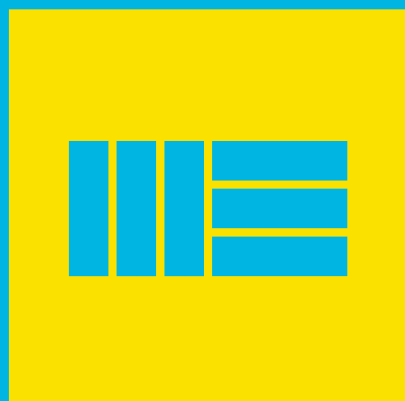


KING'S MEADOW VIEW, READING

PLANNING STATEMENT

02 JUNE 2023



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1.0 INTRODUCTION

1.1 This Planning Statement forms part of the application for outline planning permission (“the Application”) submitted on behalf of abrdn Property Income Trust (“the Applicant / “abrdn”) to Reading Borough Council (“the Council” / “RBC”) for mixed use development comprising of up to 820 residential units and up to 5,500 sqm of commercial floorspace (“the Proposed Development” / “the Scheme”) on part of Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS (“the Site”). King’s View Meadow (“KMV”) is the name that has been given to the project.

THE APPLICATION

1.2 In summary the Proposed Development comprises:

- Demolition of the existing buildings and structures on Site.
- Construction of new buildings to provide the following:
 - Up to 820 residential units; and
 - Up to 5,500 sqm of flexible Class E floorspace.
- Up to 200 parking spaces associated with the residential aspect of the development, all of which are to be located at basement level, and 53 parking spaces for the commercial uses.
- Delivery of 860 cycle parking spaces,
- Diversion of the existing sewer running through the Site.
- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.

1.3 This Application seeks outline planning permission with all matters reserved, save for highways access. The description of development is as follows:

“Outline application for comprehensive redevelopment, including demolition of existing structures, comprising a residential-led mixed use scheme of up to 820 units (Class C3) and up to 5,500 sqm (GEA) of commercial uses (Class E) together with ancillary and associated development including new and enhanced pedestrian routes and vehicle access routes, open spaces, hard and soft landscaping, basement, and basement car parking providing up to 200 car parking spaces, and up to 53 car parking spaces serving the commercial uses, up to 860 cycle parking spaces and servicing facilities, sewer diversion and associated works, with details of layout, scale, external appearance and landscaping reserved”.

1.4 The application format allows RBC and other relevant key stakeholders to assess parameters of the scheme against the statutory Development Plan (and other material considerations), whilst allowing flexibility for the Site to respond to changing market conditions, requirements and demands, with the Design Codes securing the key principles of design. Subsequent details in relation to appearance, landscaping, layout and scale will be submitted to and determined by RBC through future reserved matters applications and will have to comply with the approved Design Codes and fall within the limits set by the approved parameter plans and the Development Specification Report.

- 1.5 The outline application provides a robust framework for RBC to ensure that through detailed design development and subsequent reserved matters applications, high quality buildings and spaces will be delivered on the Site. This reflects that the outline Application has been tested robustly through Environmental Impact Assessment which is considered below.

FORMAT OF APPLICATION

- 1.6 The Application seeks outline planning permission for the development of the Site, as detailed above, with all matters reserved except for highways access.
- 1.7 Given the scale of the proposals, it was concluded that the proposals have the potential to have significant effects on the environment and that the proposed development constitutes Schedule 2 Paragraph 10(b) development, falling within the Category 'Urban Development Infrastructure Project'. The development involves more than 1ha of non-residential development, more than 150 dwellings and the overall area of the development exceeds 5ha, therefore it was accepted by the Applicant that an Environmental Impact Assessment was required in support of the Applicant. As such, a formal screening request to RBC was not considered necessary.
- 1.8 However, a request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) for an Environmental Impact Assessment ("EIA") Scoping Opinion, was submitted to RBC on 24 February 2023.
- 1.9 On 18 April 2023 RBC provided their formal response. As a result, this Application is supported by an Environmental Statement ("ES"), the scope and content of which has been considered and agreed with RBC.

PLANNING POLICY CONTEXT

- 1.10 The Proposed Development has been guided by national and local planning policy, planning guidance and other material considerations. The Development Plan relevant to the Site comprises the Reading Borough Local Plan (adopted November 2019).
- 1.11 Therefore, policies relevant to the development proposal derive from the suite of adopted development plans listed above and the National Planning Policy Framework (NPPF) (2021). The proposal has been developed with consideration to relevant national and local policies and this Statement will assess the development against these policies. Relevant policies for the Site are set out in Section 4 and assessed in Section 5.

REPORT AND PURPOSE STRUCTURE

- 1.12 This supporting Planning Statement assesses the development proposal against relevant policies in the adopted Development Plan, outlined in 1.14 above, key national policies and other material considerations including supplementary planning guidance. Furthermore, this Statement seeks to highlight the wider social, environmental and economic benefits of the proposal and ultimately demonstrate why the Application is considered appropriate for the Site and surrounding area, adheres to national and local planning policy and is therefore acceptable in planning terms.
- 1.13 This Planning Statement is structured as follows:
- **Section 2 Site Location and Context** introduces the existing Site, its location and its surroundings, including the Site's planning history and relevant planning history from the wider area.
 - **Section 3 Proposed Development** outlines the details of the proposed development and Application.

- **Section 4 Planning Policy Framework** provides an overview of relevant planning policy, including national and local policies and supplementary planning guidance.
- **Section 5 Planning Assessment** considers the proposal against relevant policy and provides a planning assessment, including retail considerations, detailing how the proposal complies with relevant planning policy.
- **Section 6 Summary and Conclusion** provides a summary and overview of this Statement and concludes that the proposal complies with the relevant policies and should be granted permission.

2.0 THE APPLICATION SITE AND PLANNING HISTORY

THE SITE AND SURROUNDINGS

- 2.1 The Site is located in Reading, to the east of the town centre. The Site is bound to north by the railway lines that serve Reading Station, beyond which lie a small number of 2/3 storey office buildings. The large area of open space which is known as King's Meadow, and from which the project name is drawn, is located to the north of the railway embankment. The Application Site within the wider area is shown outlined in red in **Figure 1.1** below.

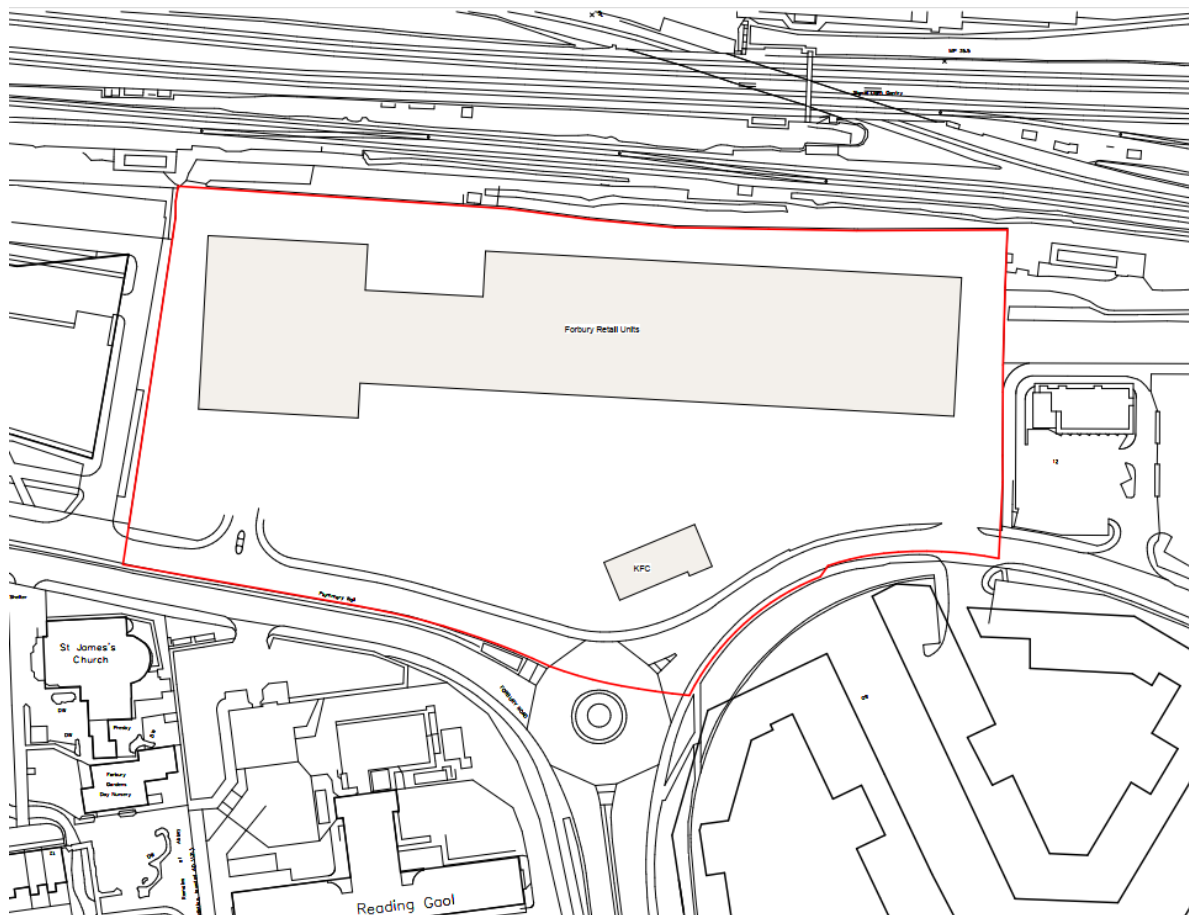


Figure 1.1 Site Location

- 2.2 To the north-east, approximately 200m from the site, is a residential development known as Luscinia View comprising 6 buildings between 4 and 9 storeys in height, located between King's Meadow and the railway lines. Beyond this site to the east is a Tesco 'Extra' store, that is served by a large area of surface level car parking.
- 2.3 The east of the Site is abutted by the remaining part of Forbury Retail Park, comprising a large area of surface car parking, a standalone McDonalds unit, and a number of large retail units, with occupiers including Decathlon.
- 2.4 Along the River Kennet, approximately 350m to the south-east, is an area of residential land uses comprising a number of 3-5 storey buildings located between the River Kennet and the railway lines to the north

- 2.5 The Site is bounded by Forbury Road and Kenavon Drive to the south. Across Kenavon Drive to the southeast is the Huntley Wharf site, which has planning permission for 765 residential units and is currently under construction and nearing completion. To the south-west beyond Forbury Road is Reading Gaol; a Grade II listed building. Further west along Forbury Road are the Abbey Ruins and Forbury Gardens, forming a cluster of historic assets.
- 2.6 Abutting the Site to the west are three large floorplate office buildings known as Forbury Place, accommodating 41,209 sqm across 8 storeys. Occupiers include KPMG, Southern Electric Power Distribution and Osborne Clarke.
- 2.7 The Site itself currently comprises part of the Forbury Retail Park and extends to 2.62 ha. This part of the Retail Park comprises a terrace of retail warehouses. The occupiers include; Home Sense, dfs and SCS. There is also a standalone KFC drive through unit on the south part of the Site. The remainder of the Site comprises a large area of surface level car parking facing Forbury Road and Kenavon Drive.
- 2.8 In relation to levels, the Site sits below Forbury Road with a 1-1.5m drop forming the boundary of the site along Forbury Road. The remainder of the Site is relatively flat, with another rise in levels between the site and the railway lines to the north.

ACCESSIBILITY

- 2.9 The main access to the Site is on its southern boundary from Forbury Road. This provides pedestrian access and ingress and egress for customer vehicles and egress for service vehicles. To the east of the south boundary there is a secondary access from Kenavon Drive. This provides ingress only for both customer vehicles and service vehicles. The existing service area is behind the retail units running along the north boundary of the Site.
- 2.10 Forbury Retail Park is served by the number 42 bus, which provides access to Reading Town Centre and Reading Station, as well as serving the residential land uses to the east of the Site. In relation to pedestrian and cycle routes, the Site is served by the existing routes along Forbury Road providing access to Reading Town Centre, with Reading Station being a 7-minute walk from the Site.

PLANNING HISTORY

SITE PLANNING HISTORY

- 2.11 Forbury Retail Park was constructed initially under permission ref: 940008, which was approved in 1995, for 5,727 sqm of non-food retail warehousing with associated parking and landscaping. The standalone KFC unit was approved separately in 2015 under permission ref: 150085. Since the park's construction there have been a large number of asset management planning applications relating to alterations at the Retail Park. These include applications for mezzanine areas, minor external alterations, and advertisement consents and largely relate to new occupier requirements.

SURROUNDING PLANNING HISTORY

- 2.12 There have been a number of recent developments in area surrounding the Site to support the regeneration of the wider Forbury area, located to the east of the town centre.

Huntley Wharf

- 2.13 The Huntley Wharf site is located 20m to the south east of Forbury Retail Park. The site benefits from planning permission (ref: 170509), granted in October 2018, for the demolition of the existing retail structures and the erection of new buildings ranging from between 2 and 11 storeys, providing 765 residential units, 5 commercial units and

associated works to the public realm, including a new riverside square and landscaping. Construction of the development is well underway and progressing well.

Housing to the East of Decathlon / McDonald's

- 2.14 The housing approximately 300m east of Forbury Retail Park, between the River Kennet and the railway lines, was permitted under two applications.
- 2.15 Application ref: 04052 was approved in October 2004 for 457 dwellings and ancillary community and retail accommodation. This comprises predominantly 3-4 storey buildings running along the River Kennet, with an outlook over the river for the majority of dwellings.
- 2.16 Application ref: 131280 was approved in December 2013 for 192 dwellings with associated parking landscaping and open space. This comprises the housing to the north of this residential area, along the railway lines. The buildings are mostly 2-3 storeys, with an increase in height on the western part of the site nearer the Decathlon store, where the buildings range from 4-8 storeys.

Forbury Place

- 2.17 Forbury Place is immediately adjacent to the Site to the west, and comprises 8 storey office buildings, providing 41,209 sqm of office floorspace.

Reading Gaol

- 2.18 The main building of Reading Gaol is a Grade II listed building located opposite the Site over Forbury Road to the south-west. There have not been any recent significant planning permissions at the Site. However, the site is subject to a site allocation for uses compatible with its heritage. It is no longer used as a prison.

3.0 THE PROPOSED DEVELOPMENT

This section provides an overview of the proposed development quantum, layout, design, use and access arrangements as well as the description of development.

DESCRIPTION OF DEVELOPMENT

3.1 This Application seeks outline planning permission for the demolition of the existing buildings and the construction of a residential-led development including commercial floorspace, which could include a foodstore, basement car parking, the diversion of the existing sewer and associated public realm, landscaping and other works. All matters are reserved apart from highways access.

3.2 The description of development can be summarised as follows:

Outline application for comprehensive redevelopment, including demolition of existing structures, comprising a residential-led mixed use scheme of up to 820 units (Class C3) and up to 5,500 sqm (GEA) of commercial uses (Class E) together with ancillary and associated development including new and enhanced pedestrian routes and vehicle access routes, open spaces, hard and soft landscaping, basement, and basement car parking providing up to 200 car parking spaces, and up to 53 car parking spaces serving the commercial uses, up to 860 cycle parking spaces and servicing facilities, sewer diversion and associated works, with details of layout, scale, external appearance and landscaping reserved.

APPLICATION STRUCTURE

3.3 The Application seeks to establish the principles of uses proposed, the amount and scale of development, the appearance, layout and the landscaping of the development. All matters, except for access, are reserved for future consideration.

3.4 In summary the proposed development comprises:

- Demolition of the existing buildings on Site.
- Construction of new buildings to provide the following.
 - Up to 820 residential units; and
 - Up to 5,500 sqm of flexible class E floorspace which could accommodate a foodstore on the western part of the Site.
- Up to 200 parking spaces located at basement level for the residential units and 53 spaces for the commercial floorspace.
- Up to 860 cycle parking spaces.
- Diversion of the existing sewer running through the Site.

- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.
- 3.5 A set of Parameter Plans and Design Codes have been submitted for approval which define the: development zones and plot boundaries; land uses; site levels; amenity play space and publicly accessible open space; vehicular access and circulation, and maximum building heights and minimum separation distances between blocks for the future development of the Site.
- 3.6 The **Proposed Land Use (Lower Ground Floor / Ground Floor / Typical Floor) Parameter Plans** outlines the proposed land uses within each development plot. Where land uses are given as 'Typical' Floor these are replicated on all of the floors above the ground floor commercial uses.
- 3.7 The **Development Zones and Plot Boundaries Parameter Plan** outlines the extent of the developable land and defines the maximum building footprint for each development plot and minimum separation distances.
- 3.8 The **Maximum Deviation Plan (Lower Ground Floor / Ground Floor / Typical Floor) Parameter Plan** sets out the maximum building parameters of the buildings proposed by this application.
- 3.9 The **Proposed Maximum Site Levels Parameter Plan (Lower Ground Floor / Ground Floor)** shows the proposed site levels for the Site.
- 3.10 The **Proposed Site Levels (Maximum Building Heights) Parameter Plan** details the maximum AOD building heights for each development plot excluding plant to show compliance with policy.
- 3.11 In addition to the Parameter Plans, a **Development Specification Document** is also submitted for approval. This covers matters that cannot be captured in the parameter plans such as use the maximum floorspace, accessibility and parking. Housing mix is illustrative at this stage and is not for approval.
- 3.12 The **Design Codes** which are submitted for approval provide the set of 'rules' which future applications for the approval of reserved matters must comply with. The plot layouts and the form of the buildings will be determined at the reserved matters stage based upon the rules set out above. If a reserved matters application does not comply with the Design Codes then they would be inconsistent with the outline planning permission and RBC could chose to refuse them.
- 3.13 While the Parameter Plans and Development Specification Document set a maximum envelope within which the development may be brought forward at the reserved matters stage, when the approved Design Codes are applied it means that an acceptable scheme cannot maximise all the parameters to the 'edge' of every envelope.
- 3.14 The applicant invites a condition to require that all reserved matters applications shall be submitted to comply with the approved Parameter Plans, Development Specification Document and Design Codes.
- 3.15 A suite of supporting documents have also been submitted in support of this application and should be read alongside this Statement in the consideration of this application.
- 3.16 This includes the Design and Access Statement prepared by Squire & Partners which unlike the Design Codes is illustrative and not for approval. It explains that the evolution of the illustrative schemes that were discussed with RBC during the pre-application process have culminated in the illustrative scheme that shows one way of developing the Site in accordance with the approved Design Codes, Parameter Plans and Development Specification Document.

- 3.17 The illustrative scheme as per the Design and Access Statement does not represent the only way that the development of the Site could come forward and there is scope for variation as long as it is compliant with the approved Design Codes, Parameter Plans and Development Specification Document.
- 3.18 This approach allows for the flexibility to employ new building techniques such as Modern Methods of Construction (“MMC”) as well as to introduce changes to meet occupational requirements while still applying the approved development principles set out in the Parameter Plans, Development Specification Document and Design Codes. This allows minor amendments to be made with certainty to the applicant and Reading Borough Council.

ENVIRONMENTAL IMPACT ASSESSMENT

- 3.19 The submitted Environmental Statement has been prepared by Stantec and assesses the likely effects of the proposed development on the environment. This has used the Parameter Plans and Development Specification Document. The proposed development would constitute an urban development infrastructure project involving more than 1 hectare of non-residential development, more than 150 dwellings and an overall area of development exceeding 5 hectares. Therefore an ES is required as per Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The scope and content of the ES has been reviewed and agreed with the relevant planning authority, RBC.

PRE-APPLICATION ENGAGEMENT

- 3.20 The applicant has engaged extensively with the Council and other key stakeholders throughout the pre-application (‘pre-app’) process which began in December 2019. This first pre-app comprised an initial meeting with the then case officer to establish the principles of the scheme. Following extensive design work five further pre-application meetings were held with the then case officer and his colleagues throughout 2021.
- 3.21 In addition to the pre-application meetings a Design Review Panel (“DRP”) was held with Design South East (“DSE”) in July 2021, comprising a detailed meeting as well as written feedback. The DRP addressed various key elements of the scheme including the location of cycle parking spaces, concerns over the number of single aspect units, and variation of massing. Following the detailed feedback provided by DSE the design team updated the scheme significantly to address the comments this included designing out all single aspect units resulting in a substantial loss of overall units, demonstrating a commitment to high quality design. These changes are charted in the Design and Access Statement prepared by Squire & Partners.
- 3.22 Through the DRP and 2022 pre-app meetings significant progress was made in terms of design, with Officers agreeing to key principles of the scheme such as building heights and pedestrian routes through the Site amongst others.
- 3.23 In January and February 2022 further meetings were held with Councillors including Councillor Page and Highways Officers. Subsequently the case officer left the Council, leading to two hand over meetings culminating in a meeting on 8th May 2022.
- 3.24 At the May 2022 meeting further important design considerations were addressed and agreed, notably separation distances were discussed. The new case officer raised questions over the separation distances below 18m and it was agreed that the design team would revisit any distances below 18m. However, there were also a number of areas where there were differences in officer opinion, for example the preference for the scheme to include a publicly accessible east-to-west route through the Site, whereas the previous officer had agreed the strategy of including the east west route along Forbury Road / Kenavon Drive.

- 3.25 In September 2022, there was another change in officer and pre-application meetings were held in September 2022 and January 2023. Further detailed elements of the design were discussed and commented on, however as a result of the multiple officers on the scheme and each with their own nuanced opinion, there were further requests for changes.
- 3.26 Seeking to address as many officer comments as possible balancing the requirement to ensure a deliverable scheme, there were further changes, the most substantial being the removal of the podium level, which has now resulted in the undercroft parking being replaced by a full basement and the public and private spaces being located at ground level with direct level access from adjacent routes ensuring seamless integration with surrounding areas. This represents a substantial design change at this late stage in the pre-application process as well as the multiple design iterations as a result of varying officer feedback. Given the evolution of the proposals this application represent a very carefully considered scheme, that is based upon the provision of high quality public and private spaces which provide a setting for the proposed buildings.

PUBLIC ENGAGEMENT

- 3.27 The Applicant undertook a range of pre-application consultation activities in February 2022, including both an online presentation and in person consultation event. The activities were developed and undertaken in accordance with the consultation strategy developed by Meeting Place PR Consultancy.
- 3.28 Due to Covid-19 part of the consultation exercise was undertaken digitally. The principles of the strategy were agreed with RBC during the pre-application process as a robust method of public engagement.
- 3.29 The approach to community engagement was based on national planning policy, as well as RBC's guidance on engaging with communities. Consultation with key stakeholders, local residents, local businesses and local community groups has taken place in an open and inclusive manner.
- 3.30 Some examples of the pre-application public engagement that has taken place includes:
- A dedicated webpage on the project website specifically for public consultation;
 - Virtual public consultation briefings;
 - In person public consultation events;
 - Physical and downloadable feedback forms which could be e-mailed or sent via Freepost;
 - Advertisements and public notices of consultation printed in local newspapers; and
 - Freephone line for public comments and queries.
- 3.31 The range of communication methods utilised for public consultation ensures members of the public had ample opportunities to provide their feedback on the scheme.
- 3.32 The submitted Statement of Community Involvement outlines the full consultation strategy, methods and feedback received. The Statement of Community Involvement shows that an extensive level of pre-application consultation has been undertaken with a wide range of stakeholders.
- 3.33 The comments made through the cycle of pre-application consultation have been considered during the design development of the proposal. This is fully detailed in the submitted Statement of Community Involvement and the Design and Access Statement.

4.0 PLANNING POLICY OVERVIEW

- 4.1 This section sets out a planning policy overview relevant to the consideration of this application. We consider national policy contained in the National Planning Policy Framework 2021 (NPPF) and the accompanying guidance contained in the Planning Practice Guidance (PPG).
- 4.2 Section 70 of the Town and Country Planning Act 1990 states that when determining applications for planning permission, the local planning authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

NATIONAL PLANNING POLICY

- 4.3 The 2021 National Planning Policy Framework (NPPF) was published in July 2021 and sets out the Government’s approach to planning matters. It is a material consideration in the determination of planning applications.
- 4.4 The NPPF states that *“the purpose of the planning system is to contribute to the achievement of sustainable development”* (NPPF, paragraph 7). Local planning authorities should seek to guide development to sustainable locations. Paragraph 11 identifies the importance of the presumption in favour of sustainable development and goes on to state that:

“For decision taking this means:

- a. Approving development proposals that accord with an up-to-date development plan without delay; or*
- b. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 4.5 Therefore, development management (i.e. the determination of applications such as this) and plan-making should act in a pro-active and positive way to facilitate planning and development. As this more specifically relates to decision making, the NPPF advises that Local Authorities should approach decision making in a positive and creative way and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area.
- 4.6 The overall purpose of the planning system, as explained in section 2 of the NPPF, is to contribute to the achievement of sustainable development, which is made up of three overarching and interconnected objectives; economic, social and environmental. To achieve these objectives a presumption in favour of sustainable development is central to the NPPF.

BUILDING A STRONG AND COMPETITIVE ECONOMY

- 4.7 Chapter 6 of the NPPF sets out the key principles for building a strong, competitive economy. In particular, paragraph 80 states that planning policies and decisions should help the conditions in which businesses can invest, expand and adapt, and give weight to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

DELIVERING A SUFFICIENT SUPPLY OF HOMES

- 4.8 Chapter 5 of the NPPF relates to housing delivery and the need for the planning system and development to deliver a wide choice of high-quality homes. Paragraph 60 emphasises the importance of identifying and bringing forward a sufficient amount of land to meet the housing needs of different groups. This includes ensuring homes are delivered to meet the needs of families with children, older people, people who rent their homes and other groups (Paragraph 62).
- 4.9 Considering the size, type and tenure of housing needed for different groups of the community, the NPPF advises this should be assessed and reflected in planning policies and so, in this sense, housing mix is led by local identified housing needs of different groups.
- 4.10 With regard to affordable housing the NPPF advises that the provision of affordable housing should not be sought for residential developments that are not major developments and where affordable housing is required it should, in the first instance, be delivered on-site unless off-site provision or a financial contribution can be robustly justified or the agreed approach contributes to the objective of creating mixed and balanced communities. Paragraph 65 of the NPPF expects that, where affordable housing is required, 10% of homes should be available for affordable home ownership.
- 4.11 Throughout all development the NPPF seeks to secure high-quality design and, where applicable, a good standard of residential amenity.

ENSURING THE VITALITY OF TOWN CENTRES

- 4.12 Chapter 7 of the NPPF seeks to ensure the vitality of town centres through supportive policy which takes a positive approach to their growth, management and adaptation. Paragraph 86 identifies that a network and hierarchy of town centres should be identified, with specific strategies for each, in order to direct the correct mix of uses to each location and ensure suitable sites are available.
- 4.13 Paragraph 87 of the NPPF advises that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The purpose of applying the sequential test is to protect the vitality and viability of defined centres and ensure town centre uses are located in town centres. A sequential test will form part of this application. After defined town centres, the NPPF advises the next best location for town centre uses are edge of centre locations, followed by accessible out of centre sites.
- 4.14 In addition to the above, paragraph 90 advises local planning authorities should require a retail impact assessment when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, if the development is overall proportionate, locally set floor space threshold. This impact assessment should consider:
- The impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and

- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment, as applicable to the scale and nature of the scheme.

4.15 Annex 2: Glossary of the NPPF provides more detailed guidance on what is considered a main town centre use. These include retail development; leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

PROMOTING HEALTHY AND SAFE COMMUNITIES

4.16 Chapter 8 of the NPPF establishes that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

4.17 Paragraphs 92 and 93 of the NPPF provide guidance on how healthy and safe communities can be realised spatially. For example:

- Through mixed use developments, strong neighbourhood centres and street layouts that allow for easy pedestrian and cycle connections and active frontages, all of which promote social interaction;
- Through the use of clear and legible pedestrian routes, and high-quality public space which encourages the active and continual use of public areas and safe and accessible spaces; and
- Through the provision of safe and accessible green infrastructure, sports facilities, local shops and layouts that encourage walking and cycling amongst other interventions, all of which enable and support healthy lifestyles.

PROMOTING SUSTAINABLE TRANSPORT

4.18 Chapter 9 sets out the importance of promoting sustainable transport in plan making and during the consideration of development proposals. Paragraph 108 states that applications for development should ensure that appropriate opportunities have been given to promote sustainable transport modes, ensure safe and suitable access to the site and mitigate any impacts from the development on the highway network.

4.19 Paragraph 109 of the NPPF makes clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network were severe.

4.20 Paragraph 110 outlines a hierarchy of priority with regard to transport modes. This paragraph states that priority should be given first to pedestrian and cycle movements, and secondly to facilitating access to high quality public transport.

MAKING EFFECTIVE USE OF LAND

4.21 Of particular relevance to the current proposal, Chapter 11 sets out policies to ensure development makes effective use of land, in particular brownfield sites in sustainable locations and emphasises the multiple benefits which can be derived from the effective reuse of land. Paragraph 119 also sets out the proactive role local planning authorities should take to help bring forward land which may be suitable for meeting development needs.

4.22 Paragraph 119 of the NPPF requires planning policies and decisions to encourage multiple benefits from both urban and rural land, including through mixed use schemes and to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. In addition, the NPPF makes clear planning

policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing.

4.23 As a mechanism for facilitating development that makes efficient use of land, the NPPF advises that planning policies and decisions should support development that achieves appropriate densities. Paragraph 124 of the NPPF outlines the considerations of development density including:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area's character and setting, or of promoting regeneration and change; and,
- The importance of securing well-designed, attractive and healthy places.

4.24 The NPPF supports optimising development density, through the application of the above considerations, to ensure the effective use of land.

ACHIEVING WELL-DESIGNED PLACES

4.25 The NPPF recognises that the creation of high-quality buildings and places is fundamental to what the planning process and developments should achieve. Chapter 12 of the NPPF sets out guiding principles to ensure that the planning system delivers high-quality, well-designed places. Paragraph 127 states that planning policies and decisions should ensure developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING AND COASTAL CHANGE

4.26 Chapter 14 details how the planning system should support and plan for the challenges of climate change, flooding and coastal change. Paragraphs 159 to 169 of the NPPF outline the approach planning policies and decisions should take to planning and flood risk. The first principle of ensuring inappropriate development does not occur in areas at risk of flooding is to direct development away from areas at the highest risk of flooding.

4.27 Paragraph 153 encourages Local Planning Authorities to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity

and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

- 4.28 The NPPF advises that local planning authorities should ensure that flood risk is not increased elsewhere when determining planning applications and requires that a Flood Risk Assessment is required for all development in Flood Zone 2 and 3 or sites over 1 hectare in Flood Zone 1. The NPPF also encourages Sustainable Urban Drainage Systems ("SUDS") are incorporated into new developments.

CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT

- 4.29 Section 15 of the NPPF makes clear that planning policies decisions should contribute to and enhance the natural and local environment. The planning system should be utilised to prevent new and existing development from contributing to, being put at unacceptable risk to or adversely affected by unacceptable levels of soil, air, water or noise pollution. It is stated at Paragraph 174 that development should minimise impacts on, and provide net gains for biodiversity, including through establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 179 states that the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species should be promoted, and that net gains for biodiversity should be secured.
- 4.30 In addition, the Environment Act 2021 introduced provisions to make biodiversity net gain a mandatory requirement within the planning system in England, requiring all relevant developments to achieve a minimum 10% net gain in biodiversity units relative to a sites baseline biodiversity value. It is anticipated that the secondary legislation mandating the need for 10% net gain will be in place by November 2023.
- 4.31 Paragraph 187 of the NPPF makes clear that planning policies and decisions should ensure that new development can be integrated effectively with existing uses in the vicinity. The NPPF states that *"existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established"*. To establish the acceptability of a scheme, paragraph 188 notes that the focus of planning policies and decision should be on whether proposed development is an acceptable use of land.

NATIONAL PLANNING PRACTICE GUIDANCE

- 4.32 In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. Since their conception in March 2014, the NPPG's are periodically updated and revised. The below reflects the latest NPPG's at the time of writing.
- 4.33 A number of these NPPG's are relevant to this application and provide guidance on more detailed matters for consideration.
- 4.34 Of particular relevance to applications including retail elements is the **Town Centre and Retail PPG**. This provides guidance on retail considerations and, in particular, on the sequential and impact tests. The PPG details the purpose of the sequential test is to guide main town centre uses towards town centre first locations and then if no town centre locations are available to the next sequentially available site, these being edge of centre locations and then out of centre locations. The PPG advises a preference for accessible sites which are well connected to the town centre. The PPG also advises a retail impact test is required to consider the impact on the viability and vitality of town centre, over time, of proposed retail development in out of centre and edge of centre locations.

- 4.35 Another PPG of note for this proposed development is the **Effective Use of Land PPG**. This PPG supports the more effective use of land and outlines how local planning authorities can encourage the best use of under-utilised land and plan for higher density development. The PPG advises a range of tools to help identify the appropriate development density, including the assessment of site accessibility, characterisation studies and infrastructure and environmental assessments to determine the capacity of services and any environmental risks. These assessment tools are set out to ensure the appropriate development densities are focused to the right locations
- 4.36 The **Environmental Impact Assessment PPG** provides guidance explaining the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which is also of relevance to the proposed development. This outlines the purpose of an Environmental Impact Assessment ("EIA"), when an ES is required and preparing and considering an ES. The PPG states that the ES, along with other relevant information, must be taken into account by the local planning authority in deciding whether or not to grant consent for development but the PPG notes that EIA should not be a barrier to growth.

LOCAL PLANNING POLICY

- 4.37 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.38 The statutory development plan for Reading Borough Council comprises the Reading Borough Local Plan adopted in November 2019. The plan is therefore relatively up to date. The Development Plan also includes the adopted Proposals Map (2019) and Community Infrastructure Levy Charging Schedule (2015).
- 4.39 The relevant Supplementary Planning Documents (SPDs) include
- Affordable Housing SPD (March 2021);
 - Employment & Skills & Training SPD (April 2013);
 - Revised Parking Standards SPD (October 2011);
 - Planning Obligations Under Section 106 SPD (April 2015); and
 - Sustainable Design & Construction SPD (December 2019).

READING BOROUGH LOCAL PLAN

- 4.40 According to the Council's adopted Local Plan Proposals Map, the Site currently falls within the following designations:
- Allocated Development Site CR13b – Forbury Retail Park
 - Borough of Reading Central Area – Policy CR1-10
 - Air Quality Management Area – Policy EN15
 - Major Opportunity Area (East Side) – Policies CR11-13 and SR1
 - Area of Archaeological Potential – Policy EN2
- 4.41 As well as the Site being subject to the above policy designations, an assortment of other policies from the development plan are also considered to be relevant to the proposals. These are discussed in detail below.

- 4.42 **Policy CC1** (Presumption in favour of Sustainable Development) confirms that the council will adopt a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).
- 4.43 The Policy also confirms that in accordance with Section 70 (2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 4.44 **Policy CC2** (Sustainable Design and Construction) supports new development where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 4.45 **Policy CC4** (Decentralised Energy) states that in meeting the sustainability requirements of the development plan any development greater than 20 dwellings shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.
- 4.46 **Policy CC6** (Accessibility and the Intensity of development) stipulates that the scale and density of development should relate to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.
- 4.47 **Policy CC7** (Design and Public Realm) requires all development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:
- Layout: urban structure and urban grain;
 - Landscape;
 - Density and mix;
 - Scale: height and massing; and
 - Architectural detail and materials
- 4.48 Developments will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives:
- Character - a place with its own identity and sense of place
 - Continuity and enclosure
 - Quality of the public realm and provision of green infrastructure and landscaping
 - Ease of movement and permeability
 - Legibility - clear image and easy to understand
 - Adaptability – capable of adaptation over time
 - Diversity – meets a wide range of needs.
- 4.49 Developments will also be assessed to ensure that they:
- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
 - Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;

- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily; and
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

4.50 **Policy CC8** (Safeguarding Amenity) seeks to protect the living environment of existing residential properties and prevent unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell;
- Crime and safety; or
- Wind, where the proposals involve new development of more than 8 storeys.

4.51 The policy continues that *“the position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy”*.

4.52 **Policy EN1** (Protection and Enhancement of the Historic Environment) seeks to protect historic features, areas of historic importance and other elements of the historic environment, and where possible enhanced. Proposals are expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance.

4.53 Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings. Should proposals effect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

4.54 **Policy EN2** (Areas of Archaeological Significance) requires applicants to identify and evaluate sites of archaeological significance by consulting the Historic Environment Record, as well as conduct an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined.

4.55 **Policy EN5** (Protection of Significant Views with Heritage Interest) states that new development should not harm and where possible should make a positive contribution to views of acknowledges historical significance.

4.56 **Policy EN6** (New Development in a Historic Context) stipulates that new development in areas characterised by heritage assets, the historic environment will inform and shape new development that will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. The policy confirms that the following factors will be taken into consideration:

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
- b. Sensitivity to historic context;
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing); and
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.

- 4.57 **Policy EN7** (Local Green Space and Public Open Space) identifies a list of Local Green Spaces (LGS) and Public Open Spaces (POS) that will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted. LGS EN7Cd Kings Meadow and Coal Woodland is located just over 100m to the north of the Site and has therefore been an important consideration within the development proposals.
- 4.58 **Policy EN9** (Provision of Open Space) requires all new development to make provision for appropriate open space based on the needs of the development. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks.
- 4.59 **Policy EN12** (Biodiversity and the Green Network) states that new development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.
- 4.60 On all sites, Policy EN12 states that development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.
- 4.61 In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.
- 4.62 **Policy EN14** (Trees, Hedges and Woodlands) states that Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

- 4.63 **Policy EN15** (Air Quality) seeks to protect and improve air quality and require development have regard to the need to improve air quality. The policy stipulates that development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated and that the following criteria should be taken into account:
- Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;
 - Whether the development is within, or accessed via, an Air Quality Management Area; and
 - Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.
- 4.64 Where development would introduce sensitive uses, including residential into Air Quality Management Areas, the policy requires detrimental effects to be mitigated. If there are any significant detrimental effects that cannot be mitigated the application may be refused.
- 4.65 **Policy EN16** (Pollution and Water Resources) states that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation. Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.
- 4.66 **Policy EN18** (Flooding and Drainage) directs development to areas at lowest risk of flooding in the first instance, and development is required to consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding.
- 4.67 The Site is not in an area at risk of flooding (within Flood Zone One), however the policy requires all major developments to incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology.
- 4.68 **Policy H1** (Provision of Housing) confirms that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The total need for the Borough in the plan period is 16,077 homes.
- 4.69 **Policy H2** (Density and Mix) stipulates that the appropriate density of residential development should be informed by:
- the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;
 - its current and future level of accessibility by walking, cycling and public transport;

- the need to achieve high quality design;
- the need to maximise the efficiency of land use; and
- the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

4.70 An indicative density of 60 – 120 dwellings per hectare is set out for sites in the urban area. However this is caveated by the criteria above that may indicate that a different density is appropriate. The Policy also confirms that residential development capacity figures within the site allocation policies are often based on these densities, and Forbury retail park (allocation CR13b) provides an indicative potential of 1,230 – 1,840 dwellings on the 6.99 ha Site. This provides a guide a key guide to appropriate density, however the policy requires that factors above and the design and layout to be carefully considered at application stage in order to guide density.

4.71 Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan, in particular for family homes of three or more bedrooms.

4.72 **Policy H3** (Affordable Housing) requires development of 10 or more dwellings to provide 30% of the total dwellings as affordable housing, with the provision to be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

4.73 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.

4.74 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.

4.75 **Policy H4** (Build to Rent Schemes) states that planning permission will be granted for developments of self-contained, private rented homes which:

- Are secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met; and
- Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and
- Provide a high standard of professional on-site management and control of the accommodation; and
- Provide a commitment to high-quality rental arrangements, through meeting Reading Borough Council's voluntary Rent with Confidence Standards or equivalent measures; and
- Provide for a mix of unit sizes in accordance with Policy H2 or CR6; and
- Meet the standards of design set out in Policy H5; and
- Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.

4.76 **Policy H5** (Standards for new housing) sets out the standards that new build housing development should be built to unless it can clearly be demonstrated that this would render the development unviable, the following standards are relevant for the development proposals:

- All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations;
- All major new-build residential development should be designed to achieve zero carbon homes;

- All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).
- On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.

4.77 **Policy H10** (Private and Communal Outdoor Space) states that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. For flats the provision may be made via communal outdoor space, balconies and/or roof gardens.

4.78 The Policy also requires the design of outdoor areas to respect the size and character of other similar spaces in the vicinity, clearly identifying whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.

4.79 **Policy TR1** (Achieving the Transport Strategy) states that proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans. Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures. All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.

4.80 **Policy TR3** (Access, Traffic and Highway Related Matters) stipulates that in determining proposals involving the generation of addition trips or altered access to the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where;

- i. Accesses and works to the highway comply with the adopted standards of the Transport Authority;
- ii. The development would not have a material detrimental impact on the functioning of the transport network;
- iii. The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- iv. The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
- v. For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided

4.81 Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

4.82 **Policy TR4** (Cycle Routes and Facilities) expects development to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Furthermore the cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions.

4.83 **Policy TR5** (Car and Cycle Parking and Electric Vehicle Parking) requires development to provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Within communal car parks greater than 10 spaces for residential developments at least 10% of the spaces should provide and active charging point.

- 4.84 **Policy RL2** (Scale and Location of Retail, Leisure and Culture Development) states that retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, or other defined centres, a sequential approach should be adopted to identifying alternative sites.
- 4.85 All development will be required to comply with the relevant tests for retail, leisure and culture development set out in national policy.
- 4.86 **Policy RL5** (Impact of Main Town Centre Uses) requires proposals that include more than 1,000 sq m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location to demonstrate that there will be no significant adverse impact on existing centres. Ensuring that centres within areas of deprivation are not adversely affected is of particular local importance.
- 4.87 **Policy CR13** (East Side Major Opportunity Area) sets out the principles for development in the East Side Major Opportunity Area, which requires development to:
- i. Provide a more defined urban environment than currently exists, of a medium to high density;
 - ii. Contribute towards the provision of a new residential community at the eastern fringes of the central area;
 - iii. Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;
 - iv. Safeguard land which is needed for mass rapid transit routes and stops;
 - v. Conserve and enhance the listed buildings, scheduled ancient monument and historic garden in the area and their setting where possible;
 - vi. Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;
 - vii. Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;
 - viii. Provide additional areas of open space where possible, particularly in the centre of the new community;
 - ix. Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth; and
 - x. Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.
- 4.88 The Site itself forms the east part of Site Specific Allocation CR13b as shown by the extract below at Figure 2 from the Local Plan with the Site highlighted in red.

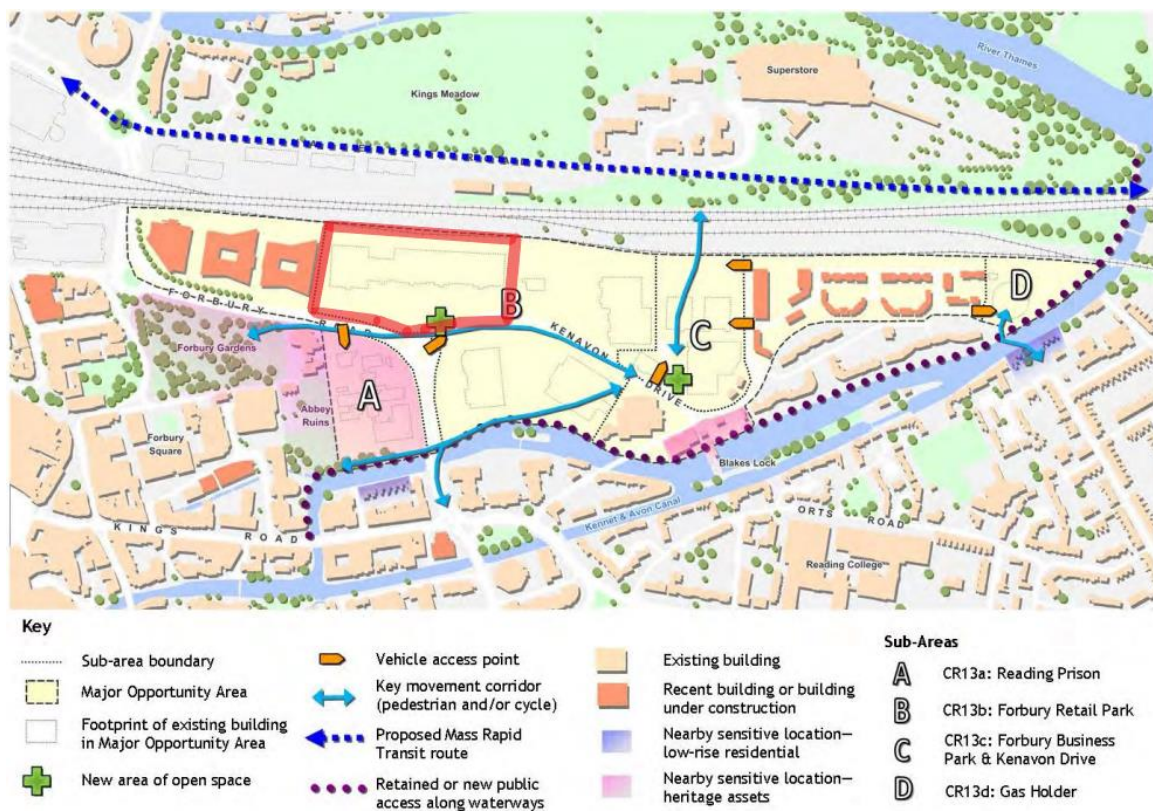


Figure 4.1 – Extract of CR13b Site Allocation in Local Plan

- 4.89 Allocation CR13b allocates the site for the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area.
- 4.90 Some parts of the site are likely to be implemented in the long term. The indicative potential of the 6.99 ha Area b is for 1,230 – 1,840 dwellings and no net gain of retail.
- 4.91 As noted above, the Site is also located within the Central Area of Reading. The following extract at Figure 4.2 from the Local Plan sets out the Council's Strategy for the Central Reading Area. The Site is located within an area that the Council considers is an opportunity for major development.

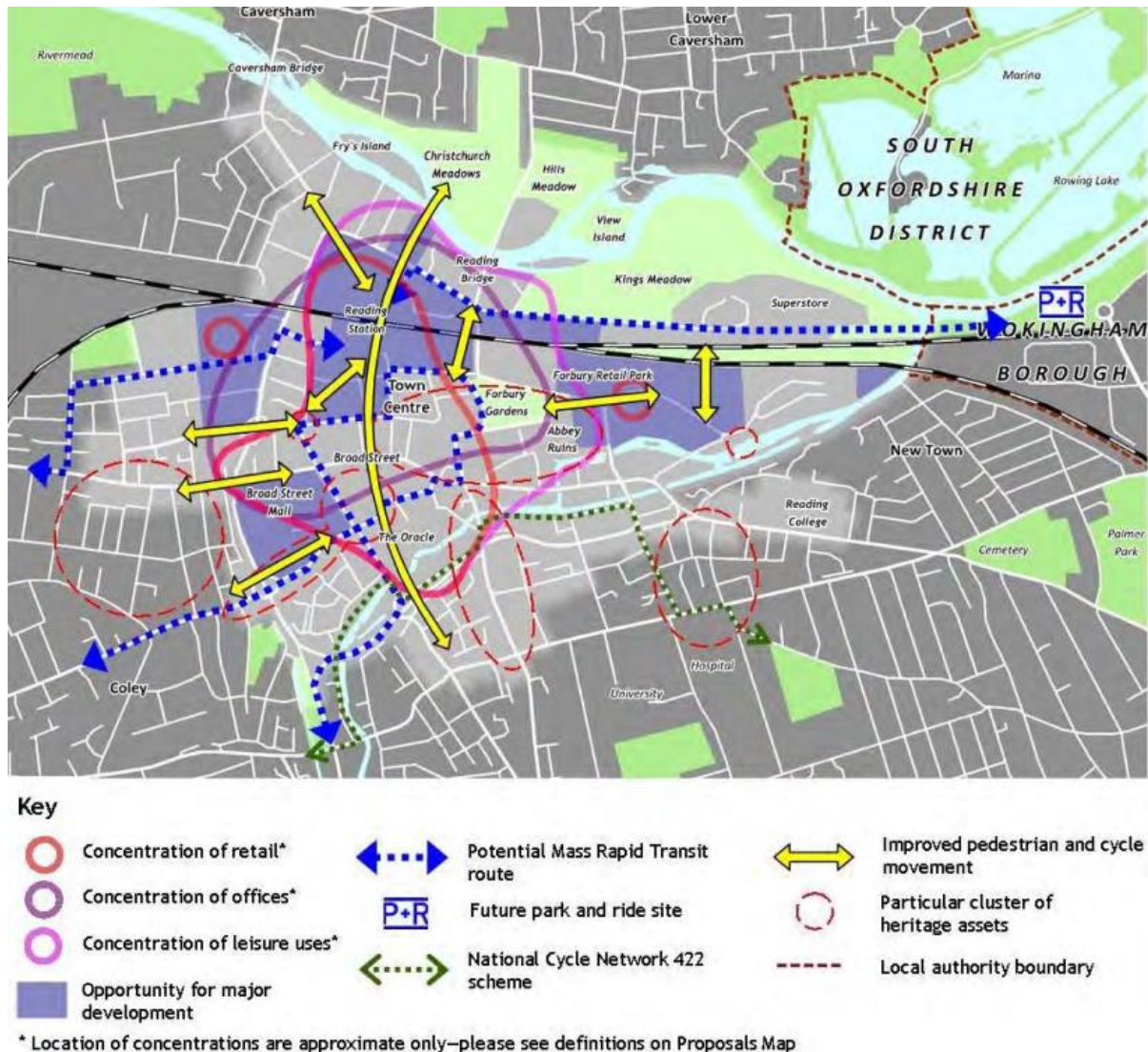


Figure 4.2 – Extract of Area Strategy for Central Reading in Local Plan

4.92 **Policy CR2** (Design in Central Reading) states that applications for development within Central Reading should demonstrate the following attributes:

- Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;
- Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;
- Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;
- The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;
- Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and
- Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.

4.93 **Policy CR3** (Public Realm in Central Reading) states that proposals for new development will need to make a positive contribution towards the quality of public realm of the central area and will be assessed against the following criteria:

- All proposals on sites of more than 1 hectare within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development. Smaller developments will contribute towards improvements to the public realm;
- Imaginative uses of open space and the public realm, which contribute to the offer of the centre, will be encouraged, and new open spaces should be of a size and shape to be flexible enough to accommodate such uses. The provision of water features, trees (including street trees) and other planting, as well as hard landscaping, to create high quality spaces, will be expected, where appropriate;
- Development proposals adjacent to or in close proximity to a watercourse will retain and not impede existing continuous public access to and along the watercourses, and will provide legible continuous public access to and along the watercourses where this does not currently exist;
- The design of developments adjacent to a watercourse, including the refurbishment of existing buildings, will be required to enhance the appearance of the watercourses and to provide active elevations facing the watercourses. Development that turns its back on the watercourses and results in blank or mundane elevations facing the watercourses will not be permitted.
- The public realm should conserve and enhance the historic environment of the centre and the significance of heritage assets therein and their setting, including through layout, materials, hard and soft landscaping. There may be opportunities for areas of public realm to provide improved access to and visibility for heritage assets.

4.94 The Policy states that pedestrianisation, traffic management and/or environmental enhancements will continue to be implemented on appropriate streets.

4.95 **Policy CR6** (Living in Central Reading) states that proposals for residential development within the central area will be assessed against the following criteria:

- All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.
- Proposals for new residential development within the central area will be required to demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated.
- In meeting the requirement to provide affordable housing, in the central area an overconcentration of social renting for single persons will be avoided.
- Where proposals for serviced apartments and apart-hotels fall outside the C3 use class, they will be located within the Central Core. Such proposals will not be permitted unless the duration of occupation of residents is restricted, to ensure the units are used on a short stay basis and not as residential flats, and information monitoring the implementation of this restriction is regularly supplied.

EMERGING PLANNING POLICY

4.96 Since the adoption of the Local Plan in 2019 Reading Borough Council has not yet publicly began preparing a new Local Plan, therefore there are no emerging planning policies for consideration at the time of submitting this application for outline planning permission.

SUPPLEMENTARY PLANNING DOCUMENTS

AFFORDABLE HOUSING

- 4.97 The Affordable Housing Supplementary Planning Document ('SPD') was adopted in March 2021. The purpose of the SPD is to provide further information to supplement policies in the Local Plan in achieving affordable housing. The SPD states that on developments of ten or more dwellings, provision of affordable housing is expected to take the form of on-site provision, as specified by Local Plan Policy H3. This means provision of either completed units or serviced land. Policy H3, as well as Policy H4 in the case of build-to-rent proposals, specifies that 30% of the dwellings proposed should be affordable. This relates to the total provision on-site, not to the net increase in dwellings.
- 4.98 In terms of tenure, of tenure of the on-site affordable housing provided to comply with policy H3, the tenure split will be as follows:
- Affordable rented accommodation at 'Reading affordable rent' levels – at least 62%; and
 - Affordable home ownership (shared ownership or another product) – maximum 38%.
- 4.99 The SPD recognises that the viability of residential development will vary from site to site, and that this may in some circumstances affect whether a development can provide a level of affordable housing that complies with policy provision. Policies H3 and H4 and their supporting text make clear that, where applicants can demonstrate exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on viability to potentially reduce the affordable housing requirement. The onus will be on a developer to clearly demonstrate the circumstances justifying a lower affordable housing contribution.

EMPLOYMENT SKILLS AND TRAINING

- 4.100 The Employment, Skills and Training Supplementary Planning Document ('SPD') was adopted on 15 April 2013. The purpose of the document is to set out the obligations which will be sought from developers at the construction and end user phases of development to contribute towards a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.
- 4.101 The SPD states that for both the construction and end-user phases of development, developers and occupiers will be required to work with the Council (and Reading's economic development company) to develop a site specific Employment and Skills Plan ('ESP'). A financial contribution will be sought where a developer chooses not to implement an ESP.
- 4.102 The ESP states that ESP's should typically cover the following outcomes (both construction and end use phases):
- Number of apprenticeships;
 - Employment/training initiatives;
 - Training and work experience for younger people, including those who are not in employment, training or education;
 - Best endeavours to maximise local labour; and
 - Local procurement agreement – potential for local businesses to be included in tender lists.

REVISED PARKING STANDARDS AND DESIGN

- 4.103 The Revised Parking and Standards Supplementary Planning Document ('SPD') was adopted on 31 October 2011. The SPD defines four zones within Reading and includes different standards for these four zones according to the accessibility of those zones. The SPD also sets out requirements for cycle parking.
- 4.104 The Site is located within Zone 3, which is stated as being a 'Secondary Core Area' in the SPD that features a variety of land uses and densities and includes some local centres for day-to-day needs.
- 4.105 The following maximum parking standards are permitted in Zone 3, as per Table 4.1.

Table 4.1 – Maximum Car Parking Standards

Land Use	Maximum Parking Standards
Food Retail	1 space per 30 sqm
Dwelling Flat 1 – 2 Bed	1.5
Dwelling Flat 3 + Bed	2
Dwelling House 1 Bed	1
Dwelling House 2 Bed	1.5
Dwelling House 3 Bed	2
Dwelling House 4 Bed +	2
Visitor Parking	1 space per 4 dwellings (flats only)

4.106 The SPD also provides maximum standards for lorry parking and loading bays. For food retail over 1,500 sqm the maximum standard in Zone 3 is three loading bays.

4.107 The SPD sets out minimum standards for cycle parking. The following minimum cycle standards will be sought by RBC in Zone 3, as per Table 4.2.

Table 4.2 – Minimum Cycle Parking Standards

Land Use	Minimum Cycle Parking Standards
Food Retail	1 space per 6 staff and 1 space per 300 sqm
Dwelling Flat 1 – 2 Bed	0.5
Dwelling Flat 3 + Bed	1
Dwelling House 1 Bed	1
Dwelling House 2 - 3 Bed	2
Dwelling House 4 Bed +	2

4.108 The SPD states that RBC will also require that sufficient additional facilities within a development have been provided to support the level of cycle parking provision. Such facilities include changing rooms, showers, clothing lockers, and where appropriate CCTV coverage. Cycle parking and storage facilities for all developments should be designed with consideration for the following objectives

- Conveniently located in relation to the trip origin and destination. It is considered that cycle activity is encouraged when parking is provided in more convenient locations to car parking, i.e. parking entrances;
- Easy to use; Where the cycle can be secured easily and quickly to the parking device;
- Secure; Where parking is overlooked by development nearby, located close to well used areas or is within the coverage of a local security camera system. After dark lighting is required to ensure personal safety for bike users; and
- Covered; Particularly important for overnight and all day parking at places of employment and transport interchanges.

4.109 In relation to accessible parking, the SPD states that where up to 200 spaces are provided, a minimum of 3 disabled spaces should be provided or 5% of the total parking capacity (whichever is greater).

4.110 For developments of more than 50 residential units in Zone 3, the SPD states that developers will be required to provide or support a car club on the site, or demonstrate that the development will have access to and the use of a car club on a nearby site, as well as create dedicated car parking spaces on the site for the car club. Car clubs must provide a minimum of 2 cars. Spaces will be required to be provided on site, easily accessible for all residents.

PLANNING OBLIGATIONS UNDER SECTION 106

4.111 The Planning Obligations Under Section 106 Supplementary Planning Document was adopted in April 2015. The SPD sets out the Council's approach towards seeking planning obligations, alongside the introduction of the Council's Community Infrastructure Levy ('CIL') Charging Schedule. The SPD sets out key principles the Council will follow to secure Section 106 planning obligations.

4.112 The Council will assess each application individually, to determine whether an obligation is needed, and what matters it should address, and will justify the reasons for seeking an obligations.

4.113 The SPD states that any requirement for a Section 106 will be raised with a developer as early in the process as possible. Details of the agreement will be recorded on the Council's Section 106 database. As the timetable for determining planning applications is 8 weeks for minor applications and 13 weeks for major applications it is advisable for heads of terms for Section 106 agreements to be agreed and documented prior to the submission of any planning application.

4.114 Draft heads of terms have been submitted in support of the application for planning permission.

SUSTAINABLE DESIGN AND CONSTRUCTION

4.115 The Sustainable Design Supplementary Planning Document was adopted on 16 December 2019 and explains planning requirements with regard to energy, climate change, water management and waste reduction. It is intended to supplement the policies of the Local Plan, particularly:

- CC2: Sustainable Design and Construction;
- CC3: Adaptation to Climate Change;
- CC4: Decentralised Energy;
- CC5: Waste Minimisation and Storage;
- EN18: Flooding and Drainage; and
- H5: Housing Standards.

4.116 Reading Borough Council is committed to working with the local community and businesses to respond to the challenges of climate change by reducing greenhouse gas emissions and preparing for the changes that climate change will bring.

4.117 The SPD states that to comply with the relevant policies and standards on energy, a combination of measures including those for energy efficiency, energy conservation and inclusion of renewable or low carbon sources should be considered and factored in from the design stage onwards. In this regard the SPD requires applicable planning applications to be accompanied by Sustainable Statements, which consider all aspects of development form which can contribute to securing high standards of sustainable development from the outset, and Energy Statements, that demonstrate how the energy related aspects of the proposed development meet the requirements of local planning policy and BREEAM energy and emissions standards.

4.118 For residential development of ten dwellings or more the SPD states that the Local Plan requires 'Zero Carbon' development, unless it can be clearly demonstrated that this would render a development unviable or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero. The SPD also reiterates that the Local Plan requires BREEAM standards to be achieved for non-residential development.

5.0 PLANNING ASSESSMENT

- 5.1 In this Section we assess the proposed development against the Development Plan policies applicable to the Site and other material considerations outlined in Section 4.0 of this Planning Statement.

PRINCIPLE OF DEVELOPMENT

- 5.2 This Application seeks outline planning permission (apart from means of access) for a residential-led mixed use development with commercial floorspace. The Site currently accommodates ten retail warehouse units with ancillary customer car parking and dedicated service yard. The existing units comprise approximately 9,818 sqm. of Class E floorspace.
- 5.3 It therefore constitutes previously developed land as defined by the NPPF and can be considered as brownfield in nature. The Site is located in an accessible town centre location.
- 5.4 The NPPF states the overarching purpose of the planning system is to contribute to the achievement of sustainable development. Both Chapter 11 of the NPPF and the Effective Use of Land PPG make clear that development should, in particular, utilise brownfield sites to meet development needs as much as possible. Moreover, Paragraphs 118 and 119 of the NPPF make plain that planning policies and decisions should give substantial weight to the value of using suitable brownfield land and promote and support the development of under-utilised land and buildings, including through mixed use schemes and where the development will meet identified need.
- 5.5 Turning to the identified needs of RBC, the Site is recognised as an Opportunity Area and forms part of site allocation CR13b 'Forbury Retail Park'. The site allocation extends beyond the Application Site boundary to include two other major parcels of land and permits the following:

"This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term".

- 5.6 The wider site allocation outlines an indicative residential potential of 1,230-1,840 residential dwellings, and no net gain of retail. The application site comprises approximately 50% of the overall site allocation, and therefore this results in a pro-rata proportion of 615-920 residential units. The reference to the frontage to the canal relates to a different area of ownership. The final sentence clarifies that the three main parts of the allocation will be delivered at different times.
- 5.7 The neighbouring Huntley Wharf site which is nearing completion has been considered in both the development of the design and technical assessment of the application proposals in the EIA submitted in support of the application where the cumulative impacts have been assessed. This confirms that the proposed development will not result in unacceptable impacts.
- 5.8 Policy H1 (*Provision of Housing*) of Reading's Local Plan outlines that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The Policy goes on to state that the Council will continue to work with neighbouring authorities within the Western

Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period.

- 5.9 Given the Site's accessible town centre location as demonstrated in Figure 5.1 below, the existing developed nature of the Site, as well as its specific allocation for housing, makes it a suitable and sustainable redevelopment opportunity for the scale and nature of the residential-led development that proposed. Furthermore, in line with the allocation of the Site, there will be no net gain in retail floorspace. The existing Site represents poor utilisation of previously developed urban land, as a low height and density, and the allocation of the Site for development illustrates the in-principle acceptability and policy support for redevelopment of the Site, subject to detailed design considerations.

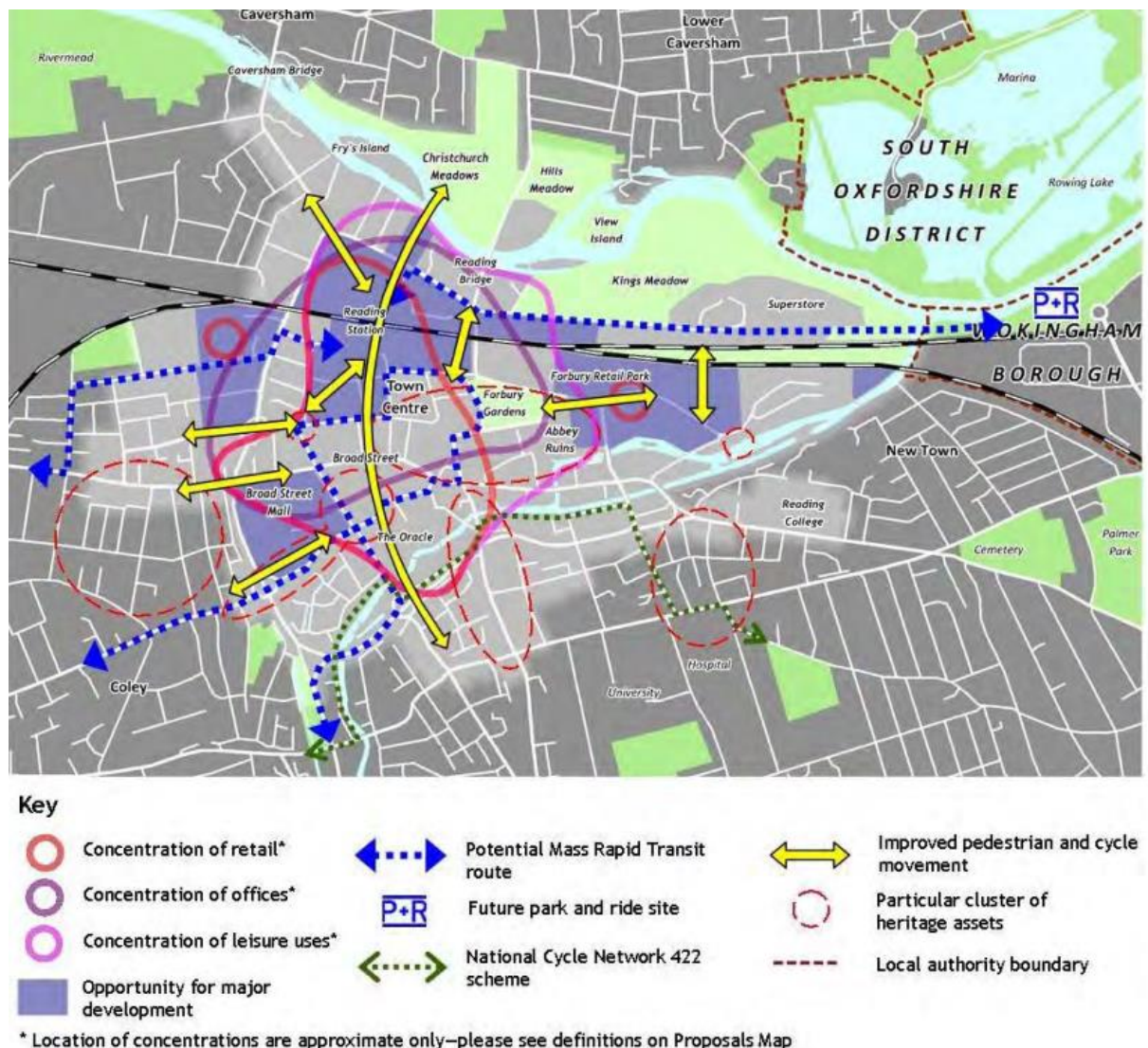


Figure 5.1 – Extract of Area Strategy for Central Reading in Local Plan

- 5.10 Therefore, when assessed against the NPPF, the proposed development is considered to make effective use of underutilised brownfield land and brings forward a residential-led scheme to meet identified local development needs. It is therefore clear that the principle of the proposed development accords with aims and ambitions of the NPPF and relevant Development Plan policies.

LAND USE: RESIDENTIAL

- 5.11 The proposed development will deliver up to 820 residential units. As outlined previously, the Site benefits from site allocation CR13b, which states that the Site (and wider site allocation to the east and south) should be the focus of a new residential community.
- 5.12 The delivery of up to 820 homes on the Site will make a substantial contribution to the Council's housing targets. This is particularly relevant when considering the Council's minimum annual target has increased to 1,598 units as prescribed by the Government's 2021 standard methodology for housing need.
- 5.13 The most recent Annual Monitoring Report 2021-22 which was published in December 2022 shows that the Council has 6.17 years' supply at 31 March 2022. This Report assumes the delivery of the application site in 2031 and therefore includes the permitted Huntley Wharf but excludes the rest of the site's allocation including the application site.
- 5.14 With regard to the proposed housing mix, the NPPF advises that the size, type and tenure of housing for different groups in the community should be assessed and reflected in planning policies. As such, the appropriate housing mix and type for the Site should be steered by local planning policies. Local Plan Policy H2 (*Density and Mix*) states that wherever possible residential development should contribute towards meeting the follow unit mix at Figure 5.2:

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	10.3%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
Overall	18.6%	30.5%	36.5%	14.4%

Figure 5.2 – Estimated size of accommodation type required in Reading

- 5.15 Policy H2 goes on to state that as a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.
- 5.16 The development proposes an appropriate mix of housing to be determined at reserved matters stage, reflective of the local need, the Site's city centre location and physical characteristics. However, the illustrative scheme provides the following unit mix:

Unit Type	Illustrative scheme
1 Bed / Studio	55%
2 Bed	27%
3+ Bed	17%

Figure 5.3: Proposed Unit Mix

N.B. For Information not for approval

- 5.17 The exact mix of units is reserved at this stage and will form part of the forthcoming reserved matters applications, but will be provided in accordance with the approximate parameters set out in Figure 5.2.
- 5.18 In summary, the scheme will help meet the identified housing need in RBC and in particular the town centre, where 15,847 dwellings are needed over the plan period. The provision of residential units at the Site would therefore

make a significant contribution to meeting the housing needs of RBC on previously developed, allocated for residential, land in a highly accessible location.

LAND USE – RETAIL

- 5.19 The site allocation (CR13b) allocates the site for the focus of a new residential community, and, alongside residential, permits additional retail uses at a scale to serve the Kenavon Drive area. The allocation recognises that implementing this allocation may involve complete redevelopment or using new additional development to improve the existing urban form of the area. The indicative potential of the 6.99 ha Area b, within which the Site is located, is for 1,230 – 1,840 dwellings and the allocation allows for retail development on the Site provided there is no net gain of retail floorspace. Overall it is clear that the Site allocation supports the principle of retail floorspace on the Site as part of its redevelopment.
- 5.20 RBC Policy CR1: Definition of Central Reading, sets out the status of the Proposals Map in terms of applying the sequential Test, as set out in Paragraph 86 of the NPPF. This Primary Shopping Area boundary is tighter than the 'Central Reading' boundary set out in Section 5 of the adopted plan. This PSA boundary is to the west of the Site and the eastern boundary of the station. The Central Core boundary also defined under Policy CR1 is located to the immediate south west of the application Site on the southern side of Forbury Road and includes Forbury Gardens but excludes the former Reading Gaol.
- 5.21 The spatial strategy for Central Reading and the guidelines on Major Opportunity Areas (including Policy CR13: East Side Major Opportunity Area which covers the Site) gives guidance on the main locations for floorspace. This supports retail floorspace on the Site as part of a mix of uses including residential and is considered in more detail in the Retail Statement. The proposed commercial floorspace is of a scale to serve the Kenavon Road area and therefore accords with policy (CR13b: Forbury Retail Park).
- 5.22 There will be a net reduction of 4,000 sq m of retail floorspace as a result of the proposed redevelopment of the Site. The car-orientated existing retail warehouses and restaurant will be replaced by commercial floorspace, potentially being capable of being operated as a small foodstore, which will be fully integrated in the development with homes above. That store will be walkable from the town centre and the new area of homes that is emerging on this eastern side of Reading town centre. It will also be well-served by cycling facilities including safe and secure cycle parking.
- 5.23 In terms of the sequential test, the site should be treated as edge of centre. Policy RL5 only requires the application of the sequential test where there is a net gain of over 2500 sq m of floorspace. The Application proposes a reduction in retail floorspace and therefore policy does not require sequential testing. However, for the sake of completeness the Retail Statement includes a desktop sequential assessment of the town centre which concludes that there are no sequentially preferable sites.

DESIGN, DENSITY AND LAYOUT

DESIGN AND LAYOUT

- 5.24 With regard to the design and layout of the proposed development, the accompanying Design and Access Statement details the evolution of the indicative scheme design including how it has responded to policy as well as neighbouring developments and established land uses. As is clear from the Design and Access Statement, high quality design forms an intrinsic consideration within the scheme.

- 5.25 Chapter 12 of the NPPF expects the planning system to achieve high quality buildings and places which are visually attractive through good architecture, layout and landscaping as well establishing a strong sense of place and function well and add to the overall quality of the area.
- 5.26 The Parameter Plans ensure that the development is set back from the boundary of the Site. At the rear of the Site this ensures that access is maintained to the railway embankment while on the other boundaries this ensures that there is sufficient space between buildings that will be delivered in the Site and those on adjoining sites which have been built, are under construction and will be delivered in the future. In 6.2 of the Design Codes there is a requirement that the general arrangement of buildings must not significantly impact daylight and sunlight levels experienced by neighbouring developments. This is also tested in the EIA in the sunlight and daylight assessment which shows that there are no unacceptable impacts.
- 5.27 The development parameters have been prepared in accordance with the site allocation (ref. CR13b) The allocation stipulates an indicative potential of the 6.99 ha Area b is for 1,230 – 1,840 dwellings, in order to achieve this a degree of height is required. The maximum height parameters set out in Parameter Plan 13 (Maximum Building Heights, Drawing Number 18111-SQP-ZZ-05-DR-A-PL00013)] show + 75 m AOD excluding plant which therefore accords with this policy. These parameters also accord with the policy requirement for buildings to step down from the Tall Buildings in the Station Area Cluster in Policy CR10a.
- 5.28 Furthermore, the maximum height parameter plan 13 shows a variety of maximum heights for the different blocks to add variety, ranging from + 75 m AOD to + 63.5 m AOD. To minimise impacts on adjacent properties and maximize daylight penetration into the key open spaces, the height of the masterplan was focused to the centre and north portions of the site and gradually reduced towards the periphery to the far east and west. Additionally, step backs have been incorporated into the top floors of buildings along the south of the site to minimize the viewing impact when the scheme is observed along Forbury Road and Kenavon Drive. These maximum parameters set the maximum scale of development that can be brought forward at the reserved matters stage. The heights of the proposed building are set below the 36 m policy datum, with the measure taken from the existing levels of the Site.
- 5.29 The Design Codes require that building plots are not flexible and cannot shift from the maximum deviation boundary set by the Parameter Plans. Building lines should have a complementary relationship with adjoining plots.
- 5.30 Section 6.2 of the Design Codes also sets out how the EIA testing in daylight sunlight, wind and noise have informed the massing and built form.
- 5.31 The proposed development will be offer a high quality design, guided by Design Codes. The Design Codes define the overarching character and materiality of the proposed development. Section 6.3.1 controls materiality. with 6.3.2 controlling elevational principles.
- 5.32 The proposed layout will ensure active frontages are adjacent to public spaces. Commercial. residential and servicing frontages are controlled in 6.4.1-3 of the Design Codes.
- 5.33 There are then specific Design Codes for each block in Section 6.5.
- 5.34 The proposed development enhances and promotes permeability across the Site, through the creation of new east-to-west pedestrian and cycle routes. These proposed links will create a permeable and legible development, drawing visitors and footfall through the Site from the City Centre and providing a future link to the wider Forbury Retail Park and the Biscuit Tunnel to the north.

- 5.35 In addition to the site allocation, Policies CC7 (Design and the Public Realm), CR2 (Design in Central Reading) and CR3 (Public Realm in Central Reading) have been central to the design proposal as they have developed, resulting in the provision of a range of visually attractive, well designed open space and public, which utilises high quality hard and soft landscaped areas. These visually attractive spaces will assist in creating a sense of place within the proposed development, as well as contribute towards incentivising active travel and create a sense of community cohesion. The proposed open space and public realm will also contribute to the diversity of the Central Area of Reading. The open spaces and areas of public realm proposed are accessible and vary in size and shape and are considered to be capable of accommodating a range of activities across user groups.
- 5.36 It is clear from the above assessment that the Site will deliver a high-quality design that will create an attractive new residential community for Reading and deliver on the aspirations of site allocation (ref. CR13b). The layout positively and effectively relates to the Site's wider context including key views, and the creation of a high-quality pedestrian and cycle only green link. As such, the proposals meet the policy aspirations of the NPPF and local planning policies on design and layout matters.
- 5.37 The high quality buildings will draw on the design principles and material palette set out in the Design Codes, which is inspired by the Site's past and present context.

DENSITY

- 5.38 As per Chapter 11 of the NPPF, one of the key mechanisms through which effective use of land can be realised is by achieving the appropriate development density. When reaching a conclusion on the appropriate development density, paragraph 122 of the NPPF outlines the important considerations which include:
- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - The availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use;
 - The desirability of maintaining an area's character and setting, or of promoting regeneration and change; and,
 - The importance of securing well-designed, attractive and healthy places.
- 5.39 RBC Local Plan Policy H2 relates specifically to Density and Mix and supports an appropriate density of residential development that is informed by the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas; its current and future level of accessibility by walking, cycling and public transport; the need to achieve high quality design; the need to maximise the efficiency of land use; and the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 5.40 The local development plan identifies a need for additional housing in the town centre and allocates the Site as available land to bring forward such development, in addition to other appropriate uses. The Site is located in close proximity to both services and infrastructure within the city centre. Reading train station is located within 500m of the Site.
- 5.41 The accessibility of the Site lends itself to sustainable travel modes and the scheme has been designed to promote and encourage this where possible. The Site has been designed to create legible pedestrian and cycle links through the Site.
- 5.42 The scheme has been well-designed to create attractive and healthy places, prioritising pedestrian and cycle links, incorporating social and open spaces and a holistic landscaping and tree strategy. For these reasons it is

considered the appropriate development density has been achieved onsite as per the NPPF and local Policy H2 (Housing Density and Mix) and this makes the most effective use of land in line with the character of the Site and the character of the surrounding area, which assist in the delivery of new homes for Reading.

HERITAGE

- 5.43 The Council has a duty under the Town & Country Planning Listed Buildings & Conservation Area Act 1990, as amended, to ensure that the setting of listed buildings and conservation areas are not adversely affected by new development unless there is less than substantial harm.
- 5.44 The Built Heritage Chapter in the EIA identifies the following assets as being most likely to experience an effect by the Proposed Development by reason of proximity and/or relationship to the Site (for completeness we include the likely environmental effect arrived at through the ES methodology while also applying professional judgement):
- Reading Abbey Receptors (Grade I) – Minor to Moderate Neutral.
 - Forbury Gardens RPG (Grade II) – Minor to Moderate Neutral.
 - Reading Gaol (Grade II) – Minor Neutral.
 - Church of St James and St James's Presbytery and St James Former School Buildings (Grade II) – Minor to Moderate Adverse.
- 5.45 For the purposes of the policy analysis the following commentary is provided in relation to the Church of St James and St James's Presbytery and St James Former School Buildings.
- 5.46 For the avoidance of doubt, with regard to all other assets not discussed below, it is considered that the Proposed Development complies with relevant provisions in the Reading Local Plan (2019).

Church of St James and St James's Presbytery and St James Former School Buildings

- 5.47 It is judged that the Proposed Development would give rise to a minor harmful impact on the setting of the listed church through the appearance of the new buildings beyond the church's principal gable in linear views from within Forbury Gardens. This effect is illustrated in proposed View 2. It is considered that the presence of the new residential building changes to a small degree the prominence of the church's bell tower, currently experienced against a clear sky background. This is the view from the west only – other views of the church from the north are unaffected. The impact is clearly one of setting only, and there is no harm to any intrinsic aspect of the asset's significance.
- 5.48 The harm identified, which we would judge to be at the lowest end of the less than substantial scale, is limited to one part of the listed building's setting and would reduce or be removed entirely from other parts of the church's setting where the bell tower and principal gable retain their prominence. The Proposed Development does not diminish or detract from the intrinsic significance of the church, which would continue to provide an important local landmark. The Proposed Development does not detract from or restrict opportunities to appreciate the architectural quality and detailing of the listed building. The harm identified is limited to a small, transient effect when experienced in linear views from within Forbury Gardens.
- 5.49 It is judged that the limited harm identified is demonstrably outweighed by the public benefits delivered through the Proposed Development. It is therefore considered that the Proposed Development complies with the relevant provisions in the Reading Local Plan.

- 5.50 The first consideration must be that the quality of architecture prepared by Squires and Partners is of the highest calibre. It would demonstrably uplift the quality of the Site through a thoughtful and well-considered scheme and integrated landscaping masterplan prepared by Macgregor Smith.
- 5.51 We consider that the public benefits of the Proposed Development are as follows, and form part of the overall justification of the development:
- Introduction of new residential, commercial and flexible uses in keeping and complementary to the Site's town centre location and contributing to the regeneration and revitalisation of this part of the local townscape, including the setting of local heritage assets.
 - Creation of high-quality areas of green space and public realm within the Site which has beneficial impacts on local heritage assets and the character, appearance, and function of the local townscape.
 - Provision of high-quality architecture that draws on the local townscape context, both modern and historic precedents, as well as surrounding heritage assets.
- 5.52 On account of finding less than substantial harm and undertaking the balancing exercise we find that the proposals accord with Reading Local Plan Policies EN1, EN3 and EN6.
- 5.53 In addition, Section 66(1) of the 1990 Act states that "*in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses.*" The Proposed Development also conforms to the statutory duties established by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act.

VISUAL IMPACT AND VIEWS

- 5.54 The proposed development seeks to optimise the capacity of the Site, as is sought by national policy and the Local Plan. The proposed development will utilise the potential of an accessible, brownfield site, which benefits for an allocation for residential development as detailed within this Planning Statement. In developing the proposals, the design team have had regard to Local Plan Policy CR10 (Tall Buildings), which defines tall buildings in Reading as being above 10 storeys for residential development, equating to 36 metres, and sets out requirements that proposals for tall buildings must meet.
- 5.55 It is clear that the planning policy expects the Site to take account of views in and out of the Site. As further detailed within the Design and Access Statement, and the Parameter Plans, the building heights would range from + 63.5 m AOD up to + 75 m AOD (as set out in Parameter Plan 13 (Maximum Buildings Heights)). East Block 3, Central Block 3 and Central Block 4 would have lower building heights than the tallest building proposed on the Site (+ 75 m AOD) and have been designed to respond to the massing of the adjacent Huntley Wharf development, which also forms part of the same CR13b allocation.
- 5.56 The height, overall mass and profile of the maximum parameters of development proposed for the Site have been considered from a number of viewpoints as set out in the Townscape and Visual chapter of the ES.
- 5.57 As set out within this chapter, at completion long-term and permanent visual effects that are assessed as beneficial and moderate levels of significance of effect, which are significant, are assessed for people's views and visual amenity at VL1 (Forbury Road), VL2 (Forbury Gardens), VL10 (Huntley Wharf) and VL12 (Kenavon Drive) towards Reading Prison. All other visual receptors were either assessed as receiving negligible or minor level of significance of effect at completion, which are not significant or have no change.

- 5.58 The Townscape and Visual Impact Assessment identified no cumulative effects arising as a result of the Proposed Development in addition to, or in combination with, committed developments. This is because the Proposed Development and committed developments are within the existing urban area; the Proposed Development would not alter key characteristics of townscape character areas in the surrounding urban area; and committed developments are in locations which would experience no, or very limited intervisibility with the Proposed Development.
- 5.59 It is considered therefore that the proposal would make a positive visual contribution to the city skyline. It is considered that the high quality design of the Proposed Development, which will have differing characteristics as set out in the submitted Design Codes, will help to provide variety and interest in visual terms in Central Reading, as well as assist in creating a distinctive character for CR13b allocated site. The provision of taller buildings on the Site aligns with the character of the wider area, which will further create a strong reference point for the Central Area of Reading, allowing for greater urban legibility in the Borough.

AFFORDABLE HOUSING

- 5.60 The Financial Viability Assessment submitted in support of the application shows that the scheme is unable to support affordable housing.
- 5.61 Although it is recognised that Policy H3 (Affordable Housing), which is supported by the Affordable Housing SPD, requires residential development to make appropriate contributions towards the provision of affordable housing that meets the needs of Reading, Policy H3 and the SPD balance this requirement in relation to viability considerations. Where proposals fall short of the policy target, Policy H3 provides a mechanism for an open-book approach to be taken where a developer has the opportunity to clearly demonstrate the circumstances that justify a lower affordable housing contribution, based on the overall viability of a proposed development.
- 5.62 Accordingly a Financial Viability Assessment has been submitted with in support of this application. The assessment analysis demonstrates that the scheme is challenging on a present-day basis. This is consistent with existing market trends elsewhere in the current macroeconomic environment, with the assessment currently showing a deficit of over £74m. Therefore in accordance with Local Plan Policy H3 the assessment clearly demonstrates that the proposed development is unable to support a provision of affordable housing.

SOCIO-ECONOMICS

- 5.63 The key objective of the NPPS is the principle of sustainable development, with three overarching objectives: economic, social and environmental.
- 5.64 The social objective supports strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 5.65 The economic objective is to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure (paragraph 8).
- 5.66 Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or compensatory measures should be considered.

- 5.67 In order to demonstrate the socio economic impacts and benefits of the proposed development socio-economics have been scoped in to the ES and is set out in chapter 7. The assessment scope relates predominantly to the operational phase of development including effects on jobs, homes, education, healthcare, recreation and public access. For the construction phase only effects on jobs is scoped in as the construction workforce is not expected to move to the area, and the impact is identified as beneficial as a result of the proposed development is expected to generate 61 full time equivalent jobs in Reading.
- 5.68 Operationally the proposed development will have a beneficial impact on housing and jobs through the provision of up to 820 new homes and 56 net additional FTE jobs, therefore improving the socioeconomic status of the area in these two regards. The socio economic chapter identifies the potential for minor adverse effects in respect of Primary and Secondary Education, however the assessment confirms that the school provision for both categories currently meets local needs and has the capacity to absorb the expected number of school children generated from the development. Further mitigation against potential impact can also be provided via CIL contributions, as such the development is acceptable with regard to primary and secondary education.
- 5.69 In relation to healthcare, the assessment identifies that the impact of the new residents on GP provision would be medium adverse, however the sensitivity of GP surgeries is identified as high. Therefore in order to mitigate the potential impact CIL contributions will be made, supporting GP surgeries and ensuring they are will not be over capacity issues as a result of the proposed development.
- 5.70 In summary the socio economic assessment within the ES demonstrates how the proposed development contributes to achieving the socio economic objectives of the NPPF specifically in relation to housing and jobs, and where impacts have been identified suitable mitigation measures largely through CIL and S106 contributions ensure that the socio-economic objectives are still achieved.

HIGHWAYS

- 5.71 Policy TR1 (Achieving the Transport Strategy) supports development that contributes to meeting the objectives of the Council's most up to date Local Transport Plan and proposals that commit to implementing measures that promote and improve sustainable transport facilities, including in relation to walking, cycling and the use of public transport.
- 5.72 In this regard, and in accordance with Policy TR1, the proposed development makes provision for measures that enhance accessibility to and from the site by utilising active and sustainable modes of travel in the first instance. The proposals submitted for planning permission enables and supports walking, cycling and the use of public transport.
- 5.73 A Transport Statement has been submitted in support of the application for planning permission, which has considered the impact of the proposed development on surrounding transport networks.
- 5.74 The Statement sets out that the Site is in an accessible central location within the Reading Central Area, with good access to public transport, shops and services. For example;
- The Site is within a 20 minute walk from the Town Centre;
 - The Site connects well with the existing cycle network with a cycle route running along the south boundary of the Site connecting to 3 identified cycle routes;
 - There are a number of bus stops within walking distance from the Site including those on Blagrove Street, Forbury Road, Kings Road and Station Road. The stops within walking distance are served by 19 bus

routes that provide access across Reading and to the wider region, including to Bracknell, Newbury and Wokingham; and

- Reading Station is a 10minute walk from the Site, which provides excellent railway access to London and across the south of the UK.

- 5.75 Therefore demonstrating that the Site is in a sustainable location and in accordance with policy seeks to maximise the available sustainable modes of transport.
- 5.76 The enclosed transport assessment confirms that the proposals include the provision of 200 car parking spaces at basement level for residents is significantly below the maximum parking standards of 1,250 spaces for the proposed 820 units. Therefore further encouraging the use of sustainable transport modes. In accordance with policy the 200 spaces will include a minimum of 5% disabled spaces, and 10% EV charging spaces. There will also be provision of 3 car club spaces across the proposals.
- 5.77 A separate parking provision of 53 spaces is proposed at ground level on the west of the Site to serve the commercial unit. The spaces are enclosed to the rear of the unit. The total parking provision on the Site results in a reduction of the existing provision of 313 spaces to 253.
- 5.78 The proposed provision therefore accords with Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging) and the Parking Standards and Design SPD. The levels of car parking proposed align with, and do not exceed, the maximum provision permitted at the Site.
- 5.79 The Transport Assessment assesses the impact on trip generation for the existing and proposed uses at the Site, including both the residential and commercial floorspace proposed. Concluding that the proposed development is anticipated to generate 93 greater two-way car trips in the AM peak hour and 28 fewer two-way car trips in the PM peak hour. While across the daily, there would be a decrease of 825 car trips. Therefore it is concluded that the net change in traffic generation is not material to the wider operation of the highway network, and that the development is acceptable in highways terms.
- 5.80 Policy TR4 (Cycle Routes and Facilities) supports development, such as the submitted proposals, which make full use of opportunities to improve access for cyclists to, from and within a development site and that integrate the provision of new facilities that encourage cycling. Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging), which is supported by the Parking Standards and Design SPD, set out an expectation that developments will provided cycle parking that is at an appropriate level to the accessibility of a development site.
- 5.81 The Site benefits from strong existing cycle network links, and the proposed development seeks to retain and enhance the cycle route along the south boundary of the Site ensuring cyclists are not required to cycle on Forbury Road / Kenavon Drive. Furthermore a total of 860 cycle spaces are proposed at the Site which is a significant increase from the existing 40 spaces, as well as exceeding the minimum parking standards by 377 spaces. Representing a significant public benefit and private residential benefit.

FLOODING AND DRAINAGE

- 5.82 The National Planning Policy Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Local Plan Policy EN18 (Flooding and Sustainable Urban Drainage Systems) directs development to areas at lowest risk of flooding and states that all major developments must incorporate sustainable drainage systems in line with Government Technical Standards.

- 5.83 The Site is located within Flood Zone 1, which indicates that there is a low probability of flooding as the Site from rivers and the sea. As such, it is within a zone assessed as having a <0.1% (1 in 1000 year) annual probability of tidal and fluvial flooding. However, in accordance with Environment Agency Guidance, as the Site is greater than 1 hectare and in Flood Zone 1, a Flood Risk Assessment ('FRA') has been submitted in support of the application for planning permission.
- 5.84 The FRA has undertaken a comprehensive review of all sources of flooding relating to the Site, including fluvial and tidal flooding, pluvial flooding, flooding from reservoirs, ground water flooding, flooding from sewers, flooding from water mains and has also considered the predicted effects of climate change in relation to increased rainfall intensities, river levels and increased sea levels.
- 5.85 In summary, the FRA concludes that the Site has a 'medium' to 'very low' risk of flooding from all sources. Furthermore the impact of the proposed development on the surrounding area will reduce the risk of flooding with surface water being discharged at a reduced rate from the existing discharge rates. Therefore confirming that the proposed development accords with Local Plan Policy EN18.
- 5.86 The application is also supported by a Drainage Strategy Report which sets out the drainage strategy for the proposed development including the suitability of SUDS on the Site. The strategy confirms that the maximum surface water discharge run off rate will not exceed 45 l/s in accordance with the relevant greenfield run off rate targets.
- 5.87 In relation to foul water discharge the drainage strategy confirms that the peak flows for the residential blocks will be 38 l/s and 0.45 l/s from the commercial elements, which has been confirmed as acceptable by Thames Water, who have confirmed that capacity exists within the system to accommodate these discharge rates.
- 5.88 Both surface and foul water drainage systems can be achieved via a gravity network, with both systems discharging at acceptable rates in accordance with the relevant national guidance, as well as reducing the risk of flooding elsewhere and including SUDS techniques (with the exact type and extent to be determined during detailed design). Therefore the proposed development is acceptable in drainage terms.

ENERGY AND SUSTAINABILITY

- 5.89 Energy and sustainability is scoped out of the ES and is assessed in a separate report produced by Method LLP.
- 5.90 In developing the energy and sustainability strategy for the Site, regard has been had to Local Plan Policy CC2 (Sustainable Design and Construction), which supports new development where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care, and that also take account of the effects of climate change.
- 5.91 As the application submitted for planning permission is for outline consent, the extract details of the heating and domestic hot water system, as well as the potential for renewable energy technologies on the site, have not been finalised. However, as set out in the Energy and Sustainability Statement it is anticipated that the development will incorporate a heating scheme that is fed by electric heat pumps, with suitable sizes photovoltaic ('PV') panels spread across the roof tops of the residential blocks, where space is not already required for other plant.
- 5.92 Based on representative SAP calculations under Part L 20 2021, we are anticipating at least a 50% reduction in regulated CO2 emissions on site. This will be achieved through a combination of energy efficiency measures, and low and zero carbon technologies.

- 5.93 Energy efficiency is to be improved via passive design measures such as optimising natural lighting, incorporating thermal mass, and maximising potential for solar gains in the winter months; all of which will act to help reduce overall energy demand. Combining these measures with the use of heat pumps for domestic hot water and space heating should allow a 50% improvement over the target emission rate of Part L 2021. Further reductions may also be achieved once the PV array is taken into consideration, but an estimate on this percentage improvement has not yet been established and will be determined as the detailed design of the development progresses and as reserved matters applications are submitted.
- 5.94 It is considered that these measures exceed the requirements of the Local Plan to achieve at least a 35% reduction in CO2 emissions on the Site. It is proposed that any remaining CO2 emissions will be discussed and agreed with Reading Borough Council via a carbon offset scheme.

CONTAMINATION

- 5.95 The effective protection of the environment is a key aspect of sustainable development, and reducing pollution is one of the core planning principles in the NPPF. **Policy EN16** (Pollution and Water Resources) states that development will only be permitted on land affected by contamination where it is demonstrated that contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use.
- 5.96 A 'Phase 1 Environmental (Desk Study) Technical Note' been submitted in support of the application for planning permission. The study assesses the likely geo environmental conditions and potential for contamination predominantly through the use of historical land use records, investigative records and results, and the findings on nearby development sites. Based on the historical and background geo-environmental information the report concludes that there is a high potential for contamination at the Site. With the following factors identified as the principal risk drivers:
- Made Ground
 - Contamination from previous use as railway buildings and tracks (metals and hydrocarbons)
 - Contamination from previous use as a biscuit factory.
 - PCB contamination from previous use as electrical substation.
 - Hydrocarbons from previous site use as a car park
 - Sulphates within the ground
 - Asbestos from previous railway sidings use (brakes & maintenance), former buildings and possibly existing buildings on the site
 - Unexploded Ordnance
- 5.97 However, the assessment sets out relevant next steps to ensure that the contamination risk factors are mitigated and development can proceed safely without risk of further contamination or degradation of surrounding amenity. Principally the report concludes that a comprehensive site intrusive investigation is required, whilst also carrying out environmental sampling and trial pits, which can be secured by an appropriately worded condition.
- 5.98 A phase 2 assessment will also be undertaken, and can be secured via condition, and the report identifies that it should also consider the further assessments that may be required, depending on the results of the phase 2 assessment.
- 5.99 In summary, despite the site having a high potential for contamination the Phase 1 Environmental (Desk Study) Technical Note identifies a clear strategy for assessing and mitigating contamination found on the Site. Therefore provided such measures are incorporated and secured via appropriately worded conditions the proposed development will be acceptable with regard to contamination.

ARCHAEOLOGY

- 5.100 **Policy EN2** (Areas of Archaeological Significance) requires applicants to identify and evaluate sites of archaeological significance and assess the archaeological impacts of the development proposals. Given that the Site is located within an area of archaeological interest this application is supported by an Archaeological Desk Based assessment prepared by Orion consulting.
- 5.101 The assessment includes the results of a site survey, an examination of published and unpublished records, and charts historic land-use through a map regression exercise. In summary the assessment identifies that remains of significance that would require preservation in situ are not expected – On the basis that the Site contains no designated archaeological assets and the Site has the following potential for non designated archaeological assets:
- A high potential for buried geoarchaeological deposits associated with the paleo-channel / Plummary Ditch. Such remains are considered likely to be of local significance.
 - A low potential for historic (early medieval, medieval or post-medieval) in situ archaeological evidence associated with the Plummary Ditch. Such remains are likely to be fragmentary and considered likely to be of local – regional significance.
 - A low potential to contain finds or features from the Roman-post medieval periods. Such remains are considered likely to be fragmentary and of local to regional significance
- 5.102 Furthermore modern development appears to have heavily truncated the upper levels of earth likely to contain the above, therefore the groundworks for construction are not anticipated to have a high level of physical impact on the non-designated heritage assets. Notwithstanding the above, mitigation is proposed in order to ensure any significant archaeological finds can be recorded, in the form of geoarchaeological deposit modelling and geoarchaeological evaluation which can be secured via an appropriately worded condition.
- 5.103 The assessment also considered the potential for impact on surrounding designated archaeological assets within the surrounding study area of 300m. The study identifies that the Site makes a slight contribution to the significance of the abbey precinct, however that the assessment concludes that the proposed development will not result in a significant change to the significance of the scheduled monument or how the monument is appreciated/experienced. As such the proposed development accords with the relevant national and local archaeological policies and guidance and is acceptable in this regard.

NOISE AND VIBRATION

- 5.104 Policy EN16 (Pollution and Water Resources) supports development proposals that are sensitive to the effects of noise. In addition, Local Plan Policy CC8 (Safeguarding Amenity) supports development proposals that protect the living environments of existing residential properties, as well provide acceptable living conditions for new residential properties, including in relation to noise and disturbance.
- 5.105 Accordingly noise and vibration assessment has been scoped in to the ES and it is considered that the proposed development is in accordance with Policies EN16 and CC8. The assessment considers the likely effects at all surrounding potentially receptors, including both residential and commercial land uses, for the demolition construction and operation of the proposed development. The majority of surrounding land uses are not anticipated to experience adverse effects, moderate adverse effects are anticipated at the following locations:
- St. James Church (demolition);
 - Kenavon Drive residences (construction of Phase 3);
 - Phase 1 (construction of Phase 2); and
 - Phase 2 (construction of Phase 3).

- 5.106 Only Kenavon Drive residences is anticipated to experience major adverse impacts during the demolition phase. However, it is noted that the predictions of the assessment are based on reasonable worst case assumptions, as such there will be extended periods in the demolition works when the noise levels will be inherently lower than those predicted. Furthermore the demolition and construction phases are temporary, with mitigation measures controlled via a CEMP able to further reduce any temporary impacts.
- 5.107 The operational phase of development does not propose any inherently noisy activities, notwithstanding the assessment includes consideration of the proposed plant that will serve the development. In order to ensure any noise emissions are appropriately controlled the noise assessment sets specific limits for plant and the commercial units. Limits have been determined for the closest receptors on the basis that the control of noise emissions from building services plant at these receptors will inherently result in lower noise levels at receptors further away.
- 5.108 For the commercial units the assessment concludes that provided the noise from the commercial units is managed to within reasonable levels for the proposed Class E use (considered L_{Aeq} 90 dB within this assessment) and that measures are implemented to minimise noise transfer via entrances, the significance of effects are predicted to be negligible. The 90 dB limit is also significantly above the likely internal noise levels of the retail uses that are likely to occupy the ground floor commercial units.
- 5.109 Therefore provided the limits are adhered to as set out in the noise assessment the noise levels within and around the proposed development will be acceptable in all regards, and these limits can be secured by an appropriately worded condition.

ECOLOGY AND BIODIVERSITY

- 5.110 The NPPF supports development that minimises impacts on, and provides net gains for biodiversity, including through establishing coherent ecological networks that are more resilient to current and future pressures. Local Plan Policy EN12 (Biodiversity and the Green Network) states that on all sites development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.
- 5.111 In order to demonstrate the improvements to ecology and biodiversity the proposed development provides in relation to the existing context an ecological assessment of the Proposed Development has been undertaken, as well as an extended Phase 1 Habitat Survey, which both form part of the Ecology Chapter of the Environmental Impact Assessment. As set out within this Chapter, the Site is comprised predominantly of hardstanding and buildings with small areas of amenity grass, scattered trees and ornamental planting.
- 5.112 The Site is not adjacent to or other wise connected to any statutory designated areas, although the rail line directly north of the Site is designated as an 'Area of Identified Biodiversity Interest' as shown on the Reading Borough Council Local Plan Proposals Map and includes open green spaces and wildlife corridors that are said to contribute to Reading's Green Network. However, the Proposed Development will not affect the integrity of this identified area of biodiversity interest; the landscape design will add to and strengthen the ecological function of this area, as well as contribute to the wider green network.
- 5.113 The Site currently supports habitats of limited intrinsic ecological value but nevertheless there may still potentially support limited numbers of legally protected species, including nesting birds and foraging/ community bats. The Ecology Chapter therefore sets out measures to avoid contravention of the legal protection afforded to birds, as well as recommendations for the implementation of industry standard pollution control measures, which will be implemented by the Applicant. These measures will also be further detailed within a Construction Environment Management Plan, which we understand is likely to be added as a planning condition.

- 5.114 The landscape design for the Site seeks to retain existing trees, as well as provide significant enhancements for biodiversity in comparison with the baseline position identified, including through the planting of a native species hedgerow along the northern boundary, the inclusion of biodiverse roofs on residential buildings and the provision of bird and bat boxes. These measures will provide additional habitats for invertebrates and foraging resources, as well as roosting and nesting habitats for bats and birds.
- 5.115 Given the limited ecological value of the Site at present, the landscape measures that form part of the Proposed Development will significantly enhance the Site, in accordance with the NPPF and Local Plan Policy EN12.

TREES

- 5.116 Policy EN14 (Trees, Hedges and Woodlands) seeks to protect against the removal of trees and secure appropriate mitigation measures, within development proposals. Accordingly the statement demonstrates the acceptability of the proposed tree strategy. An Arboricultural Statement is enclosed in support of this application. The proposed development has made provision for the retention of trees where possible, this principally includes the retention of the seven category B trees on the south boundary of the Site along Kenavon Drive amongst others.
- 5.117 The proposals also include substantial planting of trees and other landscaping measures as part of the open space and public realm proposed. This is guided by the design codes which provide rules to ensure the quality of the landscape and planting strategy is maintained throughout. As such it is considered that these measures are in full compliance with the requirements of Local Plan Policy EN14 will assist in improving the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area. In addition, the landscaping measures proposed provide for biodiversity and contribute to reducing carbon, directly assisting with addressing climate change.
- 5.118 A Landscape Management Plan will also be secured via condition to ensure the management and maintenance of the extensive planting at the Site to maximise the quality of all of the planting, including the retained trees and the proposed.

AIR QUALITY

- 5.119 In line with the requirements of Local Plan Policy EN15 (Air Quality) the proposed development has had regard to the need to improve air quality within the Borough and reduce the effects of poor air quality. Accordingly an Air Quality Assessment is scoped in to the Environmental Impact Assessment. The air quality chapter confirms that due to the lack of ecological receptors within the threshold defined by the IAQM, these can be screened out. However, that the assessment in respect of human receptors is screened in, in accordance with the guidance.
- 5.120 The assessment identifies that the Site falls partially within an Air Quality Management Area (AQMA), and therefore air quality has been carefully considered as part of the development proposals. The assessment identifies that the operational road traffic emissions will be lower than the existing road traffic emissions, this is a result of the reduced trip generation as identified in the transport assessment prepared by Stantec. Therefore the proposed development is considered to give rise to beneficial impact on local air quality, improving the quality of the AQMA for the operational phase of development.
- 5.121 In the construction phase of development the assessment identifies a potential risk of adverse effects, however it is noted that these can be mitigated through appropriate methods secured via a Dust Management Plan (DMP)

and Construction Environment Management Plan (CEMP) which can be secured via appropriately worded conditions. The CEMP and DMP will include measures as set out in the Air Quality Assessment such as regular monitoring and inspections, wheel washing, screening and covering, dust suppression techniques (for specific cutting and grinding works), amongst others.

- 5.122 Accordingly the proposed development accords with Local Plan Policy EN15 as it improves air quality in the long term in respect of the operational impacts, also in accordance with the relevant national air quality guidance. Furthermore the risk of potential adverse impacts of the construction phase can be mitigated via a CEMP and DMP, therefore ensuring that no phases of development in the short, medium and long term give rise to any unacceptable impacts on air quality.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 The Proposed Development submitted for outline planning permission has been guided by national and local planning policy, planning guidance and other material considerations. The Applicant has engaged extensively with Reading Borough Council and other key stakeholders, including with members of the public, throughout the pre-application stage, which began in December 2019. As demonstrated in this Planning Statement, and throughout the suite of information that has been submitted in support of the outline Application for planning permission, the Proposed Development is in accordance with the Development Plan for the Site, and in particular, its Site Allocation in the Reading Borough Local Plan (Policy ref: CR13b).
- 6.2 A set of Parameter Plans and Design Codes have been submitted for approval which define the development zones and plot boundaries on the Site, together with the land uses; site levels; amenity play space and publicly accessible open spaces; vehicular access and circulation; and maximum building heights and minimum separation distances. In addition, a Development Specification Document is also submitted for approval, which covers matters that cannot be captured in the Parameter Plans, such as the maximum floorspace, accessibility and parking.
- 6.3 An illustrative scheme for the Proposed Development of the Site, which accords with the Parameter Plans, Design Codes and Development Specification Document, has been submitted to Reading Borough Council as part of the Design and Access Statement. This illustrative scheme does not represent the only way that the development of the Site could come forward, but rather demonstrates a form of high quality, high density development that could enable the further realisation of the CR13b Site allocation and the delivery of a new residential community in the east of Reading town centre.
- 6.4 The Design Codes submitted for approval provide a comprehensive set of 'rules' that will ensure that any future submissions for the approval of reserved matters at the Site will achieve a consistent quality of design. Additionally, the Parameter Plans will ensure that any residential or commercial development will make efficient use of the previously developed, brownfield Site, and maximise its development potential.
- 6.5 Together the Design Codes, Parameter Plans and Development Specification Document submitted for approval will ensure that future development at the Site responds positively to its local context, and creates and reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm. The illustrative scheme positively and effectively relates to the Site's wider context, including in respect of key views, and creates high-quality open spaces whilst improving the Site's connectivity.
- 6.6 The application proposals have the potential to up to 820 homes out of the indicative potential of 1230 to 1840 dwellings that form part of the CR13b allocation. The introduction of new residential, commercial and flexible uses at the Site is in keeping with, and complementary to the Site's town centre location, and will contribute to the ongoing regeneration and revitalisation of this part of the local townscape. The proposed commercial floorspace is of a scale that will serve the Kenavon Drive area and there will be a net reduction in retail floorspace overall.
- 6.7 The Environmental Impact Assessment has assessed the maximum Parameters of the Proposed Development. In terms of scale, the submitted proposals are cognisant of the fact that the Site falls outside of the area supported for Tall Buildings in Reading, defined as being above 10 storeys of commercial or 12 storeys of residential use (36m tall), as per Policy CR10 (Station Area Cluster, Western Grouping and Eastern Grouping). The maximum

height of the development as set out in Parameter Plan 13 (Maximum Building Heights is + 63.5 to + 75 m AOD excluding plant).

- 6.8 The ES has tested the Application proposals and has concluded that:

Socio-Economics

Both primary and secondary school provision is expected to be able to absorb the expected number of school children generated from the Proposed Development. However, pre-school provision in the local area already exceeds capacity. The introduction of the new population of the Proposed Development is expected to further strain existing health facilities. However, there will be a substantial CIL payment arising from the Proposed Development which will generate substantial funding for education and GP services.

Noise and Vibration

With the implementation of a CEMP and the contractor adopting best practice the assessment indicates that at the construction stage there will be a temporary minor adverse effect on the majority of the assessed receptors during demolition and construction. Operational noise levels associated with road traffic and rail noise have been assessed. Through employing appropriate mitigation measures such as incorporating façade sound insulation, all operational effects are expected to be Negligible and therefore Not Significant.

Air Quality

As the Site is currently a retail park, construction vehicle movements are expected to be lower than the current use of the Site. A CEMP and a Dust Management Plan will be implemented to mitigate the impacts of construction vehicle movements on human health receptors in the local area. There is to be a maximum of 200 car parking spaces as part of the residential element of the Proposed Development so it will be a low-car development. As overall operational vehicle movements are expected to decrease as a result of the Proposed Development, the potential for adverse impacts from operational road traffic is considered Not Significant. As the Proposed Development is expected to lead to a decrease in road traffic emissions compared to the existing Site, any in-combination effects will be less than those assessed in isolation through individual planning applications. The overall cumulative effect at operational stage is considered Not Significant.

Heritage

No significant effects have been identified in respect of heritage during the demolition and construction stage and would be temporary. On balance, the Proposed Development is judged to have a beneficial or neutral impact upon the setting of heritage receptors and therefore their heritage value is not harmed and the ability to appreciate their interest is preserved.

Townscape and Visual Impact

The height, overall mass and profile of the maximum parameters of development proposed for the Site have been considered from a number of viewpoints as set out in the Townscape and Visual chapter of the ES. The Proposed Development will make a positive visual contribution to the city skyline and realise the potential of an allocated, brownfield site. It is considered that the high quality design of the Proposed Development, which will have differing characteristics as per the submitted Design Codes, will help to provide variety and interest in visual terms in Central Reading, as well as assist in creating a distinctive character for CR13b allocated site. The provision of taller

buildings on the Site aligns with the character of the wider area, which will further create a strong reference point for the Central Area of Reading, allowing for greater urban legibility in the Borough.

Daylight, Sunlight and Solar Glare

The operational effects present a worst-case scenario where massing will be at its greatest extent. Therefore the effects for the demolition and construction phase would be the same or less than those arising from the operational stage. Any effects will be Not Significant for daylight, sunlight and solar glare during demolition and construction of the Proposed Development. The detailed design of the Proposed Development will ensure effects are mitigated through the design.

Wind and Microclimate

No mitigation measures are required during the construction phase as the residual effects in respect of wind and microclimate would be temporary and negligible in the long-term. During detailed design, mitigation measures will be implemented as required to improve wind conditions at the Proposed Development.

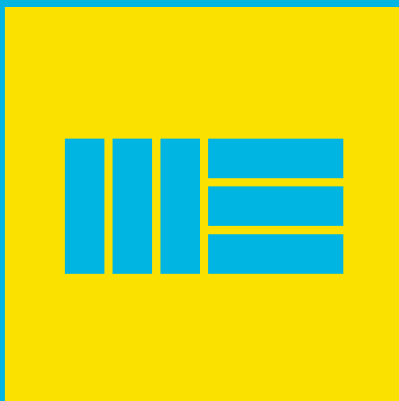
Townscape and Visual Impact

The character of the Site is an established, urban retail park of large block and large mass structures with ground surface dominated by hard materials. The Site is located within an area of evolving change and major regeneration. This context is important in the overall assessment of the Proposed Development. The Proposed Development was assessed from 19 key views to illustrate the scale, massing and height of the Proposed Development within its townscape setting.

- 6.9 The proposals will also bring significant environmental, social and economic benefits, including:
- Reading has a need for new residential dwellings. The Proposed Development could contribute up to 820 residential units, which would equate to nearly 5% of Reading Borough's housing requirement across the Local Plan period, which would also have a beneficial impact on the regional housing market.
 - The Proposed Development is likely to result in 708 gross full-time equivalent jobs per year during the construction phase and there is estimated to be 236 full-time equivalent jobs created within the commercial elements during the operational phase of the Proposed Development.
- 6.10 In the light of the above, we consider that the Proposed Development is acceptable and therefore respectfully request that Reading Borough Council approve the application for outline planning permission.

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