



Amethyst Lane

**Planning Statement (Incorporating
an Affordable Housing Statement)**

HTA Design LLP on behalf of
Reading Borough Council

May 2023

Report presented by HTA Design LLP
75 Wallis Rd, London E9 5LN

020 7485 8555
info@hta.co.uk
www.hta.co.uk

In association with	Reading Borough Council	Status	Final
		Issue	1
		Issue date	
		Author	SW
		Checked by	RO
		Approved by	RO
		File name	

© 2023 HTA Design LLP. All rights reserved

This document has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by HTA Design LLP, no other party may copy, reproduce, distribute, make use of, or rely on its contents. No liability is accepted by HTA Design LLP for any use of this document, other than for the purposes for which it was originally prepared and provided.

Opinions and information provided in this document are on the basis of HTA Design LLP using due skill, care and diligence in the preparation of the same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to HTA Design LLP has been made.

HTA Design LLP. Registered Partnership in England No. OC381717

Contents

1.	Introduction.....	4
	Accompanying Documents.....	4
	Report Structure.....	5
2.	Application Site and Surrounding Context	6
	Site Description.....	6
	Access and Local Service Provision.....	6
	Relevant Designations.....	6
	Planning History	6
3.	The Proposed Development.....	7
	Scale, Massing, Layout, and Materials.....	7
	Accommodation schedule	8
	Landscape Proposals	8
	Sustainability measures	9
	Consultation.....	9
4.	Planning Policy Context	11
	National Planning Policy Guidance (July 2021)	11
	Reading Borough Council Local Plan and Proposals Map (2019).....	11
5.	Affordable Housing Statement	12
	<i>Affordable housing requirement</i>	12
	<i>Affordable housing completion</i>	12
	<i>Affordable housing offer</i>	13
6.	Compliance with Development Plan Policy	14
	Principle of Development.....	14
	Access and Parking	15
	Trees	17
	Ecology and Biodiversity Net Gain (BNG)	18
	Design and Quality	19
7.	Other Matters.....	20
	Ground Contamination.....	20
	Sustainable Urban Drainage	20
	Noise Impact Assessment	20
	Energy	21
	Daylight and sunlight	21
	Sustainability	22
8.	Planning obligations and Community Infrastructure Levy.....	23
	Community Infrastructure Levy	23
	Planning conditions.....	23
9.	The Planning Balance.....	24
	Appendix 1: Site Plan	25
	Appendix 2: Drawing schedule.....	26
	Appendix 3- Correspondence from Adult Social Care.....	27

1. Introduction

- 1.1 This Planning Statement has been prepared by HTA Design LLP on behalf of Reading Borough Council (the 'Applicant'), in support of a full planning application to Reading Borough Council for the redevelopment of Amethyst Lane (the 'Proposed Site' or 'Site') to deliver 21 new homes and a new respite centre alongside ancillary work ('Proposed development'). A Site Location Plan is enclosed at **Appendix 1**. The Application seeks approval for:

"Demolition and redevelopment of the Site at Amethyst Lane to deliver a new respite care facility alongside 21 new homes, landscaping and ancillary works".

- 1.2 The development proposals are hereafter referred to in this Planning Statement as the 'Proposed Development'. A full description of the Proposed Development is set out in Section 3 of this Statement.
- 1.3 Housing demand and need was quantified through the Berkshire Strategic Housing Market Assessment (SHMA) 2016, which identified a need for 16,077 new homes (699 a year) between 2013 and 2036 in Reading. Of these, 58% (406 a year) of new homes need to be affordable – reflecting the imbalance between property prices and private rent levels and the average salary of residents.
- 1.4 Until 2020 the housing market in Reading continued to thrive, however it has failed to keep up with demand of affordable housing and family sized homes, which are not entirely suited to town centre locations due to lack of space and requirements for adequate outdoor amenity provision.
- 1.5 The Council therefore need to address the under-delivery of family homes in the affordable sector, particularly for families living in temporary accommodation. The Council's Housing Team is leading a response to this through the delivery of several sites, including Amethyst Lane for development. Building new homes will support people in temporary and emergency housing move out into a home of their own.
- 1.6 The Applicant is proposing to deliver comprehensive redevelopment of the Proposed Site to provide new affordable homes whilst improving the overall amenity, security and general appearance of the existing site.
- 1.7 The Proposed Development will also support the Borough's ambition to address the lack of specialised care facilities in the Borough- in this instance, a respite care facility for people with learning disabilities.
- 1.8 The Proposed Development demonstrates its potential to offer significant planning benefits, which will be discussed in detail in Section 5 of this Planning Statement.

Accompanying Documents

- 1.9 This Planning Statement provides a contextual assessment of the site, proposals and planning context before assessing how the Proposed Development responds to relevant planning policies and local constraints. It also deals with site-specific technical issues to be dealt with through the planning process and draws from the conclusions of several environmental and technical documents which accompany the application.
- 1.10 The following technical/supporting documents have been prepared and are submitted in support of this application, which assess the Proposed Development.

Table 1: List of Accompanying Application Documents

Document	Author
Planning Application, ownership certificate and CIL Form 1	HTA Design LLP
Plans, Drawings and Design & Access Statement	HTA Design LLP
Arboricultural Impact Assessment	Middlemarch
Ecology Surveys:	ADAS
Daylight, Sunlight & Overshadowing Assessment	HTA Design LLP
Energy and overheating Assessment	HTA Design LLP
Sustainability Statement	HTA Design LLP
Planning Statement (Including Affordable Housing Statement)	HTA Design LLP
Statement of Community Involvement	HTA Design LLP
Noise Impact Assessment	A24 Consultants
Ground Investigation Report	Hydrock Consulting
Flood Risk Assessment & Drainage Strategy	Hydrock Consulting
Transport Assessment	Hydrock Consulting

- 1.11 Plans and drawings submitted for the application are detailed in the accompanying Drawing Schedule prepared by the HTA Design LLP provided in **Appendix 2**.

Report Structure

1.12 This Planning Statement is structured as follows:

- **Section 2** describes the Site, surroundings, and planning history.
- **Section 3** sets out a detailed description of the Proposed Development and the consultation undertaken in developing the proposals.
- **Section 4** provides a summary of the relevant planning policy context.
- **Section 5** provides the Affordable Housing Statement
- **Section 6** outlines how the Proposed Development responds to key policies and local context
- **Section 7** provides a summary of other relevant issues relating to this development
- **Section 8** provides a summary of the key planning obligations and draft Heads of Terms.
- **Section 7** outlines the summary and conclusions to this Planning Statement.

2. Application Site and Surrounding Context

- 2.1 The Proposed Site is located at the end of Amethyst Lane within the ward of the Southcote ward, southwest of Reading Town Centre. It is currently derelict with several single storey buildings dotted across the site. Vehicular access is from Liebenrood Road to the west which adjoins Bath Road, a main artillery road running east and west of Reading. In addition, there is pedestrian access from Bath Road, via Parkhurst drive to the south. The Site Location Plan included at **Appendix 1**.

Site Description

- 2.2 The Proposed Site is 0.57 ha in size and sits at the end of cul-de-sac served by Amethyst Lane. It is currently closed off from access and contains the derelict Day Centre facility.
- 2.3 The Site is filled with 1 storey courtyard style blocks and outbuildings and several mature trees and shrubbery.
- 2.4 The Site is bounded by the back garden properties of Ashdene Road to the east and to the north is Sue Ryder Duchess of Kent Hospice. Most of the western boundary of the site runs perpendicular to number 12 Jenkins Close and the gardens of 1-7 Jenkins Close. The remainder of the western boundary is adjacent to a car park and garages which are assumed to be serving properties at 1-6 Liebenrood Roads. To the south, there is a main access road off Amethyst Lane, which bounds the southern edge of the site.
- 2.5 The immediate area is characterised by residential cul de sac developments ranging between 2 and 3 storeys.

Access and Local Service Provision

- 2.6 Reading Borough is recognised as an urban area with great diversity in transport provision and need. The centre of Reading is well served by sustainable transport public and private transport infrastructure serving several local towns, villages, regional and national centres throughout the UK.
- 2.7 Reading is split into four transport accessibility zones, with 1 being the most accessible and 4 being the least accessible. This site is in Zone 3, which means that it is on the lower scale of accessibility.
- 2.8 The report prepared by Hydrock Consulting provides information on the local pedestrian provision and confirms that Liebenrood Road is a secondary walking route and provides access to the primary walking route along the A4 Bath Road, which is situated in Zone 2. There is also a local access footway between the site and the A4 Bath Road.
- 2.9 The A4 Bath Road is identified as part of the national cycle network, and the northern footway is a shared footway/cycleway and several bus routes, and these are shown in Figures 2.2. and 2.3 of Hydrock's Transport Statement (April 2023), alongside routes and frequencies from Tilehurst Road and the A4 Bath Road.
- 2.10 This demonstrates that the site benefits from good public transport provision which provides services to Central Reading, Newbury, and Tilehurst, as well as further afield including Basingstoke.
- 2.11 It is also within excellent distance to several community facilities and services, including Little Dragons Nursery and the Wren School to the south, off Bath Road as well as Western Elms Day Nursery, St Edward's Prep and Nursery and Cranbury College located on Tilehurst Road, all within 500m of the site.
- 2.12 It is for these reasons that it is considered that this site's proximity to Zone 2 means that it has very good accessibility.
- 2.13 Figure 2.5-7 in Hydrock's Transport Assessment provides further information on accessibility of the site to other forms of community facilities including shops, health facilities and a Post Office.

Relevant Designations

- 2.14 Reading Local Plan (2019) designates the Site under policy WR3n Amethyst Lane, making it suitable for 32-48 dwellings, which should be designed to meet appropriate back-to-back separation from existing residential homes.
- 2.15 The site is within Flood Risk Zone 1 and nearby designated areas, including an Air Quality Management Zone, Prospect Park, a Historic Park and Garden and 76, Bath Road, a Grade II Listed Building.
- 2.16 The site is not within or adjacent to any other local, regional or national designation.

Planning History

- 2.17 There is no relevant planning history to reference in relation to this site and the Proposed Development.

3. The Proposed Development

- 3.1 This section summarises the Proposed Development, but full details of the proposals can be found in the DAS and other supporting technical documents that accompany this application. The Application seeks approval for:

"Demolition and redevelopment of the Amethyst Lane Day Care Centre to deliver a new respite care facility alongside 21 new homes, landscaping and ancillary works".

- 3.2 The Applicant's brief that informed the development proposal included:

- Suburban 30-60 homes per ha (target = 77pdh) family sized housing;
- 100% council housing;
- Provide a state of the art respite care facility within a clearly defined area of the site, which is designed to CQC standards and is not institutional in nature but offers a 'home from home' environment;
- A site layout and scale which clearly distinguishes between the two proposed uses, but uses architectural design and materials which stitch each use and area of the site together;
- 0.8 car parking ratio, to support a reduction in car numbers in place of better amenity;
- 2 cycle spaces per 3- and 4-bedroom home;
- Individual refuse, recycling and food waste facilities for each home;
- Adequate provision for private and communal amenity;
- On-site play for new residents;
- Biodiversity improvements which lead to a net gain improvement; and,
- The incorporation of sustainable measures including net zero homes, water efficiency 19% beyond building regulations.

Scale, Massing, Layout, and Materials

- 3.3 The proposed layout is based on a detailed assessment of the site, its constraints and surrounding context.
- 3.4 Drawing from the local context, the proposed layout creates a cul-de sac layout typology by introducing a new centrally located street, designed to support a future connection through Jenkins Close to Prospect Park.
- 3.5 A single point of access for both vehicular and pedestrian access will be provided from the south of the site via Amethyst Lane.
- 3.6 To the south and at the entrance sits the single storey respite centre, with access fronting Amethyst Lane, while in the new street, new homes are arranged within three terraces to the east and west facing each other and a further terrace located to the north.
- 3.7 Siting the entrance to the respite centre on Amethyst as opposed to inside the development allows for the site to be used and accessed independently of the homes, helping to create a clear separation between the two uses.
- 3.8 The simple building forms and simple architectural language and materials, particularly the use of red brick and light brick details, which are common throughout Reading, help to stitch the site together and back into the wider context. The use of lighter brick framing the ground floor residential and lower façade of the respite centre are also based on local vernacular references.
- 3.9 At one storey, the respite centre reflects the height and massing of the bungalow developments immediately south of the site and helps to complete the street frontage on Amethyst Lane.
- 3.10 The proposed house type and heights reflects those across Reading and in the local area. The houses range between two and three storeys depending on their location within the development, with three storeys proposed for the bookends on the terraces to the east and west, with others pepper potted throughout the northern terrace helping to create variation and interest within the street scene, while tying the terraces together.
- 3.11 The layout of the new terraces across the site will provide active frontages and natural surveillance, while supporting a legible route based on the predicted desire lines of future residents.
- 3.12 Parking for the respite centre will be contained within a dedicated parking area fronting Amethyst Lane to help ensure the separation of access and uses to the housing. Parking for the homes is spread throughout the site, providing equal access for each individual household.
- 3.13 The only exception to this is the area to the east of the terraces where a green spine is introduced to provide greening, attenuation and informal play. An additional green communal area is located to the south providing informal garden and incidental play.
- 3.14 Each new home will have a private garden, while the design of amenity in the respite centre facilitates a range of outdoor activities including raised beds for growing, a potting shed/ garden store, sensory planting, space for external activities and dining.

- 3.15 Overall, it is considered that the proposed scale, massing, layout, and materials have been sensitively developed to incorporate all key design principles of the Applicant to create a successful design.

Accommodation schedule

- 3.16 The proposal consists of 21 three and four bed homes, which are 100% affordable rent, all of which will be M4(2) compliant. All residential homes have been designed to meet nationally prescribed space and local standards and will be either dual or triple aspect.
- 3.17 The respite centre will provide 6 rooms.
- 3.18 Across the site, a total of 28 parking spaces will be provided, 21 of which be for general housing needs, resulting in 1:1 parking ratio.
- 3.19 For the respite centre, 6 parking spaces will be provided within the curtilage of the respite centre to provide:
- 4 staff spaces (3 general needs spaces and one disabled access space)
 - 1 disabled access visitor's space
 - 1 larger minibus drop off space
 - 1 dedicated deliveries space (to the North of the building)
- 3.20 In terms of cycle parking, each home will be provided with two cycle parking spaces contained within secure lockable stores. In addition, a secure lockable storage space for seven bikes is also provided for the respite centre.

Table 2: Accommodation schedule¹

Unit size	Bed space per unit type	Habitable rooms per unit type	Total units	Total habitable rooms	Area	Amenity space ²	Total number of occupants	mix
3B5P	5	4	12	48	95.3-110.6	40*	60	57%
3B6P	6	5	6	30	103	58*	36	29%
4B8P	8	6	3	18	143	42* ³	24	14%
Respite centre	6	6	1	6	529.7	446.2	6	-

Table 3: Parking schedule

Unit size	Total units	Cycle parking spaces	Car parking spaces
3B5P	12	24	12
3B6P	6	12	6
4B8P	3	6	3
Respite centre	1	7	4

Landscape Proposals

- 3.21 As part of the proposals, a key aim of the landscape design is to maximise opportunities for wildflower, hedgerow and new tree planting and the creation of green space close to houses that benefits both wildlife and people.
- 3.22 Each house will have a private garden which ranges between 39.2 – 86.3 sqm, with the average size for all gardens across the site being 40 sqm. In addition, a total of 219 sqm of communal and incidental space will be provided over two areas of the site at the dry swale and communal green.
- 3.23 Boundary treatments will consist of buffer planting to provide a clear distinction between public and private spaces.
- 3.24 The respite facility will also include 446.2 sqm of amenity which is split over three individuals purposefully designed accessible spaces, which incorporate accessible, continuous walkways, wild areas for exploration and relaxation, scented and unscented planting and a range of seating areas.
- 3.25 The design aims to support local wildlife, be low maintenance, provide privacy and interaction, peace and quiet and be visibly and accessible throughout. Each of the three areas are described below:
- The centrally located communal garden aims to facilitate a range of outdoor activities including raised beds for growing, a potting shed/ garden store, sensory planting, space for external activities and dining, and ornamental tree planting. Furniture is moveable to facilitate outdoor games and a wall on the northern

¹ A detailed Accommodation Schedule was submitted as part of this application

² * Average garden size

boundary provides the opportunity for tactile/ sensory panels and the projection of images to aid visual and sensory stimulation.

- The sensory garden will provide a quiet space for residents with semi-private seating areas. Planting will be used to enhance the sensory experience, catering for residents with both hyper and hypo sensitivities.
- The Wildlife Garden is designed to provide a calming backdrop to the residents' bedrooms with planting utilised to both attract wildlife and create a visual display throughout the year. It will allow residents in the western wing a pleasant and natural outlook.

3.26 In addition, biodiversity enhancements will be distributed throughout the development and include:

- 8 Bird boxes;
- Bat boxes (amount subject to further investigation);
- Native and biodiverse planting;
- Green roofs;
- 43 new trees (19 to be removed); and
- Reuse of felled trees or dead branches to create habitats for invertebrates and mammals.

3.27 These measures result in a betterment of Biodiversity Net Gain (BNG) of 11.39% gain in habitat units and 89.68% above policy requirements in addition to offsite planting.

Sustainability measures

3.28 The proposal has been designed to meet the requirements of being zero Carbon and include measure such as:

- Fabric first approach with high levels of insulation;
- External shading devices to limit overheating;
- Triple glazed windows;
- Efficient background mechanical ventilation with heat recovery (MVHR)
- Air Source Heat Pumps and PVs to all homes and across the respite centre

Consultation

4.1 The Proposed Development has been informed by pre-application discussions with officers from Hampshire County Council, RBC planning, highways, ecology officers, Parks and Streetscene Teams, as well as residents and stakeholders.

4.2 Feedback has been collated through verbal feedback and the completion of feedback forms during consultation events or online through the dedicated project website- details below.

4.3 A Statement of Community Involvement submitted with this application, but the following provides a summary of the engagement activity which has taken place.

Pre-Application Discussions

4.4 Pre-application consultation has been undertaken with officers at RBC under a dedicated PPA, enabling officers to engage in an iterative design development. Several meetings occurred including:

- November 2022 scoping meeting to discuss the general layout, massing and initial landscape, ecology, and tree strategies.
- January 2023 pre-application meeting to discuss layouts and access, refuse strategy parking and delivery strategies.
- January 2023 pre-application meeting to discuss detailed design, character and materials, landscape strategy including trees, ecology and biodiversity net gain.
- March 2023: meeting with the Case Officer to discuss the DRP feedback and next steps.
- April 2023 pre-application meeting to discuss the landscape proposals, biodiversity net gain and off-site mitigation measures. The final design proposals for submission were also presented.

Consultation with RBC Adult Care

4.5 The design of the respite centre has been developed through a constructive co-design process consisting of workshops with RBC's Adult Social Care team, with support from Hampshire County Council's architectural team who have delivered a similar building in the neighbouring borough.

- 4.6 In addition, separate workshops have been held with both staff and building users of the existing Respite Care Facility at Whitley Wood, with a focus on issues within the centre that could be improved.

Design Review Panel

- 4.7 In March 2023, the scheme was presented to Reading's Design Review Panel (DRP). Overall, the review was positive.
- 4.8 Following the feedback from the DRP, the proposals were revised to address some of the comments on architectural design of the elevations and fenestration and the entrance to the respite centre.
- 4.9 Further details on the DRP and the design responses are provided in the supporting DAS.

Community Consultation

- 4.10 Residents were consulted about the proposed development during the pre-application process and their comments and concerns shaped the development of the proposals. Flyers with information about the proposed development were distributed and a website with information was set up (<https://consult.reading.gov.uk/dens/amethyst/>).
- 4.11 A drop in event for residents was held on 7th March YMCA on Parkside Road (7 minutes' walk from the proposed site) with presentation boards highlighting key site constraints and surveys, and current proposals at the time.
- 4.12 Overall, the collated feedback confirms support from the local community for affordable homes for families and in particular houses over flats and the proposed scale of the proposals. However, residents did raise concerns over traffic and parking provision, possible vehicular or pedestrian connection with Jenkins Close and overlooking.
- 4.13 Further detail on the full consultation exercise carried out throughout this project can be found in the Statement of Community Involvement.
- 4.14 In conclusion, the quantum of development is considered appropriate for the size of the site. The design is either policy compliant or exceeding national or local requirements. As such, it provides several benefits to the local community and environment which will be demonstrated throughout this planning application.
- 4.15 The overall size and design respects the character of the local vicinity and is commensurate with respect to local requirements and the design principles.
- 4.16 The proposals have been developed through detailed analysis of the site, its surroundings and local evidence alongside consultation with Local Officers.
- 4.17 The DAS and other supporting documents, demonstrates how the scheme positively integrates energy, flooding and drainage strategies to ensure a high-quality standard of development for Reading Borough Council.

4. Planning Policy Context

- 5.1 The Town and Country Planning Act 1990 (referred to as 'the Act'), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England. Collectively the three acts create a plan-led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (Section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.2 In this instance, the statutory development plan relevant to the Site comprises The National Planning Policy Framework (2021) and Reading Borough Council Local Plan and Proposals Map (2019). Other material considerations include The National Planning Practice Guidance (2021).
- 5.3 Supplementary Planning Guidance (SPG) documents that support the Local Plan include: Affordable Housing SPD (July 2021), Revised Parking Standards and Design SPD (October 2011) and Sustainable Design and Construction SPD (July 2019).
- 5.4 Planning law dictates that where there is conflict between development plan policies, precedence is given to the newer policy. Reading's Local Plan was published in 2019. This generally follow the requirements laid down in NPPF, which has since been updated in the 2021, with further changes being consulted on.

National Planning Policy Guidance (July 2021)

- 5.5 The National Planning Policy Framework (NPPF) sets out the Government's overarching planning policies for England on the delivery of sustainable development through the planning system. The NPPF identifies the economic, environmental and social dimensions of sustainable development in creating strong, vibrant and healthy, sustainable communities.
- 5.6 At the heart of the NPPF lies a presumption in favour of sustainable development (Paragraph 11). This means approving proposals that accord with an up-to-date development plan or policies which are most important for determining the application are out-of-date, granting permission unless local, regional or national policies provides a clear reason for refusing the development proposed.
- 5.7 Relevant chapters include; Chapter 5 (Delivering a Sufficient Supply of Homes), 8 (Promoting Healthy and Safe Communities) 9 (Promoting Sustainable Transport), 11 (Making Effective Use of Land), 12 (Achieving well-designed Places), 15 (Conserving and Enhancing the Natural Environment) and 16 (Conserving and Enhancing the Historic Environment).
- 5.8 The National Planning Practice Guidance (NPPG) documents were published from March 2019 to provide supporting context for the Framework. The following NPPG documents are considered relevant to the Application Scheme:
- Air Quality (2019);
 - Climate Change (2019);
 - Community Infrastructure Levy (2018);
 - Consultation and pre-decision matters (2019);
 - Design process and Tools (2019);
 - Determining a Planning Application (2019);
 - Effective Use of Land (2019);
 - Housing Needs of Different Groups (2019);
 - Housing for Older and Disable People (2019);
 - Transport Evidence Basis in Plan Making and Decision Taking (2019);
 - Use of Planning conditions (2019);
 - Viability (2014).

Reading Borough Council Local Plan and Proposals Map (2019)

- 5.9 The Development Plan for Reading Borough Council comprises adopted Local Plan and Proposals Map (November 2019) which covers the period up to 2036.
- 5.10 Other policy documents include: the Planning Obligations under S106 (April 2015), Community Infrastructure Levy Charging Schedule (January 2015) and Annual Monitoring Report 2022.

5. Affordable Housing Statement

- 5.11 This chapter provides a statement on the affordable housing provision proposed on the site. Specifically it focuses on the assessment of the proposed housing provision, in terms of amount, mix and tenure to local plan policy requirement H5.
- 5.12 It is a key objective for Reading Borough Council to deliver more housing especially affordable homes. Policy H5 Affordable Housing states that:

Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading

- On sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing;
- On sites of 5 – 9 dwellings, a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided will be as affordable housing elsewhere in the Borough; and
- On sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.

For sites of 10 or more dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

In all cases, where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer / landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.

In determining residential applications the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development.

Priority needs are currently for housing with two or more bedrooms that can house families. The Council will regularly monitor and review the need for, and delivery of, affordable housing.

Affordable housing requirement

- 5.13 The SHMA 2016 for Berkshire identifies that there is a total need of 970 affordable homes per annum for Reading; considering the supply from existing affordable housing stock (564) there is a net need of 406 affordable homes per annum.
- 5.14 In terms of the dwelling size, the SHMA 2016 estimates the need for different sizes of affordable homes based on analysis of demographic trends. For the period 2013 to 2036, approximately 75% of the need is for one and two bed homes across the area covered by the SHMA, and for Reading Borough itself.
- 5.15 The requirement for affordable homes for Reading Borough is set out below:

Table 4: Extract of table 108 Estimated size of accommodation required by number of bedrooms (2013 to 2036) – Affordable Sector

		Unit Sizes				Total
Local authority		1 bed	2 bed	3 bed	4+ bed	
Reading	No.	1,490	1,129	741	72	3,433
	%	43.4%	32.9%	21.6%	2.1%	100.0%

Affordable housing completion

- 5.16 Regarding affordable housing completions, the AMR 2021 – 2022 states that a total (178 gross) affordable homes were completed. It is noted there has been a significant increase in the affordable housing completions in recent years from 2020-21 (54), 2019-20 (80) and 2018-19 (158). Furthermore, delivery was at its highest level since 2013.
- 5.17 However, the supply of affordable housing is significantly lower than the annual requirement of 406 over the Local Plan period.
- 5.18 In relation to size, Indicator 17 in Reading's Annual Monitoring 2021-22 Report reports on new build completions. In the reporting year, 13% of the total was for three-bed or more, which is some way below the policy target of 50%. When dwellings in designated centres are excluded as prescribed in policy H5, the figure rises to 30%. Whilst some completions were on sites that predated this policy position, this illustrates the difficulty of securing family housing in Reading.
- 5.19 The proportion of newly permitted new build dwellings that are three-bed or more is very similar to completions, at 12%.
- 5.20 This therefore emphasises the continued importance for the Borough to try and secure larger family homes in future developments.

Affordable housing offer

5.21 The application proposes 21 new homes, all of which will be affordable. The accommodation schedule is set out below. For the residential element, the largest proportion of homes will be 3 bedroom (86%), with smaller proportions of 4 bedroom (14 %).

Figure 5.3 Proposed Affordable Housing

Unit size	Bed space per unit type	Habitable rooms per unit type	Total units	Total habitable rooms	Total number of occupants	mix
3B5P	5	4	12	48	60	57%
3B6P	6	5	6	30	36	29%
4B8P	8	6	3	18	24	14%
			21	96	120	

5.22 In conclusion, this application proposes 21 new homes, all of which will be affordable social rent, under the management of Reading Borough Council and will contribute to the affordable housing need of 406 dwellings per annum.

5.23 Although this proposal does not meet the indicated housing mix requirement for affordable homes as set out in the SHMA 2016, the under provision of family sized units in the affordable market in Reading means that there is an acute need for developments like this which aim to deliver affordable family sized homes.

6. Compliance with Development Plan Policy

6.1 This section assesses the key planning considerations of the Proposed Development against development plan policy and other material considerations. It should be read together with the DAS and other supporting technical documentation accompanying this application. It is considered that the key issues relevant to this application are:

- Principle of development;
- Parking and access;
- Trees;
- Ecology; and
- Design Quality.

6.2 Other issues relating to contamination, energy, daylight, and sunlight etc will be reviewed under the section on 'Other Matters' presented in Chapter 7.

Principle of Development

6.3 One of the core objectives of the NPPF is to boost the supply of all housing types and to make the most effective use of land. Chapter 5 contains specific guidance on supporting this, noting that local strategic policies should seek to support the size, type and tenure of housing needed for different groups including, affordable housing, families with children and people with disabilities.

6.4 At a local level, Policy H1 places considerable emphasis on the delivery of new housing across the Borough including the western region, which is identified to deliver 2,400 homes between 2013 and 2036⁴.

6.5 Furthermore, Policy H6, sets out the approach for delivering homes to vulnerable people, although it is geared specifically to meeting the needs of older people, it is noted that: *'Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible'*.

6.6 The principle for development at this site, is ultimately set out in the allocation Policy WR3n and previous use. The policy notes that the site is suitable for 32-48 dwellings, therefore making it suitable for residential uses.

6.7 The policy allocation is silent on the reprovision of a care facility, but evidence to support this is by virtue of the site's previous use and supporting evidence on local need.

6.8 Under the Care Act, the Council are required to improve people's independence and wellbeing and must ensure that adequate facilities are provided and safe. The Respite Service provides a short-term break for adults with a learning disability, or those with autistic spectrum disorder, and their careers.

6.9 In 2018, the council undertook a review of Adult Social Care and identified several constraints relating to the operation of their respite facility at 188 Whitley Wood Lane, which was deemed to be no longer suitable and costly to run. The Borough undertook a consultation which considered the relocation of the service with service users. The outcome confirmed broad support for a new facility alongside a review of the future aspirations of the service⁵.

6.10 In the assessment of future need it was noted that the former Whitley Road provided 11 respite spaces and that by 2025, a further 75 spaces were likely to be required. The Borough have identified several sites to address this need, but a specific facility is required for people with learning difficulties. Six spaces are proposed in the new respite facility and is the maximum number of spaces supported by the Care Quality Commission for this type of facility.

6.11 Given that the site was previously used to provide a care facility and sits in an area with good transport connectivity and other facilities, it seems appropriate to reuse the site to provide a new facility to ensure that specific local housing needs are met, and that the Borough meets its obligations under the Care Quality Act.

6.12 The proposal maximises the number of bedspaces to be provided within the care facility, which therefore leaves a significant area of land for housing provision in accordance with Policy WR3n.

6.13 Table 2 sets out the Borough's performance against Local Plan Policy H1 targets over the last 5 years. The table demonstrates that, the Borough has performed extremely well with respect to housing delivery. Although, most developments have been in the town centre targeting young professionals. In 2021-22 over 90% of completed dwellings were for one- or two bed dwellings, and almost 95% were for flats rather than houses. Most new homes continue to be small and flatted and therefore unsuitable for families. There are a growing number of families in the Borough residing in temporary accommodation, which the current pipeline of delivery is not responding to.

⁴ Reading Local Plan (2019) Paragraph 7.2.4

⁵ [RBC Relocating the Learning Disability Respite Service and Shaping its Future](#)

Table 5: Housing Completions in Reading

Year	Policy H1	Total completions	% of target
21/ 2022	689	805	117%
20/ 2021	689	408	59%
19/ 2020	689	521	76%
18/ 2019	689	910	132%
17/ 2018	689	700	101%
Total	3,445	3,344	97%

- 6.14 The specific affordable housing needs have been discussed elsewhere in Chapter 5 and concludes that this the provision of 21 new homes for affordable social rent, under the management of Reading Borough Council will contribute to the affordable housing need of 406 dwellings per annum identified in the Berkshire SHMA 2016.
- 6.15 While this is development will not meet the expectations of Policy WR3n to deliver 32-48 dwellings, the Applicant's proposal will contribute to overall housing delivery in accordance with Policy H1 and H6.
- 6.16 Reading is a small, tightly constrained urban Borough with limited land available for new homes. The existing site is currently obsolete and therefore not providing any function or contribution to the Borough and is available for development, which could contribute to improvements to local character and townscape. Redeveloping the site to provide the co-location of respite and general housing needs, aligns with the historic use of the sites, relevant national and local policies, and helps the Borough to meets its obligations with respect to ensuring its residents have the appropriate accommodation and care that they deserve.
- 6.17 On this basis, the principle of development for the proposed uses is considered sound.

Access and Parking

- 6.18 The starting point of the assessment is to understand how the proposals perform against local policy requirements, which can be found in Reading's Revised Parking Standards and Design SPD (2011) and Local Policy TR3-5. Section 3 of the SPD sets out the maximum parking standards for all forms of development and in relation to respite care, there is no specific policy requirement relating to this land use, but three and four bed homes should be provided with a ratio of 2.1 ration.
- 6.19 Policy TR3 establishes the Borough's commitment to ensuring that proposals do not create a detrimental impact upon the existing transport infrastructure and confirms that new access works should be designed to an adoptable standard and should be safe for all users. Furthermore, Policy TR5 notes that proposals should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport and that this requires striking a careful balance. Policy TR4 sets out the Borough's commitment to the provision and protection of sustainable transport facilities, including those for cyclists. In terms of cycle parking, the SPD notes that 1 space is required per 3 bed property and 2 for 4+ bedroom property.
- 6.20 Given the acute level of need for family sized affordable homes, the Applicant has engaged Hydrock Consulting to lead on an iterative design process with the local Highways Officer on layout, safety, and the parking strategy, which is to a suitable design for adoption.
- 6.21 Pedestrian and cycle access to the site is to be taken from the main vehicular access. Footways will be created on both sides of the entrance of Amethyst Lane. This results in a realignment at the junction with Liebenrood Road. A new turning head at the northern end will be introduced so vehicles can enter, turn, and exit the site in a forward gear. The roads within the site will be between 4.8m or 5.5 m wide. Guidance in Manual for Streets confirms that this is an appropriate width for a car to pass a large vehicle, and for two large vehicles to pass each other respectively.
- 6.22 The forward visibility corresponds to the Manual for Streets requirements for 20mph to be achieved through a large section of the site and therefore vehicles will be able to see each other during travel into and out of the site. A 20-mph design speed is robust given the highway geometry proposed. Nonetheless, the left-right bend at the entrance to the site will require larger vehicles to give-way, should two be accessing the site at the same time, although data from the trips assessment confirms that the likelihood of this occurring will be a low. Again, this approach is supported by Manual for Streets 2, paragraph 8.6.12.
- 6.23 In terms of delivery and servicing, the respite care facility will be provided with 2 x 1280l Eurobins and 1 x 240l bin within a dedicated secure bin store and vehicle collection area, which will be shared with other delivery vehicles servicing the residential element of the site. Each home will be provided with 3 x 240l bins located in front gardens which will be dragged to the roadside for emptying during bin collection days. The overall provision and delivery and service strategy is considered adequate for the site and proposals and has been developed in consultation with Reading's Waste and Highways Team.
- 6.24 The following sets provides a summary of the proposed parking strategy and how it responds to local policy and the local context of the Proposed Site.

Parking strategy for the respite care facility

- 6.25 The parking strategy is based on consultation with Reading's Adult Care and Health Team and the Borough's Highways Officer.
- 6.26 The staffing requirements for the centre are still being developed, but the Adult Care and Health Team have advised that there will always be up to 10 staff members on site. Residents are likely to be dropped off at the centre by family members or in assisted transportation.
- 6.27 Residents are likely to have high dependency needs and will be housed in a specialist environment providing for their physical and mental wellbeing for anything from one night up to two or three weeks, based on their allocated number of days / nights per year. It was considered by Reading's Highway's Officer that the parking strategy for the centre should be based on the parking requirements of a nursing home as described in Reading's Revised Parking Standards and Design SPD (2011). This stipulates a requirement of 1 per FTE staff & 1 per 4 residents.
- 6.28 Accordingly, this generates a maximum demand of 12 parking spaces- 10 for staff and 2 for 6 residents. The design proposes:
- 4 staff spaces (3 general needs spaces and one disabled access space)
 - 1 disabled access visitor's space
 - 1 larger minibus drop off space
 - 1 dedicated deliveries space (to the North of the building).
- 6.29 Firstly, hospitals are larger in scale and that would include significant amounts of ancillary staff, which is unlike this facility and as such a parking strategy has been proposed which is below the expected maximum stipulated in the SPD, but there are several factors driving this approach.
- 6.30 With respect to staff parking, staff are likely to work along two main shift patterns starting early morning and evening to cover the full day/night and therefore not all 10 members of staff will be on site at the same time.
- 6.31 This site is in Zone 3 but is under a 5-minute walk to Zone 2 on Bath Road where there are several public services either to the west of Reading or into the centre, making its accessibility excellent for potential staff. Most staff at the facility are likely to work shift patterns throughout the day and into the evening, when residents are awake and require care, meaning that the most staff like hospital workers could/would use public transport.
- 6.32 Furthermore, given the nature of dependency and needs, residents are unlikely to have the capacity or use a car, therefore demand for spaces by residents is unlikely. Instead demand for short stay drop-off spaces is required for dropping off and collecting residents alongside a suitable amount for staff (long-stay).
- 6.33 On this basis, it is considered that the parking strategy for the site is appropriate to the use. Extensive consultation has been undertaken with Reading's Adult Care and Health Team who, have confirmed support for the proposed parking strategy for the centre- See correspondence in **Appendix 3**.
- 6.34 All parking spaces for the centre will be contained within the curtilage of the centre to the south of the site, with extensive landscaping used to help demarcate the area to help visitors distinguish between the centre and the wider highway / residential parking zones.
- 6.35 In terms of cycle parking, a secure cycle store for 4 spaces based on the SPD guidance for this type of facility.

Residential parking strategy

- 6.36 Based on the SPD, a maximum of 44 parking spaces would be required to support this development. This is considered quite excessive given the sites location to local service provision and excellent transport services. Therefore, in accordance with Policy TR5, the Applicant has sought an appropriate strategy in consultation with the Borough's Highways officer, which is based on the accessibility of the site, capacity assessment and evidence of car ownership using Census data.
- 6.37 As the Applicant is proposing an affordable housing development it was considered appropriate to focus specifically on 2021 Census data Output Areas (OAs) where social housing represents at least 50% of the total housing provision. The identified 44 OAs comprising 5,419 households in Reading. A three-stage methodology was developed to understand parking demand at a regional level, using household size and locale. This confirmed that the following average ratios set out in Table 5.

Table 6: Key findings from the Parking study

Parking Demand criterion	Average parking demand
Regional car ownership average amongst majority affordable housing tenants	0.91
Car ownership average amongst affordable housing tenants in different sized units (1-2 bed)	0.74
Car ownership average amongst affordable housing tenants in different sized units (3 bed+)	1
Average car ownership within locality of Amethyst Lane	1.31

- 6.38 As can be seen, across the Borough average ownership amongst affordable housing tenants is between 0.74 to 1 depending on the size of unit, however within the locality of the Site, car ownership is considerably higher. Of the three output areas assessed (E00082937, E00082959, E00082960) Table 3.2 in Hydrock's report confirms that E00082937 where Amethyst Lane (Proposed site), registers a 0.9 parking ratio which has the highest level of

affordable housing at 35%. In other OAs, E00082960 is predominantly 1- and 2-bedroom homes and E00082959 which recorded the highest parking ratio at 1.31 is predominantly private housing and smaller homes.

- 6.39 On this basis, private homes in the locality have on average 28-36% more cars than social housing homes across the Borough. It was therefore considered reasonable to apply an adjustment between private/ social housing tenants in order calculate the expected car ownership levels for the local if more than 50% of homes were affordable housing tenure. This gave a local social housing car ownership of 0.96 spaces per dwelling. On this basis, the design of the scheme includes the provision of 21 parking spaces, which equates to 1 space per unit. This is above the predicted average for the area but in line with the current regional average for affordable housing and affordable larger family homes.
- 6.40 It is considered that this is the maximum level of parking based on evidence and with reference to the site's transport accessibility and constraints.
- 6.41 The Application is submitted with a Travel Plan for adoption by RBC. This sets out, a long-term management strategy which includes a package of measures that will aim to promote more sustainable travel choices and reduce reliance on the private car, including a Travel Information Pack (TIP) for all future residents. In addition, each new home will have cycle parking storage to the front. It is understood that RBC Housing also have the capacity to place restrictions on ownership in tenancy agreements and identify suitable households who do not own a car. The layouts include demarcated parking bays to control the locations where cars can be parked.
- 6.42 For residential cycle parking, the SPD notes that 1 space is required per 3 bed property and 2 for 4+ bedroom property, which leads to a requirement for 24 cycle parking spaces. The proposals include 42 cycle spaces, which equates to two spaces per unit, which is above the policy requirement, but considered appropriate given the need to encourage sustainable movement and the likelihood that families are likely to have demand for more cycle parking provision than the SPD requires.
- 6.43 In conclusion, the development site is situated in an accessible location, within walking and cycling distance of a wide range of public transport and facilities. The proposed levels of parking have been developed through a review of evidence and in consultation with Adult Care and Health Team, RBC Highways, and waste teams. The Applicant has also identified potential mitigation strategies to safeguard future occupiers and visitors safety and access. On this basis, is it considered that the proposed design would prohibit this development being supported on traffic or transportation concerns.

Trees

- 6.44 Policy N14 seeks to protect individual trees, groups of trees, hedges and woodlands from damage or removal and to encourage the further greening of the Borough. New development is expected to make provision for tree retention and planting within the application site and where shortfalls occur, make an off-site contribution. The importance of green infrastructure is also important to local eco-systems, amenity, biodiversity, and climate change as referenced in local policies CC3, CR3, CR14, EN12, EN15 EN18.
- 6.45 Middlemarch have prepared a supporting Arboricultural Impact Assessment (AIA) in accordance with British Standard 5837:2012 and a desktop study and site survey were conducted on the 23rd September 2022. The approach has been developed in consultation with RBC officers.
- 6.46 In total 22 individual trees, groups and hedgerows were identified on site during the survey, which includes TPO186/06 close by on Liebenrood frontage. Table 4.1 in the AIA confirms that there are no Category A trees (the best quality) on site, but there were four trees within Category B, 18 within Category C and 3 within Category U - the poorest quality. A general discussion on the quality of notable trees and their conditions is provided in Chapter 4 of the AIA.
- 6.47 From the outset, every effort has been made to retain existing trees on site and create a suitable balance between buildings/ hard landscape and soft landscape, whilst meeting the brief for much needed new family homes and a Respite Facility. This included reductions in the car-parking strategy, reduced garden sizes, retention of large trees in back gardens and alternative layouts. However, all of these were deemed unacceptable to private amenity provision, maintenance, and highways. Therefore, the delivery of this proposal relies on the removal of 19 tree and hedgerow species as detailed in Table 5.1: Tree Removal of the AIA.
- 6.48 The tree removal strategy includes the partial removal of G3, which falls into the demise of a proposed new private garden and two trees and one group of trees (T6, T12, G5) identified for removal (Category U) owing to their condition, which would be required, irrespective of the proposed development. One tree and one group of trees identified for removal (T5 & G6) was found to be of moderate value (Category B) whilst options were investigated to retain these trees through consultation with the design team and RBC tree officer, this was not possible. Therefore, it was agreed that suitable new tree planting would offer an adequate level of mitigation for the loss.
- 6.49 Although the removal of one tree and one group of 'Category B' trees is considered an arboricultural loss, these trees were likely planted as part of the historic site use of the site as a care home, which is now derelict and so these trees offer limited public amenity to the surrounding area.
- 6.50 The remaining trees and groups (See Table 5.1) that are to be removed or partially removed were assessed as being low value (Category C). Further works are also proposed to the Root Protection Areas (RPAs) of several trees as detailed in Table 5.2 of the AIA.

- 6.51 Although, the tree removal strategy results in significant loss, an extensive tree planning proposal of 43 additional trees (a net addition of 24 trees), is proposed as illustrated in the proposed landscape arrangement plan and offers the opportunity to implement informed replanting of specimens that can benefit the site and its new use for the benefit of future occupants and visitors. The Applicant is also seeking to agree with Partners across RBC a supplementary off-site tree planting strategy to ensure suitable mitigation is offered for the proposed loss of trees in terms of canopy cover and net-gain in quality.
- 6.52 The proposed tree planting strategy will enhance the character and appearance of the area and provide for biodiversity in line with Policy EN14. In line with Policy CC3 and EN15, the new trees together with the wider landscape scheme will provide shading of amenity areas, connect habitat and help mitigate climate change.
- 6.53 It is therefore considered that the impact on trees should be considered acceptable as the new development will make a lasting contribution to the visual amenity value and canopy coverage across the site, alongside a tree planting strategy off-site, for the benefit of all residents. On this basis, the proposal is compliant with Local Plan policies and should not be refused on arboriculture grounds.

Ecology and Biodiversity Net Gain (BNG)

- 6.54 Paragraph 174-5 and 80 sets out the national position on the protection of biodiversity and how the assessment of ecology should be undertaken by Applicants. Essentially, all development should contribute / enhance the natural local environment, minimising impacts and providing net gains, such as connections to / creation of habitats and green infrastructure through their integration in the design.
- 6.55 While ecology intersects with several Local Policies in the Borough, Policy EN12 provides the main source of guidance in the Borough. New development is expected to maximises opportunities to create new green link assets and no development should result in a net loss of biodiversity and geodiversity.
- 6.56 RSK ADAS Ltd were instructed to undertake a Preliminary Ecological Appraisal (PEA) in October 2022. The following observations were made:
- The dominate habitat was hardstanding with some broadleaved plantation woodland, improved grassland, amenity grassland, ephemeral/short perennial vegetation, introduced shrub, species-poor hedge with trees and scrub. The
 - Bats- the buildings on site offered opportunities for roosting bats and nesting birds, with Building 3 providing evidence of the presence of bats;
 - Badgers Badger sett located in the north-east of the site and latrines found within the north-east and north-west of the site;
 - A mammal den/burrow was identified under Building 2 through evidence of feeding adjacent to the burrow.
- 6.57 In January 2023, a pre-works Badger check was undertaken on the site to confirm any new signs of activity and a new single entrance sett was found approximately 8 m south of the original sett. Further monitoring of the setts were recommended using camera traps to record activity associated with the sett entrances and mammal paths.
- 6.58 The table contained on pages 6-7 of the report provides information on further surveys, mitigation measures and enhancement measures recommended for the site. In relation to the surveys, it is anticipated that additional surveys will be undertaken with respect to badgers nesting birds, bats, foxes and Ground Level Tree Assessment will be undertaken and submitted to support this application between May and August 2023.
- 6.59 Proposed enhancements have been recommended and include:
- Native trees and shrubs are planted where possible within the development site to enhance habitat for bats, birds, invertebrates, and other wildlife;
 - A planting strategy which creates or strengthens wildlife corridors both within the site and the local environment;
 - Create log piles following any vegetation clearance resulting from possible development, to be installed within suitable retained habitat;
 - Bird and bat boxes installed within existing mature trees onsite, and incorporated into the development of the new proposed buildings to increase habitat suitability and capacity for these species at the site;
 - Native hedgerows and/or installation of Hedgehog highways at site boundaries and across the site;
 - Create additional hibernacula to encourage amphibians at all life stages to be present at the site;
 - Create 'insect hotels' constructed of planks of wood interspaced with bricks (with holes) and terracotta pots, and natural materials including bark, moss and soil; and
 - Wildflower planting post construction to encourage greater assemblages of invertebrates.
- 6.60 These recommendations aim to ensure that the development complies with NPPF and Reading's Local Plan by ensure no net loss in biodiversity. The Town and Country Planning Act 1990 will be updated in November to include targets for Biodiversity Net Gain (BNG). Although, this application is to be submitted and decided ahead of this update, the LPA have sought this assessment to understand whether the proposal will meet the TCPA BNG target of +10% net gain.

- 6.61 ADAS have prepared an assessment based on Defra's Biodiversity Metric 3.1 Calculation tool (Natural England, 2021) and the tables below provide the baseline and post development assessment. Although positive, it does not meet the required 10% and the trading rules of the metric for one habitat. To satisfy the trading rules creation of heathland and scrub habitats of medium distinctiveness is required. Nonetheless, these results demonstrate that the Site will achieve a net biodiversity area gain of 0.45 biodiversity units, which represents a 14.42% net gain in area habitats and a net biodiversity linear gain of 0.93 biodiversity units, which represents a 252.83% net gain in linear habitats.

Design and Quality

- 6.62 The Local Plan states that housing standards serve an important role in ensuring resident health and well-being (paragraph 4.4.40). Therefore, Policy H5 Standards outlines six criterion, which new housing must meet. The following table assesses how the new proposal performs against each of these criteria.

Table 7: Performance of the scheme against Policy C5

Policy H5 requirements		Scheme response
a	Floorspaces must comply with Nationally Described Space Standards	As detailed in the Accommodation Schedule which is included in the submission, all new homes will either meet or exceed the Nationally Described Space standards. In relation to the respite centre, the Borough does not have minimum space standards for bedrooms in this type of facility, but with respect to HMOs, there is a minimum of: 6.51 square metres for one person aged 10 years or over. 0.5 square metres for two persons aged 10 years or over All rooms in the respite centre exceed this minimum standard.
b	All new buildings will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations	As confirmed in the supporting Sustainability Assessment, in line with the Sustainable Design and construction Checklist (Water section), the new dwellings will reduce the use of potable water to below 105 litres/person/day using water efficient fittings. A downpipe is proposed to the rear of every house to provide the opportunity for rainwater collection for gardening purposes.
c	All major new-build residential development should achieve zero carbon homes	The development achieves 45% reduction above 2021 Building Regulations at 'Be Lean' stage and 112% overall carbon reduction above 2021 Building Regulations, achieving a net zero regulated carbon.
d	All new build housing will achieve a minimum 19% improvement in the dwelling emission rate over the target emission rate, as defined in 2013 Building Regulations	As reported in paragraphs 7.28-9 the development achieves 45% reduction above 2021 Building Regulations at 'Be Lean' stage. This equates to 16.3 tCO ₂ (14.7 tCO ₂ per year for residential spaces and 1.6tCO ₂ per year for Respite centre). The total Cumulative Savings has been assessed as being 112% overall carbon reduction above 2021 Building Regulations, achieving net zero regulated carbon.
e	All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3)	All homes onsite are designed to be accessible and adaptable in line with M4(2) of the Building Regulations.
f	On developments of 20 or more new build dwellings, at least 5% of dwellings will be for wheelchair users dwellings in line with M4(3) of the Building Regulations.	The respite centre contains 6 rooms and has been designed to meet M4(3). This equates to 4.5% of all new accommodation on site or 6% of total hab rooms on site. It therefore meets the requirements of this policy.

- 6.63 In addition to the above, all new residential units have been designed to be dual or triple aspect, facilitating natural ventilation and access to natural light. The scheme is underpinned by a detailed energy strategy which has been integrated with a daylight and sunlight assessment to ensure that no new homes will overheat. A detailed assessment of the daylight and sunlight performance confirms all new homes achieve an excellent living environment for future occupants. Elsewhere additional measures have been adopted in relation to noise and drainage (detailed in chapter 7) to ensure design quality is met.
- 6.64 All homes enjoy private rear gardens and additional communal amenity space is also provided in the form of a dry swall and garden, totalling 213 sqm. The respite facility also includes 446.2 sqm of amenity space across three different spaces.
- 6.65 In conclusion, the proposed standards for housing in the proposed development will play an important role in supporting future residents' health and well-being. The delivery of affordable family homes will also help to reduce overcrowding, unhealthy living conditions, injuries in the home and social isolation. In doing so, proposed development meets the criteria of Policy H5.

7. Other Matters

7.1 This section provides a summary of the key findings raised in supporting reports.

Ground Contamination

7.2 A Desktop (Phase 1) and Ground Investigation Report (Phase 2) have been prepared in support of this application.

7.3 The Desktop Study identified the following potential contaminant sources at the Site:

- Made Ground associated with historical construction activities and imported fill;
- Ground gas from organic material in Made Ground; and
- Asbestos within the existing buildings.

7.4 The Phase 1 report notes that a ground investigation will be required to further investigate the ground conditions at the Site and determine the level of contamination present.

7.5 The intrusive ground investigation was undertaken between 14th and 17th March 2023 and included one cable percussive boreholes, seven window sampled boreholes and two trial pits utilised for soakaway testing. Representative soil samples have been chosen from the exploratory hole locations for chemical laboratory testing.

7.6 Based on the desk-study and field observations, no significant contamination of the ground is expected at the Site, but this is subject to change pending the results of the laboratory testing. The findings of the laboratory testing will be presented in the Ground Investigation Report (Phase 2) will be submitted to the LPA in due course.

Sustainable Urban Drainage

7.7 Hydrock Consulting have prepared a Drainage Strategy in accordance with both national guidelines and incorporate 'best practise' approach to reducing the impact of the flooding caused by the new development. Chapters 2-3 provides an overview of the site context and water infrastructure and confirms that this site is in Flood Zone 1.

7.8 Table 3.4 assesses various SuDS measures for the site and confirms that the use of permeable paving, swales and underground storage will be used in the drainage design. The implementation and selection of SuDS techniques is based on the site layout and context. The target run-off rate for this site is 2 l/s, but this is deemed unfeasible due to financial reasons and spatial limitations. Therefore a 5 l/s discharge rate is proposed, which Thames Water has deemed acceptable.

7.9 The use of the underground storage system is subject to adoption by either the Highways Authority or Thames Water, which are proposed beneath the adoptable highway to the north and within the private road to the south of the site. Cellular storage will attenuate storms up to and including the 100yr+ 40CC% storm. Thames Water assets will require an upgrade to achieve this.

7.10 The foul and surface water drainage systems for the new development will be designed to accommodate the required flows for the lifetime of the development and all surface water run-off from storm events up to and including the 100-year plus 40% climate change will be retained within the overall site.

7.11 Section 5 of the report sets out the ownership and maintenance strategy of drainage assets. Ownership and maintenance liabilities for the drainage system will be clearly defined so that in the event of failure, appropriate action can be taken, and the system continues to work efficiently.

7.12 In conclusion, the drainage design adopts SuDS principles, taking into consideration the site context and location. The SuDS are designed to maximise the opportunities and benefits to secure surface water run-off management in terms of quality, quantity, flood risk, and amenity. It is therefore considered that the SuDS strategy for the site accords with Policy EN18 on flooding and drainage and should not prevent approval of this scheme.

Noise Impact Assessment

7.13 A Noise Impact Assessment in line with local authority guidance, British Standard BS 8233: 2014 and the WHO Guidelines was undertaken by 24 Acoustics Ltd and has been submitted with this application. The noise survey was undertaken by a suitably qualified consultant between 1st and 8th March 2023.

7.14 The main noise source affecting the site is from distant road traffic using Liebenrood Road and that acceptable internal and external noise levels would be achieved at the proposed development through the use of enhanced thermal double glazing and the proposed use of mechanical ventilation (MVHR).

7.15 In relation to the external plant at the respite centre, it is recommended that the cumulative noise level from all new plant associated with the development should have a maximum rating noise level of 5 dBA below the existing background noise levels when assessed at the nearest sensitive property.

7.16 Overall, the assessment confirms that an appropriate internal and external acoustic environment can be provided at the proposed development, and it is therefore in line with the requirements of policy CC8 Safeguarding Amenity and national and local guidance.

Energy

- 7.17 HTA Sustainable Futures has been prepared an Energy and Overheating Assessment Statement to support the submission of the planning application for the site. This report sets out how the development responds in relation to energy and overheating.
- 7.18 As per policy H5, all new homes are expected to be zero carbon and achieve a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations⁶. The strategy for reducing energy use and associated carbon emissions through the design of the scheme follows the 'Be Lean', 'Be Clean', 'Be Green' Energy Hierarchy.
- 7.19 Energy efficiency will be achieved using fabric first approach which utilises high fabric efficiency, good air tightness levels, efficient building services, and the installation of PV panels on the roof.
- 7.20 The possibility of employing a decentralised energy network was investigated but no current or future decentralised energy schemes were identified within the vicinity of the site.
- 7.21 Air Source Heat Pump will provide both hot water heating. The use of ASHP reduces carbon emissions and poor air quality. Most of the dwellings will be provided with efficient compact Air Source Heat Pumps (ASHPs) with no outdoor units. However, the large end terrace houses will have efficient Air Source Heat Pumps with outdoor units.
- 7.22 The development achieves 45% reduction above 2021 Building Regulations at 'Be Lean' stage. This equates to 16.3 tCO₂ (14.7 tCO₂ per year for residential spaces and 1.6 tCO₂ per year for Respite centre).
- 7.23 The total Cumulative Savings has been assessed as being 112% overall carbon reduction above 2021 Building Regulations, achieving net zero regulated carbon.

Daylight and sunlight

- 7.24 Policy CC8, confirms that developments are expected to respect the living environment of existing residential properties and not create unacceptable living conditions for new residential properties. HTA Sustainable Futures have prepared a report to review of the daylight and sunlight impacts of the proposed development.

Daylight

- 7.25 In relation to daylight, the impact upon surrounding properties, 24 windows in surrounding properties and at Dellwood Community Hospital were tested as part of the daylight assessment using Vertical Sky Component (VSC) assessment. The results show that 67% or 16 windows achieved VSC lighting levels and of the 8 that failed:
- 3 out of the remaining 8 windows achieved VSCs higher than 20%, which is considered to be a satisfactory in urban environments.
 - The other windows were located at ground and first floor of 47 -63 Ashdene Gardens. Given the low-rise nature of the existing structures on site the reduction in VSC, does not mean that the light levels will be unacceptable but here may be a noticeable change in daylight levels to the occupants
- 7.26 On this basis, it is considered that the overall impact of the proposal on surrounding properties is likely to be noticeable but not unacceptable.
- 7.27 Daylight levels of the proposed blocks have been tested. The Illuminance (SDA) has been carried out to assess the daylight availability within representative habitable rooms of the proposed scheme. For the purpose of this study, 50 spaces were tested (37 rooms are residential and 13 in the Respite centre including office spaces). The results confirm 77% of rooms tested in the respite centre pass and 81% of the rooms in the residential blocks also pass. Most of the rooms which failed were LKD across the site and these recorded a result below 50%. The failing windows in the residential elements are in corners of the buildings and are therefore overshadowed by the proposed geometry of the building.
- 7.28 Overall the results are acceptable given the low-rise nature of the existing structures on site and the proposed redevelopment of a similar size.

Sunlight

- 7.29 The impact of the proposed development on the existing surrounding buildings (Dellwood Community Hospital and 47 -63 Ashdene Gardens) has been assessed in terms of sunlight provision. A total of 12 windows were assessed of which 12 passed the BRE criteria for annual probable sunlight hours (APSH) and 6 windows for winter probable sunlight hours (WPSH). The results showed that:
- 5 windows fall marginally below the Annual sunlight target. With the exception of one window in the community Hospital, all the remaining windows that fail are all located in 47-63 Ashdene Gardens. Given the low-rise nature of the existing structures on site, it was expected to have a noticeable reduction in the sunlight compared with the previous condition.
 - Of the 6 windows which failed the winter probable sunlight hours (WPSH), all are located in close proximity to the proposed scheme and face eastwards as a result they have fewer hours of sunlight over a day.

⁶ Now replaced by the 2021 Building Regulations

- 7.30 In conclusion, the impact of the proposals on daylight to surrounding properties is considered acceptable, especially when considering the existing site situation and the proposed development which is of a similar height to neighbouring properties.
- 7.31 In relation to the proposed development, eight south facing living rooms have been tested and all 8 passed and the results are therefore deemed to be excellent.
- 7.32 In the overshadowing assessment, the amenity spaces in all neighbouring properties were found to achieve sunlight availability in line with the BRE criteria. For the proposed development, six spaces were tested and of these four passed against the assessment for the 21st March. The two which failed were still considered to be well lit and usable throughout the year.
- 7.33 Overall, the proposed development will offer adequate levels of daylight and sunlight to future occupants and existing residents the external amenity area throughout the year.

Sustainability

- 7.34 HTA Sustainable Futures have prepared a Sustainability Statement that describes how the proposal responds to local sustainability policies. The report confirms that the proposed development will provide all residents with an opportunity to live a healthy, secure, and affordable life. The approach puts people at the centre creating a local area with a distinctive character with communal green spaces. The homes, internal and external spaces and the other facilities will support residents in improving their quality of life and creating a sustainable lifestyle.
- 7.35 Section 3 describes how the scheme responds to relevant sustainability policies and confirms that:
- The development achieves 45% reduction above 2021 Building Regulations at 'Be Lean' stage and 112% overall carbon reduction above 2021 Building Regulations, achieving a net zero regulated carbon.
 - There will be an improved sense of community to accommodate the needs of the residents in affordable homes built to high standards.
 - There will be improved connectivity across the site using a more sustainable travel plan for residents where walking and cycling movements is prioritised in an enhanced and natural environment which supports local biodiversity.
 - The proposal will optimise the use of resources on the environment across all construction and operation stages, including water where new dwellings will reduce the use of potable water to below 105 litres/person/day using water efficient fittings. A downpipe is proposed to the rear of every house to provide the opportunity for rainwater collection for gardening purposes.

8. Planning obligations and Community Infrastructure Levy

- 8.1 Paragraph 54 – 56 of the NPPF (2021) confirm planning obligations or conditions can be used to make otherwise unacceptable development acceptable in planning terms.
- 8.2 Paragraph 54 confirms that: *“planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*
- 8.3 Paragraph 56 further confirms planning obligations must meet the following three tests, including:
- “necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.”
- 8.4 Policy CC9 confirms that *‘Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.*
- 8.5 This includes employment, but the LPA will prioritise transport, open space (including enhancements to biodiversity), education and economic development.
- 8.6 As the application is being made by the Borough, it is expected that a Unilateral agreement will be made between the Reading Borough Council's Housing Team (The Owner) for enforcement by Reading Borough Council Departments (The Council).
- 8.7 Based on the guidance and a discussion with Officers, we propose the draft Heads of Terms set out in Table below to consist of the following items to be included in the Unilateral Agreement.

Table 8 Items for consideration in the Unilateral agreement

Item	Notes
Sustainable Drainage Systems	RBG to consider the adoption of the proposed cellular tank(s) and associated drainage infrastructure as prescribed in the supporting Drainage Strategy prepared by Hydrock Consulting
Employment	A financial contribution towards construction skills and end user employment, as set out in the Employment, Skills and Training SPD (April 2013)
Tree Planting Strategy	The Applicant has commenced these discussions with the RBC Parks Team, Tree Officer and Borough Ecologist to prepare and obtain approval for an off-site tree planting scheme to compensate for loss of tree canopy cover and biodiversity net-gain and will continue to liaise with the RBC Parks Team to agree tree species, sizes and locations for tree planting. This approach provides an opportunity to benefit the wider community instead of just future residents at the development site. The planting strategy will be based on the tree planting schedule prepared by HTA Design. The Applicant is seeking to secure the implementation of the strategy over the course of the development with a proportion of trees planted during the construction phase and the remainder planted within 3 years of the development being completed.
Biodiversity Net Gain	Obligation to secure the biodiversity net gain set out in the biodiversity assessment prepared by ADAS report.
Travel Plan and Monitoring	Obligations relating to residential Travel Plans.
S278 Highway Works	An obligation to enter a S278 works for the highway works required to facilitate the development and for the subsequent new roads and highways infrastructure to be adopted.

Community Infrastructure Levy

- 8.8 In addition to S106 planning obligations, the Proposed Development will be subject to Reading's CIL charge.
- 8.9 LB Reading Borough Council introduced its own CIL Charging Schedule in January 2015 and is applicable to all development in the Borough. The Site is designated within the Boroughwide charging area. The latest CIL Rate Summary (2023) confirms the following charging rates: £167.06 per sqm and £0.00 per sqm for care home facilities.

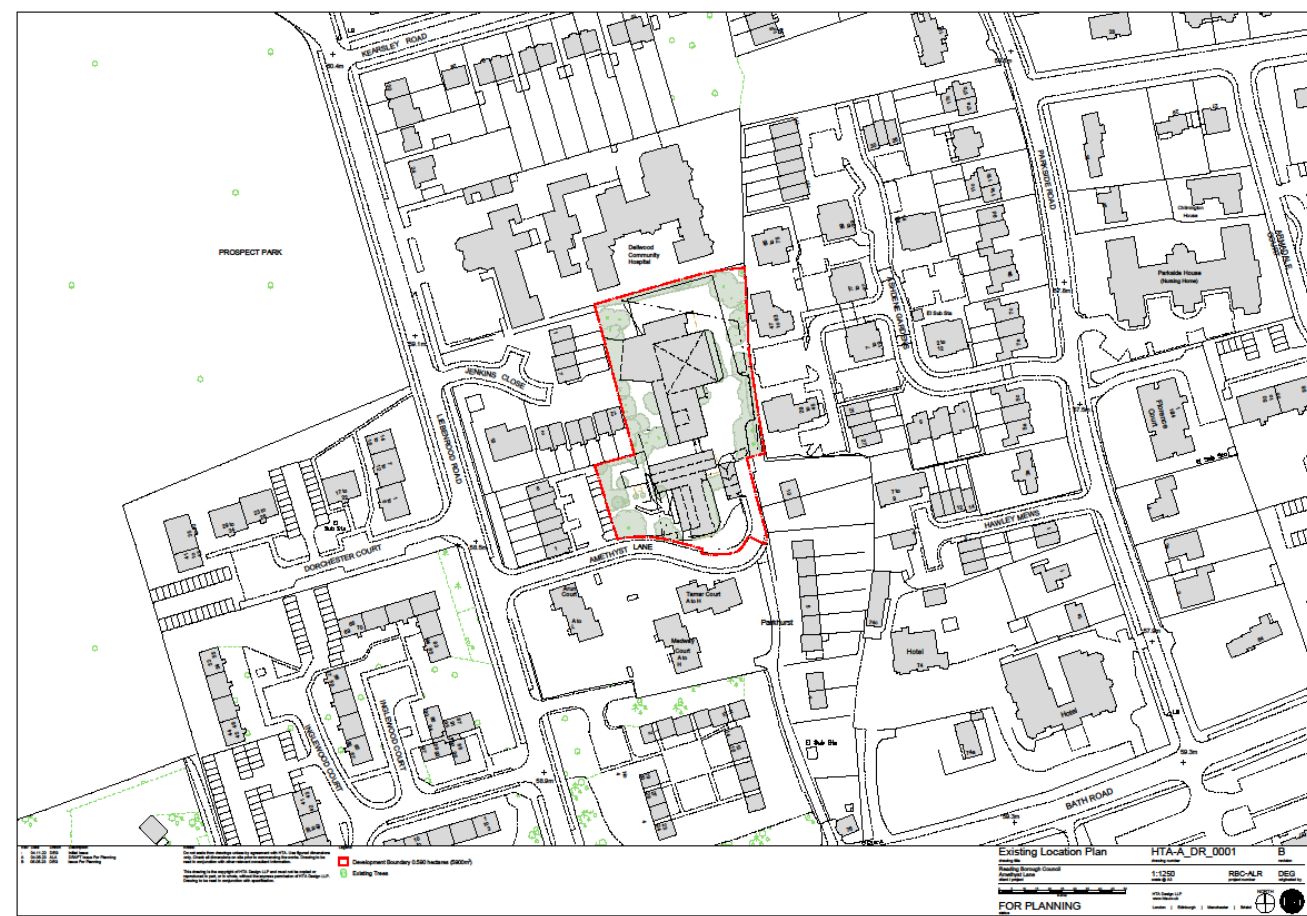
Planning conditions

- 8.10The Applicant expects that if approved, the application will be subject to several conditions including those relating to trees, landscape management and contamination.
- 8.11To ensure an efficient approach to managing the Borough's approvals of these matters, the Applicant has prepared and submitted Arboricultural Method Statement and Landscape management and maintenance plan for approval with the main planning application and will be submitting a Phase 2 contamination Assessment, during the determination stage for approval.
- 8.12Subject to these documents being acceptable, it is expected that the Borough will condition these reports as a matter of compliance for the scheme approval of the application.

9. The Planning Balance

- 9.1 There is a clear affordable housing need in the Borough. Planning permission is sought for:
"Demolition and redevelopment of the Amethyst Lane to deliver a new respite care facility alongside 21 new homes, landscaping and ancillary works".
- 9.2 The NPPF explicitly provides support for the redevelopment and optimisation of underutilised land, particularly public sector land, to provide much needed general and specialist housing, as proposed by the Applicant.
- 9.3 This Planning Statement, and the suite of supporting application documents submitted, demonstrates that residential development is appropriate at the site. Sections 5-7 of this Planning Statement demonstrate that the Proposed Development is in accordance with RBC's statutory development plan and will amount to sustainable development in accordance with the NPPF.
- 9.4 The Applicant has undertaken a collaborative approach to developing the proposals through engaging pre-application consultation with RBC officers and residents; all of whom have helped to shape the design and layout submitted with this planning application.
- 9.5 The proposals were also presented to the Design Review Panel in March 2023. The Panel were predominantly supportive of the scheme, but design development has progress with the support of the RBC officer team.
- 9.6 The Proposed Development includes the provision of 21 affordable dwellings and a new specialist respite facility and based on the discussions presented in chapters 5 and 6, there is a clear demonstratable need for these types of accommodation in Reading, meaning that it makes a positive contribution to local housing requirements.
- 9.7 The proposed dwellings will be of high quality, built to meet nationally described space standards, and provided with adequate private amenity space, as well as suitable levels of car and cycle parking. They will be of a high-quality, contemporary design. The siting of the respite centre helps to complete the street with its own entrance and parking area helping to create a clear distinction and separation to the homes.
- 9.8 The simple architectural design and material pallet help stitch the site into one architectural language to provide a contemporary and responsive cul-de sac design.
- 9.9 The Site integrates an energy and overheating strategy to achieve net carbon design and will contribute to further the sustainable credentials of the scheme through an exceptional SuDs strategy and biodiversity improvements which result in a net gain overall.
- 9.10 The landscape proposals have been sensitively developed to integrate the design within the context of the surrounding area while also responding to the very sensitive usership of the respite centre.
- 9.11 In conclusion, it has been demonstrated that there are no material considerations which would indicate that the Proposed Development should not be approved, and it is concluded that a decision to grant planning permission would be in accordance with the development plan when read as a whole.
- 9.12 The Applicant has included and wishes to agree a comprehensive mitigation strategy to address any potential adverse impacts and therefore we respectfully ask that planning permission for the Proposed Development at the Amethyst Lane site is granted without delay.

Appendix 1: Site Plan



Appendix 2: Drawing schedule

Document & Drawing Register Issue Sheet
Dwyer Road, ReadingHTA Design LLP
telephone: 020 7485 8555
email: info@hta.co.uk75 Wallis Road,
London E9 5LN
web: www.hta.co.ukProject Ref RBC-DRR
Dwg Series Planning

Drawing Number	Scale	Sheet Size	Document / Drawing Title	Status	06/04/2023	06/06/2023													
EXISTING																			
0001	1:1250	A3	Site Location Plan	FOR PLANNING APPROVAL	A	B													
0002	1:200	A1	Existing Site Plan	FOR CONTEXT	-	B													
SITE DRAWINGS																			
0100	1:200	A1	Proposed Site Plan	FOR PLANNING APPROVAL	J	L													
0110	1:200	A1	Proposed Roof Plan	FOR PLANNING APPROVAL	-	A													
0150	1:200	A1	Proposed Street Elevation	FOR PLANNING APPROVAL	-	-													
BLOCK PLANS																			
200	1:100	A3	Proposed Block Plan - Building A - Sheet 1	FOR PLANNING APPROVAL	E	F													
201	1:100	A3	Proposed Block Plan - Building A - Sheet 2	FOR PLANNING APPROVAL	-	F													
202	1:100	A3	Proposed Block Plan - Building A - Sheet 3	FOR PLANNING APPROVAL	-	A													
203	1:100	A3	Proposed Block Plan - Building A - Sheet 4	FOR PLANNING APPROVAL	-	A													
204	1:100	A3	Proposed Block Plan - Building A - Sheet 5	FOR PLANNING APPROVAL	B	C													
BLOCK ELEVATIONS																			
250	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
251	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
252	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
UNIT PLANS																			
301	1:50	A3	Proposed Dwelling Plan - 3B5PH Type B	FOR PLANNING APPROVAL	D	E													
302	1:50	A3	Proposed Dwelling Plan - 4B8PH Type A	FOR PLANNING APPROVAL	D	E													
303	1:50	A3	Proposed Dwelling Plan - 4B8PH Type B	FOR PLANNING APPROVAL	C	D													
304	1:50	A3	Proposed Dwelling Plan - 4B8PH Type B	FOR PLANNING APPROVAL	C	D													
305	1:50	A3	Proposed Dwelling Plan - 5B10PH Type A	FOR PLANNING APPROVAL	C	D													
306	1:50	A3	Proposed Dwelling Plan - 5B10PH Type A	FOR PLANNING APPROVAL	C	D													
310	1:50	A3	Proposed Dwelling Plan - 1B2PF Type A	FOR PLANNING APPROVAL	D	E													
311	1:50	A3	Proposed Dwelling Plan - 1B2PF Type B (WCH)	FOR PLANNING APPROVAL	D	E													
312	1:50	A3	Proposed Dwelling Plan - 1B2PF Type C	FOR PLANNING APPROVAL	C	D													
DETAIL ELEVATIONS / SECTIONS																			
600	1:50	A1	House Type 3B5PH Type B Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
601	1:50	A1	House Type 4B8PH Type A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
602	1:50	A1	House Type 4B8PH Type B Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
602	1:50	A1	House Type 5B10PH Type A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
603	1:50	A1	Block A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
604	1:50	A1	Block A Elevation / Sections - Sheet 2	FOR PLANNING APPROVAL	-	-													
REPORTS																			
RP_0100	N/A	A3	Design and Access Statement	FOR PLANNING APPROVAL	-	-													
RP_0101	N/A	A4	Statement of Community Involvement	FOR PLANNING APPROVAL	-	-													
SCHEDULES																			
SC_0010	N/A	A4	Schedule of Accommodation	FOR PLANNING APPROVAL	H	I													
SC_0011	N/A	A5	Schedule of Accommodation	FOR PLANNING APPROVAL	-	-													

Appendix 3- Correspondence from Adult Social Care



Melissa Wise
Interim Executive Director of
Social Care and Health
Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

Shweta Sharma Bhatia
Principal Property Development Officer
Property Development Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

12th May 2023

Your contact is Karla Vickers – Senior
Transformation Project Manager

Dear Shweta

Re Planning Application – Parking: Respite Facility at Amethyst Lane

I am writing to provide confirmation about the parking requirements for the proposed Respite Facility at Amethyst Lane.

Reading Borough Council's Adult Social Care Team are working with HTA Designs Ltd to design a respite facility to support up to 6 people. People will stay there for between 1 – 2 weeks to allow them to have a break and time away from their usual home.

The design team has undertaken extensive consultation with us to design a facility which is suitable in all aspects including parking for staff and visitors.

The parking proposals as outlined below are sufficient for the proposed facility.

- » 4 staff spaces (3 general needs spaces and one disabled access space)
- » 1 disabled access visitor's space
- » 1 larger minibus drop off space.
- » 1 dedicated deliveries space (to the North of the building)

Yours Sincerely