic Environment Record
5. Pre-commencement, barring partial demolition works hereby approved, details of all external materials to be submitted to the LPA (and sample details to be provided on site - including the expectation for the brick bond to be similar to the southern warehouse façade to be demolished) and approved in writing with the LPA. Approved details to be retained on site until the work has been completed
6. Ground floor shopfront details (including sections) at 1:10 scale (expectation to comply with RBC Shopfronts SPD).
7. Compliance condition relating to the retention of the 'Smallbone' ghost signage on the Northfield Road elevation
8. * Pre-commencement Demolition and Construction Method Statement (including EP-based matters)
9. Compliance condition for provision of vehicle parking as shown prior to first occupation, with 4 spaces for the existing office use, 5 spaces for the proposed retail use (4 for customers and 1 for staff) and 5 spaces for future residential occupiers.
10. Compliance condition for provision of vehicular access as shown prior to first occupation
11. Compliance condition for provision of cycle parking as shown prior to first occupation
12. Compliance condition for provision of refuse and recycling storage facilities as shown prior to first occupation
13. Compliance condition for existing accesses to be stopped up after new access is in use
14. Pre-occupation submission and approval of all postal addresses in order to ensure that parking permits are not automatically issued
15. Compliance condition specifying no automatic entitlement to parking permit
16. Pre-occupation submission and approval of EV Charging Point Scheme details
17. Pre-commencement, barring partial demolition works hereby approved, detailed scheme for protection of future residential occupiers from the external noise environment
18. Compliance condition relating to delivery and waste collection times being restricted

- from 0800 to 2000 Mondays to Saturdays and 1000 to 1800 on Sundays and Bank Holidays
19. Compliance condition restricting the ground floor retail unit opening/operating outside 0700 to 2300 Monday to Saturday and 0800 to 1800 on Sundays and Bank Holidays
 20. Pre-installation of mechanical plant submission and approval of a noise assessment
 21. Pre-construction above foundation level submission and approval of air quality mitigation details
 22. * Pre-commencement (including partial demolition works hereby approved) contaminated land site characterisation assessment
 23. * Pre-commencement (including partial demolition works hereby approved) contaminated land remediation scheme
 24. Pre-construction above foundation level contaminated land validation report
 25. Reporting of unexpected contamination at any time
 26. Compliance condition relating to hours of demolition/construction works
 27. Compliance condition relating to no burning of materials or green waste on site
 28. Pre-occupation submission and approval of measures to prevent pests and vermin accessing bin stores
 29. Pre-commencement, barring the partial demolition works hereby approved, submission and approval of all hard and soft landscaping details, specifically including biodiverse roof details
 30. Pre-occupation submission and approval of boundary treatment details
 31. Pre-commencement, barring the partial demolition works hereby approved, submission and approval of habitat enhancement measures
 32. Compliance condition relating to protecting nesting birds during partial site clearance works
 33. Compliance condition for excavation works to not be left open overnight, to protect wildlife and animals during construction
 34. Pre-commencement, barring partial demolition works hereby approved, submission and approval of Sustainable Drainage Strategy
 35. Compliance condition for SuDS approved in condition above to be completed prior to first occupation of any part of the development and managed/maintained thereafter.
 36. Compliance condition for development to implement the FRA mitigation measures prior to first occupation
 37. Compliance condition permitting Class E(a) use only within the ground floor retail unit
 38. Compliance condition for the ground floor Class E(a) unit fronting Caversham Road to retain 'active window displays'
 39. Dwelling mix restricted to 23 x 1-bedroom, 5 x 2-bedroom and 1 x 3-bedroom units
 40. No conversion of non-residential floorspace to residential without separate permission
 41. Pre-occupation accessible and adaptable and 5% wheelchair user dwelling details
 42. Management of miscellaneous items (lights, meter boxes, flues, vents or pipes, and no window cleaning or telecommunications equipment, building maintenance unit, alarm boxes, television aerials or satellite dishes)
 43. Flat roof areas not to be used as roof terraces unless where specified on the approved plans
 44. Pre-occupation submission and approval of external lighting details
 45. Pre-commencement, barring partial demolition, Security Strategy details to be submitted and approved
 46. Pre-occupation submission and approval of privacy screen details
 47. Pre-commencement, barring partial demolition, submission and approval of fire statement / strategy measures.
 48. Pre-commencement, barring partial demolition, SAP assessment (energy) - design

stage

49. Pre-occupation of any residential unit SAP assessment (energy) - as built
50. Pre-commencement, barring partial demolition, submission and approval of an interim BREEAM Certificate demonstrating a minimum BREEAM 'Very good' rating
51. Pre-occupation of retail unit submission and approval of a final BREEAM Certificate demonstrating a minimum BREEAM 'Very Good' rating

Informatives:

1. Positive and Proactive Statement
2. Highway works
3. High density residential development and car parking
4. Section 106 Legal Agreement
5. Possible requirement for separate advertisement consent
6. Clarification concerning pre-commencement conditions (marked with an *)
7. CIL
8. Party Wall Act
9. Building Regulations
10. Terms and conditions
11. Noise between residential properties
12. Definition of shell and core, further to condition 3
13. TROs are subject to separate legislation

1. INTRODUCTION

- 1.1 The application site comprises a corner plot on the west side of Caversham Road (the IDR) and south side of Northfield Road, to the north-west of the town centre and Reading Station. The site is broadly rectangular in shape, flat in topographical terms and 0.16 hectares in size (see figure 1 below).



Figure 1: Site Location Plan (not to scale)

- 1.2 As existing, the site comprises a series of buildings. Most prominently on the eastern frontage of the site is a 2-storey retail warehouse. This has been vacant since December 2018 (as per the CIL form submitted by the applicant), having previously been occupied for many decades by Drews the Ironmongers. On the Northfield Road elevation, on the west side of the site are the smaller scale 2-3 storey buildings known as 'The Brewery' and 'The Malthouse', which like the main building were all historically former brewery buildings. As existing, these buildings are in active office use, with a vehicular parking and service yard located between the separate buildings and accessed off Northfield Road.

- 1.3 All of the existing application site buildings were added to the Council's list of locally important buildings and structures on 11/02/2020 (LL15: Former Dreads, 71-73 Caversham Road, 1 Northfield Road and the Malthouse Building). The local listing states:

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.



Figure 2: The application site from Caversham Road looking south-west (Nov 2022)

- 1.4 In dismissing a previous planning appeal at the site (see section 3 for details) the Inspector commented that the existing building has decorative brickwork, a low height with pitched roofs in various materials, notable window openings particularly the distinctly large ground floor windows on Northfield Road) and looks like a Victorian warehouse, with the original use as a maltings being able to be appreciated. The Inspector also commented that the site is a landmark owing to its corner position and the openness/alignment of Caversham Road and Northfield Road. Furthermore, the Inspector considered that the architectural and historical value at the site is largely as a whole (i.e. all buildings at the site collectively).
- 1.5 From a transport perspective the A329 Caversham Road forms part of the town's Inner Distribution Road (IDR), with two lanes in both north and south directions (see figure 2 above). The pedestrian network surrounding the site has adequate footway and street lighting provision. There is a staggered pelican crossing on Caversham Road, immediately south of Northfield Road. Vehicular access to the site is currently provided via Northfield Road only. Caversham Road and the surrounding road network all have extensive parking restrictions preventing on-street parking.

1.6 As already referenced above, the existing buildings at the site are locally listed, but it is also relevant to clarify that the site is not located within a conservation area and none of the buildings are statutory listed either. Accordingly, in practice, being locally listed means they are ‘non-designated heritage assets’ for the purposes of national planning policy, local planning policy and all related guidance. The following other designations and information in relation to the application site are considered to be relevant:

- The site is not specifically allocated for development within the local plan;
- The site is within the boundary of the Reading Central Area (Policies CR1-10)
- The site is within the Office Core (Policy CR1)
- The site is within an Air Quality Management Area (Policy EN15),
- The site is within Flood Zone 2 (Policy EN18)
- The site has potential for contaminated land (given its former uses) (Policy EN16)
- The site is within a Smoke Control Zone
- Caversham Road is part of the classified highway network (see Policy TR3) and Northfield Road is a cycle route (see Policy TR4)
- The site is outside, but adjacent to one of the three major opportunity areas within Central Reading, with the Station/River MOA being to the north and east of the site.
- The site is outside a designated tall buildings cluster (in contrast to the site to the east (former Royal Mail sorting office at 80 Caversham Road) which is inside the MOA / tall buildings cluster).
- The site is in Thames Ward.



Figure 3: Aerial view of the surrounding area looking north (from Google maps)

1.7 The surrounding area comprises a mix of uses. To the north, beyond Northfield Road is the 3-storey Shurgard self-storage facility, while to the east are the vacant former Royal Mail sorting office and distribution centre, with ancillary 3-storey offices closest to the Caversham Road boundary. To the north-east is the Vastern Court Retail Park, occupied by a series of operators. Both the Royal Mail and Retail Park sites are subject to either a current pending application (Royal Mail) or appeal (Retail Park) for redevelopment (see relevant history section below). To the south are a modestly scaled 2-storey terrace of buildings occupied by Pure Gym and formerly by Dawsons Musical Instruments store, with substantial surface-level parking to the rear. Beyond this is the 2-storey Caversham Road fire station and the main railway line. To the west on Northfield Road are the 3-storey block of flats known as Monmouth Court, beyond which are the low-rise domestic scaled Victorian terraced properties and streets such as Swansea Road and York Road, as seen in figure 3 above. As such, the character to the west is distinct from that to the east (as existing and in terms of policy).

1.8 The application is being considered at Planning Applications Committee as it relates to a major application which is recommended for approval by officers.

2. PROPOSALS

2.1 Full planning permission is sought for the partial demolition of the former retail warehouse building on the corner of Caversham Road and Northfield Road. The extent of retention / demolition of existing buildings at the site is summarised below in figure 4. The existing remaining building will be partly remodelled and partly redeveloped to provide a part 2 storey (and accommodation within the roofspace through two proposed dormers on the Northfield Road elevation and rooflights on both street elevations) building fronting onto Northfield Road and part of the Caversham Road frontage, rising to a part 5 and part 6 storey building in the new build parts of the site fronting Caversham Road.



Figure 4 - The extent of retention and demolition of existing site buildings

2.2 No changes are proposed to the 2-3 storey 'The Brewery' and 'The Malthouse' office buildings on the western side of the site fronting Northfield Road. These would remain unaltered as offices as part of the proposed works at the site, with these structures included within the redline boundary of the site.

2.3 The proposed development seeks to provide a 297sqm retail unit (Use Class E(a)) at part ground floor level, along the entire Caversham Road frontage of the site and part of the Northfield Road frontage too. The unit would be serviced via a proposed loading bay on Northfield Road, with access provided to the rear of the unit. A standalone retail refuse store is also proposed on-site, adjacent to the vehicular access point on Northfield Road. Cycle parking is also proposed to the front and rear of the proposed unit.

2.4 Aside from this retail component, the remainder of the development seeks to create self-contained residential units (Class C3). A total of 29 units are proposed across the building, with the proposed mix being 23 x 1-bedroom units, 5 x 2-bedroom units and 1 x 3-bedroom unit, as detailed in figure 5 below. 21 of the 29 units are proposed for market sale (17x1, 3x2 & 1x3-bed units), with 8 on-site shared ownership affordable housing units. This equates to a 27.59% on-site provision of affordable housing, with this comprising 6 x 1-bedroom units (all at first floor level) and 2 x 2-bedrooms units (one each at ground and first floor level). A commuted sum of £58,400 is proposed to ensure the affordable housing provision is at a policy compliant level. 2 wheelchair accessible (Part M4(3)) units are

proposed, split equally between the affordable and market tenures, comprising 1x1-bed shared ownership unit at first floor level and 1x2-bed market unit at fifth floor level.

Floor	1-bedroom	2-bedroom	3-bedroom	Total units	Units with private amenity space
Ground		1*		1	1
First	6*	1*	1	8	6
Second	7			7	7
Third	4	1		5	5
Fourth	4	1		5	5
Fifth	2	1		3	3
Total	23	5	1	29	27

* denotes the 6 x 1-bed and 2 x 2-bed shared ownership affordable housing units proposed

Figure 5 - Proposed mix of residential units.

2.5 The residential units will be accessed from two entrances, one off Northfield Road and a step-free option on the western elevation of the building, accessed via the on-site vehicle parking area/courtyard. Refuse and cycle stores associated with the residential units are integrated within the proposed building at ground floor level, with two lifts and a single stair core providing access to the upper floors. 27 of the 29 residential units would include private amenity space (see figure 5 above), largely in the form of external balconies, but also including a series of ‘winter gardens’ within units fronting Caversham Road. In addition, at fifth floor level an external shared podium garden courtyard is proposed. This is 70sqm in area and is shown to propose soft landscaping and seating spaces, with it intended to be available for use by all future residential occupiers. The roof level of the building includes photovoltaic panels and a biodiverse roof. Mechanical plant space is provided predominantly at ground floor level (shown below in figure 6), as well as rising through the floors of the building.

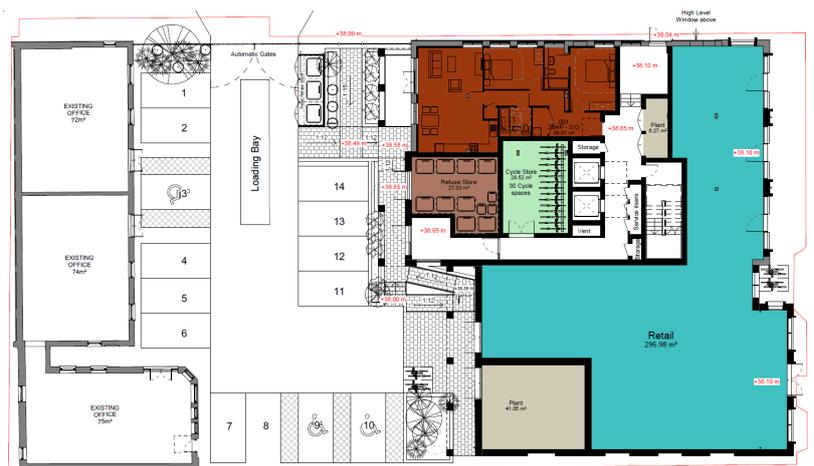


Figure 6 - Proposed ground floor plan

2.6 Vehicular access into the site will be via replacement automatic gates off Northfield Road, with fourteen vehicular spaces; providing for the existing office use (4 spaces), the proposed retail use (4 for customers and 1 for staff) and future residential occupiers (5 spaces). Included within this total are three wheelchair accessible parking spaces (see figure 6 above). The proposed parking provision represents an increase in two spaces when compared with the 12 spaces at the

existing site. The space will also include elements of soft landscaping to separate the pedestrians and vehicles and soften the proposed Northfield Road entrance.

2.7 During the course of the application's consideration, a number of changes have been made to the scheme, summarised as including:

- A change in the proposed external materials, with the omission of the originally proposed buff brick components and instead the new build brickwork elements will solely comprise red brick finishes.
- The original proposal sought to provide nil on-site affordable housing. During the course of the application, following negotiations, this has altered to firstly the proposed introduction of 4x1-bed first floor on-site shared ownership affordable housing units. Following further negotiations, the on-site provision was subsequently increased again to 8 shared ownership units (6x1-bed at first floor and 1x2-bed at both ground and first floor), which is the proposal under consideration.
- A change in the mix of units proposed, with one originally proposed 2-bedroom unit becoming a 1-bedroom unit at second floor level. The overall unit mix therefore changed from the original submission of 22 x 1-bedroom, 6 x 2-bedroom and 1 x 3-bedroom units to 23 x 1-bedroom, 5 x 2-bedroom and 1 x 3-bedroom units.
- An increase in size of the ground floor mechanical plant room, therefore slightly reducing the size of the ground floor retail space from 311sqm to 297sqm
- Changes to the proposed ground floor waste store, increasing provision and including collection vehicles servicing the store from the proposed on-site car park, as opposed to the original intention of this being from the proposed Northfield Road loading bay.

2.8 None of these changes to the scheme were considered to be of a nature or extent which warranted formal public re-consultation to occur.

2.9 In terms of the Community Infrastructure Levy (CIL), the applicant duly completed a CIL Liability form as part of the submission of this application. This specifies that the building to be partly demolished / partly retained was last occupied for its lawful use on 20/12/2018, whilst the 2 separate buildings proposed to be retained on site are still in office use. Should there be no deduction for the existing floorspace to be retained, then solely on the basis of the proposed floorspace the CIL liability is likely to be £391,566.92 (proposed residential GIA of 2343.87 x 2023 indexation residential CIL rate of £167.06 per sqm - all floorspace figures are based on information supplied by the applicant). This figure would reduce if the proposed on-site affordable housing were to qualify for mandatory or discretionary social housing relief.

Drawings:

MP_SW_1000 Rev P2 - Site Location Plan

MP_SW_1004 Rev P1 - Existing Site Plan

MP_PL_1100 Rev P1 - Existing Ground Floor Plan

MP_PL_1101 Rev P1 - Existing First Floor Plan

MP_PL_1109 Rev P1 - Existing Roof Plan

MP_EL_1200 Rev P2 - Existing North Elevation

MP_EL_1201 Rev P1 - Existing South Elevation

MP_EL_1202 Rev P1 - Existing East Elevation

MP_EL_1203 Rev P2 - Existing West Elevation

MP_EL_1204 Rev P2 - Existing East Courtyard Elevation

MP_EL_1205 Rev P1 - Existing West Courtyard Elevation

MP_SW_1002 Rev P1 - Existing Street Elevations
MP_SE_1303 Rev P1 - Existing Section AA
MP_SE_1304 Rev P1 - Existing Section BB
MP_SE_1305 Rev P1 - Existing Section CC

MP_PL_1110 Rev P1 - Demolition - Existing Ground Floor Plan
MP_PL_1111 Rev P1 - Demolition - Existing First Floor Plan
MP_PL_1112 Rev P1 - Demolition - Existing Roof Plan
MP_EL_1212 Rev P1 - Demolition - Existing North Elevation
MP_EL_1213 Rev P1 - Demolition - Existing North Elevation
MP_EL_1214 Rev P1 - Demolition - Existing East Elevation
MP_EL_1215 Rev P2 - Demolition - Existing West Elevation
MP_EL_1216 Rev P2 - Demolition - Existing East Courtyard Elevation
MP_EL_1217 Rev P1 - Demolition - Existing West Courtyard Elevation
MP_SE_1306 Rev P1 - Demolition - Existing Section AA
MP_SE_1308 Rev P1 - Demolition - Existing Section BB
MP_SE_1309 Rev P1 - Demolition - Existing Section CC

MP_EL_1209 Rev P2 - Proposed West Elevation
MP_EL_1211 Rev P2 - Proposed East Courtyard Elevation
MP_SE_1300 Rev P1 - Proposed Section AA
MP_SE_1302 Rev P1 - Proposed Section CC

As all received on 22/08/2022

MP_SW_1001 Rev P2 - Proposed Site Plan
MP_PL_1104 Rev P3 - Proposed Second Floor Plan
MP_PL_1105 Rev P2 - Proposed Third Floor Plan
MP_PL_1106 Rev P2 - Proposed Fourth Floor Plan
MP_PL_1107 Rev P2 - Proposed Fifth Floor Plan
MP_PL_1108 Rev P3 - Proposed Roof Plan
MP_EL_1206 Rev P3 - Proposed North Elevation
MP_EL_1207 Rev P3 - Proposed South Elevation
MP_EL_1208 Rev P3 - Proposed East Elevation
MP_EL_1210 Rev P3 - Proposed West Courtyard Elevation

MP_EL_1212 Rev P2 - Proposed North Elevation (without Landscape)
MP_EL_1213 Rev P2 - Proposed South Elevation (without Landscape)
MP_EL_1214 Rev P2 - Proposed East Elevation (without Landscape)
MP_EL_1215 Rev P2 - Proposed West Elevation (without Landscape)

MP_SW_1003 Rev P3 - Proposed Street Elevations
MP_SE_1301 Rev P2 - Proposed Section BB
MP_RS_1500 Rev P2 - Retail Refuse Store Plans & Elevations
As all received on 01/12/2022

MP_PL_1102 Rev P5 - Proposed Ground Floor Plan
MP_PL_1103 Rev P4 - Proposed First Floor Plan
As received on 08/02/2023

Other supporting documents:

Air Quality Assessment by RPS Ref JAR02849 Rev 1 dated 10/05/2022;
Phase 1 Contaminated Land Preliminary Risk Assessment by RPS Ref JER8219 Version 03
dated 07/01/2022;

Preliminary Bat Roost Assessment by Amphibian, Reptile & Mammal Conservation Limited
Flood Risk Assessment and Surface Water Drainage Strategy by RPS Ref HLEF82310 Version 2 dated 09/06/2022;
Flood Risk Sequential Assessment by RPS Ref HLEF82310 Version 2 dated 17/02/2022;
Supporting letter by Quod Ref Q100020, dated 15/06/2022
Planning Noise Assessment by Waterman Ref WIE16329-101-R-1.1.4_Noise Issue 001 dated 11/05/2022;
Heritage and Townscape Assessment by Icen Projects;
Housing Delivery and Viability Statement by Quod dated June 2022;
Sustainability Overheating Risk Assessment TM59 by Hoare Lea Revision 00 - dated 11 March 2022;
Utilities Assessment by RPS Ref 82598 Version 004 dated 17/02/2022;
Planning Statement by Quod Ref Q100020 dated June 2022;
Transport Statement by Mayer Brown Ref S2CavershamRoad Rev A dated 11/05/2022;
Design and Access Statement by JTP Ref 01662B dated 20/06/2022
As all received on 22/06/2022

Sustainability Statement by Hoare Lea Rev 00, dated 19/05/2022;
Preliminary Ecological Appraisal by Middlemarch, Ref 158559-01, dated 18/08/2022
Biodiversity Net Gain Assessment by Middlemarch Environmental Ref 158559-02, dated 12/08/2022
The Biodiversity Metric 3.1 - Calculation Tool excel document by Middlemarch Environmental Ltd, dated 18/08/2022;
Landscape Principles by Quod, dated August 2022;
S106 Draft Heads of Terms Proposal by Quod Ref Q100020 dated July 2022;
Open Space Statement by Quod Ref Q100020 dated July 2022
As all received on 22/08/2022

Letter from Haslams 'Proposed development of 71-73 Caversham Road' dated 27/09/2019
Valuation Report by Haslams Surveyors LLP dated 24/09/2019
Feasibility Bunker Cost Model by AECOM Issue 1.0 dated 29/08/2018
As all received on 06/09/2022

Daylight and Sunlight Report by Calford Seaden Ref L190224/PS/G8, dated 20 September 2022
As received 23/09/2022

Energy Strategy by Hoare Lea Revision 01 - dated 06 October 2022
As received 06/10/2022

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 17/11/2022

Design and Access Statement Addendum by JTP Ref 01662B dated 20/11/2022
As received on 30/11/2022

Letter from Quod 'Formal Revision to Planning Application (Ref: 220922) on behalf of S2 Caversham Limited' Ref Q100020, dated 30/11/2022
As received on 01/12/2022

P22978.MEP.001 Rev B MEP Plant Locations Roof Layout
P22978.MEP.002 Rev C MEP Plant Locations Ground Floor Layout
CIL_01 Rev P3 - Proposed CIL Plans
Planning Comment Response Summary by MEP Concepts Rev A dated 19/12/2022

BRUKL Output Document Compliance with England Building Regulations Part L 2021 dated 08/12/2022

Part L compliance report - Unit 101 - 3B5P MF Type
Part L compliance report - Unit 104 - 1B2P MF-EF Type
Part L compliance report - Unit 001 - 2B4P GF Type
Part L compliance report - Unit 401 - 2B4P TF Type
Part L compliance report - Unit 502 - 1B2P TF Type
Part L compliance report - Unit 108 - 1B2P MF Type
Part L compliance report - Unit 301 - 2B4P MF Type
As all received on 22/12/2022

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 27/12/2022

Caversham Road - BREEAM update by Hoare Lea Ref DOC-2324398-05-JT-20230106-BREEAM Target Score update-REV01.docx
As received 06/01/2023

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 24/01/2023

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 31/01/2023

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 06/02/2023 at 10:49am

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated and received 06/02/2023 at 12:48pm

MP_SC_1400 Rev P4 - Area Schedules

Email from Quod 'RE: 71-73 Caversham Road, Reading (220922)', dated 08/02/2023
As both received on 08/02/2023

3. PLANNING HISTORY

Application site

3.1 7437 - Store for cellulose. Granted 25/03/1960.

3.2 13987 - Lean to extension. Granted 09/09/1966.

3.3 77/01066/00 - New shopfront central infill link replacing existing building for retail & storage. Granted 06/01/1978.

3.4 95/00345/FD (Alternative Ref 950014) To fit roller shutters to front windows on outside. Refused 15/06/1995.

3.5 97/00509/AD Freestanding advertisement panel sign. Refused 08/09/1997.

3.6 191792/FUL - Demolition of former retail warehouse and erection of a mixed-use building comprising 44 residential units consisting of x5 affordable units, 194sqm of retail floorspace (Use Class A1) at ground floor and associated car parking, cycle parking and landscaping. Refused 16/10/2020.

3.7 The reasons for refusal related to (in summary):

1. Complete loss of 71-73 Caversham Road and its removal compromising the setting of the remaining cluster of non-designated heritage buildings; Also a

failure to demonstrate that retention and re-use has been explored fully and the scheme benefits not significantly outweighing the harm, contrary to Policies EN1 & EN4 and section 16 of the NPPF.

2. Out-of-scale and failure to transition down with neighbouring buildings within and adjoining the site along Caversham Road and Northfield Road, contrary to Policies CC7, EN1 & EN4 and section 16 of the NPPF.
3. Absence of a legal agreement to secure a financial contribution towards affordable housing, open space, highways works, car club, carbon offsetting, a s278 agreement and a construction stage ESP, contrary to Policies H3, TR1, TR3, TR4, TR5, H5, CC9 and the Affordable Housing and ESP SPD's.

3.8 Appeal (Ref: APP/E0345/W/20/3263270) dismissed 14/05/2021 following a Virtual Hearing on 24/03/2021. In dismissing the appeal, the Inspector stated in relation to the effect of the proposal on the character and appearance of the area that:

“The new building would be substantially taller than the surroundings, particularly in relation to the west side of Caversham Road and Northfield Road where it would appear unduly tall, diverting attention from the street level to a new higher skyline. It would appear dominating and out of scale, more appropriate to an urban centre rather than a suburban location.

The perceived height of the building would also be emphasised by its narrow footprint. This would lead to a pronouncedly vertical orientated building.

The proposal would drop to 5 storeys towards Northfield Road. However even at that height it would appear out of context. Additionally, the seventh storey element behind would be visible from parts of Northfield Road” (Paragraphs 10-12)



Proposed East Street Elevation

Figure 7 - Dismissed at appeal Caversham Road (above) and Northfield Road (below) elevations



- 3.9 The Inspector also raised concerns with some elements of the detailed design, such as the elongated windows on the top two floors accentuating the perception of height, as would “eye-catching” window mullions (see figure 7 above). Another concern was the blank façade to the south (see figure 8 below), which the Inspector considered to lack relief and interest, making the building “*appear austere and overly dominant when seen from the south*” (paragraph 14). The Inspector concluded that “*the proposal would cause significant harm to the character and appearance of the area*” (paragraph 16), contrary to Policies CC7 and EN4, together with paragraph 127 of the NPPF.



Figure 8 - Dismissed at appeal south elevation

- 3.10 With regard to the effect of the proposal on the significance of a non-designated heritage asset, the Inspector commented that:

“The existing building reflects the values of the Historic England Guidance, in particular, for its historic significance as an identifiable Victorian warehouse, built for the brewing industry and, aesthetic significance for its massing, form and in part detailing, as a landmark on a prominent corner. I therefore conclude that the building has significant significance as a non-designated heritage asset and its loss would harm the historic environment” (paragraph 28).

- 3.11 The Inspector clarified that the proposals would be in conflict with Policies EN1 and EN4, together with paragraph 197 of the NPPF. Noting that the proposals involved the demolition of the frontage building, but retention of the smaller office buildings, the Inspector specifically commented that, “*their architectural and historical value is largely as a whole, and the proposal would harm their group value*” (paragraph 25). The appeal decision is included in full as Appendix 11.

Nearby sites of relevance (80 Caversham Road, Vastern Court & Carters)

- 3.12 To the east of the application site at 80 Caversham Road (former Royal Mail site) outline planning permission (Reference 182252) was resolved to be granted (subject to conditions and the completion of a s106 legal agreement) at the Planning Applications Committee meeting on 30th March 2022, for:

Outline application considering access, landscaping, layout and scale for redevelopment proposal involving the demolition of all existing buildings and structures (Classes B1a & B2) and erection of new buildings ranging between basement and 2 - 24 storeys in height, providing 620 (72 x studio, 196x1, 320x2 & 32x3-bed) residential units (Class C3), office accommodation (Class B1a), flexible ground floor shop (Class A1), financial and professional services (Class A2) or restaurant/café (Class A3) uses, a community centre (Class D1), health centre uses (Class D1) and various works including car parking (94 spaces (70 at basement level)), servicing,

public and private open space, landscaping, highways, pedestrian and vehicular access and associated works. This application is accompanied by an Environmental Statement (amended description).

- 3.13 At the time of writing the legal agreement is in the process of being completed, so the application has not yet been formally determined by the local planning authority.
- 3.14 To the north of the 80 Caversham Road site, so to the north-east of the application site, is Vastern Court, Caversham Road (otherwise known as the Aviva site or Vastern Road/Court Retail Park) an appeal (Ref APP/E0345/W/21/3289748) under non-determination was lodged on 23/12/2021. The outline application (Ref 200328) was reported to Planning Applications Committee on 15/02/2022, whereby members resolved that had they been able to determine the planning application they would have refused outline planning permission. The application sought:

Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. A demolition phase and phased redevelopment (each phase being an independent act of development) comprising a flexible mix of the following uses, Residential(Class C3 and including PRS), Offices (Use Class B1(a), development in Use Classes A1, A2, A3(retail), A4(public house), A5 (take away), D1 and D2(community and leisure), car parking, provision of new plant and renewable energy equipment, creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting, and for the laying out of the buildings, routes and open spaces within the development, and all associated works and operations including but not limited to demolition, earthworks, provision of attenuation infrastructure, engineering operations.

- 3.15 The appeal was heard via Public Inquiry between April and November 2022. The recommendation by the Inspector and subsequent outcome by the Secretary of State is awaited at the time of writing.
- 3.16 To the north of the site at the nearby Caversham Road / Vastern Road roundabout a full application (Ref 221324) at the former 'Carters' site was resolved to be granted (subject to conditions and the completion of a s106 legal agreement) at the Planning Applications Committee meeting on 1st February 2023, for:

Redevelopment of 97a-117 Caversham Road, and associated land to the rear, to provide 60 dwellings, including affordable housing, together with associated access, parking and landscaping.

- 3.17 At the time of writing the legal agreement is in the process of being completed, so the application has not yet been formally determined by the local planning authority.

4. CONSULTATIONS

i) Internal and External consultees

1) RBC Transport

- 4.1.1 Transport officers advise that the development proposes to consolidate the existing vehicular accesses to the site into a single dropped kerb access on Northfield Road.

The design of the proposed access is acceptable and will be secured via condition. This will provide access to the 14 proposed parking spaces at the site. These are designed to serve both existing office occupiers and future residents and those associated with the proposed retail unit. More specifically, there are 5 residential car parking spaces (including 2 disabled bays), 4 office car parking spaces, 1 commercial car parking space and 4 retail car parking spaces. To meet the 10% Local Plan requirement a minimum of two of the parking spaces will be enabled for electric vehicle charging (and 2 further spaces future-proofed), with details to be secured via condition. 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. In accordance with the adopted Parking Standards and Design SPD, the development is required to provide 1 parking space per residential unit (29 spaces) and 1 space per 10 units for visitor parking (3 spaces). 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).

4.1.2 The proposed parking provision is therefore below the Council’s requirements. However, given the site’s close proximity to the centre of Reading, 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 has parking restrictions preventing on-street parking too. Therefore, a reduction in the parking provision will not lead to on street parking being detrimental to road safety and is considered acceptable, subject to conditions to secure the parking as shown and guard against parking permits being gained on-street.

4.1.3 The reduced level of car parking provision for the residential units will also be supported by future occupiers having access to a car club scheme as part of the proposals. This will be in association with an existing car club operator in Reading, at this stage would either be on site or joining up with an existing nearby Central Reading car club, and will be secured in full via s106 legal agreement.

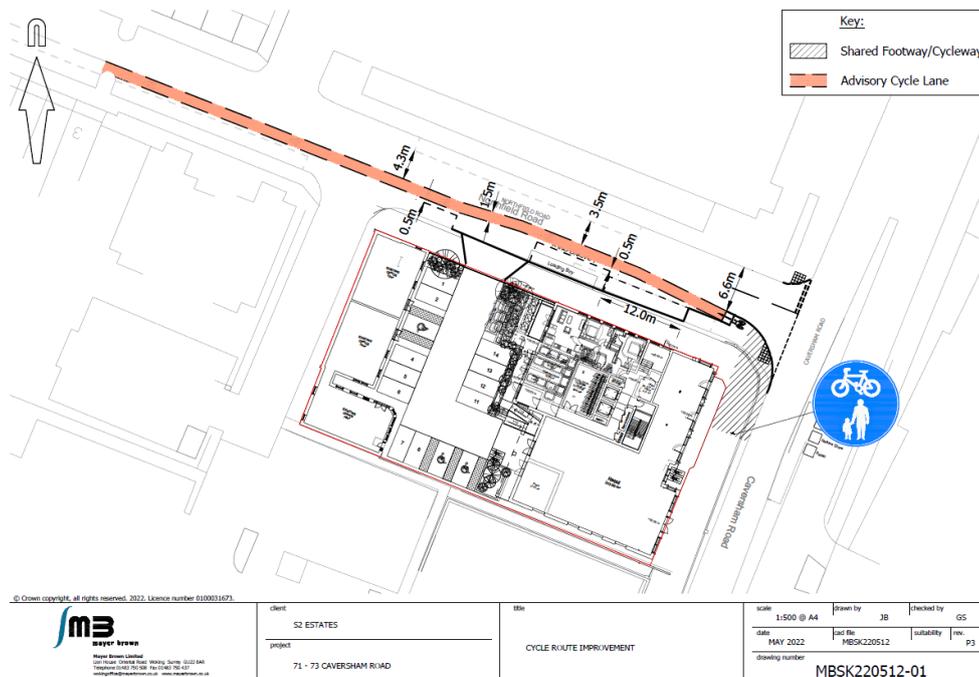


Figure 9 - Proposed cycle route improvements

4.1.4 To promote sustainable transport, the development also proposes cycle route improvements on Northfield Road, and a cycle parking provision that exceeds

minimum requirements. The proposals include the introduction of an on-carriageway dedicated cycle link along Northfield Road between the Caversham Road crossing and Swansea Road to the west (see Figure 9 above). 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. This will require an agreement under Section 278 of the Highways Act 1980, but in principle is welcomed and supported. Given the off-site location of these works they will also be required to be secured in full via s106 legal agreement. The highway works to be secured under s106 legal agreement will also encompass works to 'stop up' disused accesses onto Northfield Road, with the footway reinstated at these points.

4.1.5 The development will provide 30 cycle parking spaces for residents by way of double stacked cycle storage, located in a covered storage area on the ground floor and secured by controlled entry points. Also proposed are two Sheffield stands providing 4 cycle parking spaces for the other uses and visitors, which will be located in the car park. Furthermore, another two Sheffield stands providing 4 cycle parking spaces are proposed to the front of the retail unit on Caversham Road. This over-provision is welcomed and all cycle parking will be secured via compliance based conditions.

4.1.6 In terms of refuse collection arrangements, refuse vehicles currently service the existing residential and commercial properties on Northfield Road. The Council's Waste department has provided comments on the level of bins required for the 29 residential units (see section 4.8 below). The waste collection crews will access the property through the electric gates and reverse up to the bin store area. All bins will be stored within 10m of the rear of the collection vehicle. From a transport perspective this on-site servicing would cause a temporary obstruction within the car park (see figure 10 below). However, it would only occur once a week for a short period of time and therefore would not unduly obstruct users of the on-site parking facilities. These waste storage facilities and arrangements will be secured via a compliance condition.

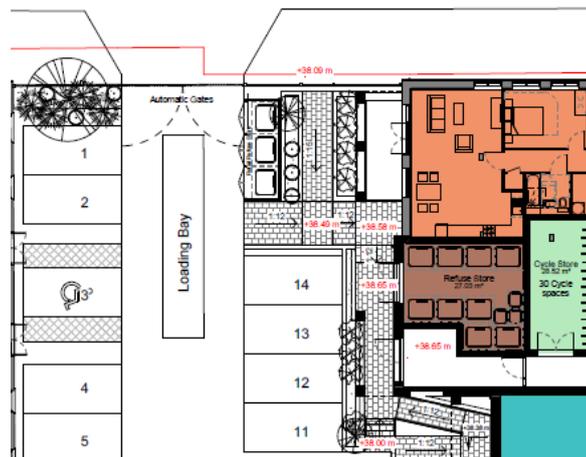


Figure 10 - On-site refuse facilities and collections

4.1.7 Turning to consider the servicing of and deliveries to the ground floor retail unit, this 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 without any net loss in parking. 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 TROs are considered under separate legislation to the Planning Acts 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. From a Transport Planning perspective the on-street loading bay arrangement is a suitable solution, given it has not been demonstrated that deliveries to the retail unit could occur without causing obstruction to either the proposed car park or Caversham Road on a frequent basis.

- 4.1.8 A Demolition and 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. The Council's standard pre-commencement condition is recommended in this regard.
- 4.1.9 With the conditions and s106 obligations referenced above secured the proposals are considered acceptable from a transport planning perspective.

2) RBC Conservation and Urban Design Officer (CUDO)

- 4.2.1 The CUDO comments outline the background (including the dismissed at appeal scheme and subsequent pre-application discussions undertaken) and the legislative and policy context (national and local) for the proposals. In the interests of brevity, these are not specified within this report. The CUDO has commented on the significance of the existing buildings and the impact the proposals would have on these.
- 4.2.2 As a reminder, the site is a collection of locally listed commercial buildings (malting warehouses) from the 1870s, which were connected to a local brewery. The site is not in a conservation area. A previous scheme was refused and then dismissed at appeal, with the main issues detailed in section 3 above. The current proposal follows a series of pre-application discussions by the applicant with the local planning authority in 2021 and 2022, together with separate input from the Reading Design Review Panel (DRP - see section 4, part 17) below) in September 2022.
- 4.2.3 The existing buildings are considered to be of local significance, with the corner buildings (71-73 Caversham Road) originally being two malthouse warehouse buildings which formed part of Reading's important brewing industry. Externally, the northern warehouse building is reasonably intact, with good quality brick with 'burnt headers' in Flemish Garden Wall Bond, buff brick detailing over segmental windows and doors. On Northfield Road there also appears to be 'ghost' sign-lettering ('Smallbone') at first floor level. It is however acknowledged that there are later additions to the building and the roof has probably been replaced. The historical association with locally prominent businessman and brewer Henry Pendlebury Dowson between 1870 and 1900 is part of its importance, as is the original malthouse use giving it industrial and cultural importance in the town. Architecturally too, the building is representative of a commercial use and style that is significant to the development of Reading, with group value being derived from the survival of the buildings fronting Northfield Road too. This all cumulated in the buildings being locally listed, due to a combination of their age, architectural quality, landmark presence in the street scene and relationship to Reading's historic industries.
- 4.2.4 In terms of the impact that the proposals would have on the locally listed buildings, it is firstly acknowledged that the current proposals differ significantly to those

dismissed at appeal in 2021. In particular, it is no longer proposed to demolish the entirety of the 71-73 Caversham Road corner building, with the proposals now seeking to refurbish and extend a proportion of the northern warehouse building. Demolition is now only proposed to the southern half of the Caversham Road frontage, which historically was separate to the proposed retained/reconfigured building on the corner of Caversham Road and the entirety of the Northfield Road façade (see Figure 11 below). The CUDO’s site inspection in February 2021 identified that there was no significant remnants or detailing left on the inside of this building.



Figure 11 - Edited 1912-13 OS map showing separate buildings fronting Caversham Rd

4.2.5 In relation to the latest (as amended) scheme the most significant parts of the original warehouse buildings, on the corner of Caversham Road and Northfield Road, would be retained, which is a welcomed change in approach in comparison with the previous scheme. The extent of demolition is shown below in figure 12, which confirms that the Northfield Road elevation would remain, as would the first floor and roof of the northern half of the Caversham Road frontage. This includes the area where the ‘Smallbone’ ghost sign is located.

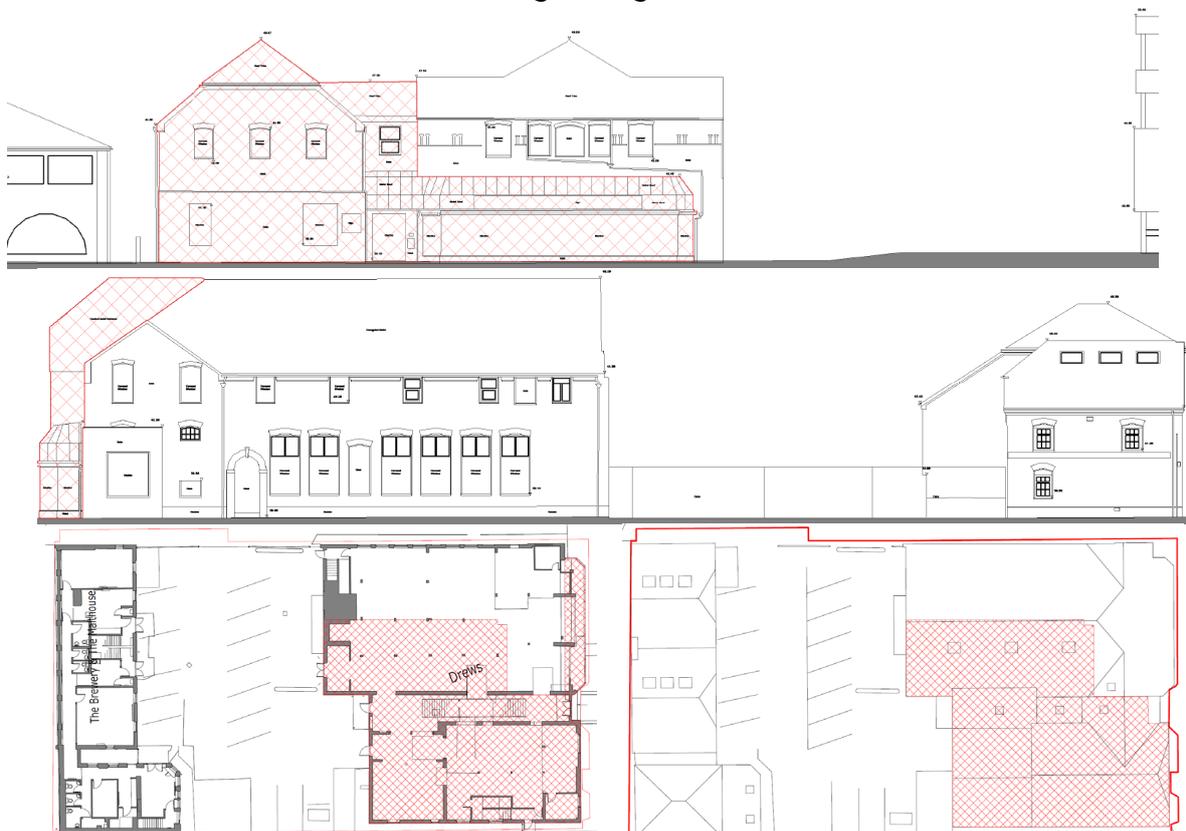


Figure 12 - Extent of proposed demolition hatched

in red (street frontages, ground and roof plans)

4.2.6 The applicant acknowledges (within the Heritage and Townscape Assessment) that some fabric would be lost to the front of the building, most notably the above ground floor level element of the southern building fronting Caversham Road. However, the applicant considers that the most significant and characterful portions would be retained. More specifically, the applicant considers:

- The historic character of the corner of Caversham Road and Northfield Road would continue to be readable.
- The relationship between the warehouse buildings to the Brewery and Malthouse buildings on the west side of the site would continue to be readable.
- Their former industrial relationship and ‘cultural contribution’ would substantially remain.
- The southern building has experienced considerable change over time and little remains of the original fabric which would be appreciated from the public realm. Historically the southern building had a far deeper footprint into the site and was divided from the building to be retained to the north. The infill to create the single composition fronting Caversham Road also altered the roof form. The ground floor shopfront has also been replaced.

4.2.7 With specific reference to the southern half of the site fronting Caversham Road, in pre-application discussions the applicant did explore options whereby the façade was retained. However, this was not pursued as the applicant considers it isolated in all directions by later interventions. The applicant considers that, if retained, it would either have to be entirely deconstructed for re-integration within a new building, which calls into question its authenticity, or entirely suspended in situ, as shown in visuals provided within the supporting Design and Access Statement (see figure 13 below)



Figure 13 - The southern half of the Caversham Road frontage and alternative proposals considered by the applicant.

4.2.8 Given the evidenced difficulties in practically and coherently incorporating this part of the existing building within a scheme of the nature shown, it is accepted on balance by the CUDO that this specific loss is accepted. In particular, the CUDO considers it pertinent that in itself this part of the building only has low significance as it is only a partial shell of the original, with no interior features remaining. Steps have been taken to include the most significant elements of the building into the proposed development. On balance, it is considered to have been done in a satisfactory manner.

4.2.9 Subsequent to the application being registered in August 2022 the proposals have been amended following input from the Reading DRP. This has simplified the

palette of materials but its massing has not changed. The CUDO has no objections to the changes made to the scheme following the DRP comments. In short, the CUDO has no objections to the design quality of the new build element in itself, in the context of the locally listed building and the streetscene, being generally in line with policies CR2 and CC7 in particular. For example, the proposed shopfront would represent a significant improvement in comparison with existing. While it is considered that the new works would have some impact on the buildings identified by the Local Listing, on balance when the proposal is viewed from Caversham Road, the northern warehouse is still a prominent element of the site and the new build is clearly seen as a later addition. The retention of the rear 2/3 storey buildings also help explain the earlier malting site configuration and they are an important contributory element to the significance of the site.

4.2.10 Therefore, with regard to the overall impact of the proposals on the significance of the locally listed buildings at the site, the proposed development, aligning with paragraph 203 of the NPPF, is considered to have “less than significant harm” on the non-designated heritage asset. In addition, the proposed design (following revisions) sufficiently and suitably incorporates the existing and proposed component parts into the streetscape. The proposed scheme is a clear improvement in terms of the refused and dismissed at appeal scheme in regard to heritage issues, with the proposals in themselves moreover considered to be accepted in regards to size, scale and materials on its own merits. Hence the CUDO supports the proposal and raises no objection to the level of demolition shown, subject to the following conditions:

- Pre-commencement level 2 photographic recording of the buildings for the Historic Environment Record (the HER)
- Pre-commencement, barring demolition, proposed material details, including for the brick bonding to be similar to the southern warehouse façade to be demolished.
- Ground floor shopfront details at 1:10 scale (expectation to comply with RBC Shopfronts SPD).
- Compliance condition relating to the retention of the ‘Smallbone’ ghost signage on the Northfield Road elevation

3) RBC Environmental Health - Environmental Protection (EP)

4.3.1 EP officers are satisfied that the submitted noise assessment is acceptable, with it providing detail regarding the level of mitigation in terms of glazing and ventilation required to protect the new occupants from noise. The details regarding layouts and proposed glazing are not yet available therefore will need to be secured via condition. In addition, EP officers have specific potential concerns about noise disturbance to future occupiers from deliveries and waste collections associated with the retail use proposed and the operation of the use itself. As such, an hours condition for deliveries and servicing between 8am and 8pm daily, and opening/operating hours being between 7am-11pm Monday to Saturday and 7am-6pm on Sundays and Bank Holidays are recommended to protect future amenity.

4.3.2 Turning to consider the development causing noise disturbance from plant, this is possible and given the detailed specifications of any plant have not been specified by the applicant it is considered that a mechanical plant noise assessment condition is necessary and required, with details approved prior to any mechanical plant is permitted to be installed.

4.3.3 With regard to air quality and the proposal’s increased exposure to poor air quality, the assessment submitted concludes that the air pollutants will be below the

objective limits, and therefore mitigation is not required. However, as the levels of NO₂ are not 'good', as they are up to 37.4 ug/m³ which is marginally below a cut-off point of 40, and ventilation will be required to the main facades to protect occupiers from noise, it is considered that air quality should be taken into account when designing the ventilation strategy to ensure that polluted air is not drawn into the properties. Accordingly, a pre-construction above foundation level condition is recommended to secure a mitigation strategy to protect the health of future occupiers from poor air quality.

- 4.3.4 Separately, in terms of the proposed development itself increasing emissions, EP officers are content with the conclusion of the assessment that there will not be a noticeable worsening of air quality as a result of the development and therefore no further assessment or mitigation is needed.
- 4.3.5 Given there is a known significant problem with rodent activity in Reading town centre a condition will secure details to ensure the proposed bin stores are adequately pest-proof.
- 4.3.6 Moving on to consider contaminated land matters, the preliminary assessment submitted itself concludes that an intrusive investigation is needed to assess the risks. Officers concur and hence the standard four stage contaminated land based conditions (1. Site characterisation; 2. Remediation scheme; 3. Validation report; 4. Reporting of unexpected contamination) are recommended, with the first two components being prior commencement conditions.
- 4.3.7 With regard to the demolition and construction phases of development, dust, noise and pest control measures are recommended within the demolition and construction method statement condition suggested by Transport. Standalone compliance-worded conditions are recommended too in terms of hours of working and there being no burning of materials on site, all to protect nearby amenity.

4) RBC Valuations

- 4.4.1 At the outset of the application the applicant sought to justify, through a viability submission, a zero on-site provision of affordable housing. Notwithstanding this position, the applicant offered to provide a commuted sum payment-in-lieu towards affordable housing of £165,000. The applicant also indicated a willingness to enter into an early-stage review mechanism post-decision, which would enable the amount of affordable housing to potentially increase up to a compliant tenure mix, subject to future viability and delivery timescales. The applicant considered that the provision of any contribution towards affordable housing would exceed what the scheme was required to provide, owing to the financial viability position submitted.
- 4.4.2 In assessing the principles and details of the viability submission, a number of areas of disagreement with the applicant's established position were identified by RBC Valuations. As such, the original offer by the applicant, as outlined above, was not agreed as making an appropriate contribution towards affordable housing to meet the needs of Reading Borough. RBC Valuations advised the applicant that it would be reasonable and necessary, in the context of the RBC assessment of the viability context, for a minimum of 4 on-site affordable housing units (equating to a 13.79% on-site provision). The remainder of the Policy H3 30% requirement was suggested by RBC Valuations to be provided via a suitable Deferred Affordable Housing Contribution Mechanism (with parameters which differed from those suggested by the applicant specified by officers), as secured via s106 legal agreement.

- 4.4.3 On the basis of these discussions the applicant altered its original affordable housing offer, introducing the provision of 4x1-bed shared ownership units on-site at first floor level. Factored into this offer was a proviso that should there be no credible interest in the on-site units, a s106 legal agreement secured cascade mechanism would permit converting the on-site provision into an equivalent financial payment of £165,000. In that scenario the shared ownership units would revert to market sale units. Responses were provided seeking for alternative inputs to any Deferred Affordable Housing Contribution Mechanism, not agreeing with those specified by RBC Valuations.
- 4.4.4 In response to the revised offer by the applicant, RBC Valuations advised that whilst the inclusion of 4 on-site affordable units was broadly welcomed and considered reasonable in the circumstances of viability, the financial contribution as part of the cascade secured within the legal agreement was considered to have been significantly undervalued by the applicant. Furthermore, there were continued disagreements regarding the parameters of any Deferred Affordable Housing Contribution Mechanism.
- 4.4.5 The applicant subsequently submitted responses which, in summary, continued to seek to justify the previously proposed £165,000 cascade payment and that the RBC Valuations suggested Deferred Affordable Housing Contribution Mechanism could not be agreed. Officers rebutted the response by the applicant and simply advised that, given the on-site provision of affordable housing was below the 30% policy requirement, the scheme would not be able to progress positively without a Deferred Affordable Housing Contribution Mechanism being secured. Furthermore, the applicant was advised that any cascade payment for the proposed 4 on-site units should total £292,672, rather than the £165,000 offered. At this juncture the applicant advised that the scheme would not receive funding (and therefore not proceed) if the late-stage review detailed by officers was secured. Discussions thereafter occurred regarding various different scenarios, with view to arriving at a mutually agreeable position. These negotiations cumulated in the applicant subsequently revising the proposed affordable housing offer to the following:
- The provision of 8 on-site shared ownership affordable housing units (6x1-bed at first floor level - including 1 wheelchair unit - and 2x2-bed - one each at ground and first floor level. This amounts to a 27.59% on site provision.
 - A payment-in-lieu commuted sum towards affordable housing of £58,400 (which is the equivalent of a 0.7 units / 2.41% contribution towards affordable housing, as agreed with RBC Valuations)
 - The provision of a cascade mechanism should the affordable housing not be disposed of (to first a Housing Association (HA) or Registered Provider (RP), or then the Council) the affordable housing contribution transfers to a commuted sum financial contribution of £585,344 (as agreed with RBC Valuations), with the on-site units then no longer required to be provided as on-site affordable units.
- 4.4.6 The proposed offer therefore amounts to 30% of the dwellings being in the form of affordable housing, with 27.59% (8) on-site units and 2.41% via a commuted 'top-up' financial contribution (0.7 units) of £58,400. A possible future scenario if the affordable units are not disposed of has also been agreed, amounting to a financial contribution of £585,344. Given the proposed offer, there is no requirement for a Deferred Affordable Housing Contribution Mechanism, as in either case, the scheme is fully policy compliant.

4.4.7 Set within the context of local policy requirements and the originally proposed affordable housing offer by the applicant, the subsequently negotiated position is considered to be a substantial offer by the applicant. The proposed offer exceeds the viability position evidence presented by the applicant, with the applicant evidently recognising the strong local policy requirements for on-site affordable housing in the Borough. Even if no HA, RP or the Council takes on the on-site units, the cascade mechanism securing a financial contribution of £585,344, together with the upfront payment-in-lieu of £58,400, would exceed the original offer or that proposed during the application prior to the now proposed offer. As such, in this particular instance, the proposals are considered to exceed what is considered to be an appropriate contribution towards affordable housing from an RBC Valuations perspective. The fully policy compliant level of affordable housing is therefore supported and welcomed.

5) RBC Housing

4.5.1 As a starting point, for any proposal seeking to create 29 residential units, the 30% Policy H3 requirement for affordable housing equates to 8.7 residential units. In practice, this would comprise 8 on-site units, with a financial contribution making up the remaining 0.7 of a unit requirement. Of the 8 on-site units, at least 5 would be required to be rented and no more than 3 shared ownership to comply with the Affordable Housing SPD tenure mix requirements. Set within this context, it is strongly supported that the overall provision of affordable housing, as proposed during the course of the application, amounts to the full 30% requirement. This comprises 8 on-site units, with the 0.7 shortfall topped up via an appropriate (as per guidance from RBC Valuations, as per section 4.4 above) financial contribution of £58,400. The proposal will therefore provide an appropriate headline figure contribution towards affordable housing to meet the needs of the Borough.

4.5.2 In terms of the specific nature of the on-site provision itself, RBC Housing is disappointed that the proposed tenure offered is entirely shared ownership, given the Affordable Housing SPD requires a tenure split of at least 62% rented and no more than 38% shared ownership. However, it is acknowledged that the provision of rented units in the scheme would worsen the viability position. Furthermore, it is accepted that there would be practical challenges incorporating rented units into the scheme, given the general preference to avoid service charges associated with the block and differing management requirements, meaning in practice rented units would typically expect to be separately accessed from the remainder of the units. In addition, it is acknowledged and considered that this site providing solely shared ownership units is likely to be a more attractive proposition for a HA or RP in terms of site management than the development incorporating both rented and shared ownership units. This is solely considered the case when the total number of units involved is relatively low from the perspective of a HA or RP, as would be the case in this specific instance. As such, providing that all other matters are secured as proposed, it is considered that RBC Housing would be content to support solely shared ownership units given the particular circumstances of this case.

4.5.3 In terms of the mix of unit sizes proposed, it is welcomed that a combination of 1 and 2-bed units are proposed, with the greater number of 1-beds (6) than 2 beds (2) aligning with figure 4.6 within Policy H2, where within the overall affordable tenure the greatest requirement is for 1 bed units. The inclusion of 1 of the 1-bed units being a wheelchair unit is welcomed too. Given only a single 3-bed unit is proposed in the scheme as a whole, it is accepted that the largest unit should be for market sale, given that the greatest need for market housing are 3-bed units.

Accordingly, the unit sizes of the shared ownership units is broadly welcomed in aligning with the Policy H2 needs.

- 4.5.4 It is essential for the 8 on-site affordable housing units and commuted sum of £58,400 to be secured via legal agreement, together with a cascade should a HA or RP not be found to take on the units. The cascade would require the applicant to fully evidence its attempts to identify a partner, with the Council then providing assistance in this process or for the Council to purchase the affordable housing units. Should this not occur then the affordable housing contribution shall transfer to a financial contribution towards affordable housing elsewhere in the Borough, which RBC Valuations have negotiated as being £585,344 (see section 4.4 above). Given the above, it is confirmed that no deferred affordable housing contribution mechanism is considered to be required in this case.

6) GS Ecology (RBC Ecology consultants)

- 4.6.1 GS Ecology advise that the bat survey report has been undertaken to an appropriate standard and concludes that the building is unlikely to host roosting bats. In addition, the Preliminary Ecological Appraisal concludes that once conditions are put in place to protect nesting birds and mammals during construction, the proposals are unlikely to affect protected species or priority habitats. As such, since the proposals are unlikely to affect bats or other protected species, there are no objections to this application on ecological grounds.

- 4.6.2 Furthermore, in relation to the proposed works, a biodiversity net gain calculation has been undertaken and concludes the development will result in more than 10% net gain in habitat units. A number of biodiversity enhancements are proposed, including a biodiverse roof and limited planting on the roof terrace and around areas of hardstanding. It therefore seems reasonable to assume that the proposals will result in a net gain for biodiversity, although a greater than presently shown quantity of trees and planting would nevertheless be welcomed. Accordingly, in addition to the landscaping details to be secured via condition (see Natural Environment Officer comments below at section 4.7), a separate condition should be secured to ensure wildlife enhancements, in particular swifts, are provided within the new development. This aligns with paragraph 180 of the NPPF, which states that “opportunities to improve biodiversity in and around developments should be integrated as part of their design”. Further compliance conditions are also recommended to protect nesting birds during partial site clearance works and wildlife during the construction phase of development. Subject to these conditions there are no objections to this application on ecological grounds.

7) RBC Planning Natural Environment

- 4.7.1 Given the site is within a low canopy cover area (as per the RBC Tree Strategy) and an air quality management area, it is a location where sufficient greening is of importance as part of any development.

- 4.7.2 It is recognised that the landscaping includes several trees within the ground floor parking courtyard, additional planting at ground floor level to the rear of the main building, a communal roof terrace and a biodiverse roof. This is all positive and will increase green provision compared to existing. The green wall elements provided on the Caversham and Northfield Road elevations under the previous application are no longer included. It is acknowledged that the partial retention of the original building accounts for this, although it no longer being incorporated is regrettable. This could have potentially contributed to a landscape-led SuDS approach, which

the proposal also disappointingly lacks. However, in the context of the existing site the proposals are considered appropriate in principle from a landscaping perspective, with there being no objections subject to conditions securing full hard and soft landscaping and boundary treatment details.

8) RBC Waste Services

4.8.1 Initial comments on the proposals raised concerns in relation to an inadequate on-site provision of bins for the number of residential units proposed. Concerns were also raised in relation to the collection distances being in excess of the 10m requirement. The applicant submitted revised plans showing an increased number of bins and collections taking place from the on-site car park, thereby addressing the original concerns raised. As such, both the quantum of bins and the collection arrangements is now acceptable to RBC Waste Services.

9) RBC Access Officer

4.9.1 The RBC Access Officer raised a series of initial queries and comments on the proposals from an access perspective, which the applicant duly responded to. In summary queries were raised in relation to:

- the gradient of the external ramps within the car park leading to the building;
- wheelchair user dwellings not being on the ground floor (they are proposed at first and fifth floor level);
- the lack of a shelter or car port for the two wheelchair user car parking spaces proposed
- queries over how accessible the amenity spaces are for wheelchair users
- comment that the rooftop terrace should include a range of seating types, suitable for wheelchair users

4.9.2 The applicant provided clarification regarding the ramp gradients (1:15), which the Access Officer confirmed were welcomed and satisfactory. The applicant sufficiently demonstrated that it was practically challenging to provide a ground floor wheelchair unit, with the two units provided accessed via the two lifts proposed. The Access Officer does not object to the proposals on this basis. The applicant has explained that the provision of a parking shelter was discounted on space grounds, which would negatively impact on the layout and amount of soft landscaping possible. The Access Officer is disappointed in this regard. In terms of the amenity space for wheelchair users, the applicant has explained that the proposed fifth floor unit includes a balcony, with the first floor unit not having a dedicated space, but would have access to the communal rooftop terrace proposed. The Access Officer welcomes that all occupiers have scope to access amenity spaces and welcomes the applicant stating that seats with and without arms and at different heights can be secured via condition (Planning Officer note: this would be secured within the hard and soft landscaping details, as per the Natural Environment Officer comments at section 4.7 above).

10) RBC Leisure

4.10.1 As with all town centre developments, and this is no exception, there is very limited open space on site for residents, with 70m² equating to less than 3m² per unit. The proposal does not provide meaningful recreational open space and the delivery of adequate on site open space is not achievable.

4.10.2 RBC Leisure therefore seek 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 Local Plan, Policy EN9 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 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.

4.10.3 The added pressure from an increase in the number of residents moving into new developments increases the wear and tear on the existing infrastructure. It is considered 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 £60,900 and which is in addition to CIL funding, would be used to continue to improve and extend facilities within the Thames Parks (including Caversham Court Gardens and Allotments) and Great Knollys Street Recreation Ground, which are in close proximity and would serve the development.

11) RBC Lead Local Flood Authority

4.11.1 The proposed drainage scheme significantly reduces surface water run-off. As such, there are no SuDS based objections subject to planning conditions. The first condition would be pre-commencement, securing a fully detailed SuDS strategy (as insufficient details have been received at this juncture). The second condition would effectively ensure the details in the first condition are completed prior to first occupation.

12) Reading’s Economy & Destination Agency (REDA) (formerly Reading UK CIC)

4.12.1 REDA note this important mixed use redevelopment near to the town centre will include 297sqm of Retail Class E (a) space, which is welcomed to help ensure commercial use of property along Caversham Road, one of the town’s most important transport hubs. In addition it will provide new residential space in easy reach of the centre.

4.12.2 Due to the extent of the redevelopment REDA would expect the applicant to enter into an Employment and Skills Plan, as required by the Supplementary Planning Document dated April 2013. Alternatively the applicant may prefer to make financial contributions in lieu of a plan to deliver training and recruitment programmes which benefit local residents.

13) Environment Agency (EA)

4.13.1 The EA replied advising that the planning application is for development the EA does not wish to be consulted on.

14) Royal Berkshire Fire & Rescue Service

4.14.1 Comment that whilst there is no duty placed on the Fire Authority to comment and that comments should not be taken as formal approval, the plans have been briefly examined and the following is noted:

- Access for fire-fighting, particularly vehicular access, must comply with Part B5 of the Building Regulations guidance.
- Structural fire precautions and all means of escape provision will have to satisfy Building Regulation requirement.

15) Delva Patman Redler Chartered Surveyors (DPR) (Light consultants for RBC)

4.15.1 DPR undertook an independent review of the daylight, sunlight and overshadowing components of the development (report by Calford Seaden) on behalf of the local planning authority. A summary of DPR's conclusions on the assessment by the applicant are:

- 73% of the 66 proposed habitable residential rooms will satisfy or exceed the minimum recommended daylight illuminance targets;
- 90% of the 29 units tested (those with a window facing within 90 degrees of due south) will satisfy or exceed the recommended sunlight exposure targets.

4.15.2 DPR advises that the main causes of the poorer daylight results are mainly due to windows beneath balconies having a more limited view of sky, or units having rooms set behind semi-enclosed recessed balconies (e.g. units fronting onto Caversham Road). DPR points out that the balconies do, however, provide private amenity space for the dwelling above. DPR considers that overall, the development appears to provide a satisfactory level of adherence to daylight guidelines. With specific reference to the daylight results, DPR qualify this by detailing that *“Whilst this is a satisfactory level of adherence for a development in this location, the adoption of light finishes [white-painted rooms, no furniture, etc.] mean these are best-case results. If the developer delivers units with darker finishes, the number of rooms achieving the minimum target illuminance would be lower and fewer rooms would achieve the recommendations”*.

4.15.3 In terms of the impact on existing/future neighbouring occupiers, the assessment has appropriately considered Monmouth Court (to the west) and the (at the time of writing) current planning application at 80 Caversham Road (see relevant history section above for details). DPR concludes that the daylight and sunlight results indicate that the proposed development will not have a material effect on Monmouth Court or the proposed scheme at 80 Caversham Road.

4.15.4 The review also raised three main points of clarification, in relation to: whether balcony balustrades were included in the calculations; the parameters behind the average daylight factor and daylight illuminance assessment, and; queries over the provision of clear window location plans showing neighbouring windows assessed. All three matters were clarified by the applicant, with DPR subsequently being satisfied in all regards and concluding that:

“The assessment has been undertaken in accordance with the 2022 published guidelines and reasonable parameters have been used to evaluate the daylight and sunlight levels to the proposed habitable units.

The additional information provided addresses the clarifications raised during the initial review, and the scheme will only have a negligible effect on the neighbouring properties in daylight and sunlight terms”.

16) Element Energy (Energy consultants for RBC)

4.16.1 Element Energy undertook an independent review of the sustainability and energy components of the development on behalf of the local planning authority. The proposed strategy by the applicant can be summarised as:

- A communal heat distribution network, using a centralised air-source heat pump - led approach to supply the residential part of the development.
- The provision of on-site renewables in the form of rooftop solar photovoltaics
- The inclusion of high energy efficient building fabric and building services to reduce carbon emissions and energy demand through good practice passive and energy efficiency measures
- In total, the combination of measures is anticipated by the applicant to achieve an 89.4% reduction in CO2 emissions, in comparison to a Building Regulations Part L compliant baseline.
- Air-to-air heat pump technology shall supply space heating and hot water to the retail non-residential development, utilising a variable refrigerant flow (VRF) system
- The non-residential element of the development is designed to achieve a BREEAM “Very Good” accreditation.

4.16.2 Element Energy’s original conclusion specified that the scheme was not policy compliant, for the following overarching reasons:

- A communal heat distribution network that is compatible for connection with a future Reading-wide district heating network hasn’t been provided.
- Lack of evidence (technical analysis) to support why ground source heat pump (GSHP systems have been discounted and air source systems (ASHP) have been selected.
- The BREEAM pre-assessment, whilst exceeding the 55% threshold for BREEAM “Very Good”, only provides a buffer of 0.8%, below the accepted threshold of a 3%-5% buffer as expected by BREEAM to allow for design changes and potential constraints identified during the construction stage.

4.16.3 Element Energy made a series of recommendations as to how the applicant could potentially address the various issues raised. The applicant duly submitted further information in December 2022 and January 2023, with this being re-reviewed by Element Energy. The follow up review confirmed that many of the matters originally raised had facilitated an adequate response by the applicant (e.g. improved BREEAM pre-assessment scores were suitably evidenced). Remaining concerns remained, predominantly concerning the suitability of the evidence for discounting closed loop GSHP, given SPD guidance prefers GSHP over ASHP systems. Upon further discussions it was agreed between the technical consultants that this could be further explored at the detailed design stage.

4.16.4 Accordingly, Element Energy subsequently confirmed that the proposals are policy compliant, providing a series of planning conditions and a s106 legal agreement securing a carbon offsetting financial contribution. In particular, the first energy strategy condition will include a specific commitment for the applicant to further investigate the provision of a ‘closed loop’ ground source heat pump system at the site. This will be in the form of a feasibility report, with consideration for space heating and hot water supply strategies that minimise peak load and thus centralised heat supply system capacity, with view to a closed loop ground source heat pump system being provided instead of the presently proposed air-source heat pumps. With the conditions and legal obligation secured Element Energy confirmed contentment with the proposals from a sustainability and energy perspective.

17) Reading Design Review Panel (DRP)

4.17.1 The proposals were considered by the Reading DRP on 22nd September 2022 (during the course of this application). A summary of the subsequent DRP written comments are:

- “The design [has] evolved [in the context of the area and previous proposals] by (i) suggesting that elements above the retained facade should be metal framed with east facing winter gardens to provide external space and acoustic buffers to the interiors, (ii) that a red brick tower should sit behind the retained building, (iii) that buff brick ‘intermediate’ elements should be inserted between the grey metal winter gardens and the red brick tower. This ‘mixed’ approach was questioned by the panel (elements in [brackets] added for clarification by officers).
- There was no evidence presented of how the scheme addresses issues of sustainable design and carbon/energy/circular construction initiatives.
- There was no consideration of the wider issues of the natural environment on the site and its biodiversity.
- Diagrams showing sun angles and improvement in the daylight available to the rear of the site were questioned by the Panel.
- The visualisations did not properly describe the differences between the retained brickwork and new brick. The panel insist that these differences will be apparent and should make a significant contribution to how the detailing of the final building will be designed.
- The introduction of ‘mixed’ materials throughout the tower building should be reconsidered and a simpler pallet used. Grey metal at higher levels above roofs, new red brick below carefully distinguished from the retained sections.
- DRP urge the applicant to adopt a bolder design, simplifying the materials choice and increasing the height if necessary to achieve more sustainable design and construction goals and making the clear distinction between both the scale and architecture of the new and retained parts.
- The Panel sympathised with the applicant over how the design evolution has compromised this redevelopment.

18) RBC Education, Crime Prevention Design Advisor at Thames Valley Police, Thames Water, SGN (formerly Scotia Gas Networks) and SSE (formerly Scottish and Southern Energy)

4.18.1 No responses have been received from these consultees. If any responses are subsequently received they will be set out in any update report.

ii) Public consultation

4.19.1 Notification letters were sent to nearby occupiers on 23/08/2022, with the statutory period expiring on 13/09/2022. Site notices were displayed at the site from 24/08/2022, expiring on 14/09/2022. A press notice was published on 01/09/2022, expiring on 22/09/2022.

4.19.2 One objection has been received from a resident at an Addison Road address, with the issues raised being summarised as follows:

- Height - the proposed tower block is still higher than any other building on this side of Caversham Road, particularly the fire station.

- Precedent - Concern the proposal would set a precedent between the railway embankment and the Caversham Bridge roundabout, especially given the potential redevelopment of the Carters site (*Officer note: each application is required to be considered on its own merits*).
- Opposes any building higher than the existing Shurgard building, owing to the low-rise character to the west and overshadowing of properties in Northfield and Swansea Roads. Reference to the 2008 Tall Buildings Strategy stating tall structures should not be developed here due to the nearby small scale residential areas, which development should instead respond to.

4.19.3 As part of the objection the following comments have also been made:

- heritage concerns about the original plans (*Officer note: i.e. the refused and dismissed at appeal scheme*) have largely been addressed.

4.19.4 The changes to the scheme since the original consultation were not considered of a nature or extent to warrant formal public re-consultation.

iii) Local Groups

20) Reading Conservation Area Advisory Committee (CAAC)

4.20.1 Reading CAAC objects to the application, summarised as:

- The proposal does not address all the criticisms of the dismissed appeal.
- The impact on the streetscene towards the railway bridge, including Caversham Fire Station remains negative.
 - The Inspector's criticism that the original proposal would be taller than the surroundings on the west side of Caversham Road and Northfield Road has partly been addressed by the reduction in height to a maximum of six storeys.
 - The Inspector's criticism that the blank southern wall with window outlines provided limited relief and interest remains, whilst noting the now proposed wall is not as tall. This will be particularly dominant on the street scene when approaching the site from the town centre along Caversham Road.
 - The proposal results in the removal of about 50% of the frontage to Caversham Road. More of the maltings should be retained. The proposal will result in the loss of the maltings closest to the railway line, possibly the oldest, so only one of the three will remain. Clearly this has a significant impact on the heritage asset itself, the setting of the office buildings to the rear and harm the group value of the site as a whole.
 - The proposed dormers in the roof facing Northfield Road are completely out of keeping with a maltings building and undermine its significance
- The impact on the residential properties at Barry Place has been completely ignored and should be assessed.

4.20.2 The CAAC, whilst objecting to the proposals in overall terms, also comments as follows:

- The impact on Northfield Road has been improved in this application and is well documented within the submission.
- The CAAC welcome the retention and re-use of the shell of one of the maltings, feature doorway on the ground floor and many of the windows particularly at first floor level.

- The future of the Smallbone ghost sign (on the Northfield Road) elevation has not been specified. The CAAC requests this to be retained as it records one of the uses of the building after it ceased to be a maltings. (*Officer comment: on the demolition plans submitted this façade is not specified as being demolished*)

21) Bell Tower Community Association

4.21.1 Bell Tower Community Association was formally consulted and no response has been received.

22) Caversham & District Residents' Association (CADRA)

4.22.1 CADRA objects to the proposals, commenting in full as follows:

“While this application seeks to retain a part of the Locally Listed building of significant historical interest, it removes 50%, makes out of keeping alterations and provides new build at 6 storeys which would dominate and detract from the maltings. The view onto Caversham Road is overly dominating, with loss of about half of the original frontage. The proposed dormers in the roof facing Northfield Road are out of keeping with a maltings building and undermine its significance. While some improvements are welcome we urge that the application should be refused in its current form”.

5. LEGAL AND PLANNING POLICY CONTEXT

- 5.1 Section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 5.2 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 5.3 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) - among them the 'presumption in favour of sustainable development', which means 'approving development proposals that accord with an up-to-date development plan without delay' (NPPF paragraph 11).
- 5.4 For this Local Planning Authority the development plan is the Reading Borough Local Plan (November 2019). The relevant national / local policies / guidance are:
- 5.5 **National**
National Planning Policy Framework (2021)
The following NPPF chapters are the most relevant (others apply to a lesser extent):
- 2. Achieving sustainable development
 - 4. Decision-making
 - 5. Delivering a sufficient supply of homes

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

National Planning Policy Guidance (2014 onwards)

5.6 The relevant Reading Borough Local Plan (November 2019) policies are:

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design and Construction
- CC3: Adaptation to Climate Change
- CC4: Decentralised Energy
- 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
- EN5: Protection of Significant Views with Heritage Interest
- EN6: New Development in a Historic Context
- 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
- EM3: Loss of Employment Land
- H1: Provision of Housing
- H2: Density and Mix
- H3: Affordable Housing
- H5: Standards for New Housing
- 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
- OU5: Shopfronts and Cash Machines
- 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

5.7 Reading Borough Council Supplementary Planning Documents

Topics

Affordable Housing (2021)
Design Guide to Shopfronts (2022)
Employment, Skills and Training (2013)
Revised Parking Standards and Design (2011)
Planning Obligations under Section 106 (2015)
Sustainable Design and Construction (2019)

Sites

Reading Station Area Framework (2010)

5.8 Other relevant documentation

DCLG Technical housing standards - nationally described space standard (2015)
BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice (BR 209 2022 edition)
Reading Borough Council Tree Strategy (March 2021)
Reading Biodiversity Action Plan (March 2021)
Reading Open Spaces Strategy (March 2007)
Reading Open Spaces Strategy Update Note (January 2018)
The National Design Guide (2019)
The National Model Design Code (July 2021)
Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)
Historic England Advice Note 7 (2nd edition) Local Heritage Listing: Identifying and Conserving Local Heritage (Historic England, 2021)
Conservation Principles, Policies and Guidance (Historic England, 2008)
Guide to the Conservation of Historic Buildings (British Standards Publication BS 7913:2013, 2015)

6. APPRAISAL

The main issues are considered to be:

- 6.1 Land use considerations, including provision of affordable housing
- 6.2 Design and Heritage matters - including demolition, height scale and massing, design and appearance including detailed design, and effect on designated heritage assets
- 6.3 Quality of accommodation for future occupiers
- 6.4 Amenity impacts for nearby occupiers
- 6.5 Transport and Highways
- 6.6 Landscaping and ecology
- 6.7 Sustainability and energy
- 6.8 Flooding and SuDS
- 6.9 Other matters - S106, pre-commencement conditions & Equality

1) Land use considerations, including provision of affordable housing

Loss of existing use

- 6.1.1 In land use terms the starting point for the assessment of these proposals is to establish whether the loss of the existing lawful use of the building proposed to be partly demolished is appropriate. The existing retail warehouse use is considered to fall within the Class E use (most closely aligned to Class E(a) - display or sale of

goods), as per the 2020 amendments to the Use Classes Order. No Central Reading policy specifically protects retail uses outside of primary frontages (which the site is not within).

- 6.1.2 Officers are also mindful of NPPF paragraph 123, which states LPAs should support proposals to use retail land for homes in areas of high housing demand (discussed separately below, but in summary this is evident in Reading), provided this would not undermine key economic sections (which it is considered it would not) or the vitality and viability of town centres (which it is considered it would not within the context of the regional centre of Reading).
- 6.1.3 Moreover, the proposal would not result in the complete loss of retail use at the site, with the proposal actually involving replacement retail floorspace. Therefore the proposals involve the reduction in retail floorspace at the site, from 1,264.9sqm to 297sqm (a total reduction of 967.9sqm). The appropriateness of the proposed use is separately discussed below, but from a land use perspective there are no in-principle land use issues concerning the reduction in retail floorspace at the site.

Principle of residential use

- 6.1.4 The supporting text to Policy H1 confirms that there is a pressing need for additional housing in Reading and the surrounding area, which helps explain the policy requirement for on average 689 homes per annum in Reading Borough. Furthermore, Reading is a very tightly defined urban area, sites for new development are limited and there is a heavy reliance on previously development land. The proposed development, providing 29 residential units on brownfield land, would therefore contribute towards meeting this pressing need. For balance, it is also relevant to note that the December 2022 published Annual Monitoring Report (covering the period from 1st April 2021 to 31st March 2022) confirmed that housing delivery was strong both in general terms and in terms of delivering affordable housing, with Reading having a five year housing land supply. Nevertheless, the principle of providing residential units at the site, according with Policy H1, is considered to be established.

Principle of retail use

- 6.1.5 The application proposes the retention/reprovision of 297sqm of retail floorspace (Use Class E(a)) at part ground floor level. The site is located within the Central Area boundary of Reading, but is not located within the identified Primary Shopping Area within the Central Area, where Policy CR1 states retail development will take place. However, as outlined above, this proposal is seeking the reconfiguration and adaption of an existing retail use at the site, thereby meaning that flexibility can be applied in terms of the retail floorspace being provided outside of the Primary Shopping Area. Moreover, paragraph 5.2.5 of the Local Plan states a key theme which underpins the Central Reading strategy “*is of a mix of uses across the central area, both vertically and horizontally*”. In this instance, the provision of a non-residential component within the scheme, in principle terms is considered to align with the general thrust of Central Reading policy and a retail use would also provide an active frontage along the street, assisting natural surveillance in the area.
- 6.1.6 It is noted that the applicant has specifically sought Class E(a) (retail) use at the site. The Class E use class has 11 separate parts, with it considered reasonable and necessary for a condition to secure the floorspace solely for Class E(a) use, as the

other Class E uses have not been assessed as part of this application and could have very different amenity and transport implications as the proposed use. Along similar lines, given the wide potential for different uses being permitted in the future under permitted development rights, a further condition shall prevent the conversion of non-residential floorspace to residential without separate permission from the local planning authority.

Residential Mix

- 6.1.9 The proposed dwelling mix is 23 x 1-bedroom units, 5 x 2-bedroom units and 1 x 3-bedroom unit, as detailed in figure 5 within section 2 above. This equates to 79.31% 1-bed units and 3.45% 3-bed units. Although a mix of 1, 2 and 3-bed units are provided, the proposals are evidently and significantly at odds with the guide within Policy CR6, which states a maximum of 40% 1-bed and a minimum of 5% 3-bed units should be provided.
- 6.1.10 However, the policy also references flexibility by stating the above guide should be followed, *“unless it can be clearly demonstrated that this would render a development unviable”*. The applicant is seeking to advance the proposal on this basis and has provided a series of viability-based information, both as part of the general viability position relating to affordable housing, and specific mix-based viability information as a result of concerns being raised by officers in this regard.
- 6.1.11 In short, the viability information provided by the applicant does evidence that altering the mix in respect of reducing the number of 1-bed units or increasing the number of 3-bed units would result in an overall reduction in number of units and, moreover, a reduction in the capital value per square foot within the scheme. The impact of amending the proposed scheme mix would be a worsening of the scheme viability position, effectively resulting in the significant reduction or even removal of the on-site affordable housing and financial contribution proposed, or potentially going as far as calling into question the deliverability of the scheme as a whole. The applicant also suggests that the central location and relatively small size of the site are other factors to support a deviation from the guide, but officers do not consider these factors to be of any particular merit in this case given that Policy CR6 is a central Reading specific policy already.
- 6.1.12 Consequently, it is the viability-based information provides a sufficient basis for taking an alternative approach to the normal mix guide within Policy CR6 in this specific instance. The proposed mix of dwellings would be secured via condition, as per the recommendation at the outset of this report. Nevertheless, the proposed mix is still viewed by officers as disappointing in itself and is considered to be a shortfall of the proposal when applying an overall planning balance to the scheme. That overall balance will be weighed and discussed at section 7 below.

Affordable housing

- 6.1.13 During the course of the application, the amount of affordable housing has increased from the originally proposed nil on-site provision to 8 x shared ownership units (6x1-bed units at first floor level and 2x2-bed units - one each at ground and first floor), representing a 27.59% on-site affordable housing contribution. Furthermore, a financial contribution of £58,400, accounting for the 0.7 of a unit / 2.41% is also proposed, meaning in overall terms the provision adheres to the 30% requirement specified within Policy H3. The on-site units and financial contribution would be secured in full via the recommended s106 legal agreement.

- 6.1.14 Set within a challenging viability position, as explained within the RBC Valuations comments at section 4.4 above, the policy compliant provision of affordable housing is considered to be an extremely positive outcome, going beyond a level of provision which can reasonably be provided. This has been possible in this specific instance as the applicant has specified difficulties with its funder in terms of agreeing to the Council's required deferred affordable housing contribution mechanism, which is typically required where the provision of affordable housing is below the policy compliant level. As such, in order to preclude the requirement for a deferred mechanism, the applicant appears to have chosen to increase the on-site provision to a policy compliant level, despite the viability evidence submitted. The result of these extensive negotiations is a policy compliant provision of on-site affordable housing, supplemented with the necessary financial contribution.
- 6.1.15 In this context, officers consider that flexibility can be applied in terms of the specific tenure split of the affordable housing component not according with the SPD requirements. As detailed within the RBC Housing comments at section 4.5 above, in this specific instance the provision of solely shared ownership units (therefore not including any rented units) is considered to be appropriate. In short, this is ultimately recognised as a result of scheme viability, which Policy H3 itself acknowledges. Put simply, any change in the package of affordable housing measures proposed (e.g. incorporating rented units on-site as well as shared ownership) would have a negative impact on the delivery of the scheme as a whole, perhaps even calling into question it occurring at all. In summary, officers advise that the proposed shared ownership offer should form an important positive component of the overall planning balance, which will be discussed further at the end of this Appraisal.
- 6.1.16 As with any on-site provision, a cascade mechanism is proposed to be included within the s106 legal agreement. In practice this ensures that if any of the on-site affordable housing units are not disposed of to a HA or RP (as very much anticipated), then a fallback position would be for the Council to assist in identifying a provider or purchasing the units. If relevant requirements are met to evidence that nobody is prepared to manage the affordable units, the on-site provision requirement would instead transfer to a financial contribution towards affordable housing elsewhere in the Borough, to the negotiated sum of £585,344.
- 6.1.17 In addition, a further affordable housing related clause is included within the s106 legal agreement in relation to the Council safeguarding its affordable housing position in the future. More specifically, it is contended that should the application site subsequently be extended/alterd to create further residential units (e.g. conversion of the commercial ground floor or offices within the buildings fronting Northfield Road) or residential units as part of this proposed subdivided (e.g. a 2-bed unit becoming 2x1-bed units), then contributions to affordable housing would apply on a cumulative basis, rather than a standalone application basis. This is necessary due to Policy H3 requiring different levels of affordable housing depending on the number of units (thereby avoiding a succession of applications each having different affordable housing requirements, which if all submitted as one could generate a larger requirement. It is considered reasonable and necessary for this to be secured in this instance to ensure the site makes an appropriate contribution towards affordable housing to meet the needs of Reading. Such a clause has been included on other schemes in the Borough in recent years, including being accepted in an appeal scenario.

2) Design and Heritage matters - including demolition, height, scale and massing, design and appearance including detailed design, and effect on designated heritage assets

Demolition

- 6.2.1 Initially the proposed demolition works are considered, or more specifically the extent of demolition proposed in this instance. The proposals involve the retention of 'The Brewery' and 'The Malthouse' office buildings on the western side of the site and a significant proportion of the current building on the junction of Caversham Road and Northfield Road, barring the non-original ground floor shopfront and the southern half of the Caversham Road fronting building. The extent of demolition has already been summarised in section 2 above (visualised at figure 4), with this also shown in the context of the demolition plans submitted at section 4.2 (figure 12) within the CUDO observations. Furthermore, all of relevant visuals are combined at Appendix 2 at the end of this report.
- 6.2.2 In the previously dismissed at appeal proposals it was sought to demolish the entirety of the building on the eastern side of the site fronting Caversham Road and Northfield Road. In dismissing the appeal, the Inspector concluded at paragraph 28, as already detailed in section 3 above that *"the building has significant significance as a non-designated heritage asset and its loss would harm the historic environment"*. Taking this on board and seeking to address the concerns of the Inspector the proposals differ in seeking the partial retention / partial demolition of the building on the east side of the site. As the CUDO comments at section 4.2 above, the applicant explored retaining the whole building and the façade of the southern building fronting Caversham Road. However, this was discounted for practical and design-based reasons, which the Council's CUDO accepts. Furthermore, the retention of the characterful building on the corner of Caversham Road and Northfield Road is considered to retain the most significant part of the existing building (in the context of these historically being two separate buildings), in a genuine attempt to address previous concerns and bring forward a heritage and design-led approach in these proposals, whilst simultaneously achieving a financially viable proposal.
- 6.2.3 Given the application site buildings are locally listed, the proposals need to be considered against Policies EN1 and EN4. Policy EN1 seeks to ensure that assets on the Local List are protected and where possible enhanced. More specifically, there are two main tests within Policy EN4, namely that (1) the benefits of the development significantly outweigh the asset's significance in instances such as this where harm would occur and (2) that the development conserves, architectural, archaeological significance, which may include the appearance, character and setting of the asset. In terms of test 1, this requires a wider assessment of the application as a whole, which can only be detailed within the planning balance section of this report. As such, this is duly discussed separately at section 7. However, it is initially referenced, acknowledged and fully accepted that some harm to the locally listed buildings would occur, both individually and as part of the collective group value, as the proposals involve partial demolition, and furthermore the setting of the remaining buildings would change owing to the proposed development. Notwithstanding test 1 for the moment, in terms of test 2, the Council's CUDO comments at section 4.2 point to it being considered that the proposals do sufficiently conserve the architectural and historical significant of the asset, with the most important element of the existing building retained and incorporated into the proposed redevelopment proposal, with the rationale discounting the retention of the entire building being robust and acceptable to

officers. As such, test 2 of Policy EN4 is considered to have been met, with test 1 returned to at section 7 of this report.

6.2.4 As well as the local policy context, it is also relevant to note that the corresponding national policy position too, albeit this is not considered as stringent as the local policy context referenced above. Paragraph 203 of the NPPF requires a balanced judgement when weighing applications (such as this) that directly affect non-designed heritage assets (which locally listed buildings are), with regard required to the scale of any harm/loss and the significance of the heritage asset. In this case the CUDO considers that the scale of harm is less than significant, as detailed in section 4.2 above. In line with the Inspector's previous comments, it is echoed that the buildings have "significant significance". It is within this context that the required balanced judgement will be considered at section 7 of this report.

6.2.5 It is relevant to note at this juncture that any approval, as recommended, would include recording of all buildings at the site, in line with Historic England Level 2 recording. This dovetails with NPPF paragraph 205 and Policy EN4 and has duly been recommended by the CUDO. Moreover, it is also considered necessary to include a separate condition specifying that the partial demolition recommended shall not be undertaken before a contract for the carrying out of the works of redevelopment of the site has been made (with details submitted to demonstrate this to officers for approval to at least cover the demolition and shell and core stages of development - with the definition clarified through an informative). This is considered necessary given the potential risk of partial implementation of any permission, involving demolition works only, would cause a harmful impact in the street and townscape terms, while it would also prevent the unnecessary (in that context) partial loss of the locally listed building. Such an approach also follows recommendations detailed at paragraph 204 of the NPPF.

Height, scale and massing

6.2.6 Turning to consider the height, scale and massing of the proposed development, as identified at section 2 above, the scheme seeks a part 2 (and roofspace accommodation) storey building at the northern end of the site, rising to part 5 and part 6 storeys further south and fronting onto Caversham Road. It is initially noted that the proposed scale and massing significantly differs from that proposed as part of the previous dismissed at appeal scheme. At that time a part 5, part 7 proposal was sought (see figures 7 & 8 within section 3 above), which the Inspector criticised as appearing "*unduly tall*", "*dominating and out of scale*". The 5 storey element towards Northfield Road was also considered to appear out of context (see section 3 for more details).

6.2.7 The now proposed scheme has sought to positively respond to the Inspector's comments, with the overall height of the tallest element reduced by a storey (further reduced by the proposed flat roof design). Most significantly however, the retention of the 2-storey warehouse at the northern end of the site is considered to importantly signal a meaningful reduction in the bulk and massing, as well as the perception of bulk and massing across the site too. The comparative position is seen in figure 14 below, with additional visuals shown at Appendix 7 too. As such, the current proposals are considered to represent an extensive shift in approach by the applicant in this regard.



Figure 14 - Proposed scale and massing, with the comparative dismissed at appeal scheme outlined - please note that the proposed materials shown differ to those now proposed)

6.2.8 However, ultimately the proposed scale and massing needs to be assessed afresh on its own merits, against development plan policies. This assessment can be considered within the context of Caversham Road and then Northfield Road. Latterly, the transition between remaining and proposed component parts of the site need to be considered too. It is recognised that the site is located in a transitional area between low-rise residential terraces to the west and the larger scale commercial uses around Reading Station to the east (both as existing and possibly emerging, as per applications/appeals at sites to the east - see section 3 above for details).



Figure 15 - Existing and proposed Caversham Road streetscene elevations - see Appendix 4 for slightly larger versions of the same plans

6.2.9 With this context in mind, it is acknowledged that along Caversham Road the proposals would represent a change in the scale and massing along the west side of the road. The openness of the site, when approaching from both the north and south means it could be considered to be sensitive to change. However, such a change is not considered to be harmful in this case and instead it is considered to sufficiently maintain and enhance the character and appearance of the area. While the prevailing scale of buildings along the west side of Caversham Road is acknowledged to be 2-3 storeys, and the overall proposed height at the tallest point being 6 storeys would be greater than the prevailing context, this greater height applies to only part of the frontage. Meaningful elements of this scale are set back from the Caversham Road frontage too, thanks to the retained corner warehouse which assists in assimilating the proposed scale into the streetscene. As a consequence, when considering the existing and proposed Caversham Road streetscenes (see figure 15 above), these demonstrate an overall height and scale which is not considered harmfully taller than the existing Shurgard warehouse to the north. The appropriateness of the proposed scale and massing is also assisted

by the detailed design approach, which is discussed separately in the subsequent sub-section of this assessment. It is also pertinent that the Council's CUDO raises no concerns with the proposed scale and massing (see section 4.2), with this also being the informed viewpoint of the Reading Design Review Panel (see section 4.17) too. In short, it is considered that the proposed massing assimilate satisfactorily into the streetscene.

6.2.10 Along Northfield Road, the retention of the corner warehouse means these proposals are a fundamentally different scheme to that previously dismissed at appeal. The scale and massing are considerably reduced and in themselves provide a suitable basis for stepping up in height to the 5 and 6 storeys proposed. These components being offset from the street frontage mitigate the potential harm and create a suitable transition at this point.

6.2.11 When the proposals are considered in an east to west context, as seen below in figure 16, whilst the proposals would represent a change when compared with existing, again this is not considered harmful. The width of the proposed car parking area and, in particular the set-back nature of the new-build elements, provide a suitable transition between the retained warehouse / new build inset buildings and the 2-3 storey retained 'The Brewery' and 'The Malthouse' buildings and the 3-storey Monmouth Court further to the west. The Inspector previously considered 5 storeys to be out of context along Northfield Road, but the setback of the now proposed height is considered to successfully mitigate the previous harm identified.



Figure 16 - Existing and proposed Northfield Road streetscene elevations - see Appendix 4 for slightly larger versions of the same plans

6.2.12 To the east the width of Caversham Road mitigates any harmful impacts in the change in scale with the existing (vacant) Royal Mail buildings, with this character subject to possible change in the future if the resolved to be granted / awaiting completion of legal agreement scheme at 80 Caversham Road (Ref 182252 - see section 3 above) is implemented with 8-storey buildings along the street elevation as proposed. In that possible future context, the proposals would reaffirm the existing transitional nature of the site.

6.2.13 In respect of the transition within the site between the retained 2-storey warehouse element and the part-5, part-6 storey new build element, the retention of the roof form (albeit reconfigured with the introduction of the dormers and rooflights) means that the two separate elements can be easily identified and understood in townscape terms, whilst simultaneously assisting in breaking up the mass. In addition, the detailed design (as discussed separately in the sub-section below) also helps illustrate the appropriateness of this relationship, which is important given the prominent corner plot, as shown below in figure 17 and Appendix 6.



Figure 17 - Proposed computer generated image from Caversham Road looking south-west showing the junction with Northfield Road

6.2.14 In respect of height, scale and massing matters, it is also relevant to reference that, in dismissing the previous appeal at the site, the Inspector raised concerns with the blank seven storey wall on the southern elevation, with this considered to offer very limited relief and made the building appear austere and overly dominant. Officers consider that this has been largely addressed in the now proposed scheme (as shown in figure 18 below), through a combination of a reduction in one storey, the provision of winter gardens fronting Caversham Road and the provision of lintel detailing within the detailed design. Although the provision of windows throughout this elevation would have addressed the Inspector's concerns in full, officers accept that this is not possible in this instance as the applicant is separately required, under Policy CR2f, not to prevent or cause unreasonable burdens on the future development of adjacent development sites. As such, there is an inherent conflict between ensuring the building does not appear overly dominant, whilst not compromising future neighbouring development.



Figure 18 - Dismissed at appeal south elevation (left) and as now proposed (right)

6.2.15 In overall terms the proposed height, scale and massing of the proposals is considered appropriate and is supported by officers on its own merits. In addition, the scheme is also considered to satisfactorily address the comments raised by the Inspector in dismissing the previous proposals at the site.

Design and appearance including detailed design

- 6.2.16 The proposals are considered to comply with the principles of both design-based Policies CR7 and CC2. Firstly, the proposed layout essentially follows the existing, thereby respecting the grid layout structure in the central area and utilising the street frontages as far as possible.
- 6.2.17 The scheme has evolved during the course of the application, following specialist design input from Reading DRP (see section 4.17). The DRP's primary concern related to the original inclusion of numerous proposed materials, with it suggested that a simplified palette should be used. The applicant duly considered this and has amended the proposals to remove the originally proposed buff brick (see Appendix 8) replaced with a red brick. This is considered to be a positive amendment to the scheme, demonstrating a more modest design response to maintain the emphasis on the retained warehouse building instead of drawing the eye to the new build component.



Figure 19 - Proposed Caversham Road (left) and Northfield Road elevations

- 6.2.18 The predominant proposed material of red brick is considered appropriate in providing continuity with the retained warehouse at the site. Linking back to policy EN4, the proposed brickwork would draw upon heritage elements of the previous/retained design, although as the supporting commentary explains, it is not proposed to replicate the existing brickwork. It is instead intended for the new brickwork to be darker than existing in order to clearly distinguish between the retained and proposed components. This is supported to avoid creating a pastiche, with the subtle change in brickwork colour providing both a welcomed contrast and simultaneously a link back to the original. It is considered that the proposed approach would work well, leading to a coherent design response and ultimately creating an attractive finished appearance at the site, demonstrating a heritage-led design approach. In particular, the connection and relationship between the existing retained warehouse, 'Malthouse' and 'Brewery' buildings at the site and the proposed building has been carefully considered and the design response is considered to be appropriate. As with all sensitive sites in the Borough, to ensure design quality, it is considered to be of fundamental importance for precise details of all external materials to be secured via condition, with this including the sample panels being installed on site prior to approval to demonstrate an appropriate relationship between the retained and proposed materials.
- 6.2.19 The proposals also pay special attention to the ground floor shopfront and entrances, with this presently being an element in particular need for improvement at the existing site. The proposed shopfront and ground level design include a number of welcomed features, such as stone framing, glazed green

bricks (as per the existing building) effectively acting as the stallrisers in the proposed shopfront design and blue brick banding above (see Appendix 6 for more visual details). The shopfronts will provide an active frontage, which will also assist with natural surveillance and reduce the fear of crime, with a condition ensuring the shopfront windows are clear of vinyls or shutters. In overall terms the shopfronts are welcomed in principle, with specific material details recommended to be secured via condition. The anticipated high-quality detailing to the shopfront also assists in creating a human scale for the development, thereby assisting the height, scale and massing justification referenced above.

6.2.20 On the upper floors there is considered to be scope to introduce a contrasting material to the brickwork, with a lightweight steel frame with fins serving winter gardens on the Caversham Road frontage, with the setback stair also being framed in this manner to provide a visual link back to an industrial past. The continuation of red brick however is also important on the upper floors in more closely linking the new build elements to the retained warehouse. This is particular the case when viewed from Northfield Road (see figure 20 below), where solely brickwork is proposed on the north (aside from the setback staircore not visible in figure 20) and the west (rear courtyard) elevations, with the courtyard elevation showing no decrease in design quality, as required owing to its visibility in the streetscape and the need for an overall high quality design response to be achieved.



Figure 20 - CGI from Northfield Road looking south-east
(outline of proposed massing of 80 Caversham Road shown in the background - ref 182252)

6.2.21 It is acknowledged that local groups (see section 4.20 and 4.22 above) raise specific concerns in relation to the introduction of dormers within the roofscape of the retained warehouse building fronting Northfield Road. Whilst these are acknowledged not to be particularly characterful of the historic use, when considered within the context of the proposals as a whole they are considered a relatively minor and modest addition and not one which significantly dilutes the character or appearance of the building. Their size is considered to align with the function proposed (serving living and bedrooms within residential units) and would not overly dominate the roofscape at this point (see figure 20 above). They also help in the transition between the original and new components of the scheme and are therefore considered to be satisfactory.

6.2.22 In dismissing the previous appeal proposal the Inspector raised concerns with some elements of the detailed design, such as the top two floors having elongated

windows and eye-catching window mullions and the narrow footprint leading to a pronouncedly vertical orientated building. The now proposed scheme represents a contrasting design response to the site which no longer includes the specific features specifically referenced by the Inspector. In particular, the retention of the warehouse on the Caversham/Northfield Road junction alters the emphasis of the design response, with a more restrained and respectful of the past design approach proposed too.

Effect on designated heritage assets

6.2.23 In terms of the effect of the proposals on designated heritage assets (i.e. statutory listed buildings or conservation areas for example, and specifically excluding non-designated heritage assets such as locally listed buildings, which are discussed separately within this assessment), the proposals are considered too distant from any for there to be an impact. More specifically, mindful of Policy EN5 where the site is within the view of acknowledged historical significance from McIlroy Park, the proposed scale, massing and design approach is not considered to harm this view.

3) Quality of accommodation for future occupiers

Residential

6.3.1 The internal layout of the proposed units are arranged so as to create a suitable standard of living accommodation for future occupiers. The majority of the units are regularly shaped and sized, with all bedrooms and overall flat sizes complying with the nationally-described space standards, despite Policy H5 specifying this does not apply within Central Area locations such as this. Some initial concerns were raised in relation to the internal layout of Unit 202 at second floor level, as it is located within the roofspace of the existing building on the corner of Northfield Road and Caversham Road. It was originally proposed that both bedrooms would be served solely by rooflights, but following officer feedback the unit has been altered to a 1-bed unit, with all habitable rooms being served by conventional windows/terraces. No single aspect north-facing units are proposed (which are sought to be avoided where possible owing to a lack of direct sunlight), with the majority of units being dual aspect in nature, which is welcomed. No single-aspect south-facing units are proposed either, reducing the potential for units to suffer from overheating.

6.3.2 The proposed vehicular and cycle parking is considered acceptable, subject to compliance conditions and the proposed car club being secured via s106 legal agreement, as detailed within the Transport comments at section 4.1 above. Future occupiers will also benefit from the cycle link proposed by the applicant on Northfield Road, which is considered a benefit of the scheme. Refuse storage facilities are also considered appropriate and will be secured via a compliance condition. Therefore from a transport perspective the proposals include tangible benefits.

6.3.3 All units barring two include individual external amenity space, either as external balconies or winter gardens fronting Caversham Road. This is welcomed in providing future residents with the opportunity for a proportion of external space within the units. Furthermore, a shared rooftop terrace is also proposed at fifth floor level, with the applicant outlining that this would be for all future occupiers to use. Accordingly, the proposals provide a selection of on-site amenity spaces. However, as per the RBC Leisure observations at section 4.10 above, the proposal

does not provide meaningful recreational open space and the delivery of adequate on site open space is not achievable. The scheme is therefore required to make an off-site financial contribution towards improving and extending facilities within the nearby Thames Parks (including Caversham Court Gardens and Allotments) and Great Knollys Street Recreation Ground. The financial contribution amounts to £60,900 and will be secured via s106 legal agreement.

- 6.3.4 In relation to the other Policy H5 requirements, the Council's Access officer provided input on the accessible/adaptable/wheelchair user elements of the proposals, as summarised at section 4.9 above. Following some clarifications the Access officer is largely content with the proposals. Within the Design and Access Statement the applicant has outlined that 2 units (and including one shared ownership unit) will be wheelchair user dwellings in with M4(3) of the Building Regulations, and provided initial plans as to how this can be achieved. However, it is considered necessary and reasonable to secure full details via condition, which will ensure these are provided in practice and retained as such thereafter. In terms of all non-M4(3) units being accessible and adaptable in line with M4(2) of the Building Regulations, the applicant has not provided sufficient detail at application stage, so this will be combined into the above referenced condition in order to ensure the proposals comply with both Policies H5e and H5f. The water and energy components of Policy H5 are separately discussed in the sustainability and energy section below.
- 6.3.5 In terms of overlooking between the proposed units (as per Policy CC8), this would be possible between the proposed balcony/wintergarden spaces between some individual units. While a form of boundary treatment is denoted on the floor plan, the detail as to whether this constitutes a privacy screen has not been demonstrated. As such, this detail will be secured via a pre-occupation condition to protect the amenity of future occupiers.
- 6.3.6 With regard to daylight, sunlight and overshadowing matters for future occupiers, Delva Patman Redler undertook an independent review of the report submitted (see section 4.15 above). Whilst not all of the proposed units would satisfy the BRE guidance in terms of daylight and sunlight, this is largely a result of the proposed balconies. There is consequently an inherent conflict between providing private amenity space for future occupiers, but this compromising to an extent the daylight and sunlight levels experienced within the units. DPR considers, based on their experiences, that in overall terms the development appears to provide a satisfactory level of adherence to daylight guidelines. Given the urban nature of the site, the benefit of rooms being set off Caversham Road slightly and the provision of private amenity space, it is considered that some shortfalls for future occupiers in terms of daylight and sunlight can be tolerated in the scheme, with the majority of units adhering to the guidelines.
- 6.3.7 Turning to consider noise-based matters, a number of conditions recommended by Environmental Protection (see section 4.3) will ensure that future residents will not be significantly harmed in this regard. For example, the further noise assessment will ensure noise from Caversham Road will be mitigated, while the opening and servicing hours of the ground floor commercial unit will be restricted to protect amenity on the upper floors. Other Environmental Protection based conditions, such as in relation to air quality and contaminated land, would also protect the amenity of future occupiers too. In respect of all other Policy CC8 considerations the proposals are not considered to cause unacceptable living conditions for the new residential properties, with conditions securing further details in relation to external lighting and security for example.

6.3.8 In terms of fire safety, the proposal does not constitute a ‘gateway 1 building’, as although over 18m in height, no storeys include accommodation over 18m (the top floor is 16.7m). There is consequently no basis for requiring the submission of a fire statement as part of the application or consulting the Health & Safety Executive on the application. However, mindful of the sensitivities around this matter and the undeniable need to protect the future amenity of occupiers (and the general area), a pre-commencement (barring demolition) condition is recommended in this regard. This will require the applicant to submit a fire statement which details a strategy with suitable measures, which would then be required to be provided for prior to first occupation and then maintained as such thereafter. With this condition secured it is considered that amenity would be protected. In overall terms, subject to a series of conditions, the residential accommodation would be of a suitable standard.

Commercial uses

6.3.9 Considering first the proposed ground floor retail unit, the layout includes an expansive frontage onto Caversham Road, which continues around onto Northfield Road too. This will assist in attracting potential occupiers to the space in the future. The loading and servicing arrangements are proposed from Northfield Road, which is considered appropriate from a Transport Planning perspective. It is noted that this would require changes to a Traffic Regulation Order, which are dealt with under separate legislation to the Planning Act, but this does not prevent this planning application being determined. Suitable dedicated cycle and waste storage facilities are proposed to serve the retail unit and will be secured as such via condition. The proposed operating and servicing hours conditions are considered to strike an appropriate balance between being flexible enough to attract a wide variety of potential occupiers, without harming future residential amenity. In overall terms a suitable standard of accommodation is envisaged for future occupiers.

6.3.10 The existing office uses within ‘The Brewery’ and ‘The Malthouse’ buildings at the site would be able to function alongside the proposed development at the remainder of the site. Put another way, the proposed development at the site is not considered to unduly compromise the continued office use at the site, with noise and disturbance during partial demolition and building works managed through the demolition and construction method statement condition measures. In terms of overlooking and daylight/sunlight, the proposal would result in a worsening impact, but not harmfully so given the office use. The provision of 4 parking spaces is considered appropriate for the office use, noting that this is less than the offices will have experienced in practice since the closure of Drews in 2018. As such, a suitable standard of office accommodation would continue.

4) Amenity impacts for nearby occupiers

6.4.1 Considering first privacy and overlooking matters, the proposed dwellings are considered too distant from any existing or possible future residential units to result in a detrimental impact on the living environment of neighbours. The width of Caversham Road mitigates the possible future impact of this adjacent site to the east, while the non-provision of windows on the south elevation of the proposed building sufficiently future proofs the impact on possible future residential occupiers to the south should these sites come forward in due course. The existence and retention in office use of ‘The Brewery’ and ‘The Malthouse’ buildings on the western side of the site provides a visual barrier (as well as a

considerable physical distance) between the proposed building and the nearest residential properties to the west at Monmouth Court on Northfield Road. The generous width of Northfield Road means no significant overlooking issues would occur should the Shurgard site be redeveloped for residential in the future.

- 6.4.2 In terms of daylight, sunlight and overshadowing, the independent review by Delva Patman Redler (see section 4.15 above) confirms that the proposed development will not have a material effect on Monmouth Court or the proposed scheme at 80 Caversham Road.
- 6.4.3 With regard to visual dominance, overbearing and outlook implications, it is acknowledged that the proposals will result in an altered relationship for the existing low-rise residential areas to the west when compared with the existing experience. However, the location of the new taller element is limited to the south-east corner of the site, furthest away from the low-rise terraces to the west. Furthermore, the proposals need to be considered within the context of the anticipated scale and massing likely to emerge in time on the allocated site to the east (within a major opportunity area for the town). The proposed development would represent a transition down in scale from that likely in the future to the east. Moreover, on its own merits, the extent of visual dominance, overbearing and outlook implications for existing occupiers to the west caused by the proposed development is not considered to be of significant enough harm to warrant a sustainable reason for refusal of this application.
- 6.4.4 In relation to noise and disturbance matters, including vibrations and dust, fumes and smells, a series of conditions seek in part of in full to protect the amenity of nearby occupiers and users of the area from harm which could occur from the proposed development. This ranges from matters relating to opening and servicing hours, the restrictions on use of flat roof areas, a security strategy, a plant noise assessment and securing the hours by which demolition and construction works can take place. Collectively these conditions shall ensure no detrimental impacts from noise and disturbance would be likely to occur. In terms of the impacts from artificial lighting, the balcony railings and winter garden spaces will reduce this to an extent from within the proposed dwellings, while externally the intended lighting details within the parking area will be secured via condition.
- 6.4.5 In terms of crime and safety, despite being consulted no comments have been received from the Crime Prevention Design Advisor at Thames Valley Police (see section 4.18 above). It is noted that in the dismissed at appeal proposals the CPDA was satisfied subject to a condition being included to secure full and further details of the intended strategy. In the circumstances, it is considered necessary for submission of and approval of security strategy to be secured via condition. Whilst primarily for the benefit of future occupiers and users of the development, this will also assist the wider area too.
- 6.4.6 Whilst it is acknowledged that the CAAC (see section 4.20 above) considers that the impact on the residential properties at Barry Place (to the south-west) should be assessed, officers consider that these properties are too distant from the site, at a minimum 61m, for there to be a harmful impact.

5) Transport and Highways

- 6.5.1 In this regard the proposals are considered appropriate subject to conditions and s106 legal agreement requirements, as detailed at section 4.1 above. Furthermore, the quality of accommodation and amenity sections above have also

discussed a number of transport-based matters, such as parking, servicing and the construction phase. It is however considered pertinent to reiterate that the proposed scheme includes cycle route improvements along Northfield Road. This is welcomed and would assist connectivity to the northern entrance of Reading Station, alongside the anticipated works associated with the 80 Caversham Road scheme (see relevant history above). Such improvements would help promote sustainable transport in the Borough, with this being secured via s278/s106 legal agreement. The provision of a car club scheme is another welcomed element of the scheme from a transport perspective, with this again secured via s106 legal agreement.

6) Landscaping and ecology

6.6.1 In terms of landscaping the existing site lacks any form of soft landscaping, meaning that the introduction of a series of trees and planting at ground level, within the parking courtyard is welcomed as a positive addition. In addition, the landscaped communal roof terrace and biodiverse roof are welcome additions too. Mindful that the site is within a low tree canopy cover area and an air quality management area the proposals will increase this provision, as detailed in the Natural Environment officer comments at section 4.7 above. Whilst somewhat disappointingly the previously proposed green wall is no longer proposed, this is largely a result of the retention of part of the existing warehouse. In this instance officers conclude that the retention of the existing building at this point outweighs the possible inclusion of a green wall, given the range and nature of other soft landscaping works proposed at a site which is presently devoid of soft landscaping. In the context of an appropriate in principle scheme, details of the hard and soft landscaping will be secured via condition, as will boundary treatment details. This aligns with the Natural Environment officer comments at section 4.7 above.

6.6.2 In respect of ecology based matters, the LPA's ecology consultants GS Ecology firstly confirm (as per section 4.6 above) that species will be protected through the details submitted and those recommended to be secured via condition. Furthermore, it is confirmed that the proposed development incorporates a number of wildlife enhancing features to achieve a significant biodiversity net gain. A condition will secure full details of the measures to ensure the proposals are appropriate in ecology terms.

7) Sustainability and energy

6.7.1 As per section 4.16 of this report, Element Energy independently reviewed the sustainability and energy parts of the proposals. The submissions by the applicant indicate that the residential proposals, whilst not achieving zero carbon homes, would achieve an 89.4% reduction in carbon emissions, which is significantly above the SPD referenced minimum 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations. This includes on-site decentralised energy provision, in the form of rooftop photovoltaics. Element Energy's original review raised a series of points which required further input from the applicant. The majority of these were satisfactorily addressed in due course, barring the justification for not bringing forward a closed loop GSHP system over the proposed ASHP system. It is considered that this specific matter can be further explored further through details secured via planning condition.

6.7.2 The final energy strategy, to be secured via two separate conditions (as per section 4.16 and the recommendation section of this report), will be likely to also facilitate a carbon offsetting financial contribution. This is owing to the scheme

not being zero carbon, albeit as outlined above the shortfall is minimal, meaning in practice the financial contribution would be likely to be modest. The applicant anticipates it to amount to £6,001, but the actual amount will be ascertained through the final energy strategy secured through the conditions. The carbon offsetting financial contribution will be secured via s106 legal agreement.

- 6.7.3 In terms of the non-residential part of the proposal, following revisions during the application, Element Energy confirmed contention with the BREEAM pre-assessment identifying that the scheme would achieve the required “Very Good” rating. Two planning conditions are recommended to secure the BREEAM “Very Good” rating in practice. The first relates to securing an Interim BREEAM “Very Good” rating Certificate at the pre-commencement, barring partial demolition stage. The second will secure a Final BREEAM “Very Good” rating Certificate prior to the first occupation of the unit. These conditions are necessary to ensure the development is carried out in accordance with sustainable building standards, adhering to both Policy CC2 and the guidance within the Sustainable Design and Construction SPD.
- 6.7.4 In respect of all sustainability and energy based matters it is therefore concluded that the proposals are independently verified as being appropriate and policy compliant, subject to the recommended conditions and obligation relating to carbon offsetting.

8) Flooding and SuDS

- 6.8.1 Given the application site is located within Flood Zone 2 and is not an allocated site for development, the applicant has duly submitted a supporting sequential test assessment. This builds on the separate assessment submitted and considered satisfactory at the time of the previously dismissed at appeal proposal. In this instance, on its own merits, it is considered that the sequential test has been satisfied by the information and evidence provided by the applicant. In short, this sufficiently demonstrates that there are no reasonably available sites with a lower probability of flooding that would be appropriate for the type of development proposed.
- 6.8.2 With the sequential test passed, the next consideration is the exception test. In line with the NPPG the proposed uses would fall into the ‘more vulnerable’ (residential) and ‘less vulnerable’ (shop) categories. ‘Table 2: Flood risk vulnerability and flood zone ‘incompatibility’’ of the NPPG (Paragraph: 079 Reference ID: 7-079-20220825 Revision date: 25 08 2022) confirms that the exception test is not required in flood zone 2. Whilst the report submitted by the applicant also states this, the applicant has nevertheless gone onto assess the proposals against the exception test. Officers do not consider that to be necessary, given there is no requirement to do so.
- 6.8.3 In addition, the applicant has submitted a site-specific Flood Risk Assessment (FRA) and Surface Water Drainage Strategy. The provision of all but one of the residential units above ground floor level assists in general terms, whilst the FRA also confirms that the ground floor residential unit will also have finished floor levels in excess of the required 300mm above the 1 in 100 year river plus 31% climate change allowance flood level (it will be a minimum of 310mm). A series of other mitigation measures are proposed within the FRA, such as residents signing up to flood warnings from the Environment Agency. It is considered that all of the proposed mitigation measures are suitable and appropriate, as secured via a

compliance condition, in order to satisfactorily reduce the risk of flooding to the proposed development in line with Policy EN18.

- 6.8.4 Turning to consider SuDS matters, the RBC Lead Local Flood Authority comments at section 4.11 above confirm satisfaction with the broadly intended approach to reduce surface run-off at the site. In this instance it is necessary for full details to be secured via condition, which will be duly secured.

9) Other matters - S106, pre-commencement conditions & Equality

- 6.9.1 S106 Legal Agreement: Previous sections of this assessment have already outlined that various elements will be secured via legal agreement, relating to affordable housing (and associated) matters, open space, highways works, the car club and carbon offsetting. In addition, there is a separate requirement to secure an Employment and Skills Plan (ESP) for both the Construction phase of the development, as per the REDA response at section 4.12 above. This is required in line with Policy CC9 and the adopted Employment, Skills and Training SPD. The applicant has not yet decided whether this will take the form of a contractor-led ESP to be progressed on site, or the payment of an equivalent financial contribution, which as per the SPD formula amounts to £6,621.83. The legal agreement will be worded flexibly to enable either eventuality.

- 6.9.2 It is considered that each and every obligation referenced within this report would comply with the NPPF and Community Infrastructure Levy (CIL) in that they 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. Similar heads of terms were considered in the previous appeal at the site, with the Inspector confirming these met the tests in the NPPF. In this instance the Heads of Terms have been agreed by the applicant and broadly follow those outlined by the applicant at the outset of the application (building on those discussed as part of the previously dismissed at appeal proposals). A S106 Legal Agreement is in the process of being prepared to secure these obligations, in the event of a positive resolution at the Planning Applications Committee meeting.

- 6.9.3 Pre-commencement conditions: the number of pre-commencement (any development, including demolition) has been limited, in line with national guidance. The detailed wording of the pre-commencement conditions, in relation to the recording of the existing buildings, the contract for redevelopment, the demolition and construction method statement and contaminated land were agreed via email reply from the agent on 16/01/2023. This approach is in line with the requirements of section 100ZA(5) of the Town and Country Planning Act.

- 6.9.4 **Equality:** In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

7. CONCLUSION, INCLUDING THE OVERALL PLANNING BALANCE

- 7.1 The application is required to be determined in accordance with the development plan unless material considerations indicate otherwise, as per Section 38(6) of the

Planning and Compulsory Purchase Act 2004.

- 7.2 As a consequence the harmful impacts of the proposed development are required to be weighed against the benefits. On the basis of the assessment above the harmful impacts are considered to include the overprovision of 1-bedroom flats within the mix of residential units, although in referencing this it is also acknowledged that the Policy CR6 mix is a guide and includes a caveat that it should be followed unless it can be clearly demonstrated that a policy compliant mix would render the development unviable; such a case is considered to have been clearly demonstrated in this instance. Other harmful impacts include some deficiencies identified in respect of daylight and sunlight provision for future occupiers, the lack of rented units within the affordable housing tenure (although if this was provided it would worsen the viability position and call into question the negotiated provision) and the less than significant harm to the significance of the locally listed buildings at the site.
- 7.3 The harmful impacts of the development need to be weighed with the benefits of the proposals. The applicant has outlined a series of planning benefits as part of the documentation submitted in support of the proposals, with those of particular note summarised as follows:
- The delivery of 29 homes to positively contribute to housing supply in Reading.
 - All residential units meet the Nationally Described Space Standards, provide a mix of 1, 2 and 3-bed units within a highly accessible location and provide a shared external rooftop space, with most units also providing private amenity space, such as balconies.
 - Retaining and repairing a locally listed building, thereby securing the long term use of the asset as part of the story of Reading's Victorian Industrial heritage, with the building where works are proposed having been vacant for over 4 years.
 - The provision of a carefully designed solution which retains part of the locally listed building and proposes coherent design response in the transition between the retained and proposed elements.
 - The design of the newly proposed part of the building takes cues from the existing building, particularly with regards to the use of materials and detailing.
 - Provision of an enhanced retail space, with an active and a visually enhanced frontage along Caversham Road and the provision of an employment generating use within the building as part of a mixed use development.
 - The provision of a biodiverse roof and soft landscaping to assist biodiversity
- 7.4 The policy compliant level of affordable housing is another planning benefit, with RBC Valuations considering the offer to exceed what is considered to be an appropriate contribution in a viability context. Officers welcome and support the negotiated offer as being fully policy compliant. Set within the viability context it is therefore a planning benefit of the scheme.
- 7.5 Another notable benefit is the scheme making efficient use of a brownfield site in a highly accessible and sustainable location to facilities and services, such as the close proximity to Reading mainline railway station and bus stops. Other benefits of the scheme include the delivery of cycle works proposed on Northfield Road (to achieve sustainable travel aims of the Local Plan and LTP), the highly energy efficient nature of the proposals including rooftop photovoltaics and commitment to investigating ground source heat pump opportunities, and finally the economic benefits through the construction stage, including to local labour through the employment skills and training plan, and beyond with the non-residential use proposed.

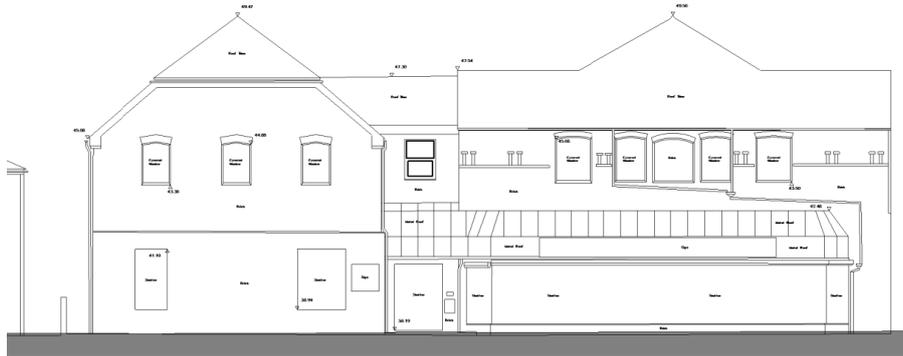
- 7.6 As a consequence of the above, officers advise that the conflicts with the development plan are considered to be outweighed by the above stated benefits of the proposals in this specific instance. It is considered that officers have applied a suitable planning balance when reaching this conclusion.
- 7.7 Therefore, when returning to the subject of test 1 of Policy EN4, as initially discussed at section 6.2 of this report (also linking back to the CUDO comments at section 4.2 of this report), it is concluded that it has been demonstrated that the benefits of the development significantly outweigh the level of harm to the significance of the locally listed buildings. This is both in terms of the individual buildings at the site and cumulatively in terms of the group value too. Accordingly, the proposals are considered to comply with Policy EN4 in full. Furthermore, in relation to the NPPF requirement (paragraph 203) for a balanced judgement in weighing an application where there is an effect on non-designated heritage assets, further to sections 4.2 and 6.2 of this report, it is considered that the benefits of the scheme outweigh the scale of harm and significance of the asset in this case, as evidenced above. Therefore, the proposals are considered to be compliant with paragraph 203 of the NPPF.
- 7.8 In overall terms the proposals are considered to be acceptable within the context of national and local planning policies, as detailed in the appraisal above. As such, full planning permission is recommended for approval, subject to the conditions and completion of the S106 Legal Agreement outlined at the outset of this report.

Case Officer: Jonathan Markwell

Appendices:

- 1) Existing elevations and plans
- 2) Demolition plans, elevations and visuals
- 3) Proposed floor plans
- 4) Proposed elevations, including existing and proposed streetscene comparisons and proposed CGIs
- 5) Proposed sections
- 6) Proposed materials
- 7) Changes to the proposed massing in comparison with the dismissed at appeal scheme
- 8) Proposed materials sought at the outset of this application - superseded during the course of the application in November 2022
- 9) Refused and dismissed at appeal elevations (part 5, part 7 storeys)
- 10) Comparison of the existing, CGI as proposed (materials have changed) and CGI of the as dismissed at appeal scheme
- 11) Appeal decision APP/E0345/W/20/3263270
- 12) Existing site photographs
- 13) Aerial views of the application site and surrounding area looking south (Google maps)

1) Existing elevations and plans



Existing Caversham Road (above) and Northfield Road (below) elevations



Existing south (above) and west courtyard elevations



Existing ground (above) and first and roof (below) plans

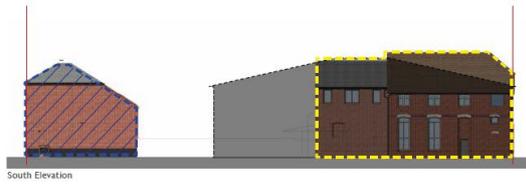
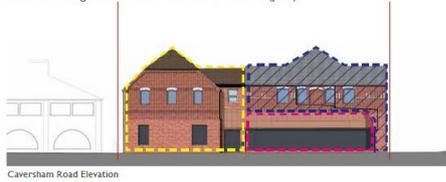


2) Demolition plans, elevations and visuals

DEMOLITION STRATEGY

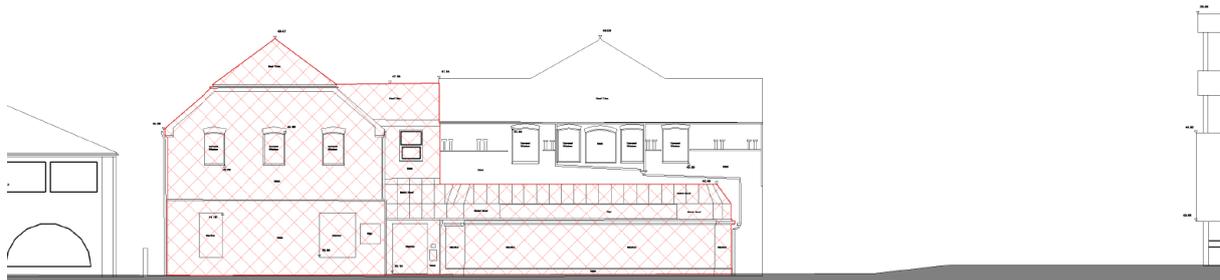
The proposal includes demolition of the southern building facing Caversham Road and part of the corner building facing Caversham Road and Northfield Road. This is highlighted in yellow on the elevations below and the plan opposite.

The existing unoriginal shopfront will be replaced with a new, sympathetic intervention that responds sensitively to the existing building and provides a modern frontage that is suitable for commercial use (pink).



- Key**
-  To be demolished
 -  To be retained
 -  Ground floor facade to be replaced

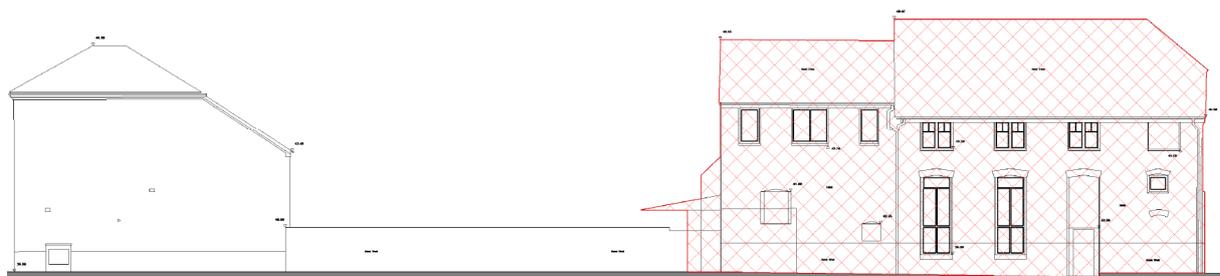
Extract from DAS summarising the extent of demolition and retention works proposed



Caversham Road elevation - demolition shown in red



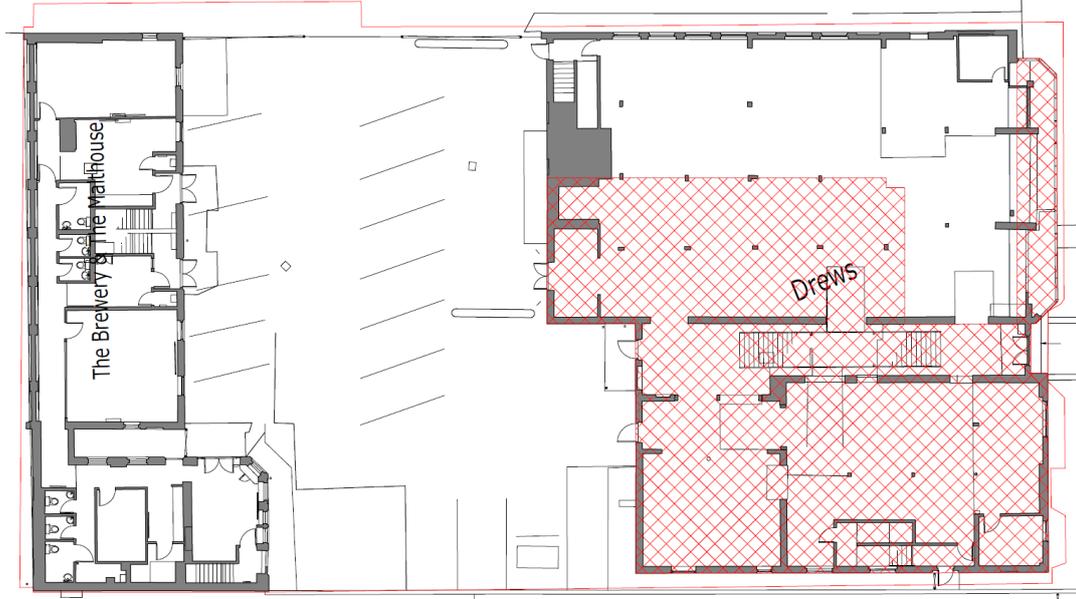
Northfield Road elevation - demolition shown in red



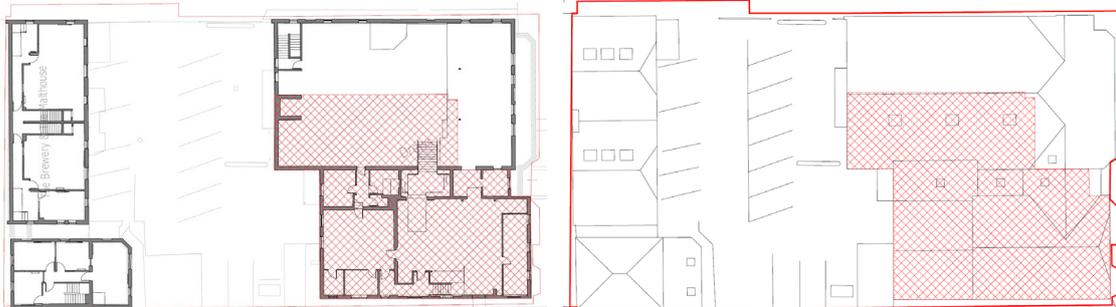
South elevation - demolition shown in red



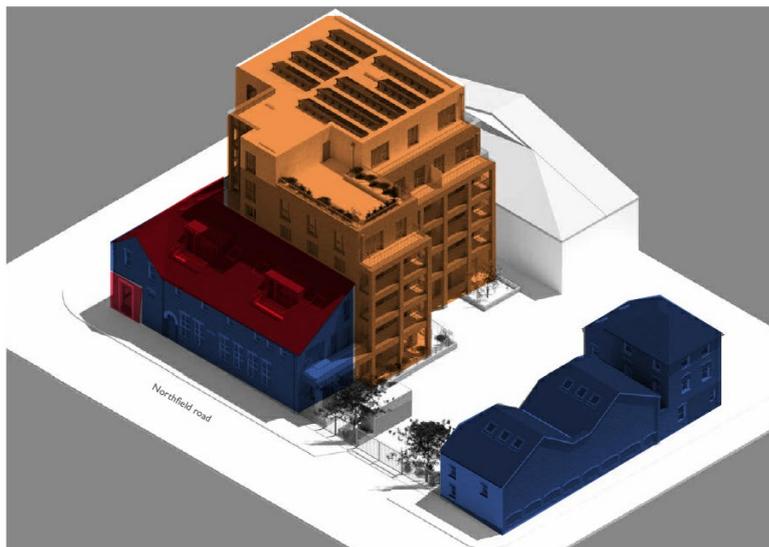
West elevation of building fronting Caversham Road - demolition shown in red



Demolition plans - ground floor (above), first and roof plans (below)



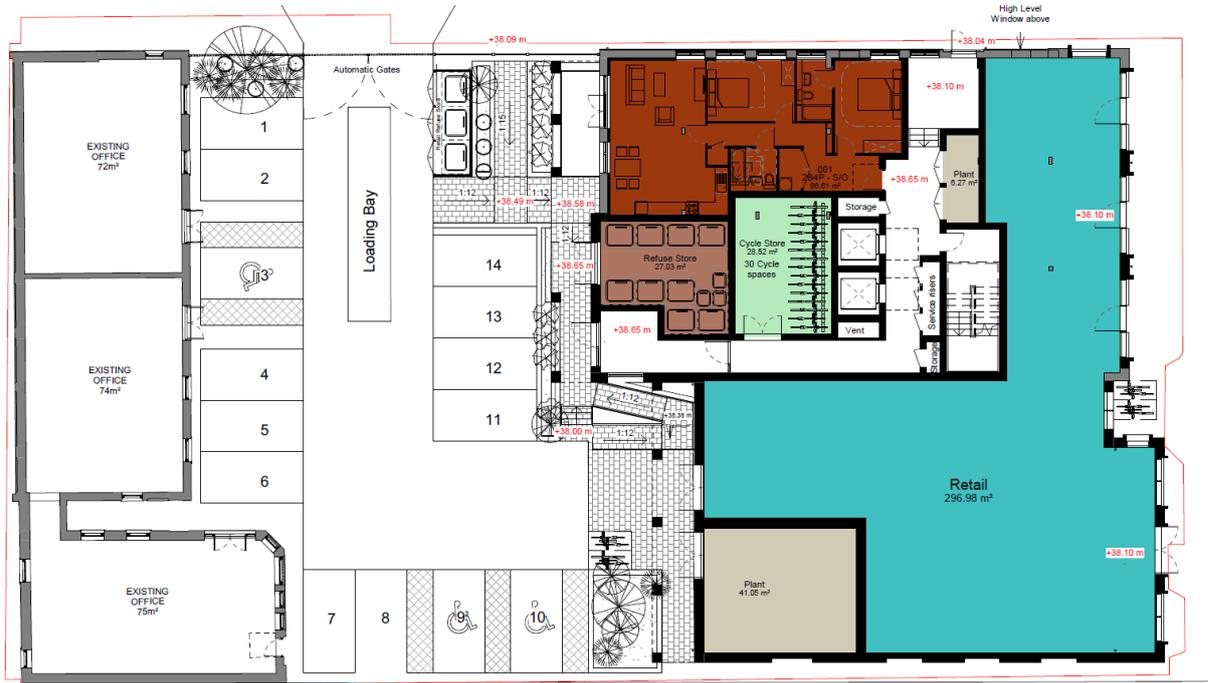
This diagrams highlights which parts of the proposal are new, retained or restored.



- Key**
- New build
 - Retained
 - Restored

CGI showing the proposals and extent of retention and restoration works

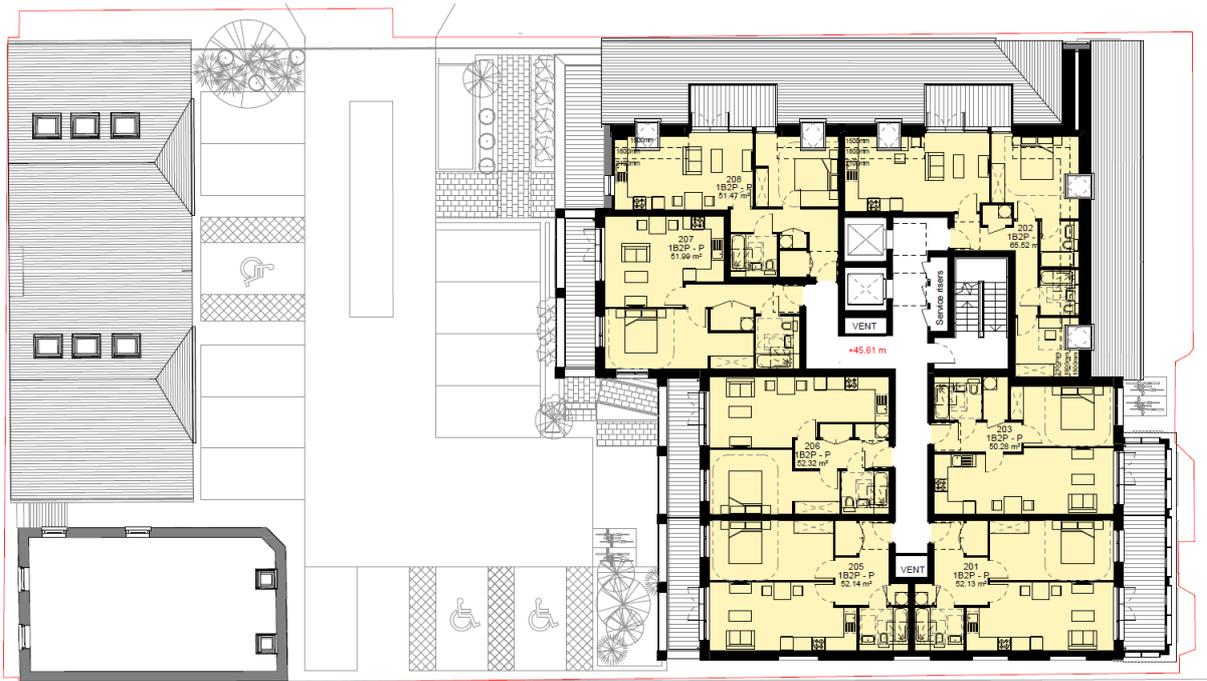
3) Proposed floor plans



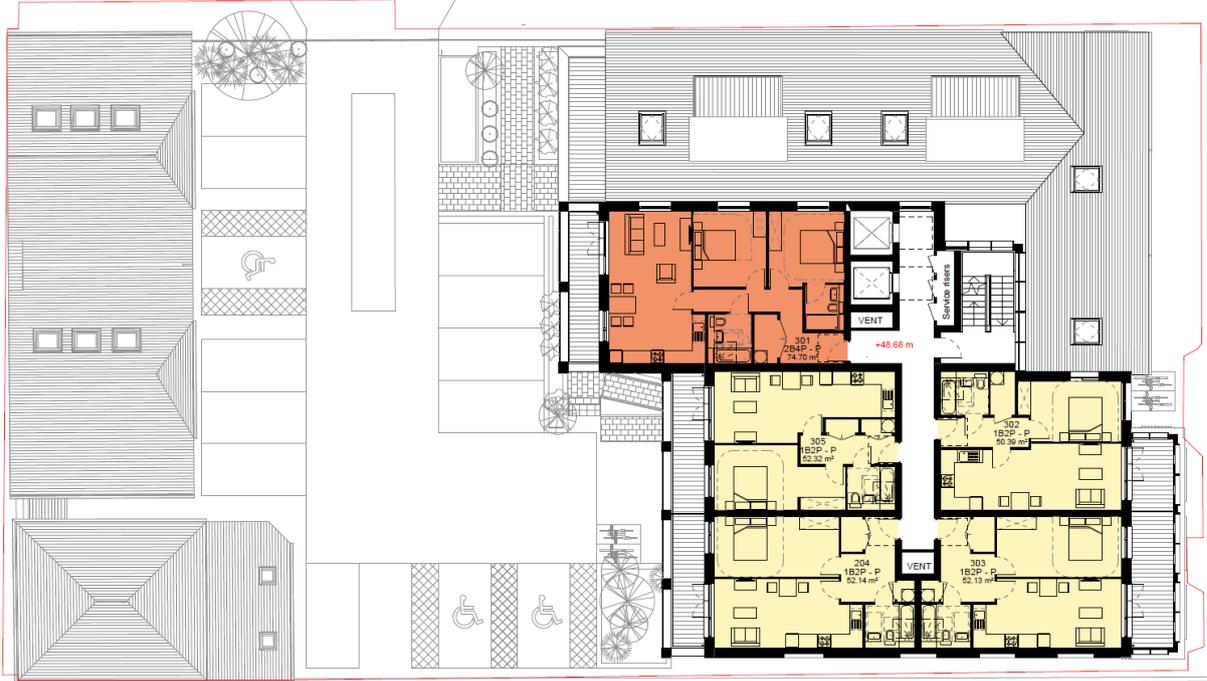
Proposed ground floor plan - retail, 1x2-bed shared ownership affordable housing unit, retained offices, access, parking, waste and landscaping



Proposed first floor plan - 6x1-bed and 1x2-bed shared ownership affordable housing units, 1x3-bed market housing unit and existing offices



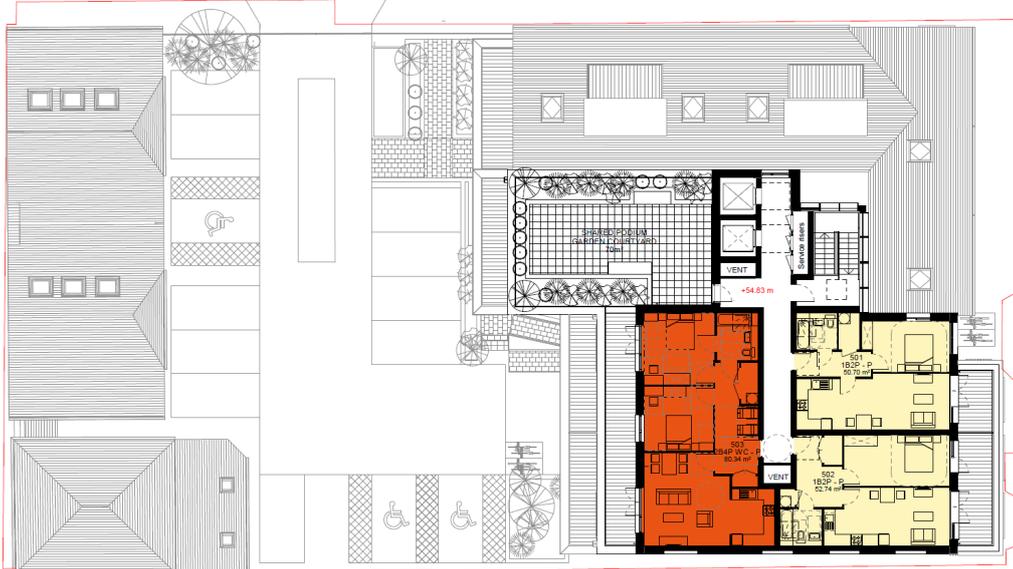
Proposed second floor plan - 7x1-bed market housing units and existing offices



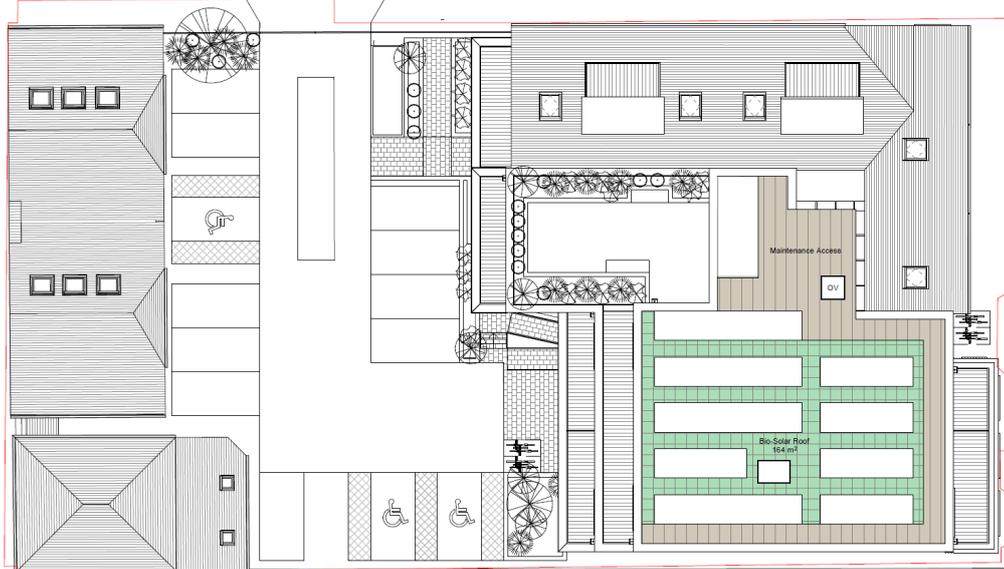
Proposed third floor plan - 4x1 and 1x2-bed market housing units



Proposed fourth floor plan - 4x1 and 1x2-bed market housing units



Proposed fifth floor plan - 2x1 and 1x2-bed market housing units and shared courtyard



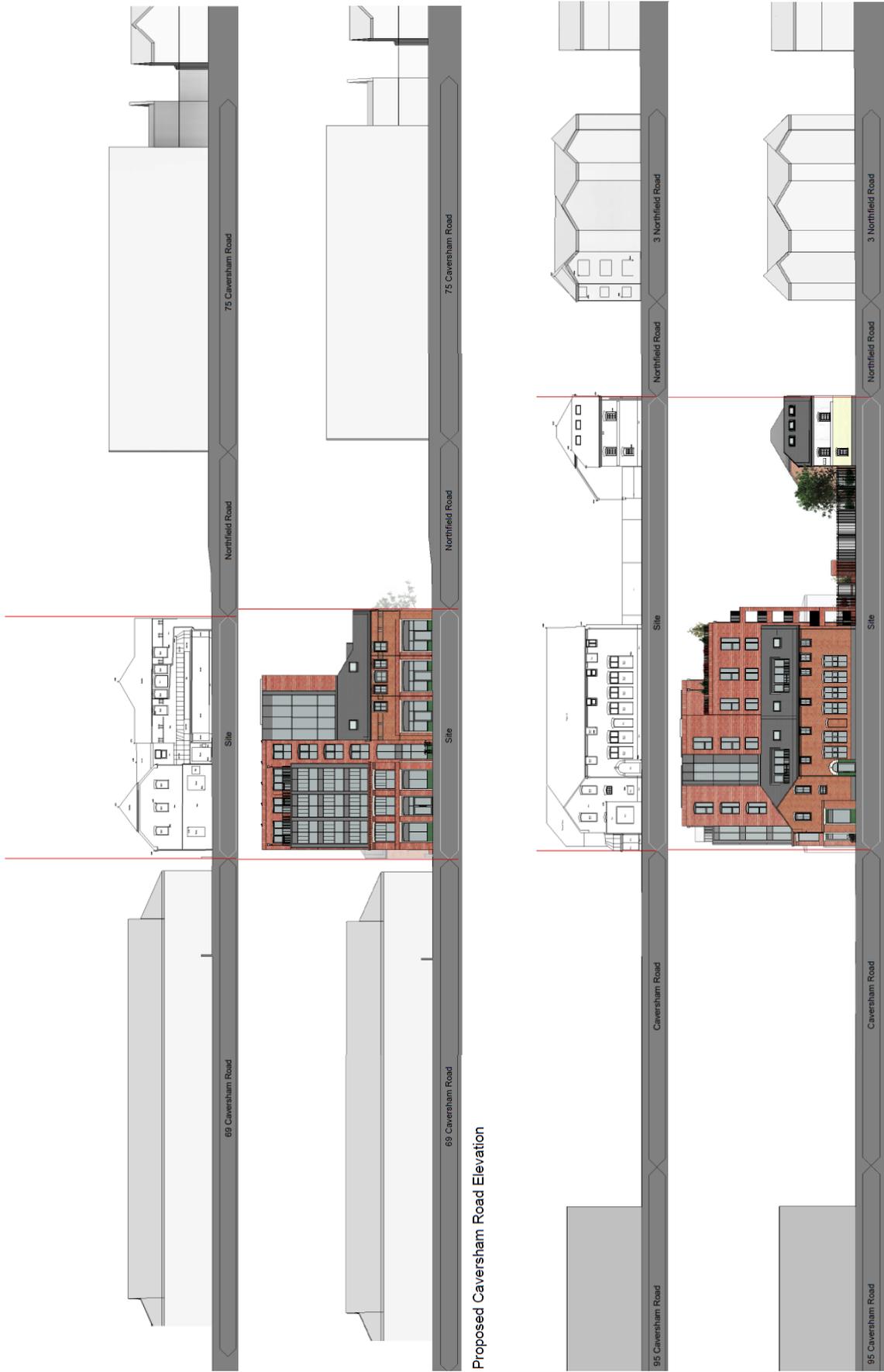
Proposed roof plan - Photovoltaics and biodiverse roof

4) Proposed elevations, including existing and proposed streetscene comparisons and proposed CGIs



Proposed Caversham Road elevation





Existing and Proposed Caversham Road and Northfield Road street elevations

2. Proposed Northfield Road Elevation



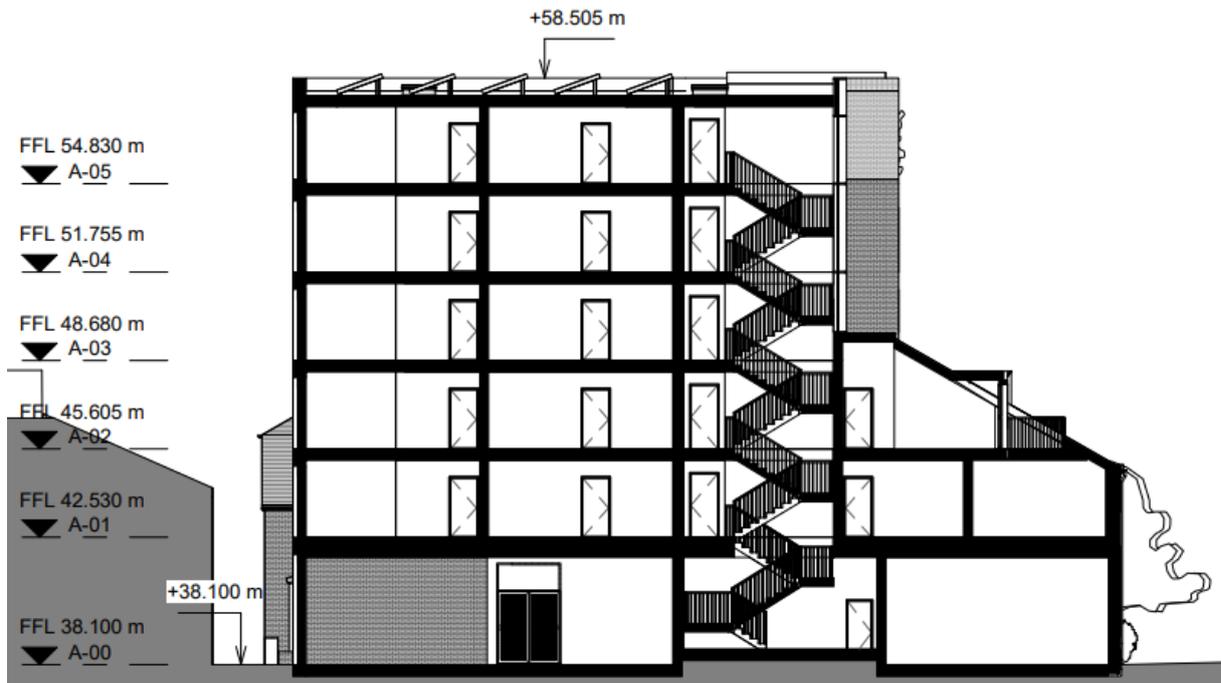
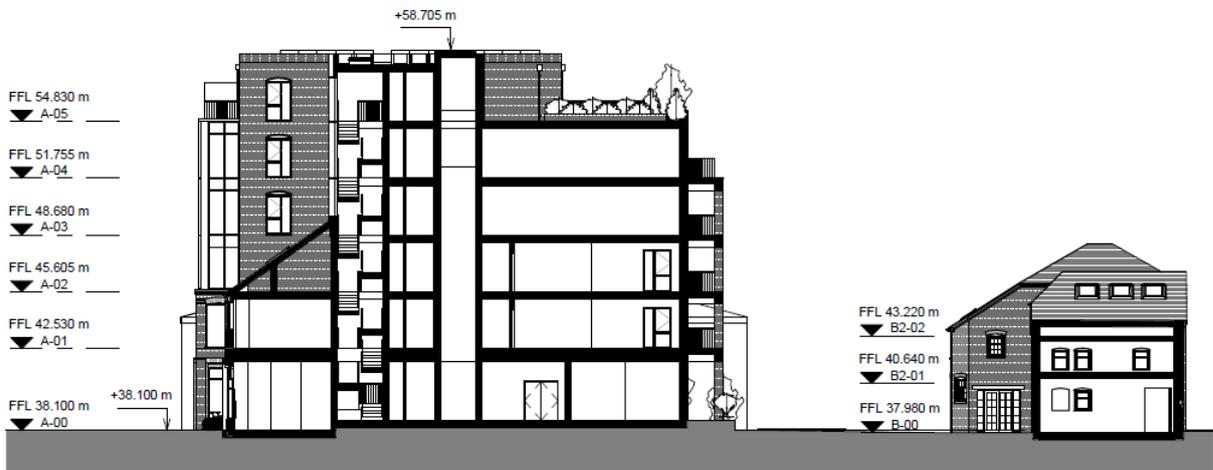
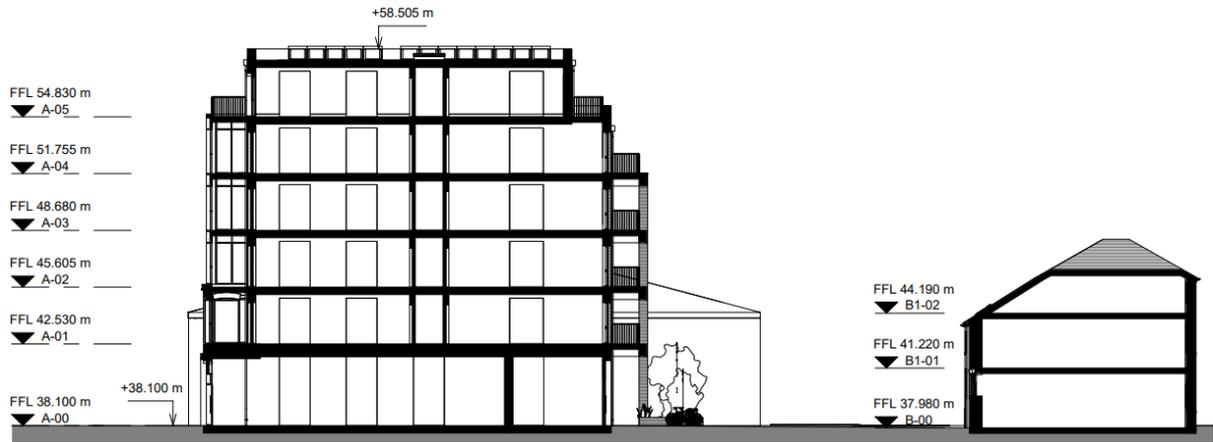
Proposed south and west elevations



CGI from Caversham Road looking south-west showing the junction with Northfield Road



CGI from Northfield Road looking south-east
 (outline of proposed massing of 80 Caversham Road shown in the background - ref 182252)
 5) Proposed sections



6) Proposed Materials

Proposed materiality

Red Brick

The former malthouse was built using an orange/red brick in English cross bond. The predominant material in the new extension is red brick. This brick is proposed to be darker than the existing one to provide a clear distinction between the retained and new elements. More detail on the brick choice will be provided at the detailed design stage, however the Wienerberger Chartham Multi brick would be a suitable choice. Common bond is proposed for the new brick as this reflects the new construction and provides a distinct contrast with the English cross bond used on the former malthouse.

Glazed brick

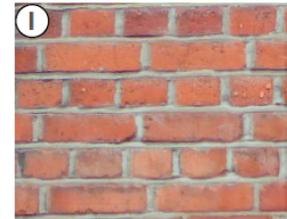
The existing building uses green glazed brick to frame the former entrance. The scheme proposes to use green glazed brick within the shop front design.

Buff Brick

The existing building utilises buff soldier course headers. The use of buff brick has been proposed to frame the new shop fronts to provide a visual link to the existing detailing.



Existing materials to be retained



Orange/red brick in English cross bond



Blue brick banding



Arch buff soldier course headers

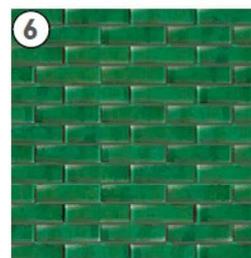
Proposed new materials



Red brick in common bond



Buff brick soldier course



Green glazed brick



Wienerberger Chartham Multi brick with a precedent image of the brick in use above at the Springfield Hospital in Tooting, London.



Existing green glazed brick used

Caversham Road proposed materials

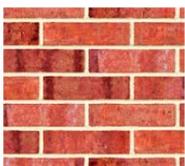


The 3D image opposite illustrates the set back between new extension and existing building.



3D bay image

-  New insertion
-  Remains as existing



1. Red brick



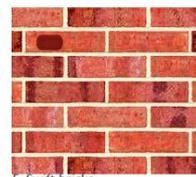
2. Brick verandas



3. Metal railing



4. Dormer detail with terrace



5. Swift bricks

Extract of proposed Northfield Road / western courtyard elevation materials

7) Changes to the proposed massing in comparison with the dismissed at appeal scheme



Caversham Road (please note that the proposed materials differ to those now proposed)



Northfield Road (above) and south & west courtyard (below) elevations



8) Proposed materials sought at the outset of this application - superseded during the course of the application in November 2022, but shown here for information



9) Refused and dismissed at appeal elevations (part 5, part 7 storeys)



Dismissed at appeal Caversham Road (above) and Northfield Road (below) elevations



10) Comparison of the existing, CGI as proposed (materials have changed) and CGI of the as dismissed at appeal scheme



Existing view from Caversham Road



Proposed massing (buff brick now red brick)



Dismissed at appeal massing



Existing view from Northfield Road



Proposed massing (buff brick now red brick)



Dismissed at appeal massing

11) Appeal decision APP/E0345/W/20/3263270



The Planning Inspectorate

Appeal Decision

Hearing Held on 24 March 2021

Site visit made on 31 March 2021

by **J P Longmuir BA (Hons) DipUD MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 14 May 2021

Appeal Ref: APP/E0345/W/20/3263270

71-73 Caversham Road, Reading, RG1 8JA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by S2 Caversham Ltd against the decision of Reading Borough Council.
 - The application Ref 191792, dated 5 November 2019, was refused by notice dated 16 October 2020.
 - The development proposed is the demolition of former retail warehouse and erection of a mixed-use building comprising 44 residential units consisting of x5 affordable units, 194sqm of retail floorspace (Use Class A1) at ground floor and associated car parking, cycle parking and landscaping.
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The description of development above is taken from the appeal form which tallies with the decision notice.
3. The third reason on the Council's decision notice related to the absence of a Section 106 agreement. However, this was jointly drafted during the appeal process and the wording was finalised at the Hearing, where upon the Council withdrew their objections.

Main Issues

4. The main issues are:
 - the effect of the proposal on the character and appearance of the area and;
 - the effect of the proposal on the significance of a non-designated heritage asset.

Reasons

The effect on character and appearance

5. Caversham Road is a busy and wide main artery through north west Reading, which leads to the town centre. There are wide footpaths along both sides of the road indicating it is a main pedestrian thoroughfare.

6. The site is within a discernible suburban part of Reading, which is west of Caversham Road. To the east is an area of modern commercial buildings on former railway sidings which back onto Reading station and the appeal site is prominent from the train. Northfield Road joins the west side of Caversham Road and the appeal site is on the corner.
7. The appeal site is part of the frontage buildings on the east side of Caversham Road and is segregated from the town centre by a railway viaduct. The frontage has low rise brick warehouse style buildings and an art deco fire station. Continuing northwards, after the Northfield Road junction, the tallest building is a modern storage facility of 3 floors, and thereafter northwards towards Caversham, the architecture is typified by Victorian buildings, two to two and a half storey in height, closely fronting the road.
8. The site is on a prominent corner with Northfield Road, which soon after the appeal site is a residential area. Except for Monmouth Court, an undistinguished modern redevelopment, and the side of the above storage building, Northfield Road is characterised by two storey uniform Victorian terraced houses with elaborate detailing, and small front gardens. The Victorian style is continued west of Northfield Road into the surrounding streets.
9. The appeal site includes two groups of buildings segregated by tarmacked car parking and access. The rear group of buildings are brick, at a height of two and a half storey. These would be retained in their current use as offices, whereas the frontage building would be demolished and replaced with a building of 7 storeys with pitched roofs fronting Caversham Road, dropping to a 5 storey flat roof to the rear.
10. The new building would be substantially taller than the surroundings, particularly in relation to the west side of Caversham Road and Northfield Road where it would appear unduly tall, diverting attention from the street level to a new higher skyline. It would appear dominating and out of scale, more appropriate to an urban centre rather than a suburban location.
11. The perceived height of the building would also be emphasised by its narrow footprint. This would lead to a pronouncedly vertical orientated building.
12. The proposal would drop to 5 storeys towards Northfield Road. However even at that height it would appear out of context. Additionally, the seventh storey element behind would be visible from parts of Northfield Road.
13. The elevations show a distinct ground floor level which would help break up the perception of the height. However, the top two floors would have elongated windows, which would accentuate the perception of height as the eye would follow their long length. Moreover, this effect would be emphasised by window mullions which would be eye-catching details at the highest point.
14. The elevations show that the southern wall of the seven- storey element would be blank. Whilst window outlines would be provided by some reveals, these would offer only very limited relief and interest to the otherwise large and high expanse of walling. Consequently, the building would appear austere and overly dominant when seen from the south.
15. The east side of Caversham Road is allocated for major re-development which is likely to involve some high replacement buildings. This site is the subject of a current application but has yet to be determined. In any event this area has a

different character being composed of large, modern commercial buildings whereas the west side has more traditional style buildings. Caversham Road forms a wide and assertive segregating boundary. This is confirmed by the Council's policy work for the area. Their analysis in the 'Townscape and Planning Constraints', copied in the Icen Heritage and Townscape Assessment, denotes the east side of the Caversham Road as a tall buildings cluster but not the west side. The 2009 Reading Central Area Action Plan shows the rear of the appeal site as a 'transition zone of low residential', whilst major development is only foreseen to the east side of Caversham Road.

16. I therefore conclude that the proposal would cause significant harm to the character and appearance of the area.
17. Policy CC7 of the Reading Borough Local Plan requires high design quality which maintains and enhances the character and appearance of the area. The detailed criteria require a positive response to local context and the policy also makes reference to height and scale. Policy EN4 of the above Plan requires that the replacement building draws upon the historical qualities of the previous building. Paragraph 127 of the National Planning Policy Framework (the Framework) requires proposals are sympathetic to local character and history. The proposal would be in conflict with these policies.

Non-designated heritage asset

18. The proposal would result in the loss of the frontage buildings, which the Council has recently identified as a non-designated heritage asset, following a submission by the local community. Historic England's Conservation Principles, Policies and Guidance 2008 advises on the components of significance: evidential, historical, aesthetic and communal.
19. The existing building has decorative brickwork, a low height with pitched roofs in various materials and notable window openings. It looks like a Victorian warehouse.
20. The site is a landmark due to its corner position, the openness of the street and alignment of Caversham Road. The massing of the buildings is broken into several linked elements which attract the eye, particularly a gable which projects northwards towards the view from Caversham Road. Distinctively large windows on the ground floor address Northfield Road and also suggest an industrial intent.
21. It is evident that the buildings were built between 1871 and 1877 and were designed and built as maltings for the well-known businessman and maltster Dowson. It supplied Simmonds one of the main brewers in Reading who lacked the capacity at the time and capitalised on the demand for barley following the repeal of its taxation.
22. The buildings were only in maltings use for 30 years but brewing was important to Reading, contributing to its social and economic development. Hence the buildings are helpful to show the town's growth and its links to the surrounding countryside which supplied the barley.
23. There have been some alterations to the original buildings. These include a ground floor shop window style projection with a sheet roof, but it is in muted materials and subservient to the front elevation. Some of the windows have been replaced but their openings and the surrounds are intact. Indeed, the

pattern of openings is notable. The roof covering to one part has been replaced by sheeting but that does not detract from a functional industrial appearance and emphasises the broken massing of the roofscape. Part of the rear of one building and the kiln have been lost but the overall shape, form and massing are very evident and readily suggest Victorian industrial buildings. The original use as maltings can be appreciated.

24. The proposal does allow the retention of the rear buildings. However, their setting would be dramatically changed by being adjacent to tall buildings, with no historic connection. Whilst the design is intended to make references to the original buildings' architectural features, the benefit would be denuded by the height of the new building.
25. Architecturally there are similarities between both sets of existing buildings in their height, scale, form, broken massing and distinctive rooflines featuring half hips and full hips. The detailing is similar with cills, arches /window openings, and some painted walls. Furthermore, historically the buildings were part of the same malting operation. Their architectural and historical value is largely as a whole, and the proposal would harm their group value.
26. The historic maps indicate that the building pre-dates much of the residential development on Northfield Road. The repetitive terraces are indicative of workers homes and the industrial buildings at the maltings do not appear out of place. Whilst the building on the corner of Swansea Road/ Northfield Road is permitted for redevelopment, there is a feeling of cohesion and connectivity between the appeal building and the Victorian surroundings.
27. Reference was made by all parties to the brewery buildings elsewhere which show Reading's past, in particular Simmonds at Fobney Street. However, this converted building has an overly fenestrated projecting balcony on its most prominent (eastern) elevation. It is also closely enveloped within an overtly residential looking cul-de-sac. I did not find that this setting evoked much sense of Reading's industrial heritage. In contrast the appeal site is very prominent and has a Victorian industrial appearance.
28. The existing building reflects the values of the Historic England Guidance, in particular, for its historic significance as an identifiable Victorian warehouse, built for the brewing industry and, aesthetic significance for its massing, form and in part detailing, as a landmark on a prominent corner. I therefore conclude that the building has significant significance as a non-designated heritage asset and its loss would harm the historic environment.
29. Policy EN4 of the Reading Borough Local Plan specifically addresses non designated heritage assets. It highlights the need to conserve architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. It states that permission may be granted where the harm or loss are significantly outweighed by the benefits of the development. Policy EN1 of the same Plan covers the historic environment and includes non-designated assets. It seeks to avoid harm in the first instance and if not whether there is clear and convincing justification. Paragraph 197 of the Framework requires that the significance of the non-designated heritage asset is taken into account and a balanced judgement is required. The proposal would be in conflict with these policies.

Other matters

30. I note the submission of the legal agreement, which accords with the Council's requirements to mitigate the impact of a development of this type. It also meets the tests in paragraph 56 of the Framework. The Council at the Hearing stated that this resolved their concerns about the lack of provision for affordable housing, pedestrian/cycle facilities, car club and a skills training scheme. I concur that the submission would satisfy the concerns in the third reason for refusal.

Planning Balance

31. The proposal would provide an economic boost in its construction and indeed the section 106 agreement provides the opportunity of employment skills training. The 44 dwellings would also contribute to housing land supply, although the Council when asked at the Hearing stated that it was meeting its housing land supply requirements, nonetheless that is a minimum target. The proposal would provide 5 affordable dwellings within the development and provide a contribution for provision elsewhere which the Council confirmed could be readily used on their developments. The proposal would make use of a brownfield site, in a location extremely accessible to facilities and services. CIL/recreation payments would be a benefit but to some extent would mitigate the needs of residents rather than be a gain. The proposal would re-create an active frontage which would help vitality and surveillance. However, the carbon emissions saved by the energy efficiency of the new building would be likely to be counter balanced with the loss of the existing. A green wall is proposed but this would be small and have very limited benefit. Cycle priority works at the junction of Northfield Road/Caversham Road are also proposed.

32. However, individually or cumulatively, these benefits do not outweigh the significant harm the proposal would have on the character and appearance of the area and the significance of a non-designated heritage asset.

Conclusion

33. I therefore conclude that the appeal should be dismissed.

John Longmuir

INSPECTOR

LIST OF APPEARANCES

THE APPELLANTS

Sam Berg	Director of S2 Estates
Tom Vernon BA(Hons) Dip TP MRTPI	Director at Quod
Daniel Rech (BA)Hons Dip TP MRTPI	Senior Planner at Quod
Laurie Handcock MA MSC IHBC MCIfA	Director Icen Projects
Dominic Chapman BA(Hons) BArch RIBA	Partner JTP Architects

THE LOCAL PLANNING AUTHORITY

Jonathan Markwell BSc(Hons) MSc LRTPI Principal Planning Officer

Bruce Edgar FRSA, IHBC, M.Phil, M.PIA, MICOMOS B.Arch Conservation and Urban Design Officer

INTERESTED PARTIES

Mary Neale MCIFA

Bell Tower Community Association

Evelyn Williams BA(Hons) ACA MBA

Reading Conservation Area Advisory Committee

Cllr Tony Page

Reading Borough Council

Cllr Karen Rowland

Reading Borough Council

12) Existing site photographs



From Caversham Road





Northfield Road



Below: west courtyard elevation





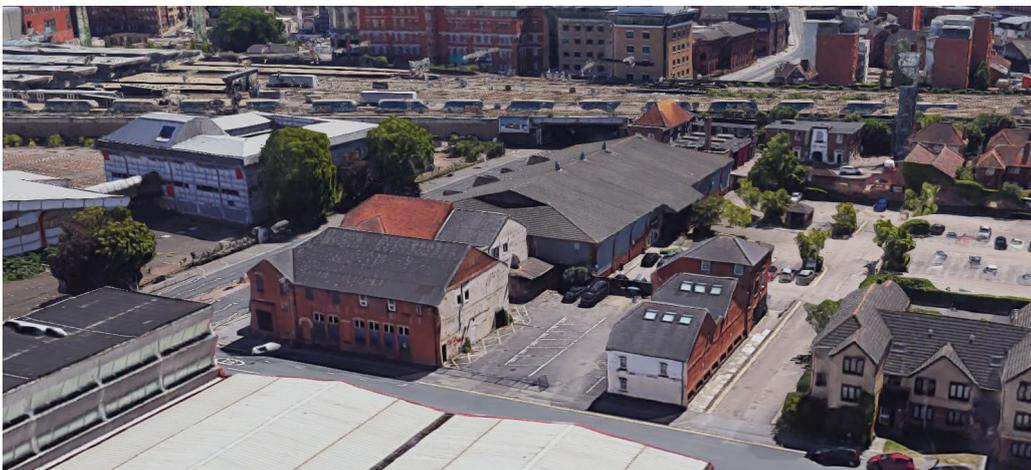
Above: Northfield Road and 'The Brewery' and 'The Malthouse' office buildings



Interior photographs from February 2021 (e.g. above right shows that the first floor eastern end timber framed double hung windows remain)



13) Aerial views of the application site & surrounding area looking south (Google maps)

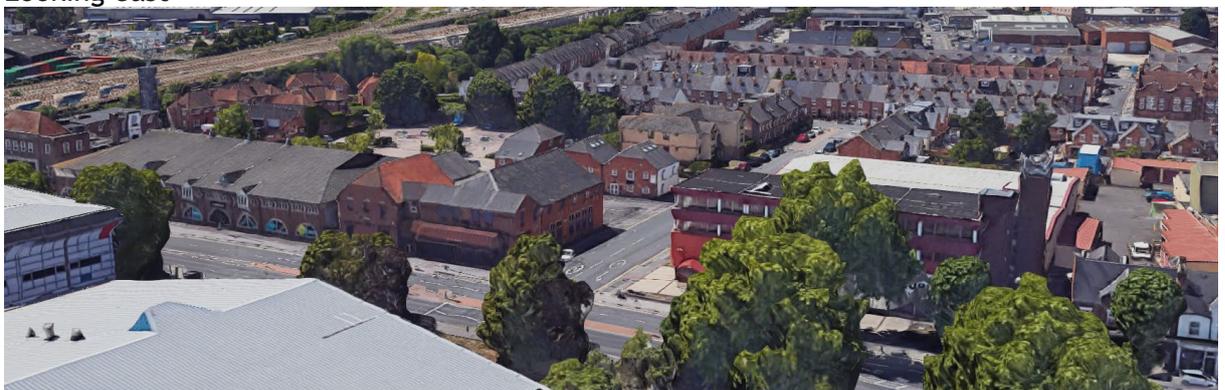




Looking north



Looking east



Looking west