



Amethyst Lane

Planning Statement Addendum

HTA Design LLP on behalf of
Reading Borough Council

November 2023

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

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

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1. Introduction

- 1.1 This is an addendum to the Planning Statement, originally prepared for Reading Borough Council (RBC), referred to as 'the Applicant,' in support of an application for the redevelopment of Amethyst Lane, hereinafter referred to as 'the Site'. The proposed development aims to create new general needs homes, alongside a respite care facility, parking, comprehensive landscaping, and associated works.
- 1.2 This document should be read as an addendum to the Planning Statement submitted in May 2023, and it should be read in conjunction with the updated drawings pack and the revised documents submitted in November 2023. The details set out in the Planning Statement are not repeated, and this Planning Addendum deals with matters which relate to the proposed amendments as submitted here.
- 1.3 This Planning Addendum is being supported by a range of documents which have been revised and submitted as addendum reports. These documents are detailed in the table below.

Document	Author	Date
Plans, Drawings and Design & Access Statement	HTA Design LLP	3 November 2023
Arboricultural Impact Assessment and Method Statement	Middlemarch	3 November 2023
Biodiversity Net Gain Assessment	ADAS	10 November 2023
Daylight, Sunlight & Overshadowing Assessment	HTA Design LLP	3 November 2023
Energy and Overheating Assessment	HTA Design LLP	3 November 2023
Planning Statement (incl. Affordable Housing Statement)	HTA Design LLP	3 November 2023
Sustainable Drainage Systems Proposal	Hydrock	17 November 2023
Transport Assessment	Hydrock	3 November 2023

Table 1.1: List of Accompanying Application Documents

Report Structure

- 1.4 This Planning Statement Addendum is structured as follows:
- Section 2: Changes to the application
 - Section 3: Implications of the changes and policy assessment
 - Section 4: Planning Balance and Conclusion

2. The Proposed Development

Background

- 2.1 The initial application submitted in May 2023 sought approval for the redevelopment of the Site to deliver a new respite care facility alongside 21 homes, landscaping, parking and ancillary works.
- 2.2 Following this submission, the application has received a number of consultation responses by statutory consultees, RBC officers and the local community. These comments have been considered and responded to. Furthermore, in August 2023 the Applicant received feedback from RBC Planning Officers, who expressed concerns in relation to the proposed layout, garden sizes, proposed narrow house types, distances to neighbouring properties and the internal highways and parking arrangements. In response to these concerns, the Applicant has undertaken a revision of the site design. This revised design has been the result of a collaborative effort between the Applicant, the design team and RBC Officers.
- 2.3 The changes seek planning permission for:
“Demolition and redevelopment of the Amethyst Lane to deliver a new respite care facility alongside 17 new homes, landscaping and ancillary works”.
- 2.4 The changes to the proposed development are described below. The design and landscape changes are illustrated in more detail in the submitted DAS Addendum and the revised plans. The complete proposal is available for review in the comprehensive reports submitted in May 2023.

Reduction in Proposed Homes

- 2.5 The design changes include a reduction in the number of proposed homes from, 21 to 17, by removing four houses from Block A in the north of the site. In the scheme submitted in May 2023, Block A comprised 12 three-bed five person houses and the amendments reduce this to four four-bed eight person houses and four three-bed five person houses.
- 2.6 The tenure of the proposed homes remains unchanged, with all units continuing to be offered as affordable rented properties. The revised housing mix is detailed in **table 2.1** below.

Block	3B5P	3B6P	4B8P	Total
Block A	4		4	8
Block B		4	1	5
Block C		2	2	4
Total	4	6	7	17
%	24%	35%	41%	100%

- 2.7 The proposals for the respite centre remain unchanged since the submission in May 2023.

Reduction in Height of Block A

- 2.8 All the houses in Block A have been reduced to two storeys. The initial scheme featured a narrow three-storey housing type with three bedrooms designed for five people, which has been omitted from the proposals.

Site layout

- 2.9 The site layout has been amended to reduce the width of the road and to increase the distance to the eastern and western site boundary. Block B has moved east by 2m and Block C has moved west by 1.5m. These shifts have narrowed the distance between Block B and C from 20m to 16.5m, and the street to the minimum to allow passing of the required service vehicles (8.6m including pavements).
- 2.10 By relocating Blocks B and C within the site, the distance to the western site boundary has been extended from 5.7 meters to 7.7 meters, and the distance to the eastern boundary has been increased from 4.6 meters to 6.2 meters at their narrowest points.

Private Amenity

- 2.11 The alterations sought to the submitted scheme have allowed for more spacious gardens for all the proposed homes. The range of garden sizes has expanded from 31.8sqm to 83.0 sqm, as outlined in the May 2023 submission, to now range from 53.9 sqm to 114.7 sqm.

Pedestrian Movement and Parking Provision

- 2.12 The pedestrian movement from Amethyst Lane into the site has been reconfigured for improved legibility. In the original design, parking bays were situated on the western side of the proposed street leading into the site. However, in the revised site layout, these parking bays have been relocated to the opposite side.

- 2.13 The original scheme included 24 car parking spaces in total. The table below include the parking provision breakdown of the May 2023 submission.

Table 2.1: Parking schedule May 2023

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

- 2.14 The parking provision has been adjusted following the reduction in proposed units and the proposals now include 18 residential parking bays. The changes do not impact the parking provision for the respite care facility. Table 2.3 below sets out the amended parking numbers.

Table 2.2: Parking schedule November 2023

Unit size	Total units	Cycle parking spaces	Car parking spaces
3B5P	4	8	12
3B6P	6	12	6
4B8P	7	14	7
Visitor			1
Respite centre	1	7	4

Landscape Proposals

- 2.15 The most substantial alteration in the landscape proposal involves replacing the swale that was originally positioned in the centre of the site, in front of Block C, with a raingarden. This raingarden has been repositioned to the west, outside of Block B and will feature six trees which is the same amount the original submission included.
- 2.16 The amenity for the respite facility has not been impacted by the amendments made since the submission in May 2023. The full Planning Statement which accompanied the application in May 2023 includes more detail on the communal gardens for the users of the respite care facility.
- 2.17 The revised scheme will include 43 new trees, which is in line with the original submission, and the biodiversity enhancements the May 2023 scheme proposed are not affected by the changes.

3. Implications of the Changes and Policy Assessment

3.1 This original Planning Statement assessed the proposed development against the following considerations. This addendum updates the policy assessment where this has changed as a result of the revised application proposals.

- Principle of Development
- Affordable Housing Provision
- Parking and access
- Trees
- Ecology
- Design Quality
- Daylight, Sunlight and Overshadowing
- Energy and Sustainability
- Sustainable Urban Drainage
- Ground Contamination
- Noise

3.2 For the planning policy context, please refer to the previous Planning Statement submitted in May 2023.

Principle of Development

3.3 The changes to the proposed development do not impact upon the principle of development established in the original Planning Statement.

Affordable Housing Provision

3.4 Policy H5 of the Local Plan requires residential development to make appropriate contributions to affordable housing to meet the needs of the Borough. The policy states that on sites of more than 10 dwellings, 30% of the total dwellings should be in the form of affordable housing and that provision should be made on site where this is feasible.

3.5 Local Plan Policy H2 (Density and Mix) sets out the overall target mix for new development across Reading which is 18.6% one bedroom, 30.5% 2 bedrooms, 36.5% 3 bedrooms, and 14.4% 4+ bedrooms units. The Council has a particular focus on delivering more family sized housing and expects major development (10 + units) outside the central area to provide 50% family homes (3+ bed units).

3.6 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. For more detailed context on affordable housing need and offer in Reading refer to the full Planning Statement submitted in May 2023.

3.7 The design amendments have led to the removal of four 3B5P houses in Block A. As a result, the scheme now consists of 17 houses, which will be provided as social rent units owned and managed by RBC.

3.8 The application in May 2023 proposed 21 new homes. The accommodation schedule is set out below. For the residential element, the largest proportion of homes were 3 bedroom (86%), with smaller proportions of 4 bedroom (14 %).

Figure 3.1 Proposed Affordable Housing May 2023

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	

3.9 The amended scheme proposes 20 homes. The new mix is set out below. The largest proportion of homes were 3 bedroom (59%), with smaller proportions of 4 bedroom (41%).

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	4	16	20	24%
3B6P	6	5	6	30	36	35%
4B8P	8	6	7	42	56	41%
			20	88	112	

- 3.10 In conclusion, this amended scheme proposes 20 new homes, all of which will be social rent, under the management of Reading Borough Council and will contribute to the affordable housing need of 406 dwellings per annum. Furthermore, all of the proposed homes will be family sized, therefore meeting and exceeding the policy requirement in Local Plan Policy H2. The amendments sought to the application are compliant with Policy H1, H2 and H5 in the Reading Local Plan regarding the provision of new housing.

Transport, Access and Parking

- 3.11 Access to the Site remains the same as in the original application via Amethyst Lane. Nonetheless, the updated proposal incorporates alterations to the internal highway layout and parking arrangement, as detailed in Section 2 of this Addendum. In brief, the central portion of the proposed street and sidewalk has been narrowed, the swale has been moved to the western side of the street, adjacent to Block B, and parking spaces have been added to the eastern side of the road that leads into the site.
- 3.12 The residential parking numbers have been reduced from 21 to 18 spaces. The parking strategy for the respite care facility remains unchanged.

Residential Parking

- 3.13 The parking provision is based on the analysis undertaken in the original Planning Statement and Transport Statement which found that a parking provision of 1 space per dwelling is acceptable given local car ownership data in output areas with similar housing mix and predominantly affordable tenure.
- 3.14 The revised design provides 18 parking spaces which are below the requirements set out in the Revised Parking Standards and Design SPD but was deemed acceptable following analysis of local car ownership data. Parking will be provided as parallel bays along the proposed street within the site.
- 3.15 In summary, it can be concluded that the changes to the parking provision are appropriate in terms of local car ownership and the site's accessibility to public transport.

Cycle Parking

- 3.16 The cycle parking strategy has not changed since the submission in May 2023. Each house will be provided with two cycle spaces located in the gardens and the respite care facility will have seven cycle parking spaces.

Refuse, Recycling and Emergency Access

- 3.17 There are no significant changes to the services strategy and emergency access on the site.
- 3.18 The refuse vehicle used within Reading has been tracked to ensure it can manoeuvre through the site, making a turn at the T-junction at the north of the site.
- 3.19 The terraced homes will house their bins in their front gardens and be collected from there.
- 3.20 The Respite Care Centre will be designed to accommodate an integral communal bin store, housing 1100l eurobins for refuse and recycling on a weekly collection.
- 3.21 Emergency vehicle access has been tracked to ensure it can manoeuvre through the site, making a turn at the T-junction at the top of the site.
- 3.22 All terraced homes comply with the overall Building Regulation max. 45m hose length.
- 3.23 The Respite Care Facility is directly accessible via Amethyst Lane or the new street.
- 3.24 The changes to the application would not have a negative impact on the operation of the local highways network and remains in accordance with Policy TR1 in the Local Plan which promotes sustainable means of transport and requires development proposals to ensure an adequate level of accessibility and safety by all modes of transport.
- 3.25 The revised parking provision is acceptable and in line with the evidence provided in the previously submitted Transport Statement. Cycle parking remains unchanged and in accordance with Policy TR5. Therefore, the changes are considered acceptable from in terms of Highways and Parking matters.

Trees-Arbicultural Impact Assessment (AIA) and Method Statement (AMS)

- 3.26 The Architectural Impact Assessment (AIA) submitted in May 2023 underwent an update in November 2023 to evaluate the design changes. It's important to note that these changes would not result in any additional tree loss.
- 3.27 The Root Protection Zones affected by the construction remain consistent with those in the original scheme, and the design modifications do not adversely affect them.
- 3.28 Policy EN14 is aimed at safeguarding individual trees, tree groups, hedges, and woodlands from damage or removal, while also encouraging increased greenery in the Borough. New developments are expected to incorporate measures for tree retention and planting within the application site. In cases where there are shortfalls, off-site contributions are required. The significance of green infrastructure is underscored for local ecosystems, amenity, biodiversity, and addressing climate change, as highlighted in local policies CC3, CR3, CR14, EN12, EN15, and EN18.
- 3.29 In summary, the design amendments do not impact the original tree removal and planting strategy. The proposed development necessitates the removal of 19 trees, a substantial number, but it also entails the planting of 43 new trees, resulting in a net addition of 24 trees. Furthermore, the Applicant is in discussions with RBC Partners to establish an additional off-site tree planting strategy, ensuring appropriate mitigation for the proposed tree loss in terms of canopy cover and net quality enhancement.
- 3.30 Consequently, the impact on trees should continue to be deemed acceptable. The new development promises to make a lasting contribution to the visual amenity value and canopy coverage throughout the site. Additionally, the off-site tree planting strategy will benefit all residents. Based on these considerations, the proposal complies with Local Plan policies and should not be rejected on arboricultural grounds.

Biodiversity Net Gain (BNG)

- 3.31 A Biodiversity Net Gain Assessment for the revised proposal has been undertaken and will be submitted to the Local Planning Authority for consideration.
- 3.32 The Applicant is seeking to achieve a 10% Biodiversity Net Gain at the Site even though the mandatory requirement to achieve 10% BNG on development sites will not come into force until early 2024.
- 3.33 The original submission resulted in a net gain of more than 10% at the Site, and it is expected that the revised proposal would have a similar outcome. However, should the changes result in BNG of less than 10%, the Applicant would explore off-site mitigation which will be secured through a Unilateral Undertaking between the Applicant and the Council.

The Design and Quality

- 3.34 All units will provide high quality accommodation, in keeping with the originally submitted application. All units will meet and exceed the Nationally Described Space Standards as set out in Policy H5 of the Local Plan.

Accessibility

- 3.35 As per the original application, the respite centre contains 6 rooms and has been designed to meet M4(3) standards. The local plan policy H5 stipulates that schemes of 20 or more units should provide at least 5% of dwellings to be accessible for wheelchair users in line with M4(3) of the Building Regulations. As the changed proposal includes 17 new homes, there is no requirement to provide M4(3) compliant homes.

Private Amenity

- 3.36 The changes allow for larger gardens for the houses and therefore result in an improved provision of private amenity within the proposed development.
- 3.37 Reading's Local Plan Policy H10 requires new development to provide suitable private outdoor amenity. The Local Plan also notes that in determining the appropriate amount of private and communal open space for new developments, the site constraints should be considered.
- 3.38 The table 3.2 below sets out the minimum and maximum private amenity provision for each proposed dwelling type as submitted in May 2023.

Dwelling Type	Minimum Provision (sqm)	Amenity	Maximum Provision (sqm)	Amenity
3b5p Flats	38.7		83.8	
3b6p houses	40.7		43.4	
4b8p Houses	39.6		50.5	

Table 3.2: Proposed Private Amenity per unit May 2023

3.39 Table 3.3 below shows the private amenity provision for the amended scheme submitted in November 2023.

Dwelling Type	Minimum Provision (sqm)	Amenity Maximum Provision (sqm)
3b5p Flats	58.8	60.3
3b6p houses	51.4	55.1
4b8p Houses	59	132.2

Table 3.3: Proposed Private Amenity per unit November 2023

- 3.40 The communal amenity for residents has been amended since the submission in May 2023. The swale originally proposed and measuring 129.8sqm has been replaced by a raingarden on the opposite side of the new street, which will be 109.8sqm in size.
- 3.41 Due to the reduction of parking spaces, an additional communal amenity area has been introduced in the northeast of the site offering 138.0sqm for residents to use. In total, the scheme now includes 319.1sqm of communal amenity for residents, which is an uplift of 105.7sqm compared to the proposals from May 2023.
- 3.42 The revised design does not impact the provision of the communal garden areas for the respite centre users.
- 3.43 Overall, the amended scheme does not have a negative impact on the quality of accommodation and even improves it in areas such as private amenity. There it follows the requirements of the Reading Local Plan.

Sustainable Urban Drainage

- 3.44 Hydrock Consulting is currently evaluating the effects of the changes on the Sustainable Urban Drainage Strategy, and the findings will be presented to the Local Planning Authority for their review and consideration in due course.

Energy

- 3.45 The addendum to the energy and overheating assessment was prepared by HTA Sustainable Futures. The assessment confirms that the amendments have no discernible impact on the energy strategy. Nevertheless, these changes do lead to a slight reduction in CO2 savings, decreasing from 121% as per the May 2023 scheme to 119%. This reduction is deemed negligible, as the design still outperforms the minimum requirements of Part L 2021 and is in alignment with Net Zero Carbon standards and even exceeds them.
- 3.46 The analysis confirms that the proposed amendments maintain the integrity of the energy and overheating strategy initially submitted in May 2023. Furthermore, they remain in compliance with the stipulations outlined in Approved Document L 2021. Consequently, the revised proposals uphold RBC's Energy and Sustainability Policies CC1, CC2, CC3 and H5 successfully achieve net zero regulated carbon emissions.

Daylight and sunlight

3.62 Local Plan Policy CC8 Safeguarding Amenity is concerned with access to sunlight and daylight.

3.63 An addendum to the daylight and sunlight report submitted in May was prepared by HTA Sustainable Futures.

Daylight

- 3.47 The design amendments such as reducing Block A by one story, shifting Block B 2 meters to the east, and moving Block C 1.5 meters to the west, have collectively improved the proposed development's impact on neighbouring buildings and enhanced their daylight conditions.
- 3.48 Furthermore, as evidenced in a Technical Note submitted to the RBC Planning Officer on 23rd August 2023, there are no windows in habitable spaces at '47 - 63 Ashdene Gardens' east of Block A. Therefore, compliance with BRE criteria is excellent and a detailed Impact Daylight Analysis for the updated design is not required.
- 3.49 The new 4B8P house type (Type C) in Block A, the north terrace, has been analysed to ensure it receives adequate levels of daylight. The amendments to Block B result in an 86% Spatial Daylight Autonomy (SDA) compliance rate, which is a good result according to BRE criteria. The amended design performs better than the scheme submitted in 2023, the Ground Floor SDA levels are higher in the revised scheme and the SDA levels on the first floor continue to meet the BRE criteria in but with slightly lower values in the updated scheme due to its orientation facing directly east towards an existing building.

Sun on the Ground Analysis

- 3.64 The design amendments a notable enhancement in access to sunlight, particularly in the northern private gardens and the eastern terrace.
- 3.65 Significantly, the reduction in building heights and the expansion of garden areas have substantially increased the percentage of areas receiving two or more hours of sunlight on March 21. Although the northern gardens do not yet fully meet the BRE criteria for March, these improvements are compensated with adequate sunlight levels on June 21, when outdoor spaces are more frequently utilised. In particular, when comparing Table 2, representing the revised scheme, with Table 3 from the former planning submission, the amendments show that the northern gardens have seen an improvement in sun-on-the-ground levels, increasing from 13.19% to 35.23%, while the eastern gardens have improved from 38.89% to 55.72%, now fully complying with BRE criteria.
- 3.66 In summary, the ground-level sunlight analysis of the revised scheme achieves a significantly higher level of satisfaction with the BRE criteria, especially for the northern and eastern amenity spaces.
- 3.67 Overall, it can be concluded that the alterations to the submitted design will not have an adverse effect on the amenity of existing residents or create unacceptable living conditions for new residents. Therefore, the requirements of Policy CC8 continue to be met.

4. The Planning Balance

- 4.1 The changes seek planning permission for:
“Demolition and redevelopment of the Amethyst Lane to deliver a new respite care facility alongside 17 new homes, landscaping and ancillary works”.
- 4.2 An application for the redevelopment of the site to provide a respite care facility alongside provide 21 affordable homes, a new access point, parking facilities, landscaping enhancements, and ancillary works, was submitted in May 2023. Since the initial submission, the Applicant and their team have worked diligently to adapt and refine the proposals in response to feedback from RBC officers and statutory consultees. This constructive dialogue has significantly improved the application, and the revised design now represents the most suitable approach to development on this site while being able to deliver a substantial number of affordable family houses and the important 6-bed respite care facility.
- 4.3 This Planning Statement Addendum outlines the changes made to the application since its submission. Notable changes, such as the reconfiguration of the site layout to increase garden sizes, the replacement of the swale with a raingarden, and the reduction in four homes to avoid overdevelopment at the site, will bring tangible benefits to both future residents and existing neighbours.
- 4.4 Given the substantial demand for housing in Reading, the development of 17 affordable council-owned homes and a respite care facility on this brownfield site, which is well-located, without significant technical or environmental constraints, and suitable for development, offers public benefits.
- 4.5 This Addendum updates the original Planning Statement sections to reflect the amended proposals for the site. The proposed development would offer a broad range of social, economic, and environmental benefits which would outweigh any harm caused by the development of the site and should be considered on planning balance.
- 4.6 The Planning Statement Addendum demonstrates that there are no material considerations that would warrant rejecting the Proposed Development. It is concluded that granting planning permission for the Proposed Development aligns with the overall development plan.
- 4.7 In conclusion, we respectfully ask that planning permission for 17 new homes alongside a respite care facility at the Site at Amethyst Lane is granted.