



R Collard Ltd

124 CARDIFF ROAD, READING

Planning Statement





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CONTENTS

1. INTRODUCTION	1
1.1. OVERVIEW AND PROJECT BACKGROUND	1
1.2. PLANNING APPLICATION	1
1.3. STRUCTURE OF THIS DOCUMENT	2
2. SITE AND SURROUNDINGS	3
3. PLANNING HISTORY	6
4. THE PROPOSED DEVELOPMENT	7
5. PLANNING POLICY CONTEXT	9
5.2. THE DEVELOPMENT PLAN	9
5.3. NATIONAL PLANNING POLICY FRAMEWORK (2019)	10
6. PLANNING ASSESSMENT	11
6.2. PRINCIPLE OF DEVELOPMENT	11
6.3. DESIGN & APPEARANCE	13
6.4. RESIDENTIAL AMENITY	14
6.5. ENVIRONMENTAL CONSIDERATIONS	15
6.6. TRANSPORT AND CAR PARKING	18
6.7. SUSTAINABLE DESIGN	19
7. CONCLUSION	21

1. INTRODUCTION

1.1. OVERVIEW AND PROJECT BACKGROUND

- 1.1.1. This Planning Statement has been prepared by WSP on behalf of R Collard Ltd [“the Applicant”] and accompanies and planning application seeking full planning permission for the *‘the demolition of No.124 and construction of a building for use as an extension to the existing waste recycling centre building at No. 128 with associated landscaping and off-street parking spaces’* on land at 124 Cardiff Road, Reading, RG1 8PQ [“the Proposed Development”].
- 1.1.2. This application is submitted to Reading Borough Council as the determining Local Planning Authority (LPA) under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 1.1.3. A full description of the Proposed Development is set out in Section 4 of this Statement and the location of the site and the extent of the Proposed Development area are shown on the Location & Block Plan drawing ref. 20.128CD.SITE.

1.2. PLANNING APPLICATION

- 1.2.1. This Statement sets out the description of development for which planning permission is sought and explains how the Proposed Development responds to relevant planning policies contained in the statutory development plan. It also deals with site-specific technical issues to be dealt with through the planning process and draws from the conclusions of several environmental and technical documents which accompany the planning application.
- 1.2.2. The form and content of this planning application has also been agreed through pre-application discussions with the LPA. A formal request for pre application advice was submitted to the LPA on 26th February 2020 and a formal response was received on 14th May. A subsequent meeting was held on 18th June with the planning officer to clarify the contents of the advice.
- 1.2.3. The supporting documents submitted to accompany the Planning Application comprise of the following:
 - Sustainability Statement (with BREEAM Pre- Assessment estimator);
 - Preliminary Bat Roost Assessment;
 - Preliminary Risk Assessment;
 - Acoustic Assessment; and
 - Flood Risk Assessment and Drainage Strategy.
- 1.2.4. A schedule of application drawings that form part of the planning application is set out in Table 1 below.

Table 1 – Application Drawing Schedule

Ref.	Title	Scale	Status
20.128CD.SITE	Location & Block Plan & Parking Plan	As Shown	For Approval
20.128CR.P01	Existing Floor Plans	1:100	Not for Approval
20.128CR.P02	Existing Elevations (Unit 128)	1:100	Not for Approval
20.128CR.P03	Existing Elevations and Street View	1:100	Not for Approval
20.128CR.P04	Proposed Floor Plan and Roof Plan	1:100	For Approval
20.128CR.P05	Proposed North and South Elevations	1:100	For Approval
20.128CR.P06	Proposed East and West Elevations	1:100	For Approval
20.128CR.P07	Proposed Site Plan	1:100	For Approval
WSP-70063683-01	Proposed Soft Landscape & Planting Plan	1:50	For Approval

1.3. STRUCTURE OF THIS DOCUMENT

- 1.3.1. This statement sets out the context and need for the Proposed Development and includes an assessment of how it accords with relevant national and local planning policies, drawing on relevant supporting information where applicable.
- 1.3.2. Following this introductory section, the remainder of this Planning Statement is structured as follows:
 - **Section 2** describes the Application Site and surrounding context;
 - **Section 3** describes the planning history relating to the application site;
 - **Section 4** sets out a detailed description of the Proposed Development;
 - **Section 5** provides a summary of the relevant planning policy context;
 - **Section 6** outlines how the proposed development responds to policy, as well as other material considerations; and
 - **Section 7** provides a summary and overall conclusion.

2. SITE AND SURROUNDINGS

- 2.1.1. The Application Site, measuring approximately 0.12 hectares, comprises a single storey detached building, located on the north side of Cardiff Road near its junction with Trafford Road. To the north and west, the site is bound by R Collard commercial waste management centre comprising a large building fronting Cardiff Road, with ancillary offices and open areas to the rear. To the east lies 126 Cardiff Road, a large UPS parcel depot.



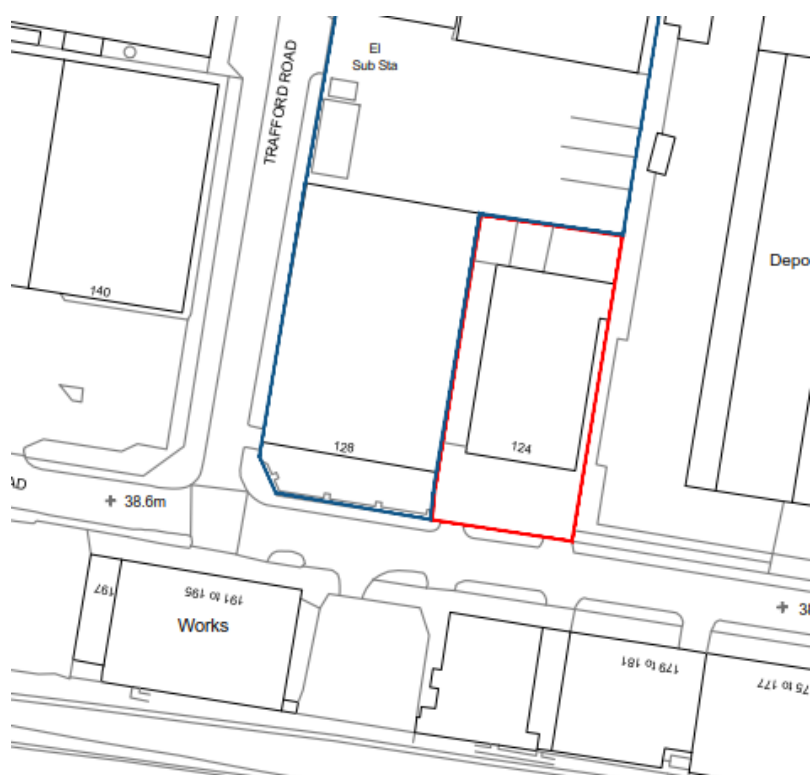
No. 128 Cardiff Road - R Collard Ltd.



No. 124 Cardiff Road (Application Site - former UPS Depot and is currently vacant)

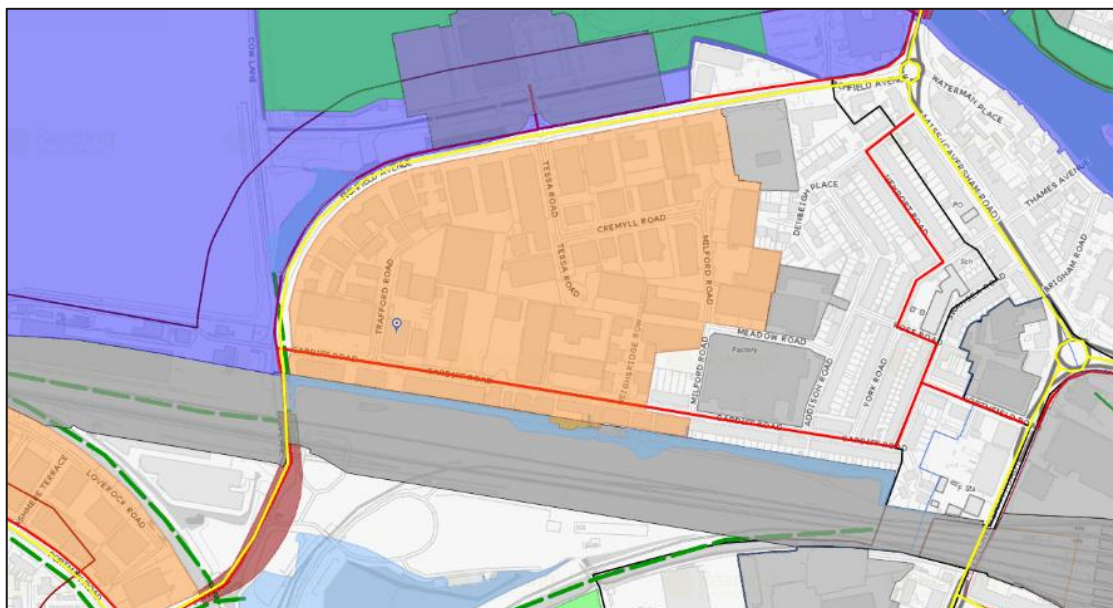
- 2.1.2. The street scene is predominantly commercial in character and appearance comprising industrial and warehouse buildings of varying sizes and appearance. There two separate storey terraces of residential properties located at the eastern end of Cardiff Road, some 300m from the Application Site.
- 2.1.3. The Application Site is well connected as it is within close proximity to Caversham Road providing direct access to the centre of Reading as well as neighbouring areas within Berkshire. Located approximately 1km south east of the site lies Reading train station, providing direct access into central London. Approximately 1km to the north of the site lies the River Thames and approximately 500m west lies open land used for agricultural purposes.
- 2.1.4. The location of the site is shown on the Location & Block Plan & Parking Plan drawing no. 20.128CD.SITE and in **Figure 2-1 below**.

Figure 2.1 - Site Location



- 2.1.5. **Figure 2-2** below illustrates the land use designations within and adjacent to the Application Site as identified in the Reading Borough Local Plan. The Application Site is not listed or lies within a conservation area, nor are there any listed structures within the site's immediate vicinity.
- 2.1.6. However, the Application Site is located within the Richfield Avenue Core Employment Area as allocated in the Reading Borough Core Strategy (The Development Plan). The site is also located within Flood Zone 2, an area designated as an Air Quality Management Area, and an area of potential contaminated land.

Figure 2-2 Land Use Designations



3. PLANNING HISTORY

3.1.1. A review of Reading Borough Council's online planning register reveals there have been a number of planning decisions at the site. **Table 3-1** provides a summary of pertinent search results.

Table 3-1 – Relevant Planning History

Reference	Description	Status
13/00304/FUL	Erection of a new loading bay and 2 storey office building	Granted
11/01745/FUL	Change of use of existing premises to a use for recycling of construction and commercial waste (Class B2) (retrospective); and the erection of new industrial building, offices and landscaping (amended description).	Granted
11/01872/FUL	Prior notification of proposed demolition of property. Prior Approval Notification	Approved
09/01818/FUL	Change of use of existing premises to a recycling of construction and commercial waste operation. (Class B2) (amended description)	Granted

4. THE PROPOSED DEVELOPMENT

4.1.1. Planning permission is being sought for:

“the demolition of No.124 and construction of a building for use as an extension to the existing waste recycling centre building at No. 128 with associated landscaping and off-street parking spaces”

4.1.2. R Collard Ltd is the South of England’s leading supplier for demolition, waste management, skip hire, ready-mixed concrete, metal recycling and scrapping cars. Waste vehicles are deployed into the local area to collect waste materials in which the waste is then transported to the site, weighed, categorised and deposited to the existing building on site.

4.1.3. They have an excellent reputation within the Waste Management field. Its operations are focused on creating a low carbon economy, providing an important service to local residents and businesses. The waste recycling plant uses mechanical, density and manual separation techniques to sort the waste into individual material fractions. i.e. Cardboard, Paper, Glass, Various polymers, wood, plasterboard, soil, stone, metals etc. Once sorted the materials are compacted in to bales or loaded in bulk for re-use and recycling within various industrial markets.

4.1.4. The operations at R Collard Ltd are focused to create a low carbon economy and provides an important service to local residents and businesses. However, the current building used for recycling restricts the operations and additional space is required for the sorting of materials. The Applicant is therefore seeking to increase the footprint of the main recycling building to provide additional space for the sorting of recyclable materials.

4.1.5. The new building, involving demolition of the existing building at 124 Cardiff Road, would be attached to the eastern side of the existing recycling centre building, to form an extension to it, as shown on the Proposed Floor Plan and Roof Plan drawing no. 20.128CR.P04. It will measure approximately 43.4m long, set flush with the front and rear walls of the existing recycling centre building, 23.5m wide, for the full width of the site, 10m high at eaves level, and 12.4m high, set 0.9m below the ridge of the existing recycling centre building.

4.1.6. A roller shutter door and entrance door are proposed on the front elevation, as shown in the **Figure 4.1** below, and the exterior of the building and roof will be finished in Kingspan composite, to match the existing. The new building will provide an additional floorspace of approximately 1019sqm.

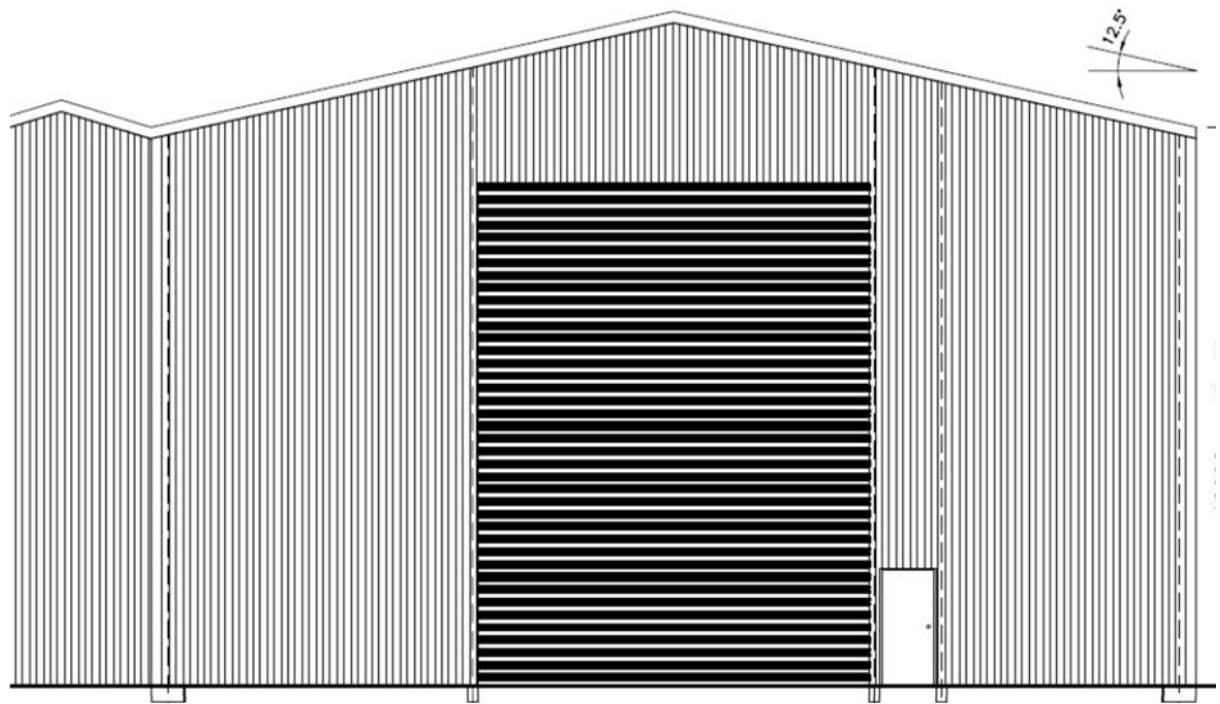


Figure 4.1 - Building Exterior

- 4.1.7. Two parking spaces with electric vehicle charging points are proposed in the front forecourt. A 1.5m wide landscape strip is also proposed at front to match the existing landscape strip, as shown on the Proposed Site Plan drawing no. 20.128CR.P07. The soft landscaping details and planting schedule are shown on the Proposed Soft Landscape & Planting Plan drawing no. WSP-70063683-01.

5. PLANNING POLICY CONTEXT

- 5.1.1. This section summarises the planning policy context for the Proposed Development. We first consider the Development Plan policies comprising the Reading Borough Local Plan 2019, the (emerging) Central and Eastern Berkshire Minerals and Waste Plan, and Supplementary Planning Documents. We then consider the national planning policy as set out in the National Planning Policy Framework (NPPF) (2019).

5.2. THE DEVELOPMENT PLAN

The Reading Borough Local Plan (RBLP)

- 5.2.1. The RBLP was adopted on 4th November 2019. It sets out the planning policies for development in Reading up to 2036, and is the main consideration for determining planning applications.

- 5.2.2. The following Planning Policies are considered relevant to the Proposed Development:

- Policy EM1: Provision of Employment Development
- Policy EM2: Location of New Employment Development
- Policy EM3: Loss of Employment Land
- Policy CC2: Sustainable Design and Construction
- Policy CC3: Adaptation to Climate Change
- Policy CC7: Design and The Public Realm
- Policy CC8: Safeguarding Amenity
- Policy EN12: Biodiversity and The Green Network
- Policy EN14: Trees, Hedges and Woodlands
- Policy EN16: Pollution and Water Resources
- Policy EN18: Flooding and Sustainable Drainage Systems
- Policy TR1: Achieving the Transport Strategy
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

The (Emerging) Central and Eastern Berkshire Minerals and Waste Plan

- 5.2.3. Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council (collectively referred to as the Central and Eastern Berkshire Authorities) are working in partnership to produce a Joint Minerals and Waste Plan which will guide minerals and waste decision making in the Plan area.
- 5.2.4. The Joint Minerals and Waste Plan will build upon the formerly adopted minerals and waste plans for the Berkshire area, eventually providing replacement policies based on up to date evidence of the current levels of provision for minerals and waste facilities in the Plan area. Importantly, the Plan aims to establish the future levels of provision required to meet national and regional policy targets and objectives. It will set out a new vision of how this will be achieved and provide details of strategic sites that we propose will deliver the vision.
- 5.2.5. The emerging Central and Eastern Berkshire Minerals and Waste Plan will guide minerals and waste decision making in the Plan Area. The plan is in the final stages of preparation and the Council have recently undertaken the Proposed Submission Regulation 19 Consultation. The

Council are aiming to adopt the plan in Winter 2021. Therefore, this plan should carry limited weight.

Supplementary Planning Documents (SPD's)

5.2.6. The following SPD's are relevant to this planning application:

- Revised Parking Standards and Design; and
- Sustainable Design and Construction

5.3. NATIONAL PLANNING POLICY FRAMEWORK (2019)

5.3.1. The National Planning Policy Framework (NPPF) 2019 forms a key material consideration that should be taken into account when determining planning applications. At the heart of the NPPF 2019 is the presumption in favour of sustainable development and key policies of the NPPF 2019 that are relevant to the proposed scheme are set out below.

- Paragraphs 7-10 Achieving Sustainable Development;
- Paragraphs 111-123 Making effective use of land;
- Paragraphs 155 – 165 Planning and Flood Risk;
- Paragraphs 102 – 111- Promoting sustainable transport;
- Paragraphs 80 -84 Building a strong, competitive economy;
- Paragraphs 124-132 Achieving well-designed places;
- Paragraphs 170-183 Conserving and enhancing the natural environment; and
- Paragraphs 178 – 183 Ground Conditions and Pollution

5.3.2. We consider how the Proposed Development responds to the aforementioned policies in section 6 below.

6. PLANNING ASSESSMENT

- 6.1.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This section identifies the main planning considerations arising from the development plan applicable to this planning application as well as the material considerations warranting the grant of planning permission for the Proposed Development.
- 6.1.2. In the context of the consideration of the main effects of the Proposed Development, the main planning and environmental considerations are:
- Principle of Development;
 - Design & Appearance;
 - Residential Amenity;
 - Environmental Considerations;
 - Biodiversity & Trees
 - Flood Risk & Sustainable Drainage
 - Land Contamination
 - Transport & Car Parking; and
 - Sustainable Design.

6.2. PRINCIPLE OF DEVELOPMENT

- 6.2.1. Paragraph 4.3.1 of the RBLP describes Reading's Employment status as *"the largest population and employment centre in Berkshire, which is one of the economic powerhouses of the UK". The economic output of Berkshire as a whole, in terms of Gross Value Added (GVA) equates to around £30bn. The components of continued strong economic growth, such as access to Heathrow airport, strong transport links to London and the west, a highly skilled workforce and a high standard of living, are likely to continue to be in place across the plan period. Continued economic buoyancy is therefore likely, but this will also mean addressing the challenges that limit growth, such as lack of affordable housing, a stretched transport infrastructure and the need for suitable business space."*
- 6.2.2. The principal of the development is established through the land use designation of the site. The existing site is in an employment use and is located within the Richfield Avenue Core Employment Area. A review of the relevant employment policies in the RBLP and the NPPF conclude that there exists overwhelming policy support at local and national level for the Proposed Development within such locations.
- 6.2.3. Paragraph 4.3.1 of the RBLP describes Reading's Employment status as ***"the largest population and employment centre in Berkshire, which is one of the economic powerhouses of the UK". The economic output of Berkshire as a whole, in terms of Gross Value Added (GVA) equates to around £30bn. The components of continued strong economic growth, such as access to Heathrow airport, strong transport links to London and the west, a highly skilled workforce and a high standard of living, are likely to continue to be in place across the plan period. Continued economic buoyancy is***

therefore likely, but this will also mean addressing the challenges that limit growth, such as lack of affordable housing, a stretched transport infrastructure and the need for suitable business space". Furthermore, on 'Existing employment areas' RBLP para 3.2.1 state that *"A high level of need has been identified for new floorspace for employment development, to help ensure the future prosperity of Reading. This means that the majority of our employment areas need to be retained and, where possible, intensified, to continue to provide this role"*. Clearly, the Proposed Development meets these aims and objectives.

- 6.2.4. In addition, Policy EM1 of the Local Plan states *"provision will be made for a net increase of 148,000sqm of industrial/warehouse space in the Reading Borough for the period 2013 to 2036"*. The Proposed Development will result in an increase in employment floorspace thereby contributing to this target.
- 6.2.5. Policy EM2 builds upon this and states *"employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas"*. The Application Site lies within a Core Employment Area.
- 6.2.6. Policy EM3 states that *"Within Core Employment Areas, the overall level of employment should be maintained"*. The Proposed Development includes the demolition of No. 124 Cardiff Road to facilitate the construction of the Proposed Development. No. 124 Cardiff Road was formerly a parcel depot office occupied by UPS and has been vacant for a number of years. The Proposed Development will bring the site back into employment operational use.
- 6.2.7. Policy DM1 in the (Emerging) Central and Eastern Berkshire Minerals and Waste Plan sets out states the following:

"The Central & Eastern Berkshire Authorities will take a positive approach to minerals and waste development that reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework (NPPF)"

- 6.2.8. The NPPF (2019) reiterates Policies EM1 and EM2 of the RBLP. At the heart of the NPPF (2019) is the presumption in favour of sustainable development. In order to achieve sustainable economic development; Paragraph 8(a) sets out that sufficient land of the right types is available in the right places at the right time to support growth, innovation and productivity. In support of this, Paragraph 80 of section 6: **'Building a strong, competitive economy'** states:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"

- 6.2.9. Furthermore, on the utilising existing brownfield land to meet identified needs, Paragraph 118 of Section 11: **'Making effective use of land'** states the following:

"Planning policies and decisions should:

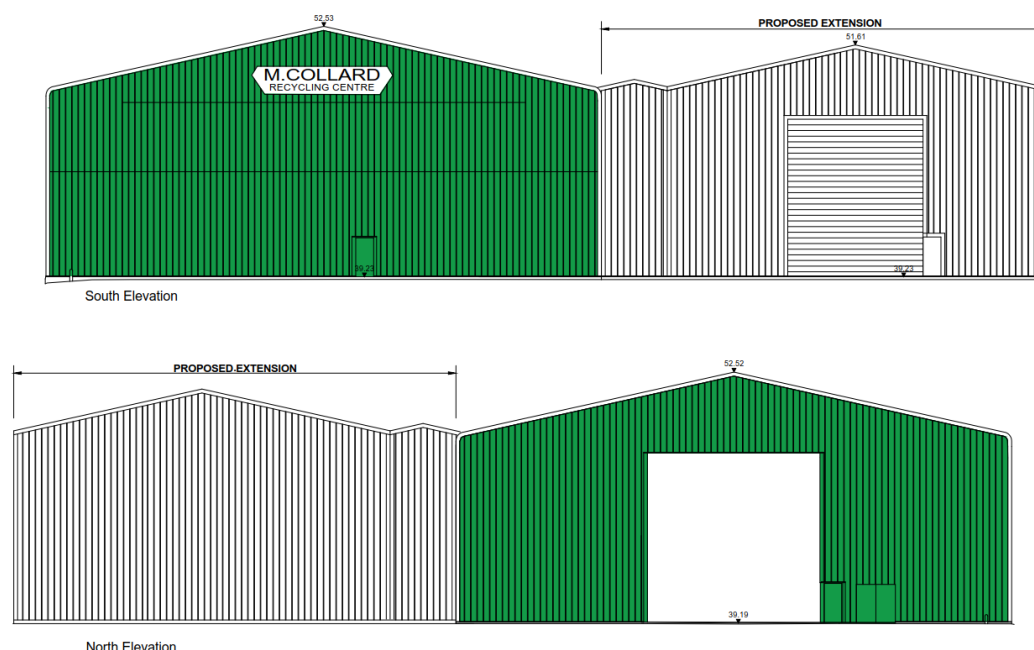
c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- 6.2.10. The characteristics of the Application Site as well as its extremely accessible location, provides an attractive opportunity to expand the existing unit for industrial/warehouse use (use class B8). This will significantly improve the existing host building, ensuring that the site is suitable for modern recycling operational use, thus enabling the business to operate more efficiently. There will be no increase in waste tonnage at this stage, but recovery rates from the waste stream will increase. This will mean less waste will go to landfill.
- 6.2.11. The Application Site is located within the Richfield Avenue Core Employment Area meaning that the principle of the provision of additional employment floorspace is acceptable. Furthermore, the aforementioned employment policies clearly demonstrate that there is overwhelming policy support for the Proposed Development. The Applicant currently employs 42 full time employees, and this will not change as a result of the Proposed Development. Furthermore, the Proposed Development will provide an additional 300m² of employment floorspace and the Application Site will remain as employment land and use, and the overall level of employment will be maintained.
- 6.2.12. Therefore, it is considered that the Proposed Development complies with Policies EM1, EM2 and EM3 of the RBLP, emerging Policy DM1, and the NPPF.

6.3. DESIGN & APPEARANCE

- 6.3.1. RBLP Policy CC7 states ***“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”***.
- 6.3.2. As mentioned in section 4 above, the Proposed Development involves the demolition of the existing building at 124, for the construction of a new building which has been designed to appear as an extension to the existing recycling centre building, as shown on the Proposed South and North Elevations drawing no. 20.128CR.P05, and illustrated below.

Figure 2 - Front & Rear Elevations



- 6.3.3. The new building will be set below the main roof ridge of the existing building so that it will appear subordinate. The new building has been designed to match the appearance of the existing building so that they will read as a seamless building in the street scene.
- 6.3.4. The eastern section of Cardiff Road comprises a variety of industrial and warehouse buildings of varying designs and appearance. It is considered that the Proposed Development will not appear out of character with the existing street scene, and as such will comply with Policy CC7.

6.4. RESIDENTIAL AMENITY

- 6.4.1. The RBLP has a strong focus on safeguarding residential amenity. Policy CC8 states ***“Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties”***
- 6.4.2. Policy EN16 adds:
“Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality”
- 6.4.3. Policy DM9 of (Emerging) Central and Eastern Berkshire Minerals and Waste Plan affirms Policy EN16 and states:
“Planning permission will be granted for minerals and waste development only where it can be demonstrated that it will not generate unacceptable adverse impacts on the health, safety and amenity of local communities and the environment”
- 6.4.4. These policies are echoed in the NPPF (2019). Paragraph 180 of section 15 ‘**Conserving and enhancing the natural environment**’ states:

“Planning policies and decisions should also ensure that new development is appropriate for its location...In doing so they should:

(a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development”

- 6.4.5. The Application Site is located within an established area of industrial and commercial activity and comprises a number of noise generating businesses such as Chiltern Auto Cars and Fast Track Tyres Ltd, which is located opposite the application site. Therefore, some noise is anticipated in such established areas.
- 6.4.6. No external operational activities or lighting are proposed at no. 124. The nearest residential properties are located at the eastern end of Cardiff Road, some 300m from the Application Site, and this distance is considered to be sufficient to ensure that no additional noise nuisance will affect the living conditions of the occupiers of these properties.
- 6.4.7. A Noise Impact Assessment has been prepared by WSP in accordance with BS4142, to support the planning application. The methodology of Assessment was agreed following discussions with the Senior Environmental Health Officer (EHO) at Reading Borough Council. Noise measurements were undertaken within the Waste Transfer Station to ascertain source levels for the various site activities and validate a computational noise model used to predict the impact of the Proposed Development. Baseline noise measurements have also been undertaken at the boundary of two noise sensitive receptors (Cardiff Road and Salisbury Road) to derive representative background noise levels at these locations.
- 6.4.8. The results of the assessment show that the operation of the Proposed Development would result in noise levels below the threshold of indication for adverse comments at NSR1 and in an indication of low impact at NSR2, depending on the context. Contextual considerations were made based on the range of background noise measurements recorded at NSR1 and the noise climate surrounding this location.
- 6.4.9. The Assessment concluded that neither sensitive receptor will incur a significant noise impact as a result of the Proposed Development, provided the recommendations relating to the minimum noise insulation requirements are adhered to. This can be secured by way of a suitably worded planning condition.
- 6.4.10. Therefore, the Proposed Development complies with RBLP Policy CC8 and EN16, NPPF (2019), and the Emerging) Central and Eastern Berkshire Minerals and Waste Plan.

6.5. ENVIRONMENTAL CONSIDERATIONS

Biodiversity & Trees

- 6.5.1. The Applicant is committed to include ecological enhancements in the Proposed Development to accord with the objectives of RBLP Policy EN12. Policy EN12 states ***“Development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible.”***
- 6.5.2. Policy EN12(b) further adds that all development should:

“Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable”

- 6.5.3. On Trees, RBLP Policy EN14 states ***“New development shall make provision for tree retention and planting within the application site, particularly on the street frontage”.***
- 6.5.4. In support, NPPF Paragraph 170(d) of section 15 ‘Conserving and enhancing the natural environment’ states:
- “Planning policies and decisions should contribute to and enhance the natural and local environment by***
- (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”***
- 6.5.5. The Proposed Development seeks to protect and enhance features of biodiversity interest, incorporating and integrating them into the development proposal.
- 6.5.6. It includes the provision of ecological enhancements to the site’s frontage onto Cardiff Road. The ecological enhancements include the provision of two Bird Cherry Trees as well as the planting of Wild Daffodil’s and shrubs and bushes, and these are shown on the Proposed Soft Landscape & Planting Plan drawing no, WSP-70063683-01. This will attract an array of wildlife and provide an extension to the existing tree canopy to the front of the adjoining site. Not only would this provide ecological benefits, but it would further improve the visual appearance of the site as well as creating greater cohesion with the adjoining site. The existing tree cover in the surrounding area is very low, therefore the ecological enhancements will bring a wealth of benefits.
- 6.5.7. The Proposed Development seeks to demolish No. 124 Cardiff Road. This building is extremely dated and has the potential to provide a good habitat for foraging and commuting bats. A Preliminary Bat Roost Assessment (PBRA) has been prepared to support the planning application. It assessed No.124 Cardiff Road’s suitability to support bat roosts, and to search for evidence indicating the current or historic use of the building by roosting bats. The PBRA concluded that the building was considered to be of low suitability to support summer/transitional bat roosts. No bats were identified to emerge from the building so roosting bats are likely to be absent. Therefore, the Proposed Development will not affect both roosting and summer/transitional bats.
- 6.5.8. It is therefore considered that the Proposed Development complies with RBLP Policies EN12 and EN14, and the NPPF (2019).

Flood Risk & Sustainable Drainage

- 6.5.9. RBLP Policy EN18 states ***“Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change”.***
- 6.5.10. Furthermore, RBLP Policy CC3 states ***“All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:***
- ***All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change”***

- 6.5.11. NPPF Paragraph 155 of section 14: **‘Meeting the challenge of climate change, flooding and coastal change’** advises that ***“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”***
- 6.5.12. The Application Site is located within Flood Zone 2 which is classified as land which has an annual probability of flooding from rivers between 0.1% and 1% every year (1 in 100 and 1 in 1000 year return period flood event) in any given year. Therefore, a Flood Risk Assessment has been prepared to support the planning application.
- 6.5.13. The Flood Risk Assessment (FRA) was produced in line with the requirements of the National Planning Policy Framework (NPPF, 2019), Flood Risk and Coastal Change Planning Practice Guidance (Flood Risk PPG, 2014) and Environment Agency Standing Advice, where applicable, and has been informed through consultation with the Environment Agency.
- 6.5.14. The FRA demonstrates that the requirements of the NPPF have been achieved with respect of flooding, as the Proposed Development is considered to be at a low risk of flooding from all sources assessed and does not cause any significant increase in flood risk off-site over the lifetime of the Proposed Development.
- 6.5.15. Furthermore, although the proposed building’s footprint results in a minor encroachment into the edge of the predicted fluvial floodplain based on the 1 in 100 annual probability with 35% allowance (higher central) for climate change event, due to the distance from the River Thames and limited encroachment there is a negligible impact on the fluvial flood risk environment expected.
- 6.5.16. In regard to surface water drainage, it is proposed to maintain the existing drainage connection off-site with no increase of discharge to the public sewer. The existing drainage regime is not proposed to be changed and the site is generally flat with levels at the front of the Site sloping towards Cardiff Road and therefore no preferential drainage flow paths are expected to be created that could increase the risk of surface water flooding off-site.
- 6.5.17. It is therefore considered that the Proposed Development will accord with RBLP Policies EN14 and CC3 and the NPPF.

Land Contamination

- 6.5.18. The Application site is located within an area of potential contaminated land. Policy EN16 of the Development Plan states that:
- “Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.”***
- 6.5.19. Paragraph 170(f) of section 15 ‘Conserving and enhancing the natural environment’ states:
- “Planning policies and decisions should contribute to and enhance the natural and local environment by***
- (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”***
- 6.5.20. Paragraph 178 advises that ***“Planning policies and decisions should ensure that:***

a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination”.

- 6.5.21. A Phase 1 Land Contamination Assessment has been undertaken to support the planning application. A site walkover assessment and a desk-based assessment was undertaken. As the Application Site is to be covered by hardstanding or building cover, direct contact pathways (i.e. dermal contact, ingestion, inhalation) are considered unlikely to be present as the hardstanding / building cover provides a break in the pathway.
- 6.5.22. Given this, the risk to future Site users and workers and third-party neighbour is considered to be Low. During the redevelopment of the Site, there is the potential for the hardstanding to be temporarily removed or broken. However, the assessment concludes that the risk to third party neighbours during this time is also considered to be low.
- 6.5.23. Also considered to be at low risk are:
- exposure to ground gas;
 - construction workers coming in to contact with contaminated soils/groundwater during ground or construction works;
 - groundwater underlying the site impacting surface water courses;
 - contamination of controlled waters; and
 - permeation of hydrocarbons into plastic pipes.
- 6.5.24. The Phase 1 Land Contamination Assessment demonstrates that the Proposed Development will not impact the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the operation of the site. Therefore, the Proposed Development complies with RBLP Policy EN16 and the NPPF 2019.

6.6. TRANSPORT AND CAR PARKING

- 6.6.1. The site is located within Zone 2, Primary Core Area of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically, this Zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this Zone.
- 6.6.2. The RBLP has a strong focus on promoting sustainable transport. Policy TR1 states that:
- “Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans.”***
- 6.6.3. RBLP Policy TR5 states ***“Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.”***
- 6.6.4. The NPPF 2019 reinforces the focus of promoting sustainable transport and sets out that:
- “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”***

- 6.6.5. The current operations at the site includes 17 active HGV vehicles leaving and arriving at the facility. There will be no increase in the amount of HGV vehicles operating at the site as a result of the Proposed Development and therefore, there will be no impact on the existing highway network.
- 6.6.6. In accordance with Policy TR5 and the Revised Parking Standards and Design SPD, the Proposed Development will provide two electric vehicle charging spaces.
- 6.6.7. Therefore, the Proposed Development will comply with RBLP Policies TR1 and TR5, the Revised Parking Standards and Design SPD, and the NPPF 2019.

6.7. SUSTAINABLE DESIGN

- 6.7.1. The Development Plan amplifies the importance of sustainable design and construction and the adaption to climate change. Policy CC2 states:

“proposals for new development, including the construction of new buildings and the redevelopment and of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals and other natural resources appropriately, efficiently and with care and take account of the effects of climate change”.

- 6.7.2. Policy CC2 requires that all minor non-residential developments are required to meet the most up-to-date BREEAM ‘Very Good’ standard as a minimum. Policy CC3 builds upon this and states:

“all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change”.

- 6.7.3. Policy DM2 in the (Emerging) Central and Eastern Berkshire Minerals and Waste Plan furthers the Council’s commitment to ensuring that measures have been taken to account for climate change. Policy DM2 states:

“waste development will be supported that contributes towards mitigating the causes of climate change”

- 6.7.4. The Proposed Development has been designed to the highest levels of sustainability. A Sustainability Statement has been prepared which demonstrates that the Proposed Development meets the objectives of the Policy CS2 of the Development plan.
- 6.7.5. The Sustainability Statement confirms that the Proposed Development will meet, or exceed where practicable, the Building Regulations Part L2A 2013. The roof and walls will be constructed of insulated composite panels which will be manufactured off site and assembled on site, reducing use of raw materials and construction waste. There has been no HVAC designed into development so building would be low energy.
- 6.7.6. The Development will use on-site renewables to support the EV charging points. The accompanying Flooding Risk and Drainage Assessment have considered projected climate changes trends, and the landscape strip at the front will support the potential to add shading to site, in line with requirements based on climate change trends.
- 6.7.7. The Application Site is situated within a good local transport network to encourage use of public transport for employees. There is no projected increase in commercial vehicles planned as part of the Proposed Development and two EV charging points are proposed at the front of the site.

- 6.7.8. The Applicant will deliver a highly-sustainable development that will efficiently optimise the existing brownfield land that would otherwise lie vacant due to the departure of UPS. Therefore, the Proposed Development complies with RBLP Policies CC2 and CC3, the NPPF (2019) and the (Emerging) Central and Eastern Berkshire Minerals and Waste Plan.

7. CONCLUSION

7.1.1. Planning permission is sought for:

“the demolition of No. 124 and construction of a building for use as an extension to the existing waste recycling centre building at No. 128 with associated landscaping and off-street parking spaces”

7.1.2. The Proposed Development will deliver a high-quality scheme. The assessment contained in this Planning Statement sets out the planning justification and demonstrate that the proposal is acceptable in terms of principal, design and townscape, residential amenity, and environmental considerations, Transport, and Sustainability.

7.1.3. The Proposed Development is located within the Richfield Avenue Core Employment Area. The reuse of employment land in this location is heavily supported by local and national policy. Also, the NPPF (2019) places a strong emphasis on the need to support economic growth and productivity, taking into account both local business needs. The Proposed Development will facilitate the growth of the operation at R Collard Ltd and provide the space to sort waste more effectively thereby increasing recovery rates. This will mean less waste will go to landfill.

7.1.4. The Proposed Development includes the demolition of No.124 Cardiff Road. This building was a former UPS parcel depot and has been vacant for a number of years. The building is not statutory or locally listed. The demolition of this building and the construction of a new extension to the existing recycling centre building, together with the addition of landscaping, will improve the overall appearance of the site and the street scene.

7.1.5. It is clear from the assessment contained in this statement that the Proposed Development is undoubtedly a positive intervention at the site and one which brings with it a sustainable, long-term solution for maximising the efficient use of the site in line with the core planning principles of the Framework. In particular, the following conclusions emerge from this Planning Statement concerning the Proposed Development:

- (i) it has been demonstrated that the Proposed Development constitutes Sustainable Development as it will make effective use of this brownfield site; and
- (ii) the Proposed Development will deliver ecological enhancements which can only be seen as a public benefit.

7.1.6. Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning Act 2004 states that development proposals should be determined with reference to the Development Plan unless any relevant material considerations indicate otherwise. Overall, it has been demonstrated that the Proposed Development complies with all levels of planning policy and is in accordance with the Development Plan. The Proposed Development will deliver considerable positive impacts in terms of built and natural environment considerations, and there are no other material considerations that outweigh the presumption in favour of the development.

7.1.7. This Statement has assessed the material considerations arising from the Proposed Development against the prevailing planning policy framework and has demonstrated that the



scheme complies with the detailed objectives of planning policy guidance set out in the Reading Borough Local Plan and the NPPF.

- 7.1.8. With this in mind, and in accordance with paragraph 14 of the Framework, and the presumption in favour of sustainable development as the golden thread running through the Framework, the proposed development at 124 Cardiff Road should be approved without delay.



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