
Cox & Wyman, Cardiff Road, Reading

Planning Statement

Submitted on behalf of Thames Properties Ltd

October 2017

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Project Ref:	24325/P1/A5/KJ	24325/P1/A5/KJ	24325/P1/A5/KJ
Status:	Draft	Draft	Final
Issue/Rev:	-	a	b
Date:	27 th September 2017	11 th October 2017	17 th October 2017
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Ref: 24325/P1b/A5/KJ/dw

Date: 16th October 2017

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1.0 INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Thames Properties Ltd (hereafter referred to as Thames Properties or the Applicant) to prepare and submit a full planning application to Reading Borough Council (RBC) for the redevelopment of the former Cox & Wyman printing works site at Cardiff Road, Reading ("the Site"). The application is in full for the development comprising:

"Demolition of existing site buildings and boundary treatments and erection of 96 no. dwellings including associated surface car parking, public realm and landscaping on land at the former Cox & Wyman building, Cardiff Road, Reading."

- 1.2 The Site, which forms an island bound by existing roads on each of its four boundaries, is located to the north of Reading town centre. The Site comprises approximately 1.31 hectares (ha) and is currently occupied by the buildings associated with the Cox & Wyman printing press which is no longer in use. A Site Location Plan (reference A-PP-E10-01) is submitted with the application.
- 1.3 The drawings and supporting documentation that accompany this application are as follows:

Plans and Drawings

- A-PP-E10-01 Location Plan at A3
- A-PP-E10-02 Location Plan at A3
- A-PP-E10-03 Block Plan
- A-PP-E10-04 Existing Site Plan at A2
- A-PP-E10-05 Demolition plans at A2
- A-PP-P10-01 Proposed Site Plan at A2
- A-PP-P10-02 Proposed Roof Plan at A2
- A-PP-P10-03 Proposed Servicing Plan at A2
- A-PP-P12-01 Proposed Site Sections at A1
- A-PP-P13-01 Proposed Street Elevations at A1
- A-PP-P13-02 Proposed Street Elevations at A1
- A-PP-P13-03 Proposed Street Elevations at A1
- A-PP-P13-04 Proposed Street Elevations at A1
- A-PP-P11-10 Apartments - Ground Floor Plan at A1
- A-PP-P11-11 Apartments - First Floor Plan at A1

- A-PP-P11-12 Apartments - Second Floor Plan at A1
- A-PP-P11-13 Apartments - Third Floor Plan at A1
- A-PP-P11-14 Apartments - Roof Plan at A1
- A-PP-P13-11 Apartments - North & East Elevations at A1
- A-PP-P13-12 Apartments - South & West Elevations at A1
- A-PP-P13-13 Apartments - Landscaped Deck Elevations at A1
- A-PP-P13-14 Apartments - Landscaped Deck Elevations at A1
- A-PP-P13-31 House Type D.01 at A2
- A-PP-P13-32 House Type D.02 at A2
- A-PP-P13-41 House Type E.01 at A2
- A-PP-P13-42 House Type E.02 at A2
- A-PP-P13-43 House Type E.03 at A2
- A-PP-P13-44 House Type E.04 at A2
- A-PP-P13-51 House Type G.01 at A2
- A-PP-P13-52 House Type G.02 at A2
- A-PP-P13-53 House Type G.03 at A2
- A-PP-P13-54 House Type G.04 at A2
- A-PP-P13-61 Substation at A2
- L-01 Landscape General Arrangement at A1 Rev E
- L-02 Landscape Illustrative Masterplan at A1
- L-03 Soft Landscape at A1
- L-04-1 Landscape Details at A1
- L-04-2 Landscape Details at A1

Supporting Documentation

- Planning Application Form and Certificates
- CIL Form
- Design and Access Statement, prepared by Barton Willmore
- Report on Community Engagement, prepared by Development Communications
- Air Quality Assessment, prepared by Peter Brett Associates
- Daylight and Sunlight Report, prepared by EB7
- Flood Risk Assessment and SUDS Assessment, prepared by Water Environment
- Ecological Appraisal, prepared by Aspect Ecology
- Energy and Sustainability Assessment, prepared by EB7
- Phase 1 Geoenvironmental Desk Study, prepared by Geotechnical Engineering
- Heritage Statement, prepared by Icen Projects Limited
- Lighting Strategy, prepared by MMA Lighting Consultancy

- Environmental Noise Assessment, prepared by Paragon Acoustic Consultants
- Transport Statement, prepared by TTP Consulting
- Residential Travel Plan, prepared by TTP Consulting
- Arboricultural Survey, prepared by Merewood Arboricultural Consultancy Services
- Tree Constraints Plan, prepared by Merewood Arboricultural Consultancy Services
- Arboricultural Impact Assessment, prepared by Merewood Consultancy Services
- Utilities Statement, prepared by Hydrock
- Existing Services Drawing, prepared by Hydrock
- Reading, Cardiff Road, Former Cox & Wyman Works - Analysis of suitability for the current market (November 2016), prepared by Campbell Gordon

- 1.4 The application has been prepared in consultation with officers of Reading Borough Council (RBC), seeking advice at the pre-application stage. The Applicant has also consulted with the local community during the preparation of the proposals, as detailed further within the Report on Community Engagement accompanying the application. This application has been prepared taking into account the comments and responses received through the pre-application process with RBC and the public consultation.
- 1.5 The application is submitted to support the sustainable growth of Reading, helping to meet the need for market and affordable housing in the town centre and the Borough as a whole. The development would deliver housing to contribute towards providing a sufficient five-year housing land supply within Reading Borough.
- 1.6 The site is located within the Richfield Avenue Core Employment Area (CEA) as dictated by RBC's adopted planning policy. However, as set out further within this Statement, the proposed redevelopment of the site is entirely reflective of the Council's aspirations for the future of the Richfield Avenue CEA as set out within the emerging Local Plan 2036.
- 1.7 The application demonstrates that the Site is sustainably located and suitable for redevelopment for residential use. The Proposed Development accords with the National Planning Policy Framework (NPPF) and is on the whole consistent with the policies contained in RBC's adopted Core Strategy and Sites and Detailed Policies document, as well as the emerging Draft Local Plan, having regard to the weight to be afforded to such policies.

Structure of Planning Statement

- 1.8 Chapter 2.0 of this statement (Site Description and Surroundings) details the physical characteristics of the Application Site and its immediate surroundings.
- 1.9 Chapter 3.0 (Pre-Application Advice) details the engagement between the Applicant and Reading Borough Council and key stakeholders during the preparation of the application and prior to submission.
- 1.10 Chapter 4.0 (The Development Proposal) provides details of the Proposed Development at the Site and should be read alongside the supporting plans and drawings.
- 1.11 Chapter 5.0 (National Planning Policy Context) makes reference to the relevant policies in the NPPF and relevant supplementary guidance in the online Planning Practice Guidance (PPG).
- 1.12 Chapter 6.0 (Local Planning Policies) and the relevant policies from the RBC Core Strategy and Sites and Detailed Policies Document and supplementary planning documents. This section refers to the emerging Reading Borough Council Draft Local Plan 2036.
- 1.13 Chapter 7.0 (Assessment of the Proposed Development) provides a response to the development plan policies and other guidance which relate to the Site and the Development. This section presents the planning balance which reviews the Development's conformity with the relevant policies of the Local Plans and other material considerations which should be given weight in determining the application. This chapter explains why the Proposed Development should be approved.
- 1.14 Chapter 8.0 sets out the conclusions of this Statement.

2.0 THE APPLICATION SITE AND SURROUNDINGS

Site Context

- 2.1 The Application Site is situated to the north west of Reading town centre, and is bound by Cardiff Road to the south, Meadow Road to the north, Milford Road to the west and Addison Road to the east. In effect, the site comprises an island that is bound by four roads. Existing residential development exists to the south, part of the south east, east and north east of the site, and the remainder of the site is bound by commercial and employment uses to the north and east. The site amounts to approximately 1.31 hectares (ha) in size.
- 2.2 The site occupies a key position between residential and commercial uses. Beyond Meadow Road and Milford Road to the north and west is an area designated by Reading Borough Council's Local Plan for employment use which extends to the boundaries of Cardiff Road and Richfield Avenue. This area contains industrial and warehousing uses, offices, trade counters, vehicle sales and hire, retail, showrooms and assembly and leisure uses. On the opposite side of the site, dense terraced housing on Addison Road and Cardiff Road form a clear residential area to the east and south of the site, beyond which is the railway line.
- 2.3 The Application Site currently comprises the building associated with the former Cox & Wyman book printing works. The building totals approximately 102,000 sq.ft of industrial and office space, including 77,000 sq.ft of partly open plan warehouse space, and was occupied and used by Cox & Wyman since its construction. The site also comprises a yard and approximately 30 car parking spaces. The building ceased operating in 2015 in part due to a decline in the demand for printing services, and to allow the company to focus its production in modern facilities that it occupies elsewhere.
- 2.4 The Cox & Wyman building has, over time, been expanded on a bespoke basis to accommodate the book printing works and is now unsuitable in terms of its layout and design for most industrial operations. Since Cox & Wyman vacated the building in April 2015 it has been let at an almost nil rent basis (10 pence/sq.ft), however there has been no significant interest to occupy the unit long term on normal market terms.

- 2.5 Beyond the residential and commercial uses adjacent to the site, to the north of Richfield Avenue is Rivermead Leisure Centre, two hotels, a restaurant and areas of open space alongside the River Thames. To the south and south east of the site is Reading town centre and the railway station which are approximately 10 minutes away by foot. The town centre offers a wide range of facilities and connectivity via bus and train to settlements beyond, including Caversham District Centre which is approximately 15 minutes on foot from the site.
- 2.6 As discussed further in this Statement and the accompanying Design and Access Statement, an opportunity exists to redevelop the site and rationalise the interface between the commercial and residential uses, and to provide new housing in a sustainable location on the edge of Reading town centre.

Planning History

- 2.7 According to Reading Borough Council's planning applications register, the site has been the subject of 7 previous planning applications, as follows:
- Application No. 170846: Request for screening opinion for proposed development at the former Cox & Wyman building (determined July 2017). Further details with respect to this application are set out in Section 3.0 of this Statement;
 - Application No. 111595: Repollard 2 no. Limes - permitted (determined March 2011);
 - Application No. 980185: Removal of existing metal gates, construct walls to replace gates - permitted (determined November 1998);
 - Application No. 940701: Demolition of plant room and store and the erection of new paper store and canopy; works to existing paper store façade and the closure of lorry fences; new lorry access onto Cardiff Road - permitted (determined December 1994);
 - Application No. 930257: Extension to printing works including additional office space over - permitted (determined April 1993);
 - Application No. 910931: Use for light engineering (knife and cutting tool sharpening) - refused (determined October 1991); and

- Application No. 880324: Proposed dormer to house part waste handling system – permitted (determined October 1988).

3.0 PRE-APPLICATION ADVICE

- 3.1 The application has been prepared in consultation with officers of Reading Borough Council (RBC) through the council's pre-application advice service. Thames Properties first met with RBC on 15th April 2015 to discuss their land interests within the wider Richfield Avenue area and the opportunities for future development. A formal pre-application submission with respect to the Cox & Wyman site was then submitted in March 2016 and a meeting with Officers held in May 2016 (RBC ref. 160485/PREAPP).
- 3.2 The first pre-application submission proposed 235 dwellings comprising a mixture of terraced housing, flats over garages (FOGs), townhouses and apartments, and ranging in height from four to six storeys. The housing mix was weighted towards 1 and 2 bed apartments with some family sized housing along the Cardiff Road frontage. RBC's Principal Officer Jonathan Markwell provided written pre-application advice in response to the proposals on 13th May 2016 setting out the Council's initial opposition to the proposed loss of an employment site in a Core Employment Area.
- 3.3 The response did however acknowledge that despite the Core Employment Area policy conflict, the existing building offered limited potential for other employment based uses and subject to an appropriately designed redevelopment and applying a critical planning balance, the council may be able to consider residential development on the site. With regard to the proposed design, RBC advised that the pre-application designs represented a gross over development of the site and a disproportionate number of smaller units.
- 3.4 Following the feedback received from RBC the proposals were significantly redesigned to accommodate fewer units, reduced building heights and a higher proportion of family-sized dwellings. The apartments proposed in the north-east corner of the site were replaced by terraced housing to better reflect the existing housing on Addison Road, and a row of double backed townhouses with a central green space were introduced. Revised proposals for 112 dwellings comprising houses and apartments were submitted in November 2016, and a meeting with officers was held on 22nd November 2016.

- 3.5 A formal written response to the second set of pre-application proposals was provided by the Council, on 31st January 2017 (RBC ref. 162145/PREAPP). Importantly, the response noted that the council had no objection to the loss of the existing building on site as it was acknowledged that the bespoke design of the building would render its refurbishment for industrial or office use unviable. RBC advised at this point that the Applicant would need to provide justification for a solely residential scheme that did not incorporate an element of commercial use.
- 3.6 Whilst the second set of proposals had made significant progress with RBC in terms of the acceptability of the design, the Case Officer continued to raise concerns with regard to the density of development; the amount of open space and private amenity space; the treatment of the north-west corner of the site; the height of the apartments in the north west of the site; the removal of TPO trees; and the street scene of the central road within the site.
- 3.7 The Applicant subsequently amended the scheme design to respond to the comments raised by RBC in their letter dated 31st January 2017. The third revision to the proposals resulted in the following key changes:
- A reduction in the number of dwellings from 112 to 96, comprising a 50:50 split of houses and apartments;
 - A reduction in the site density from 85.5dph to 73.3dph;
 - The relocation of the apartments in the north-west corner of the site to 6 metres away from the boundary to create a green buffer between the site and existing commercial units to the north and west. This area features additional tree planting and opportunity for the creation of a community orchard;
 - A reduction in the massing and height in the four-storey apartment block to 3 storeys with a setback fourth storey to articulate the form;
 - Increased private amenity space for urban houses with private balconies and roof terraces;
 - The retention of all TPO trees and adjustments to dwellings on the Addison Road frontage to respect their root protection areas; and
 - The redesign of the house types and apartment elevations on the internal site road to provide an active frontage with natural surveillance over public spaces.

- 3.8 Following the submission of a third pre-application scheme on 14th February 2017, a further meeting with RBC took place on 28th February and a written response was received from the Case Officer on 7th March 2017 (RBC ref. 162145/PREAPP II) reiterating the acceptance of the loss of the building and setting out further considerations for amending the scheme design. The comments have been taken into account and reflected in the latest proposals submitted as part of this application.
- 3.9 During the third stage of pre-application discussions a response was received from the Council's Noise and Environmental Health Officers with regard to the nearby railway station depot and the potential for low frequency noise emissions from idling trains to have a detrimental impact on future residents. A meeting subsequently took place on 4th May 2017 between the Applicant, their acoustic consultant and the RBC Officers to discuss the proposals; the ways in which to assess the potential impact; and likely mitigation.
- 3.10 RBC's Officers agreed that low frequency noise is complex to assess and could not confirm a standard methodology for its measurement. RBC did however advise that the Applicant should consider revising the internal layout of properties along the Cardiff Road frontage to ensure that occupiers were not affected by the noise of idling trains at night time. The layout of the affected properties has been amended as a result and the application is supported by a detailed Environmental Noise Assessment.

Community Engagement

- 3.11 Given the likely widespread interest in the proposals and the prominence of the site within the local area, the Applicant has been committed to undertaking widespread consultation with all key stakeholders prior to submitting a planning application, including local politicians (local ward members for Abbey ward), the Bell Tower Community Association (BTCA), local residents in proximity to the site and the local media (Reading Chronicle and GetReading website).
- 3.12 Prior to engaging with the wider community, it was considered appropriate to brief the local ward members for Abbey ward. Dialogue was undertaken with the three ward members, who advised that the Applicant should engage with the BTCA. All three ward members were invited to attend a presentation being delivered to BTCA at a meeting held on 30th May 2017.

- 3.13 A crucial part of the pre-submission consultation was ensuring that all residents and businesses situated in close proximity to the site were notified of the proposals and provided with an opportunity to comment on the scheme. A large-scale mailing was issued to 615 local properties notifying them of a public exhibition that would be held on 10th July 2017 to display the latest site proposals and provide an opportunity for the public to comment.
- 3.14 The public exhibition was held at Reading Deaf Centre on Cardiff Road situated opposite the site. In total, 47 people attended the event which took place between 3pm and 8pm. Seven information boards were displayed at the event which detailed a range of information about the scheme including a background to the proposals; the pre-application discussions with RBC; the site opportunities and constraints; details of the proposed development and next steps.
- 3.15 The feedback received from the exhibition and from the BTCA meeting was very positive, particularly with regard to the opportunity to redevelop and enhance the site. Several concerns were raised with regard to existing parking issues on the surrounding roads however it was clarified to those members of the public that sufficient parking would be provided as part of the proposals to ensure that the proposed development does not exacerbate this existing issue. A full summary of the feedback received is set out within the Report of Community Engagement accompanying the application.

4.0 THE PROPOSED DEVELOPMENT

4.1 The description of development for which full planning permission is sought is as follows:

“Demolition of existing site buildings and boundary treatments and erection of 96 no. dwellings including associated surface car parking, public realm and landscaping on land at the former Cox & Wyman building, Cardiff Road, Reading.”

4.2 The proposed development would comprise the erection of 96 dwellings, as described in detail below. The Design and Access Statement submitted with the application illustrates the principles for how the site would be developed. The application is also supported by a proposed Site Plan (reference A-PP-P10-01) and the full list of drawings listed under Section 1.0 of this statement.

Layout and Form

4.3 The layout of the development and proposed house types has been informed by the site context, particularly the existing terraced housing opposite the site on Cardiff Road and Addison Road. The proposed building types change from terraced family homes to the south and east of the site to the row of street facing townhouses to the north of the central green space, and on to the apartment buildings to the north-west of the site facing the edge of the Core Employment Area.

4.4 The proposed dwellings fronting onto Cardiff Road and Addison Road aim to mirror the existing terraced housing opposite. However, as set out at Section 5.3 of the Design and Access Statement, these existing residential developments, whilst strong and distinctive, have shortcomings in terms of a lack of car and cycle parking, bin storage provision and street trees/soft landscaping. The proposed terraced houses seek to overcome the shortcomings with a range of design measures to create a more contemporary development. These dwellings will provide family sized terraced housing with private amenity space and garages to the rear; and for some of the terraced units - a home-office unit above the garage space.

4.5 Centrally located within the site are proposed townhouses with private outdoor amenity space provided at each level and a large roof terrace. To the west of the townhouses are proposed apartments in two separate blocks of 3 storeys with a stepped back fourth storey. The house types are illustrated in more detail in Section 5 of the Design and Access Statement.

- 4.6 The access within the site runs from east to west, and utilises the existing carriageway crossing on Addison Road and the existing entrance in this location to the site. This route creates a central spine which organises the proposals around a centrally paved square and a proposed Green space. Within this green space is a children's play area that will be accessible to both future and existing residents.
- 4.7 The application is supported by an existing and proposed site plan (drawing references A-PP-E10-04 and A-PP-P10-01) which illustrate the layout in more detail. Individual house type drawings for the terraced houses and townhouses are also submitted, as well as elevation drawings of the apartment blocks.

Housing Mix and Affordable Housing

- 4.8 In total, 96 residential units are proposed for the site, with a mix of one, two and three-bedroom units. Of the 96 dwellings, a 50:50 split of houses and apartments is proposed and over half of all dwellings (over 50%) will be three bedroom. RBC's pre-application response dated 7th March 2017 acknowledged that this proportion of 3 bed dwellings complies with the council's planning policy position.
- 4.9 The proposed development will provide 30% of the total number of dwellings as affordable housing to include 1, 2 and 3 bed dwellings. In total, this equates to 67 market dwellings (70%) and 29 affordable dwellings. The distribution of affordable housing within the site will be confirmed through further discussion with RBC's Officers.
- 4.10 The proposed breakdown of dwelling size is set out in Table 1.1 below:

Table 1.1 - Proposed Dwelling Sizes

Unit Type					
Studio	1 bed	2 bed	3 bed	4 bed	Total units
0	19	21	56	0	96
0%	20%	22%	58%	0%	100%

*Based on the development of 96 dwellings.

Density

- 4.11 The proposed development comprises 96 dwellings over a site area of 1.31ha, equating to a density of 73.3 dwellings per hectare (dph). This is a lower density than the existing residential development opposite the site on Addison Road which typically represents a density of 99 dph (page 77 of the Design and Access Statement).
- 4.12 An appropriate density of development has been reached following the advice received from RBC during the pre-application process regarding the quantum and height of development and the provision of public open space within the site. The density of 73.3 dph compared to 99 dph opposite the site ensures that dwellings are provided with good levels of private amenity space whilst still reflecting the tight design of Victorian housing within the vicinity.

Building Heights

- 4.13 The proposed building heights across the site will vary to ensure that the taller buildings are set to the rear of the site away from neighbouring dwellings and closer to the commercial units to the north and west. The terraced housing will be 2-2.5 storeys in height; the townhouses will be 3-3.5 storeys; and the apartments will be 3 storeys with a stepped back 4th storey to reduce the visual massing.

Open Space

- 4.14 Green spaces are provided within the site to provide opportunities for recreation and enjoyment by future residents and members of the local community. In the centre of the site is a proposed Local Area of Play (LAP) integrated with appropriate landscape features and enclosed with an evergreen hedge and railings. The LAP has been designed specifically for use by younger children (under 6) and will be accessible to residents of the site and the local community. The LAP is centrally located on a pedestrian route through the site and serves as a green 'heart' to the scheme.
- 4.15 In the north-west corner of the site, development has been stepped back from the boundary to create a landscaped corner to the site containing new tree planting, hedging and a low-level wall with railings along the boundary. This serves as a green buffer to separate the new residential development from existing commercial uses to the north and west of the site whilst providing further open space for local residents to enjoy.

- 4.16 Development has also been stepped back from the north-eastern corner and Addison road frontage to respect the root protection areas of existing TPO trees and create an attractive green wedge along the Addison Road frontage. Again, this serves as an area of open space for use by existing and future residents. Section 6.1 of the Design and Access Statement sets out the landscape strategy and proposals for open space and additional tree planting within the site in more detail.

Private Amenity Space

- 4.17 There are 34 terraced houses proposed, all of which will have gardens of at least 10m in depth, a privacy fence panel closest to the property and a 1.2m fence panel enclosing private rear gardens.
- 4.18 There are 14 townhouses which are provided with private outdoor space at each level of the dwelling. The private amenity space provided is equal to the footprint of the dwelling. The design of these houses has been carefully considered to provide an environment suitable for contemporary urban living. The apartments are proposed to have a shared outdoor amenity courtyard over the ground floor parking area, balconies and upper level roof terraces.

Access and Movement

- 4.19 The existing points of access into the Application site are located on Cardiff Road to the south, Addison Road to the east and Meadow Road to the north. An on-street loading bay also exists on Meadow Road adjacent to the site and was previously used in connection with the Cox & Wyman works.
- 4.20 As part of the proposed redevelopment of the site, a new east/west access road will connect Addison Road and Milford Road through the site, utilising the existing access on Addison Road and creating a new access on Milford Road. The redundant points of access on Cardiff Road and Meadow Road will be 'made good' and reinstated as footway.
- 4.21 The points of ingress and egress to the proposed development for vehicles will therefore be from Addison Road and Milford Road only. It is intended that this access and service road will provide access for service, refuse & fire vehicles.

- 4.22 In terms of pedestrian connectivity, the site is well located on the edge of Reading town centre and there are footways and controlled crossings in proximity to the site to facilitate pedestrian access to the town centre and railway station. The Transport Statement accompanying the application provides further detail in relation to connectivity (Section 3).
- 4.23 In terms of cycle connectivity, the site is located within Reading Cycle Map 'R5 West Reading' where Cardiff Road is identified as an 'on-road cycle route – traffic calmed or quiet residential road'. The Cardiff Road on-road connects to the north to Route R40 at Church Street and National Cycle Path 5; to the southwest to Richfield Avenue and Cow Lane providing access to Route R5 which runs to Tilehurst Station; and to the east to Reading station where there is cycle parking for more than 600 bicycles.
- 4.24 This application is accompanied by a Design and Access Statement which provides an overview of the access and movement associated with the site, at Section 2.8. A comprehensive Transport Statement and Travel Plan are also submitted which detail the rationale behind providing the access and road network. Transport and Access is considered in more detail under Section 8.0 of this statement.
- 4.25 As set out above in Section 2, the site also benefits from excellent public transport connections. The closest northbound and southbound bus stops on Caversham Road approximately 350m north east of the site are served by 12 bus routes. There are also bus stops located on Caversham Road approximately 450m east of the site which are served by a further 5 bus routes. These routes provide access to destinations including Reading town centre (including the train station), Tilehurst, Southcote and Caversham.
- 4.26 Reading train station is located approximately 1km east of the site in the town centre providing frequent services stations such as London Paddington, Oxford and Bristol Temple Meads.

Parking

- 4.27 In total, 121 on-site car parking spaces will be provided for the 96 dwellings. The development proposes 2 spaces per dwelling for the 48 three-bedroom town houses which is up to the maximum allowable according to RBC's parking standards. Of the 121 provided there are 28 parking spaces within the courtyard for the flats. The 10 three-bedroom flats would each be allocated a parking space, which would offer 18 spaces for the remaining 28 one and two-bedroom flats, representing a parking ratio of 0.64 spaces per dwelling.

- 4.28 The existing loading bay on Meadow Road has the potential to be converted into 11 shared use parking spaces, which has been discussed and agreed in principle with the Transport Officer at the Council. The loading bay was originally provided to assist the Cox & Wyman Works but more recently has been used by the business on the opposite side of Meadow Road. It is understood that the business is due to leave the premises and therefore there will be no need to retain a dedicated loading bay. It was also agreed in principle that the visitor parking requirement would be mitigated by an increase in shared use spaces.
- 4.29 A total of 126 cycle parking spaces will be provided in accordance with the Council's minimum standards per dwelling in Zone 2 locations. A cycle store with Sheffield stands or similar will be provided at ground level for the apartment block; for the majority of terraced houses that front onto Cardiff Road it is proposed that bikes are stored in the garages; and for the townhouses, bikes will be stored in bike lockers in the front gardens of the properties.
- 4.30 Further details regarding parking provision are provided in the Transport Statement accompanying the application (paragraphs 5.7-5.17).

Landscaping

- 4.31 The site is industrial in its nature and the existing use presents few landscaping and tree planting opportunities. The redevelopment of the site therefore presents an excellent opportunity for the creation of a new, high-quality residential scheme with an integrated landscape strategy to greatly enhance the setting of the site and the wider public realm in this key location on the edge of Reading town centre.
- 4.32 A tree survey has been undertaken for the site to record the trees on the boundary edges, including some recently planted trees inside the eastern site boundary. The site is subject to TPO notice 21/14 (dated 17th April 2014) which includes 10 trees on the eastern boundary and comprises 3 mature trees and 7 younger trees.
- 4.33 As illustrated in the landscape strategy in the Design and Access Statement (Section 6) and in the landscape masterplan (drawing L-02), the proposals have sought to respect the root protection areas of the trees on the Addison Road frontage by creating a green wedge in the north-east corner of the site. Additional tree planting is proposed at ground level in the form of street trees and within communal roof gardens in planting beds.

- 4.34 In terms of hard landscaping, a variety of materials are proposed to reflect the hierarchy of spaces whether shared surface, private driveways, pedestrian routes, communal areas, entrance and access paths and interfaces with proposed and existing key areas. The strategy also seeks to incorporate architectural elements of the existing Cox & Wyman building into the new development on the entrance to the site at Addison Road. This will include reference to the finials found on the gable ends of the existing buildings, and will be picked up within two dwarf brick walls with piers and topped with the retained finials removed from the existing buildings.
- 4.35 As set out above, pockets of open space are proposed throughout the site with a centrally located and carefully landscaped LAP. Further details regarding the landscape strategy may be found in Section 6 of the Design and Access Statement and accompanying drawings L-01 to L-04-1 and L-04-2.

Surface Water Drainage

- 4.36 The site is located in Flood Zone 1 on a 'dry island' surrounded by Flood Zone 2, which is defined by the Environment Agency as having a 0.1%-1% change of flooding from a river each year. The Flood Risk Assessment (FRA) accompanying the application sets out that the existing risk of surface water flooding is low.
- 4.37 The existing site is predominantly hardstanding, comprising warehouses, concrete paved surfaces and a small amount of soft landscaping, the majority of which is impermeable. The proposed drainage strategy therefore aims to improve the existing position and consider future effects of climate change over the lifetime of the development.
- 4.38 As part of the redevelopment of the site, sustainable urban drainage in the form of porous block paving and green roofs will form part of the proposed drainage system. Green roofs are proposed on four of the garage roofs on the southern terraced-housing. A green roof type construction is also proposed over the basement car park in the building complex in the north west of the site. Porous paving is proposed for all car parking and vehicular access roads.
- 4.39 Further details regarding the existing flood risk and surface water drainage features proposed are provided with the FRA and SUDS Assessment accompanying the application, and within the landscape strategy on page 90 of the Design and Access Statement.

Sustainable Construction

- 4.40 The proposed development will meet with the requirements of nationally described standards for sustainable construction, as required by Building Regulations. This takes into account the Government's Technical Housing Standards Review which was published in March 2015.

Utilities Infrastructure

- 4.41 Preliminary investigations undertaken by the applicant indicate that there are no services or utilities within the site which present a constraint, except for an electricity substation which is proposed to be relocated on site as part of the proposals. Connections to water, gas, electricity and telecommunications services would be made as part of the proposed development. The existing site services drawing illustrates existing services lining the perimeter of the site.
- 4.42 The substation is currently located on the Cardiff Road frontage. To ensure that the proposed terraced housing on Cardiff Road can run the entire length of the frontage, the sub-station will be relocated to the north of the site opposite Meadow Road on a 4m x 4m parcel.

Planning Obligations

- 4.43 In addition to the provision of affordable housing, open space maintenance costs, any off-site highway works and other obligations which may need to be secured through a legal agreement, the Development will also be liable for Community Infrastructure Levy (CIL) costs. RBC's CIL Charging Schedule (adopted February 2016) applies a rate of £120 per sqm to residential development in this location which will be secured following the grant of planning permission. A completed CIL form is submitted with this application.
- 4.44 As part of the pre-application process it was advised that the proposed development will be required to contribute towards training for employment in accordance with the Council's Employment Skills and Training SPD. It is anticipated that the Employment Skills and Training Plan, or any alternative financial contribution, will be secured through a S106 agreement.

5.0 NATIONAL PLANNING POLICY CONTEXT

5.1 Relevant National Planning Guidance is found in the National Planning Policy Framework (NPPF), which came into force on 27th March 2012. Paragraph 11 reinforces the fact that planning law requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF replaces all previous national planning guidance set out in various Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) documents. It also replaces Circular 05/2005: Planning Obligations.

5.2 Sections of the NPPF of relevance in this instance include (paragraph numbers in brackets):

Achieving Sustainable Development:

- The Presumption in Favour of Sustainable Development (paragraphs 11-16)
- Core Planning Principles (paragraph 17)
- Delivering Sustainable Development
 - Promoting sustainable transport (paragraphs 29-41)
 - Delivering a wide choice of high quality homes (paragraphs 47-55)
 - Requiring good design (paragraphs 56-68)
 - Promoting healthy communities (paragraphs 69-78)
 - Meeting the challenge of climate change, flooding, and coastal change (paragraphs 93-108)
 - Conserving and enhancing the natural environment (paragraphs 109-125)
 - Conserving and enhancing the historic environment (paragraphs 126-141)

Decision Taking:

- Pre-application engagement and front loading (paragraphs 188-195)
- Determining applications (paragraphs 196-198)
- Planning conditions and application (paragraphs 203-206)

Annex 1:

- Implementation.

Implementation of the NPPF

5.3 Implementation section of the NPPF, which is found at Annex 1, confirms that:

'The National Planning Policy Framework aims to strengthen local decision making and reinforce the importance of up to date plans.'

- 5.4 Paragraph 210 repeats the guidance at paragraph 11 of the document that, in accordance with planning law¹, applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 212 states that:

'For the purposes of decision-taking, the policies in the Local Plan... should not be considered out of date simply because they were adopted prior to the publication of this Framework.'

- 5.5 Paragraph 214 advises that:

'For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004, even if there is a limited degree of conflict with this Framework.'

- 5.6 Decision-takers are advised that from the date of publication of the NPPF they may also give weight to: relevant policies in emerging plans according to the stage of preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging plan with the policies in the Framework.

- 5.7 Paragraph 218 of the NPPF confirms at footnote 41 that:

'Regional strategies remain a part of the development plan until they are abolished by Order using powers taken in the Localism Act. It is the government's clear policy intention to revoke the regional strategies outside of London, subject to the outcome of environmental assessments that are currently being undertaken.'

- 5.8 Accordingly, in accordance with NPPF guidance regarding implementation at Annex 1 and Section 38(6) of the PCPA 2004, the application proposals fall to be assessed against:

1. The development plan: that is, the RBC LDF Core Strategy (adopted 2008, altered 2015); and the Sites and Detailed Policies Document (adopted 2012, altered 2012).
2. The policies in the NPPF, as a material consideration.

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990

Achieving Sustainable Development

The Presumption in Favour of Sustainable Development

- 5.9 As already established, paragraph 11 of the NPPF confirms that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 12 emphasises that the NPPF does not change the statutory basis of the development plan as the starting point for decision making. It advises that:

'Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise...'

- 5.10 The NPPF constitutes guidance for local planning authorities and decision makers as a material consideration when determining planning applications.

- 5.11 Paragraph 14 is important. It highlights the fact that at the heart of the NPPF is:

'...a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking'

- 5.12 For decision taking, unless material considerations indicate otherwise, this means:

- ***Approving development proposals that accord with the development plan without delay...***
- ***Where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless:***
 - ***Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or***
 - ***Specific policies in this Framework indicate development should be restricted.'***

Core Planning Principles

- 5.13 Paragraph 17 of the NPPF sets out 12 core land use planning principles that should underpin both plan-making and decision taking. The 12 principles are that planning should:

- Be genuinely plan led, empowering local people and providing a practical framework within which planning decisions can be made;

- Not simply be about scrutiny, but be a creative exercise in finding ways to improve and enhance the places within which people live their lives;
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- Take account of the different roles and character of different areas, promoting the vitality of main urban areas, protecting the Green Belt, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- Support the transition to a low carbon future in a changing climate;
- Contribute to conserving and enhancing the natural environment and reducing pollution;
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value;
- Promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- Conserve heritage assets in a manner appropriate to their significance;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling; and
- Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Delivering Sustainable Development

Promoting Sustainable Transport

5.14 Sub section 4 of the Delivering Sustainable Development part of the NPPF deals with the promotion of sustainable transport.

5.15 Paragraph 29 explains that there is a need to give people a 'real choice' about how they travel; however:

'...the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport measures will vary from urban to rural areas.'

5.16 Paragraph 32 requires all developments that generate 'significant' amounts of movement to be supported by a Transport Statement or a Transport Assessment. Decisions should take account of the opportunities that have been taken for sustainable transport modes, having regard to the nature and location of the site; whether safe and suitable access to the site can be achieved for all people; and whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the developments. The NPPF confirms that development should only be refused on transport grounds where the residual cumulative impacts of development are severe.

5.17 Paragraph 35 advises that developments should be located and designed where practical to, inter alia:

'...give priority to pedestrian and cycle movements, and have access to high quality public transport facilities'

As well as considering

'...the needs of people with disabilities by all modes of transport.'

Delivering a Wide Choice of High Quality Homes

5.18 Sub section 6 of the Delivering Sustainable Development part of the NPPF deals with the need to deliver a wide choice of high quality homes.

- 5.19 Paragraph 47 states that to “boost significantly the supply of housing”, local planning authorities should, inter alia:

“use their evidence base to ensure that their Local Plans meets the full, objectively assessed needs for market and affordable housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;”

- 5.20 Paragraph 49 advises that housing applications should:

‘... be considered in the context of the presumption in favour of sustainable development...’

- 5.21 Paragraph 50 states, inter alia, that in order to deliver a wide choice of high quality homes, widen opportunity for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

‘where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of a broadly equivalent value can be robustly justified... and the agreed approach contributes to the objective of creating mixed and balanced communities.’

Requiring Good Design

- 5.22 Sub section 7 of the Delivering Sustainable Development aspect of the NPPF addresses design.
- 5.23 Paragraph 56 states:

‘The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’

5.24 Paragraph 57 emphasises the importance of achieving high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes.

5.25 Paragraph 60 advises that planning decisions:

'...should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'

5.26 Paragraph 61 acknowledges that the visual appearance and architecture of individual buildings are important factors but confirms that:

'...securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.'

Promoting Healthy Communities

5.27 Sub section 8 of Delivering Sustainable Development explains how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

5.28 Paragraph 69 states that planning decisions should, inter alia, aim to achieve places which promote:

'...safe and accessible developments, containing clear and legible pedestrian routes, which encourage the active and continual use of public areas.'

Conserving and Enhancing the Natural Environment

5.29 Sub section 11 of Delivering Sustainable Development looks at how the planning system should contribute to and enhance the natural and local environment.

5.30 Paragraph 103 advises that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. Development should only be considered appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test and Exceptions Test, it can be demonstrated that a sequential approach to the location of development within the site has been adopted and that the development is appropriately flood resilient and resistant.

5.31 Paragraph 109 states that it should do this by, inter alia:

'protecting and enhancing valued landscapes, geological conservation interests and soils;

recognising the wider benefits of ecosystem services;

minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

preventing both new and existing development from contributing to or being put at an unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;'

5.32 Paragraph 111 encourages the effective use of land by re-using land that has been previously developed (brownfield land).

5.33 Paragraph 125 states that:

'By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark spaces and nature conservation.'

Decision Taking

Pre- Application Engagement and Front Loading

5.34 Paragraph 188 encourages good quality pre-application discussion, advising that this enables better coordination between public and private resources and improved outcomes for the community.

- 5.35 Paragraph 189 advises that local planning authorities cannot require that a developer engages with them before submitting a planning application, but they should encourage the take up of any pre-application services they do offer.

Determining Applications

- 5.36 Paragraph 196 confirms the role of the NPPF as a material consideration in planning decisions. Paragraph 197 states that:

'In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.'

Planning Conditions and Obligations

- 5.37 Paragraph 203 states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations; planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 5.38 Paragraph 204 echoes the content of Circular 05/2005, now replaced, which states that planning obligations should only be sought where they are necessary, directly related to the development and fairly and reasonably related in scale and kind to the development.
- 5.39 Paragraph 205 advises local planning authorities to take account of market conditions over time when seeking or revising planning obligations; they should be 'sufficiently flexible' to prevent planned development being stalled. Paragraph 206 confirms that conditions should only be applied where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

6.0 THE LOCAL PLANNING POLICIES

RBC Local Plan Policies

- 6.1 The legislative framework for consideration of this application is provided by the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004.

Section 38 (6) of the 2004 Act states that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

Section 70(2) of the Town and Country Planning Act 1990 states also that in the determination of applications:

"The Authority shall have regard to the provisions of a development plan, so far as material to the application, and to any other material consideration."

- 6.2 The Development Plan in this instance comprises the Reading Borough Local Development Framework Core Strategy (adopted 2008, altered 2015) and the Reading Borough Local Development Framework Sites and Detailed Policies document (adopted 2012, altered 2015). RBC is currently preparing a new Local Plan 2036 which will set out how development will be planned and delivered across Reading Borough to 2036.

Reading Borough Council Core Strategy (Adopted 2008, Altered 2015)

- 6.3 The policies contained in the Core Strategy that are relevant to the consideration of this application are as follows:

- CS1 (Sustainable Construction and Design)
- CS2 (Waste Minimisation)
- CS7 (Design and the Public Realm)
- CS9 (Infrastructure, Services, Resources and Amenities)
- CS10 (Location of Employment Development)
- CS11 (Use of Land for Alternative Uses)
- CS14 (Provision of Housing)
- CS15 (Location, Accessibility, Density and Housing Mix)

- CS16 (Affordable Housing) including update to policy, 2015
- CS22 (Transport Assessments)
- CS23 (Sustainable Travel and Travel Plans)
- CS24 (Car/Cycle Parking)
- CS29 (Provision of Open Space)
- CS34 (Pollution and Water Resources)
- CS35 (Flooding)
- CS36 (Biodiversity and Geology)

- 6.4 Policy CS1 (Sustainable Construction and Design) requires design proposals for new buildings to use energy, water, minerals, materials and other natural resources appropriately and take account of the effects of climate change.
- 6.5 Policy CS2 (Waste Minimisation) requires development to incorporate measures to minimise the generation of waste and promote sustainable approaches to waste management.
- 6.6 Policy CS7 (Design and the Public Realm) requires that 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. Developments will be assessed, *inter alia*, to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness.
- 6.7 Policy CS10 (Location of Employment Development) states that other major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Areas.
- 6.8 Policy CS11 (Use of Employment Land for Alternative Uses) states that within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that result in the loss of such land will not be permitted.
- 6.9 Policy CS14 (Provision of Housing) states that provision will be made for the completion of an average of at least 477 dwellings for the period 2001-2006, 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026 in accordance with the Core Strategy spatial strategy.

- 6.10 Policy CS15 (Location, Accessibility, Density and Housing Mix) requires developments to provide an appropriate range of housing types, sizes and tenures, in accordance with the findings of the Housing market assessment. Net densities of below 30 dwellings per hectare will not be acceptable. The policy sets out indicative density ranges as follows (the site being located within an Urban area):

Town Centre	Urban	Accessible Urban	Less Accessible Urban
Above 70	40-75	35-55	30-50
Density Range (dwellings per hectare)			

- 6.11 Policy CS16 (Affordable Housing) required developments of 15 dwellings and above to provide 30% of the total number of dwellings as affordable housing.
- 6.12 Policy CS22 (Transport Assessments) states that planning permission will not be granted unless development proposals make appropriate provision for works and contribution to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development.
- 6.13 Policy CS23 (Sustainable Travel and Travel Plans) requires major development proposals to be accompanied by Travel Plan which commit to implement measures to promote and improve sustainable transport facilities.
- 6.14 Policy CS24 (Car/Cycle Parking) requires maximum car parking standards and cycle parking requirements to be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities.
- 6.15 Policy CS29 (Provision of Open Space) requires new provision of open space on residential sites of 50 dwellings or more. The provision of Children's Play Areas and Neighbourhood Recreation Areas should be made to ensure satisfactory levels of provision in the local area.

- 6.16 Policy CS34 (Pollution and Water Resources) states that development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution. Proposals for development that are sensitive to the effects of air, noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.
- 6.17 Policy CS35 (Flooding) sets out that planning permission will not be permitted for development in an area identified as being at high risk of flooding.
- 6.18 Policy CS36 (Biodiversity and Geology) requires development proposals to retain, protect and incorporate features of biodiversity or geological interest found within the application site into schemes.

Reading Borough Local Development Framework Sites and Detailed Policies Document (Adopted 2012, Altered 2015)

- 6.19 The policies contained the Sites and Detailed Policies document that are relevant to the consideration of this application are as follows:
- SD1 (Presumption in Favour of Sustainable Development)
 - DM4 (Safeguarding Amenity)
 - DM5 (Housing Mix)
 - DM10 (Private and Communal Outdoor Space)
 - DM12 (Access, Traffic and Highway-Related Matters)
 - DM16 (Provision of Open Space)
 - DM18 (Tree Planting)
 - DM19 (Air Quality)
 - SA8 (Other Sites for Housing Development)
 - SA12 (Core Employment Areas)
- 6.20 Policy SD1 (Presumption in Favour of Sustainable Development) sets out that the council will apply a positive approach to considering development proposals to reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework. In so doing, Policy SD1 seeks to achieve the core objectives of the Core Strategy.

- 6.21 Policy DM4 (Safeguarding Amenity) development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of:
- Privacy and overlooking;
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of a development;
 - Noise and disturbance;
 - Artificial lighting;
 - Vibration;
 - Dust and fumes;
 - Smell; or
 - Crime and safety.
- 6.22 Policy DM5 (Housing Mix) requires new developments of 10 or more dwellings outside the central area and defined district and local centres, to provide at least 50% of dwellings as 3 bedroom or more, and the majority of dwellings to be in the form of houses rather than flats.
- 6.23 Policy DM10 (Private and Communal Outdoor Space) requires dwellings to be provided with functional private or communal open space. Houses must be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.
- 6.24 Policy DM12 (Access, Traffic and Highway-Related Matters) states that in determining proposals involving a new or altered access onto the transport network, consideration will be given to the effect on safety, congestion and the environment.
- 6.25 Policy DM16 (Provision of Open Space) sets out that the amount and type of publicly accessible open space to be provided shall be as laid out in the most up-to-date Open Spaces Strategy.
- 6.26 Policy DM18 (Tree Planting) requires new developments to make provision for tree planting within the application site, or off-site in appropriate situations, to improve the level of tree coverage within the Borough and maintain and enhance the character and appearance of the area in which a site is located.
- 6.27 Policy DM19 (Air Quality) required development to have regard to the need to improve air quality and reduce the effects of poor air quality.

- 6.28 Policy SA12 (Core Employment Area) confirms the designation of the Richfield Avenue Core Employment Area (CEA) (ref SA12g). The corresponding proposals map illustrates the extent of the SA12g CEA designation, which includes the Cox & Wyman site.

Supplementary Planning Documents (SPD)

Parking Standards and Design SPD (October 2011)

- 6.29 The Revised Parking Standards and Design document is a Supplementary Planning Document (SPD) which was adopted in October 2011. It sets out the maximum car parking and minimum cycle parking requirements for developments. The document describes four zones of connectivity: the application site is located in Zone 2 (areas within a 2km walk from the centre of Reading).
- 6.30 The car parking and cycle parking standards per dwelling in Zone 2 locations is set out below:

Table 4.1: Reading Parking Standards per Dwelling (Zone 2)	
Unit Type	Maximum Parking Standards
Flat 1 - 2 beds	1 space
Flat 3 bed	1.5 spaces
Visitor parking (flats only)	0.1 space
House 1 bed	1 space
House 2 bed	1 space
House 3 bed	2 spaces

Affordable Housing SPD (July 2013)

- 6.31 The Affordable Housing SPD sets out at the forefront that applications for development containing residential development will be determined in accordance with Core Strategy Policy CS16 for sites providing 15 dwellings or more. As set out above, Policy CS16 requires the provision of 30% of the total number of dwellings in the form of affordable housing.

- 6.32 The SPD advises that under Policy CS16, on site provision of Affordable Housing is expected however in exceptional circumstances, the Council will consider provision on a surrogate site or sites.
- 6.33 The SPD further advises that new development include a range of and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs as indicated in the Berkshire Housing Market Assessment 2007 and the Berkshire Housing Need Assessment (2012). The SPD is therefore out of date as a more recent Berkshire Strategic Housing Market Assessment (SHMA) was undertaken in February 2016, and will be used as the basis to inform RBC's preferred mix of tenures for the site.

Emerging Draft Reading Borough Local Plan

- 6.34 RBC is in the process of preparing a new Local Plan to guide development within the borough to 2036. The latest version of the Draft Reading Borough Local Plan 2036 (Regulation 18 document) was consulted on in May 2017; the next stage of consultation on the emerging plan (Regulation 19 document) is expected in November 2017.
- 6.35 Draft Policy EM2 (Location of New Employment Development) of the emerging Local Plan deals with the location of new employment development and seeks to direct major employment uses to the A33 Corridor and the Core Employment Areas as shown on the proposals map. The policy does not define 'major employment uses' but does include industrial and storage and distribution uses. The Richfield Avenue CEA designation is carried forward in the Draft Local Plan under Policy EM2 and illustrated on the accompanying proposals map (site reference EM2g).
- 6.36 The new Draft Local Plan Proposals Map proposes a revised boundary to the Richfield Avenue CEA which removes the Cox & Wyman site from the area currently designated for employment use in the Sites and Detailed Policies Document and RBC's adopted Proposals Map. The revision to the CEA boundary results in the removal of three sites from the eastern edge of the CEA and their designation for redevelopment under Draft Policy WR3.
- 6.37 Draft Policy WR3a relates specifically to the 'Former Cox & Wyman Site, Cardiff Road' and proposes to it for allocate it for residential development of between 70 and 110 dwellings, with some scope for commercial use on the western edge. The draft policy states that development should:
- Take account of access restrictions on surrounding streets and ensure that residential access is generally separated from accesses to commercial areas;

- Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;
- Ensure appropriate separation or buffers between residential and industrial areas, to improve the relationship between the two uses in the local area;
- Avoid adverse effects on important trees including those protected by TPO along Addison Road;
- Address air quality impacts on residential use;
- Address noise impacts on residential use;
- Address any contamination on site;
- Address flood risk issues arising from a Flood Risk Assessment; and
- Ensure that development has no adverse effect on water quality.

- 6.38 Regarding the provision of housing, draft Policy H1 states that provision will be made within Reading Borough for at least an additional 15,134 homes (averaging 658 homes per annum) for the period 2013 to 2036.
- 6.39 Similarly to RBC's adopted planning policy position, the emerging Local Plan requires new residential development of over 10 dwellings to provide at least half of all development as 3-bedroom houses or greater, and 30% of the total number of dwellings as affordable housing.
- 6.40 The pre-submission draft of the emerging Local Plan is due to be published for consultation in November 2017. The Draft Local Plan is therefore at a relatively advanced stage in its preparation, but is yet to be submitted to the Secretary of State and tested by an Inspector at an Examination. The draft policies therefore should be regarded as carrying limited weight but are indicative of the Council's aspirations and direction for growth in the Borough.

7.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

- 7.1 This section of the Planning Statement assesses the scheme against the planning policy framework set out in Chapters 5-6 above. It also discusses other material considerations which should be taken into account in determining the application.

Principle of Development

- 7.2 Under RBC's adopted planning policy position, the application site is designated as part of the Richfield Avenue CEA by RBC's adopted Proposals Map and protected for further employment use by virtue of RBC's Core Strategy and Sites and Detailed Policies Document. Core Strategy Policy CS11 sets out a presumption against the loss of an employment use in this location and encourages proposals for major employment uses, including industrial, storage and distribution uses.
- 7.3 It is important to recognise that the Cox & Wyman business vacated the site in 2015 and since that time there has been no significant interest to occupy the unit long term on normal market terms. The report undertaken by Campbell Gordon titled 'Analysis of suitability for the current market' (November 2016) and submitted in support of the application advises that the building *'is highly unusual and was built and expanded on a bespoke basis by Cox and Wyman as a book printing works...The building is in very poor condition...The offices are extremely dated and extensively worn, and damaged from day to day usual wear and tear...The existing layout is inconsistent with the demands of the majority of modern occupiers'*
- 7.4 In terms of letting prospects, the report confirms that *'The property's age, location, layout, size, specification and condition are not suitable for the demands of the current market, and it is therefore highly unlikely to attract a tenant on a normal commercial basis...it is unsuited to modern industrial processes...the age of the building means it is in a very poor state of repair.'* Whilst the building has been actively marketed by Sharps Commercial since Cox and Wyman vacated in April 2015, it has been let at an almost nil rent basis (10 pence/sq.ft) in order to mitigate business rates and security costs.
- 7.5 Whilst there are circumstances where it is important to protect and retain existing employment sites within the Borough, the current planning policy designation fails to take account of – or allow a flexible response to - circumstances such as the fact that the former Cox & Wyman building is a vacant industrial building which has become obsolete due to its bespoke design. Moreover, the policy position fails to assess the suitability of

the CEAs to accommodate the types of business that the Core Strategy seeks to retain. For example, in the case of the Richfield Avenue CEA there has been a trend over recent years for industrial and warehousing businesses to relocate away from the more traditional employment sites close to town centres, to locations that are more accessible to strategic highways networks, which are often out of town.

- 7.6 The site is clearly no longer fit for purpose and could be put into more sustainable use on what is plainly a highly accessible brownfield site in close proximity to Reading town centre. Given the site's location on the edge of what is currently the Richfield CEA designation and adjoining residential development to the east and south, and commercial development to the north and west, the redevelopment of the site presents an excellent opportunity to facilitate a clearer demarcation between the employment and residential uses.
- 7.7 As per the current boundary of the Richfield Avenue CEA, existing residents on Cardiff Road and Addison Road are located directly opposite the employment area and some houses on Cardiff Road are almost entirely surrounded by employment uses, with other houses backing closely on to employment uses. Redevelopment of the Cox and Wyman site on the edge of the CEA clearly presents an obvious opportunity to resolve these conflicts and create an appropriate transition between the residential and employment uses, as illustrated by the site layout accompanying this application.
- 7.8 This direction of growth and aspiration for the future of the site has been supported in pre-application discussions with RBC's Officers and is reflected in the council's emerging Draft Local Plan. In terms of pre-application discussions, the written pre-application response received from RBC on 31st January 2017 set out that the council has '*no objection to the loss of the existing building on site as it is acknowledged that due to the bespoke design, refurbishment for industrial or office use is not viable. It is also acknowledged that there are constraints to some forms of replacement employment use due to the proximity of the site to existing residential properties.*'
- 7.9 In terms of RBC's aspirations for the future of the site, the Spatial Strategy contained in the emerging Draft Local Plan sets out the strategy for existing employment areas and recognises that whilst a high level of need has been identified for new floorspace for employment development (paragraph 3.2.10), there is tension between maximizing the efficiency of existing employment areas to fulfil this role and identifying existing employment areas that are failing to meet the demand:

‘...as an exception, there are some specific areas where there is some potential for residential use, in particular where the current uses are not ‘pure’ employment uses, where there is a difficult relationship with residential land that could be better addressed through development, or where there is little prospect of employment use in the long term. Areas around Manor Farm Road...and at the eastern edge of the Richfield Avenue area are the main opportunities.’

- 7.10 Those ‘opportunities’ are translated into Draft Local Plan policies WR3a (Former Cox & Wyman site), WR3b (2 Ross Road and Part of Meadow Road) and WR3c (28-30 Richfield Avenue) which fall within the overarching Policy WR3 ‘Other Sites for Development in West Reading and Tilehurst’ Policy. Draft Policy WR3a in particular proposes that the former Cox & Wyman site is redeveloped for between 70 and 110 dwellings and allows for a degree of commercial use on the site.

Housing Need

- 7.11 The supporting text Draft Policy WR3 sets out that the sites identified for residential development will not only help to regenerate underused or vacant sites, but will importantly provide much needed housing to contribute to meeting the housing needs of the Borough (paragraph 7.3.12). Draft Policy H1 sets out that provision will be made within Reading Borough for at least an additional 15,132 homes (averaging 658 homes per annum) for the period 2013 to 2036. Having regard to the OAHN identified in the Berkshire SHMA (2016) of 699 dpa, this presents a shortfall of 943 dwellings over the Plan period.
- 7.12 One of the Core Planning Principles of the NPPF seeks to encourage the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. Moreover, NPPF paragraph 111 encourages planning policies and decisions to support the re-use of land that has been previously developed (brownfield land). The former Cox & Wyman site is a previously developed brownfield site which is failing to attract an occupier for its current use and is appropriately located adjacent to existing residential development.
- 7.13 Given the pressing need for new housing in Reading and the limited availability of sites for redevelopment within the Borough boundary, the redevelopment of the site for housing seems entirely appropriate, and indeed consistent with national guidance to direct development to brownfield sites and identify specific sites for all types of housing to meet their anticipated housing requirement. In addition, the fact that the Draft Local Plan envisages that the site could be delivered within the short-medium term of the Local

Plan period, i.e. 2016-2026 suggests that RBC strongly supports residential development on the site to contribute to its housing need.

Land Use

- 7.14 Draft Policy WR3a states that the site will comprise *'Development for residential, with potential for commercial uses on the western edge of the site'*. This implies that RBC's priority for the site is redevelopment for residential use, but the *'potential'* for commercial use suggests that this will not be required by policy but would be considered by RBC if demonstrated to be appropriate in future, given the site's location adjacent to an employment area.
- 7.15 The site comprises an island that is bound on all four sides by roads which physically separate it from surrounding buildings and uses. It is therefore well suited to accommodate a solely residential development that is detached from the CEA and wholly self-contained. It is not considered that the inclusion of commercial uses on the western edge of the site will enhance the overall scheme or assist in improving the transition between residential uses and the adjacent CEA to benefit future residents; no explanation is provided in the Draft Local Plan to justify why this is included within the policy wording.
- 7.16 Moreover, there is limited demand for small scale commercial units in this location. Should a small commercial unit be integrated into the residential development and remain vacant for an extended period due to lack of demand (which might in part be due to its location on the edge of a housing site) this could potentially have a detrimental impact on the appearance of the site as whole. The infrastructure required to facilitate a commercial unit might also have a negative impact on the residential environment sought to be created.
- 7.17 As illustrated in the site layout, a careful masterplanning exercise has been undertaken to redevelop the site into an attractive, contained residential development and create a clear demarcation between surrounding existing employment and residential uses. The addition of a commercial/employment unit on the site would only serve to dilute this demarcation and extend the edge of the employment area.

Density, Housing Mix, Affordable Housing

- 7.18 The proposed scheme is for 96 units. This is within the appropriate density for an Urban site as stated in Policy CS15 at 40-75 dwellings per hectare. For this site at 1.31ha, this represents a range between 52 and 98 dwellings: 96 dwellings on a 1.31ha site equates to an appropriate density of 73.3 dph.
- 7.19 In comparison, existing residential development to the east of the site behind Addison Road as illustrated on page 75 of the Design and Access Statement is on average, 99dph. Whilst the proposed development is less dense, in accordance with Policy CS15 it is an appropriate density for an urban location.
- 7.20 The proposed development comprises a mix of one, two and three-bedroom units over a 50:50 split of houses and apartments, and over half of all dwellings (over 50%) will be three bedroom (as set out in table 1.1, above). RBC's pre-application response dated 7th March 2017 acknowledged that this proportion of 3 bed dwellings complies with the council's planning policy position.
- 7.21 The proposed mix seeks to accord with the findings of the Berkshire SHMA 2016 and advice received from RBC Officers during pre-application discussions. The proposed development will provide 30% of the total number of dwellings as affordable housing to include 1, 2 and 3 bed dwellings. In total, this equates to 67 market dwellings (70%) and 29 affordable dwellings (30%). The distribution of affordable housing within the site will be confirmed through further discussion with RBC's Officers.
- 7.22 In summary, the development proposal would provide an appropriate housing mix and level of affordable housing, in accordance with the Policies CS15, CS16 and DM5.

Design Principles

- 7.23 The Design and Access Statement accompanying this application provides an analysis of the Site and its surroundings which then underpins the masterplan principles for the proposed development.
- 7.24 The proposed development has been informed by and is consistent with the relevant design policies for RBC in terms of land use, density, access and movement, and green infrastructure.

Height, Scale and Massing

- 7.25 The new buildings are designed to mediate in form, scale, use, design and materials between the existing brick terraced houses along Cardiff Road and Addison Road and the immediate context of the industrial estate with its larger building types and road and public space designed around large vehicles rather than pedestrians, cyclists and family vehicles.
- 7.26 As set out above, the building heights across the site will vary from 2-2.5 storeys to 4 storeys, with the tallest building (the apartment blocks) deliberately set back in the north-west corner of the site furthest away from surrounding residential development and closer to the edge of the CEA. The principle of development is for the proposed scheme to negotiate the transition in scale between the existing terraced family houses to the south and east of the site and the larger scale employment uses buildings in the CEA.
- 7.27 In order to integrate the proposals successfully into the context, the new buildings are designed to match the adjacent scale, with terraced housing mirroring the terraced housing surrounding the site, and the larger townhouse and apartment blocks located to the parts of the site that are bound by employment uses.
- 7.28 Some of the larger commercial units in the Richfield Avenue CEA range from 3-4 storeys and up to 16m in height. The apartments are proposed at the north west of the site extend to 4 storeys, however through pre-application discussions with Officers, the design of the fourth storey has been set back to reduce the perceived scale and massing of the buildings and add visual interest to the blocks.
- 7.29 The new build townhouses extend to 3.5 floors and are stepped back at each floor to reduce the overall visual massing of the building and to facilitate outdoor amenity space on the first and second floors, as well as a large roof garden at the third floor. Whilst the townhouses make up only a small proportion of the overall development, RBC's adopted policy DM10 allows for private outdoor space in the form of balconies and roof gardens for flats and urban townhouses where private gardens cannot be provided in the same way that they can with private gardens for the terraced housing.
- 7.30 The largest proportion of the proposed development is terraced housing fronting onto the entire length of Cardiff Road and either side of the access point on Addison Road. The design and layout of development on the southern boundary of the site has been heavily influenced by the pre-application advice received and has been revised to reflect the existing layout of Victorian terraced housing opposite.

- 7.31 As illustrated on page 34 of the Design and Access Statement, the majority of the terraced housing comprises 3-bedroom dwellings and include garage/home office units to the rear, which is a successful design precedent taken from the scheme at Accordia in Cambridge. The office units at the first floor above the garages will also serve to provide natural surveillance over the internal access road.

Materials

- 7.32 The proposed development incorporates high quality materials that are relevant to the site and its context. For the apartment building, elevation design has been carefully developed to reference the composition of the existing commercial element of the existing buildings, and the proposed brickwork references the brick facades in the existing buildings on site.
- 7.33 The proposed materials for the terraced housing is reflective of and sympathetic to the material palette of the immediate context. Brick and slate connect the building to the Victorian housing context whilst the inclusion of metal cladding into the building design provides a more contemporary element and links to the commercial units immediately to the north of the site.
- 7.34 Further details of the proposed design can be found in the comprehensive and detailed Design and Access Statement accompanying the application. As demonstrated, the proposed scheme accords with the requirements of the NPPF to achieve 'Good Design' and with RBC Policies CS1, CS7 and DM10.

Landscape & Open Space

- 7.35 The site is situated within an urban landscape and is not subject to any local or national landscape designations. As a result of its existing industrial use within an employment area, the site lacks any form of structured landscaping and an opportunity therefore exists to vastly improve the setting and appearance of the site by delivering a high quality, attractive landscape design as part of the redevelopment of the site.
- 7.36 As illustrated on the 'landscape general arrangement plan' accompanying the application, a significant amount of tree planting and structured landscaping is proposed for the site along the northern and western boundaries in the form of hedges, railings and trees, and along the eastern boundary in the form of a generous landscaped frontage onto Addison Road to respect the setting of existing TPO trees.

- 7.37 The landscape design of the north-west corner of the site has been shaped by pre-application discussions with Officers and culminated in the setting back of the apartment block to facilitate an attractive area of landscaped open space with new tree planting. This arrangement seeks to ensure that residential amenity in north west of the site is not compromised by the location and proximity of employment uses opposite, and also serves as a graded change between the existing residential development to the south and east and the remainder of the CEA. This is a significant improvement in the relationship between existing housing and employment uses in the current site layout and arrangement. Moreover, the addition of a green buffer in the north-west corner means that continued employment use in the CEA is not constrained in future by the introduction of housing on the site.
- 7.38 The new access road running through the centre of the site features additional tree planting along either side of the route and a new centrally located Local Area of Play (LAP). Structured landscaping and areas of open space are integrated throughout the scheme to enhance the appearance and provide opportunities for recreation and enjoyment by future residents and members of the local community.
- 7.39 The Design and Access Statement provides further detail on the proposed landscape strategy for the site (Section 6) and should be read alongside the landscape general arrangement plan, landscape illustrative masterplan and detailed landscape plans accompanying the application. The proposals have sought to create an attractive sense of place and vastly improve the public realm in line with policies CS7 and DM16, and provide usable areas of open space and an equipped play area in accordance with Policy CS29.

Transport and Accessibility

- 7.40 As set out above, the site is well located in close proximity to Reading town centre and train station, which are accessible via pedestrian and cycle links from the site and or bus services which can be accessed from the bus stops on Caversham Road. The site is therefore well positioned for new residents to access the town centre and its facilities by foot or bicycle, as well as to the train station which provides convenient access to locations such as London, Oxford and South Wales.

- 7.41 As part of the development, 121 car parking spaces are proposed which is considered to represent an appropriate balance between Council standards for sites in Zone 2, policy objectives, car ownership levels and having regard to the site's location on the edge of the town centre. Parking is proposed to the rear of the terraced houses either in the form of garages or parking spaces, and to the rear of the townhouses (positioned back to back) in the form of on-plot parking spaces. Parking for the apartments will be provided in the form of a communal courtyard area.
- 7.42 The development will make provision for 126 cycles to be parked, in accordance with RBC's minimum standards for Zone 2 developments and in accordance with Policy CS24. A cycle store with Sheffield stands or similar will be provided at ground level for the apartment block which will be secure and weatherproof; where houses do not have access to a garage, it is proposed there will be a bike shed in the rear gardens; and for the north / south townhouses, bikes will be stored in bike lockers in the front gardens of the properties.
- 7.43 A new internal access running through the site will be connected by a new access on Milford Road, necessitating the loss of 2 – 3 on-street parking spaces, and the use of the existing access on Addison Road which is currently gated but previously provided vehicle access into the site. The internal road network will be 6m wide and allow two-way traffic flow.
- 7.44 As set out in the Transport Statement accompanying the application, an assessment of likely trip generation demonstrates that there will be a reduction in vehicle trips at the proposed development compared to the existing consented use of the site. Even with the current lower density of occupation, there will be a reduction in peak hour vehicle trips in the morning peak hour and no material change during the afternoon peak hour.
- 7.45 In line with Policy CS23, the application is also supported by a Travel Plan which sets out the sustainable travel options available to residents of the development and the measures and initiatives that will be used to incentivise travel by sustainable modes.
- 7.46 The supporting Transport Statement demonstrates that the proposed scheme is consistent with relevant local and national transport policy guidance and will not give rise to any material transport related impacts. It therefore meets the test of NPPF paragraph 32, which states that *"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."*

Ecology

- 7.47 The application is supported by an Ecological Appraisal of the site, which is based on an extended Phase 1 survey and specific surveys for roosting bats and badgers. The site itself is not subject to any statutory or non-statutory ecological designations. The nearest statutory designation is Lousehill Copse LNR, approximately 2.5km south west of the site, and the nearest non-statutory designation is Cow Lane Depot Local Wildlife Site approximately 0.25km south west of the site. These are well separated from the site and considered highly unlikely to be affected by the proposed development.
- 7.48 The site itself has negligible to low ecological value. Higher value habitats in the context of the site include trees at the site boundaries, albeit these are considered to be of negligible to low value at the local level and will be complimented by new planting of native species.
- 7.49 The habitats within the site have been recorded to support a small number of common foraging bats and foraging and nesting bird species. The targeted survey work did not identify any badgers. As such, the Appraisal recommends appropriate mitigation measures only, including check surveys prior to vegetation clearance and building demolition and timings of works.
- 7.50 In terms of enhancements, the proposals present the opportunity to secure a net gain for biodiversity, including through additional native planting and the provision of new roosting/nesting opportunities for bats and birds. Overall, the proposals have sought to minimise any potential ecological impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures as recommended within the Ecological Appraisal, it is considered unlikely that the proposals will result in significant harm to biodiversity.
- 7.51 In line with Policy CS36, the proposed development of the site presents an opportunity to provide an overall improvement and net gain for biodiversity, and is compliant with the paragraphs 109 and 118 of the NPPF which indicates that weight should be afforded to the environmental benefits of a development in terms of net gains to biodiversity.

Heritage and Archaeology

- 7.52 The application is supported by a Heritage Statement which confirms that the Site is not recognised as a heritage asset, neither statutorily, nor locally listed, and it does not sit within a Conservation Area. In addition to lacking any sort of heritage recognition, the Site does not sit within the setting of any heritage assets

- 7.53 A review of the historic development and current condition of the Cox and Wyman building and site has identified that there is considerable evidence of historic alteration, expansion, and later stripping out of historic machinery and other evidential features which result in the site having low heritage significance. On that basis, the degree of heritage impact arising from the demolition of the buildings and redevelopment of the site has been assessed as very low in line with the test of NPPF Paragraph 135.
- 7.54 It is further concluded that the very low degree of harm arising will be outweighed by the sizeable public benefits arising from the proposals, namely the provision of highly sustainable and high-quality housing, in line with the relevant test of NPPF Paragraph 134 and the policy requirements of NPPF chapter 7 'Requiring Good Design'.
- 7.55 Whilst the building itself is identified as having '*low heritage significance with considerable areas of later fabric that hold negligible heritage value*' (Heritage Statement, page 11), a number of respondents to the public consultation, including the BTCA, suggested that they would however like to see elements of the Cox & Wyman buildings – in terms of materials and architectural features - incorporated into the development proposals in recognition of its past function.
- 7.56 Although the Heritage Statement did not find any features of sufficient significance that would warrant retention, it is proposed that the finials from the buildings, which are instantly recognisable aspects of the existing buildings, are fitted on top of two new walls which would flank the pedestrian entrance into the site from Addison Road. This feature would make a direct visual reference to the original building on the site.
- 7.57 In terms of Archaeology, the proposed development will not involve the disturbance of ground within an Area of Archaeological Potential (as designated by the adopted or the emerging Local Plan proposals maps, and corresponding 'saved' policy CUD12 and emerging policy EN2) and no concern was raised by RBC at the pre-application stage in relation to potential archaeological significance.
- 7.58 Having regard to the baseline assessment of the site, it is considered that the proposals meet the requirements of the relevant NPPF tests on heritage grounds.

Noise

- 7.59 In support of the application, detailed noise surveys have been taken from various locations on all four roads around the site to determine the extant noise climate in the area and the potential exposure that future occupiers will have to these sources.

- 7.60 As set out in Section 3 of this statement, the potential for low frequency noise emissions from idling trains to have a detrimental impact on future residents was raised by RBC during the pre-application stage. Following the advice received from Officers, an acoustic assessment has been undertaken to measure the noise emissions from the railway line and depot to the south of the site, behind the existing housing on Cardiff Road.
- 7.61 As set out within the report, there is not a clear methodology for measuring low frequency noise, nor is there a widely accepted design criterion for controlling environmental noise, and a number of assessments are considered in order to cover a broad range of criteria. Based on the available guidance, the report advises that the low frequency noise criteria should be set for indoors and it is therefore proposed that internal sound levels within new build dwellings should be controlled to comply with the ISO 226 threshold.
- 7.62 The report concludes that ventilation will need to be provided to the most noise exposed dwellings via a whole house type arrangement with acoustically treated air inlet and exhaust paths, which will mitigate and minimise any potentially adverse acoustic impacts on health and quality of life. In accordance with these recommendations, the proposed development makes provision for Mechanical Ventilation Heat Recovery Systems (MVHR). Moreover, the layout of the properties to the south of the site that could be most affected are arranged such that bedrooms are situated to the rear of the properties furthest away from noise sources.
- 7.63 The approach adopted concurs with RBC Policy DM4, CS34, criterion 4 of NPPF paragraph 109 and the second aim of the Noise Policy Statement for England (March 2010), to mitigate and minimise adverse impacts on health and quality of life.

Air Quality

- 7.64 The proposed development is located within an Air Quality Management Area (AQMA) which encompasses the centre of Reading and major arterial roads into and out of the town, and as such, the application is supported by an Air Quality Assessment (AQA) which sets out various mitigation measures. The main air pollutants of concern relate to construction and are dust and fine particulate matter (PM10), whilst for road traffic and railway emission they are nitrogen dioxide and fine particulate matter (PM10 and PM2.5).

- 7.65 The AQA advises that the construction works have the potential to create dust. During construction it is therefore recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM10 concentrations and dust nuisance in the surrounding area. With mitigation in place the construction impacts are judged as not significant.
- 7.66 In relation to predicted NO2, PM10 and PM2.5 levels, concentrations are well below air quality strategy objectives, all of the existing receptor locations in close proximity to the site. The proposed development is considered to improve concentrations at a number of receptor locations due to the proposed changes in the site access arrangements. Taking into account the predicted concentrations, the overall air quality effect of the development is considered to be not significant.
- 7.67 There are no predicted exceedances of the air quality strategy objectives at any of the proposed receptor locations and the report concludes that the site is considered suitable for residential development without the need for additional mitigation, and that there are no air quality constraints to the proposed development. As such, the proposed development complies with Policy DM4, CS34 and NPPF paragraphs 109, 124 and 203

Flood Risk and Drainage

- 7.68 The application is supported by a Flood Risk Assessment and SUDS Assessment. The entirety of the site and the proposed access points are located in Flood Zone 1 on a 'dry island' which is surrounded by areas of Flood Zone 2, which is defined by the Environment Agency as having a 0.1%-1% change of flooding from a river each year. The dominant source of flooding at the site is identified as fluvial flooding from the River Thames, however, the FRA sets out that the existing risk of surface water flooding is low
- 7.69 Proposed finished floor levels for the development have been raised a minimum of 300 mm above the design flood level to 38.72 m AOD where possible and all finished floor levels are set above the minimum recommended flood level to inform flood resilience of 38.52 m AOD. Where a small amount of the proposed building footprint encroaches on part of the south east of the site that has a 1% annual probability plus climate change flood extent (which could result in the available floodplain storage) floodplain compensatory storage is proposed.

- 7.70 The drainage strategy has been prepared in accordance with national policy ensuring, through application of the Sustainable Drainage Systems hierarchy, that surface water runoff rates are reduced to as close as possible to greenfield rates post-development, including an allowance for climate change.
- 7.71 No surface water flooding is predicted in the 100-year plus climate change event, due to the attenuation storage provided in the sub-base of permeable paving. Moreover, surface water runoff will discharge to assumed connections to the Thames Water surface water sewer network in Addison Road, Cardiff Road and Milford Road.
- 7.72 Having regard to the conclusions of the FRA and drainage strategy, the proposals comply with the guidance relating to flood risk contained in the NPPF, and with RBC Policies CS1 and CS35, and with the advice contained in the Reading Strategic Flood Risk Assessment (June 2017) which has informed the site-specific flood risk assessment.

Ground Conditions and Contamination

- 7.73 The proposed development is situated on a site of an historic printing works which, by nature of its use, has the potential to be contaminated. As such, the application is supported by a Phase 1 Geoenvironmental Desk Study to determine the existing geoenvironmental conditions at the site.
- 7.74 Potential sources of contamination identified in the report include an on-site electricity substation, on-site fuel storage in connection with the former industrial usage as a printing works (possible chemical storage, oil and fuel spills), in existing buildings relating to the use of asbestos materials in the building construction, and made ground associated with existing and former buildings.
- 7.75 Based on the past use of the site, the study identifies an overall risk assessment of 'medium' potential for environmental liability related to ground contamination for the proposed residential use. The report makes recommendations for further work in relation to asbestos surveys prior to site clearance, and site investigations for targeted buildings and sources of contamination. It is anticipated that any further work required to identify and quantify potential contamination will be secured by RBC through a suitably worded planning condition.

Socio-Economic Assessment

- 7.76 It is expected that the construction phase of the proposed development will generate a number of jobs across all construction disciplines, from ground workers to construction management.
- 7.77 The completed development is to provide up to 96 dwellings comprising houses and apartments, across a mix of styles, size and tenure. Based upon an indicative 2.4 average household size, it is likely that the proposed development could provide homes for up to 230 people, which includes policy-compliant provision of affordable housing. This supports the 'social' role of sustainable development as indicated within the NPPF by providing a supply of housing to meet present and future generations.
- 7.78 The introduction of up to 96 additional households in Reading Borough will also inevitably bring consequential benefit of additional expenditure on a range of local convenience goods and additional comparison goods, particularly given the site's proximity to the town centre.

Sustainability

- 7.79 The development will achieve the high standards of energy efficiency and sustainable construction as required by nationally prescribed standards, set out in Building Regulations.
- 7.80 The Design and Access Statement accompanying this application demonstrates how the masterplan has incorporated opportunities for sustainable urban drainage and incorporates areas of green space to provide net gains to biodiversity. The design principles set out in the Design and Access Statement also describe the types of materials which will be appropriate and that the development will comply with RBC's design requirements in relation to water and waste.
- 7.81 The Proposed Development will follow good practice sustainable design and construction practices: given the withdrawal of the Code for Sustainable Homes, the proposed development will not undertake a Code assessment, but will use Code 'Level 4' as a design framework. The Design and Access Statement provides further details on the key targets that the development seeks to achieve in line with the requirements for sustainable construction set out under Policy CS1.

Overall Conclusions and the Planning Balance

- 7.82 The site is situated in a highly sustainable location close to Reading town centre, Reading Train Station (which is approximately 0.5 miles, 11 minutes estimated walking time away) and local bus routes and bus stops on Caversham Road. The site is in walking distance of local amenities on Swansea and Caversham Road, but also close enough to easily access the wide range of facilities provided in Reading Town Centre, as well as the excellent rail connections available at the station to destinations further afield.
- 7.83 Whilst the site is currently within the Richfield Avenue CEA site designation and protected for employment use, RBC's emerging Local Plan recognises that the site is no longer fulfilling its purpose to warrant the designation and has proposed the site's redevelopment for residential use. The site constitutes an island and is physically detached from the remainder of the CEA, but adjacent to existing residential development and sustainably located in close proximity to the town centre, all of which supports RBC's proposed allocation of the site for housing in its Draft Local Plan (Policy WR3a).
- 7.84 There are a range of benefits which would be delivered by the proposed development, securing social, economic and environmental gains as described above and in the documentation supporting the application. The proposed development of the site will deliver a range of benefits including much needed and high-quality market and affordable housing in walking distance of Reading town centre; an attractive landscape scheme to improve not only the appearance of what is currently a neglected industrial site, but also the public realm within the site; net gains to biodiversity; and the provision of landscaped areas of open space within the site and an equipped Local Area of Play for use by existing and future residents.
- 7.85 The contribution to housing delivery including the provision of the affordable housing which the development would provide should weigh heavily in support of planning permission being granted. The proposed development would also provide for a contribution to the Community Infrastructure Levy (CIL) towards, for example, local community infrastructure, as well as S106 contributions.
- 7.86 Whilst the proposed development of the site does not comply with RBC's current Local Plan position in terms of protecting employment uses on the site (Policy CS11), RBC have acknowledged through pre-application discussions that the building offers limited potential for other employment based uses and accept the loss of the building in principle. Moreover, the emerging Local Plan demonstrates that RBC view the future of the site as residential and not forming part of the Core Employment Area.

- 7.87 Notwithstanding the relatively early stage of the Emerging Draft Reading Borough Local Plan as discussed at paragraphs 6.32 and 6.38 above, the proposed development has sought to accord with the criteria set out under draft Policy WR3a, and provides an appropriate buffer and transition between the existing residential area to the south and east, and commercial area to the north and west, resulting in a significant improvement in the relationship between the two uses.
- 7.88 Moreover, the development of the site for housing accords with the NPPF's thrust to encourage the effective use of brownfield land that is not of high environmental value and to direct development to sustainable locations
- 7.89 Applying the presumption in favour of sustainable development in Paragraph 14 of the NPPF, the development would not result in significant and demonstrable adverse impacts which would outweigh the benefits identified. The application should therefore be approved.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 Barton Willmore LLP is instructed by the applicant, Thames Properties, to submit a full planning application to Reading Borough Council with respect to the site of the former Cox & Wyman printing works on Cardiff Road, Reading.
- 8.2 The Site, which constitutes an island bound by four roads, is located to the north of Reading town centre in Reading Borough, and occupies a key location between residential development to south and east and a Core Employment Area to the north and west. The site extends to approximately 1.31ha and is currently occupied by the buildings associated with the former Cox & Wyman printing press and its associated yard and parking. The Cox & Wyman business vacated the site in 2015 and has failed to attract an occupier for its full rent since that time.
- 8.3 Pre application discussions with RBC have indicated s agreed that due to the bespoke design of the building and the difficulty in attracting an occupier, its demolition is acceptable in principle. A planning application is therefore submitted in full for:

“Demolition of existing site buildings and boundary treatments and erection of 96 no. dwellings including associated surface car parking, public realm and landscaping on land at the former Cox & Wyman building, Cardiff Road, Reading.”

- 8.4 The proposed development has been assessed in accordance with the presumption in favour of sustainable development, considering the overall ‘Planning balance’, taking into account the numerous benefits of the development and demonstrates that these are not significantly and demonstrably outweighed by adverse impacts.
- 8.5 The proposed development would deliver up to 96 new homes in a sustainable location, as acknowledged by the allocation of the site for residential development in the emerging Reading Borough Council Draft Local Plan. The Site benefits from being sustainably located, in walking and cycling distance of the town centre and train station, and in walking distance of bus stops providing access to the town and nearby settlements.
- 8.6 The development would provide a mix of homes, in size and tenure including the provision of 30% as affordable homes and over half of the number of dwellings as family housing (3 bedroom) in accordance with RBC’s adopted policy requirements. As set out above, the development will make an important contribution towards meeting Reading Borough’s OAHN as identified by the Berkshire SHMA (2016) and contribute towards the draft

requirement in the emerging Local Plan of delivering 15,132 homes in the Borough over the period 2013-2036. The fact that the site is proposed as a draft allocation for residential development and envisaged by RBC as a site that could be delivered within the short-medium term of the Local Plan period, i.e. 2016-2026, suggests that RBC support residential development on the site to contribute to its housing need. This factor and the contribution towards the social 'arm' of sustainable development should be afforded significant weight in determining the application.

- 8.7 In economic terms, the proposal would generate a number of jobs across all construction disciplines, from ground workers to construction management. The introduction of up to 96 additional households in Reading Borough will also bring consequential benefit of additional expenditure on a range of local convenience goods and additional comparison goods. It will also provide more homes for workers in surrounding centres. The development would therefore contribute positively to the economic 'arm' of sustainable development.
- 8.8 The application is supported by a range of environmental surveys and assessments as listed in Section 1. These conclude that the site is not subject to any environmental designations and that the development would lead to any significant adverse impacts. The development incorporates the recommended mitigation measures set out in the reports in order to reduce or avoid any adverse impacts. Indeed, the development would result in net gains to biodiversity and the opportunity to improve the flow of traffic in and around the site.
- 8.9 As illustrated by the supporting plans and drawings, a careful design exercise has been undertaken to redevelop the site into an attractive, self-contained residential development that creates a clear demarcation and transition between surrounding existing employment and residential uses. The island nature of the site makes the site ideally suited to accommodate a solely residential development: the addition of a commercial/employment unit on the application site would only serve to dilute this demarcation and extend the edge of the employment area westwards, which could have a negative effect on the amenity of future residents.

- 8.10 The layout of the site has been carefully considered in the context of its surrounding uses. To ensure that residential amenity in north-west of the site is not compromised by the location and proximity of employment uses opposite, a landscape buffer and community orchard with tree planting is proposed and will serve as a graded change between the existing residential development to the south and east and the remainder of the CEA. This also means that continued employment use in the CEA is not constrained in future by the introduction of housing on the site.
- 8.11 Overall, the proposed development reflects RBC's aspirations for the future of the former Cox & Wyman site and accords with the Council's adopted policies for residential development within an urban location. The proposed development will rejuvenate what is currently a neglected and under used site and provide a high quality, attractive residential development which will vastly improve the public realm in this edge of town centre location. The development will provide much needed housing for Reading Borough and a deliver a site that is proposed for allocation for residential use in RBC's emerging Local Plan. Moreover, there are no adverse impacts of the development that would outweigh the range of social, economic and environment benefits that the development would deliver. Applying the presumption in favour of sustainable development, the application should therefore be approved.