



Dwyer Road

Planning Statement

HTA Design LLP on behalf of
Reading Borough Council

May 2023

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

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

In association with Reading Borough Council

Status	Final
Issue	1
Issue date	18 th May 2023
Author	MO
Checked by	SW
Approved by	SW/RO

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1. Introduction

- 1.1 This Planning Statement has been prepared by HTA Design LLP on behalf of Reading Borough Council (the 'Applicant'), in support of a full planning application to Reading Borough Council (RBC) for the redevelopment of Dwyer Road (the 'Proposed Site') to deliver 31 new homes alongside ancillary work ('Proposed development'). A Site Location Plan is enclosed at **Appendix 1**. The Application seeks approval for:

"Redevelopment of the Site at Dwyer Road to deliver 31 new homes comprising 16 two and three storey houses and 15 flats in a 4-storey apartment block, alongside new access, soft and hard landscaping, parking and ancillary works".

- 1.2 The development proposals are hereafter referred to as the 'Proposed Development'. A full description of the Proposed Development is set out in **Section 3** of this Statement.
- 1.3 Housing demand and need was quantified through the Berkshire Strategic Housing Market Assessment (SHMA) 2016, which identified a need for 16,077 new homes (699 a year) between 2013 and 2036 in Reading. Of these, 58% (406 a year) need to be new affordable homes – reflecting the gap between property prices and private rent levels and the average salary of residents.
- 1.4 Until 2020 the housing market in Reading continued to thrive, however recent developments in progress or with planning permission have predominately been town centre flatted developments targeted towards young professionals and those that may look to commute to London for work. Therefore, there is an increasing challenge for the Council to ensure the delivery of family sized homes.
- 1.5 Following several years of under-delivery of affordable housing in general, family housing in the affordable sector is in short supply across the Council and is crucial to addressing the needs of families living in temporary accommodation. The Council's Housing Team is supporting the Council to deliver new council rented homes and have identified several sites, including Dwyer Road, for the development of family housing and dedicated downsizer apartments. Building new homes will support people in temporary and emergency housing to move out into a home of their own.
- 1.6 The Applicant is proposing the comprehensive redevelopment of the Site to provide new affordable homes whilst improving the overall amenity, security and general appearance of the existing site.
- 1.7 The Proposed Development will also support the Borough's supply of affordable and family sized housing as well as dedicated flats for council tenants wishing to downsize.
- 1.8 The Proposed Development demonstrates its potential to offer significant planning benefits, which will be discussed in detail in Section 7 of this Planning Statement

Accompanying Documents

- 1.9 This Planning Statement sets out the description of development and explains how the Proposed Development responds to relevant planning policies contained at national, local and regional level. It also deals with site-specific technical issues and draws from the conclusions of several environmental and technical documents which accompany the application.
- 1.10 The following technical/supporting documents have been prepared and are submitted in support of this application, which assess the Proposed Development.

Document	Author
Planning Application, ownership certificate and CIL Form 1	HTA Design LLP
Plans, Drawings and Design & Access Statement	HTA Design LLP
Arboricultural Impact Assessment and Method Statement	Middlemarch
Ecology Surveys: - Preliminary Ecological Assessment - GTLA survey - Badger Survey	ADAS
Biodiversity Net Gain Assessment	ADAS

Daylight, Sunlight & Overshadowing Assessment	HTA Design LLP
Energy and Overheating Assessment	HTA Design LLP
Sustainability Statement	HTA Design LLP
Noise Impact Assessment	A24 Consultants
Planning Statement (incl. Affordable Housing Statement)	HTA Design LLP
Statement of Community Involvement	HTA Design LLP
Ground Investigation Report	Hydrock
Sustainable Drainage Systems Proposal	Hydrock
Transport Assessment and Travel Plan	Hydrock
Utilities Statement	Hydrock

Table 1.1: List of Accompanying Application Documents

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

Report Structure

1.12 This Planning Statement is structured as follows:

- **Section 2** describes the Site, surroundings and planning history.
- **Section 3** sets out a detailed description of the Proposed Development and the consultation undertaken in developing the proposals.
- **Section 4** provides a summary of pre-application consultation and community engagement.
- **Section 5** provides a summary of the relevant planning policy context.
- **Section 6** contains the Affordable Housing Assessment
- **Section 7** outlines how the Proposed Development responds to policy and the local context.
- **Section 9** outlines other technical and policy matters relevant to the proposals.
- **Section 9** sets out the approach to planning obligations and draft Heads of Terms.
- **Section 10** sets out the summary and conclusions to this Planning Statement.

2. Application Site and Surrounding Context

- 2.1 The Site is in the southwest area of Reading in the Southcote ward, southwest of Reading Town Centre. It is currently vacant and hoarded off. The Site Location Plan included at **Appendix 1**.

Site Description

- 2.2 The Proposed Site is 0.58 ha in size. It is bounded by Burghfield Road to the east, Dwyer Road to the south, Appleford Road to the west and Charles Clore Court to the north, which is an extra care and sheltered housing site. The site is located within a residential, suburban area of Reading with houses and flatted development between one and four storeys in height.
- 2.3 The site is hoarded off, with the exception of a chain link fence to the north along the boundary to Charles Clore Court. The site is vacant brownfield land and previously comprised the Alice Burrows Care House, which was closed in 2007 and subsequently demolished. The site currently has areas of overgrown grassland and shrubs, small areas of hardstanding and contains several established trees around the periphery. Access to the Site is from Appleford Road to the west.

Access and Local Service Provision

- 2.4 Reading Borough is an urban area with great diversity in transport provision and need.
- 2.5 Bath Road to the north is identified in Policy TR2 for Major Transport Projects. There are three cycle routes within 300m of the site including cycle routes R6 and R60 and Major Transport Project National Cycle Network route 422.
- 2.6 The site is well-served by public transport. It benefits from several local bus services which are available within walking distance (400m) of the site with the closest bus stops on Dwyer Road. These stops are named Holybrook Crescent and are served by the yellow bus line 26, and services 86, 87 and 90. The 26 yellow bus provides a direct connection to Reading Station and this journey typically takes 20 mins.
- 2.7 Reading is split into four transport accessibility zones, with 1 being the most at accessible and 4 being the least accessible. This Site is in Zone 3, which means that it is deemed to be typically within 400m of Reading Buses high frequency 'Premier Route', which provides high quality bus routes to the Central Core Area, but also zone 2 areas and beyond to major supermarket and local centre facilities.
- 2.8 Reading Station offers frequent services to national destinations including London Paddington, Bristol, Cardiff, Birmingham and Manchester, as well as Central London via the Elizabeth Line.
- 2.9 Reading West station is situated 2.5km north east of the site. This station is served by services to a range of local destinations including Newbury and Basingstoke.
- 2.10 The local area contains several local community services including supermarkets, churches, a library, a pharmacy and local businesses.
- 2.11 The nearest primary school is Manor Primary School about 250m east of the site and King's Academy Prospect Secondary School is located approx. 550m north of the site.
- 2.12 The Site is fairly well located in terms of access to play, with the Kennet Valley play area a five-minute walk to the west, and Prospect Park a fifteen-minute walk to the east.

Relevant Designations

- 2.13 The Site is allocated for residential development of 18-27 dwellings in the Reading Local Plan (2019) under policy WR3P. The allocation notes that development on the site should:
- Should be accessed from a singular access point from Appleford Road to the west;
 - Avoid adverse effects on the important trees including those protected by TPO;
 - Take account of the potential impact on water infrastructure in conjunction with Thames Water (TW) and make provision for upgrades where required. (This is normally secured in the planning decision as a series of informatives relating to permits and further consultation with TW);
 - Investigate and consider any potential archaeological significance on site.
- 2.14 The site is not within any historic or biodiversity designation of local or national importance.
- 2.15 The site is in Flood Risk Zone 1 and is therefore in a low-risk area for flooding, however the western and northern boundaries of the site are in a medium surface water risk area.

2.16 The site is located just south of an Air Quality Management Area but not within it.

Planning History

2.17 An application to demolish the Alice Burrow's Care Home, a 2-storey building which formerly occupied the site, to ground floor slab was made in 2007 but was later withdrawn by the Applicant. An application for prior approval for demolition of the Alice Burrow's care home buildings was granted in February 2011 and the care home buildings have since been demolished.

2.18 There is no other relevant planning history nearby.

3. The Proposed Development

- 3.1 This section summarises the Proposed Development, but full details of the proposals can be found in the supporting DAS prepared by HTA Design and other supporting technical documents that accompany this application.

Design Principles

- 3.2 With a brief of increasing high quality affordable and sustainable housing delivery and amenity space, the development proposals are based on detailed analysis of the Site and the wider context. The proposals aim to:
- Provide general needs housing alongside homes for council tenants wishing to downsize;
 - Arrange new homes to create active frontages and a clear distinction between public and private open space;
 - Provide appropriate levels of parking at acceptable levels for the locality;
 - Promote sustainable forms of transport by providing secure cycle parking for each home;
 - Increase biodiversity on site and retain existing trees where possible; and
 - Achieve Net-Zero Carbon homes and promote climate resilience.

Summary of the Proposed Development

- 3.3 This application proposes the redevelopment of the Site to provide 31 new homes in the form of houses and flats, landscape and amenity, refuse and cycle storage, and car parking. Specifically, planning permission is sought for the following:

“Redevelopment of the Site at Dwyer Road to deliver 31 new homes comprising 16 two and three storey houses and 15 flats in a 4-storey apartment block, alongside new access, soft and hard landscaping, parking and ancillary works”.

Scale, Massing, Layout, and Materials

- 3.4 The proposed layout is based on detailed assessment of the site, its constraints and surrounding context.
- 3.5 The layout, which responds to the topography of the Site, aims to create active frontages to the surrounding streets, particularly fronting Dwyer Road and Burghfield Road, and allows for a clearly legible and well-connected development with adequate amenity space, parking, and daylight and sunlight levels.
- 3.6 The proposals include a new mews street from Appleford Road to the west, which will form the main access into the site. Along the new mews street, are 11 terraced homes between two and three storeys. A four-storey apartment block is proposed in the north of the site and will also be accessed via the new mews.
- 3.7 To the south of the site, sit four three-storey semi-detached houses and one three-storey detached home with individual accesses from Dwyer Road.
- 3.8 The proposed dwelling types and heights reflect those across Reading and in the local area. The apartment block responds to the four-storey flatted blocks directly north of the site along Burghfield Road and allows for a transition in height from the larger buildings north of the site to the lower scale, two and three storey houses and the suburban character otherwise surrounding the site.
- 3.9 The architectural language and materials of the new homes is inspired by an analysis of the local historic precedent in the surrounding area and features mainly red brick with light brick details, which are common materials throughout Reading. The proposed elevational treatment and detailing can be found in Design and Access Statement.
- 3.10 Overall, it is considered that the proposed scale, massing, layout, and materials have been sensitively developed to incorporate all key design principles of the Applicant to create a successful design which integrates well into the surrounding context.

Housing Mix

- 3.11 The proposed 31 residential units will be provided as 100% affordable rent and the housing mix is provided in **Table 3.1** below.
- 3.12 The proposals comprise 16x houses and 15x 'downsizer' flats including two wheelchair accessible units in a four-storey apartment block in the northern part of the site. A detailed accommodation schedule has been submitted with this application.

Block	1B2P	3B5P	4B8P	5B10P	Total
Apartment block	13				15
M4(3)	2				
Houses		9	6	1	16
Total	15	9	6	1	31
%	48%	29%	19%	3%	100%

Table 3.1: Proposed Housing Mix

Private amenity and Quality of Accommodation

- 3.13 Reading's Local Plan notes that in determining the appropriate amount of private and communal open space for new developments, the site constraints should be taken into account.
- 3.14 The table 3.2 below sets out the minimum and maximum private amenity provision for each proposed dwelling type.

Dwelling Type	Minimum Provision (sqm)	Maximum Provision (sqm)
1b2p Flats	8.5	9.8
3b5p houses	31.8	45.9
4b8p Houses	40.8	84.4
5b10p House		83.0

Table 3.2: Proposed Private Amenity per unit

- 3.15 Each proposed new family home will have a private amenity space in the form of rear garden ranging between 31.9sqm and 83sqm depending on the size of the proposed home.
- 3.16 The proposed new 1b2p flats are provided with at least 8.5sqm of private amenity in the form of balconies. Additionally, the residents of the proposed flatted block will have access to a shared private garden on the ground floor measuring 288.7sqm.
- 3.17 The ground floor units in the apartment block will have their own entrance point with small defensible spaces to the front.
- 3.18 All units meet Nationally Described Space Standards (2015). The flats and 3b5p terraced homes in the mews will be dual aspect, all 4b8p homes will be triple aspect, and the proposed 5b10p house will be a detached property.
- 3.19 Two flats on the ground floor in the apartment block will be delivered as M4(3) units providing wheelchair accessible accommodation. The provision of wheelchair units is in line with RBC's policy requirement of 5% on development proposing more than 20 units (Local Plan Policy H5).

Site Access

- 3.20 Vehicular and pedestrian access to the Proposed Development to the south along Dwyer Road, will be from Dwyer Road.
- 3.21 The additional homes and apartment block within the new mews will be accessed from Appleford Road on the western boundary, although Pedestrian and cycle access to the mews will also be possible from Burghfield Road.

The proposed mews street is a cul-de-sac preventing a vehicle connection from Appleford Road to Burghfield Road through the site.

Parking Provision

3.22 The proposal includes the provision of:

- A total of 27 parking spaces, consisting of 25 standard spaces and two wheelchair user parking bays. The proposed parking is provided in the following locations:
 - 21 spaces, including two wheelchair user parking bays in the proposed mews;
 - Six spaces for the homes along Dwyer Road where each house will have one parking bay, with the exception of the end of terrace five-bedroom home will have two dedicated parking bays.

3.23 Active EV charging will be provided to each bay and is in line with Part S of the Building Regulations.

3.24 A total of 36 secure cycle parking spaces will be provided in line with RBC policy which includes 0.5 cycle parking spaces for 1bed flats and two or more bed houses to have two spaces per unit.

3.25 Cycle parking for the houses will be provided in the rear gardens and the apartment block will have a dedicated cycle storage next to the substation adjacent to the apartment block.

Landscape Proposals

3.26 The landscape strategy for the Proposed Development aims to create generous and inviting green spaces, capitalising on the maturity and setting of the existing trees around the perimeter of the site. Opportunities for wildflower planting, hedgerow planting, new tree planting and the creation of green spaces that benefit both residents and wildlife over multiple generations have been incorporated.

3.27 Each house will have a private garden ranging between 31.2-84.4sqm in size, with the average size for all gardens across the site being 51.7sqm.

3.28 The residents in the apartment block will have private balconies ranging between 8.5-98sqm and access to a shared communal amenity space on the ground floor measuring 288.7sqm with tree planting and seating.

3.29 The proposals also include a biodiverse green space measuring 282.1sqm in the southwestern corner of the site which can include a range of activities for all ages.

3.30 In terms of play, the site is well located with Kennet Valley play area only a five-minute walk to the west, and Prospect Park a 15-minute walk to the northeast. Additionally, the proposed biodiversity area in the southwest corner of the site will benefit from the inclusion of informal play (such as timber stepping and balancing logs) to meet the policy requirement that 'all homes should be within 100- 200m of open space for children to play.

3.31 Boundary treatments aim to clearly define public and private spaces while providing privacy for future residents using buffer planting in front of the proposed homes.

3.32 All existing category B and Tree Protection Order (TPO) trees will be retained and 39 new trees will be planted. Proposed trees will primarily be native or wildlife friendly species and (as per RBC policy) overall the new trees should offer diversity of the 30:20:10 ratio – no more than 30% of any one family, no more than 20% of any one genus and no more than 10% of any one species.

3.33 The Proposed Development includes several biodiversity enhancing measures such as bird and bat boxes, native and biodiverse planting, and green roofs. Additionally, the existing green spaces to the south of the site will be enhanced by the creation of new habitats.

3.34 Furthermore, the applicant is committed to plant street trees in the local area as part of the landscape and ecology mitigation strategy, with a focus on planting trees along green links where possible. For example, the green spaces to the south of the site sit along the 'green link' and could be enhanced to increase biodiversity.

3.35 The landscape strategy on site in conjunction with the of-site proposed mitigation measures will ensure that the proposals achieve a biodiversity net gain and net gain in canopy cover.

Sustainability measures

3.36 The proposed aims to achieve Net Zero Carbon is be informed by Passivhaus house principles. The sustainability measures include:

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

3.37 The total quantum of development proposed has been subject to sensitivity testing and pre-application consultation with Reading Borough Council. The Proposed Development will provide several benefits to the local community and environment which will be demonstrated throughout this planning application. The DAS submitted as part of this application demonstrates how the scheme positively integrates energy, flooding and drainage and design strategies to ensure a high-quality scheme and living standard for future residents.

4. Consultation

Pre-Application Consultation

- 4.1 The Proposed Development has been informed by pre-application discussions with officers from RBC planning, highways, ecology officers, Parks and Streetscene Teams, as well as local residents and stakeholders.
- 4.2 This Section should be read in conjunction with the Statement of Community Involvement submitted with this application.

Pre-Application Discussions

- 4.3 Pre-application consultation has been undertaken with officers at RBC who are supportive of the proposals. Below are summaries of the discussion that have been undertaken:
- November 2022 scoping meeting: the general layout, massing and initial landscape, ecology and tree strategies were discussed.
 - January 2023 pre-application meeting: topics of discussion included layouts and access, refuse strategy, design development, and parking and deliver strategies.
 - January 2023 pre-application meeting: topics included detailed design, character and materials, landscape strategy and trees, and ecology and biodiversity net gain.
 - March 2023: meeting with the Case Officer to discuss the DRP feedback and next steps.
 - April 2023 pre-application meeting: topics included landscape proposals, ecology and biodiversity net gain, tree strategy and canopy cover, as well as off-site mitigation measures to achieve a biodiversity net gain. The final design proposals for submission were also presented.

Design Review Panel

- 4.4 In March 2023, the scheme was presented to the Design Review Panel (DRP). The review was positive overall, and the comments made mainly related to parking, architectural design, the entrance to the flatted block and bin stores for the proposed terraced houses.
- 4.5 Following the feedback from the DRP, the proposals were revised to address some of the comments in relation to the architectural language and elevations, fenestration and the entrance to the block of flats.
- 4.6 Further details on the Pre-application meetings and DRP and the design responses are provided in the Design & Access Statement.

Community Consultation

- 4.7 Local residents were consulted about the Proposed Development during the pre-application process and their comments and concerns shaped the development of the proposals. Flyers with information about the Proposed Development were distributed and a website with information was set up (<https://consult.reading.gov.uk/dens/dwyerroad/>).
- 4.8 Furthermore, a drop in event for local residents was held on 25th January at Manor Primary School between 16:30-19:00. 26 people attended the event and feedback was provided in conversation during the event, through

feedback forms and the website. The feedback comprised support for the proposals, particularly on the landscape proposals, and some concerns in relation to parking and transport, massing, anti-social behaviour and additional stress on local services such as GPs or schools.

4.9 Further detail in relation to the consultation with residents is set out in the Statement of Community Involvement.

5. Planning Policy Context

- 5.1 The Town and Country Planning Act 1990 (referred to as ‘the Act’), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.
- 5.2 Collectively the three acts create a plan-led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (Section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.3 In this instance, the statutory development plan relevant comprises the following:
- The National Planning Policy Framework (2021)
 - Reading Borough Local Plan (2019)
- 5.4 Other material considerations include:
- The National Planning Practice Guidance (2021)
 - Supplementary Planning Documents (SPD) that support the London Plan, including:
 - Affordable Housing SPD (2021)
 - Revised Parking Standards and Design SPD (2011)
 - Planning Obligations under S106 SPD (2015)
 - Sustainable Design and Construction SPD (2019).

National Planning Policy

- 5.5 The National Planning Policy Framework 2021 (NPPF) sets out the Government's overarching planning policies for England on the delivery of sustainable development through the planning system. The NPPF identifies the economic, environmental and social components which are key measures in creating strong, vibrant and healthy, sustainable communities.
- 5.6 At the heart of the NPPF lies a presumption in favour of sustainable development (Paragraph 11). This means approving proposals that accord with an up-to-date development plan or where policies are out-of-date or silent, then proposals should be granted where the benefits outweigh adverse impacts and have been assessed against the policies of the NPPF as a whole.
- 5.7 Relevant chapters include Chapter 5 (Delivering a Sufficient Supply of Homes), 8 (Promoting Healthy and Safe Communities) 9 (Promoting Sustainable Transport), 11 (Making Effective Use of Land), 12 (Achieving well-designed Places), 15 (Conserving and Enhancing the Natural Environment) and 16 (Conserving and Enhancing the Historic Environment).
- 5.8 The National Planning Practice Guidance (NPPG) documents were published from March 2019 to provide supporting context for the Framework. The following NPPG documents are considered relevant to the Application Scheme:
- Air Quality (2019);
 - Climate Change (2019);
 - Community Infrastructure Levy (2018);
 - Consultation and pre-decision matters (2019);
 - Design process and Tools (2019);
 - Determining a Planning Application (2019);
 - Effective Use of Land (2019);
 - Housing Needs of Different Groups (2019);
 - Housing for Older and Disable People (2019);
 - Transport Evidence Basis in Plan Making and Decision Taking (2019);
 - Use of Planning conditions (2019);
 - Viability (2014).

Local Planning Policy

- 5.9 The Development Plan for Reading Council comprises the adopted Reading Borough Local Plan (2019), the Proposals Map and the Central and Eastern Berkshire Minerals and Waste Plan.
- 5.10 Other relevant policy documents include the Community Infrastructure Levy Charging Schedule (2015) and the Annual Monitoring Report (2022).

Reading Borough Local Plan (2019)

- 5.11 The policies in the Local Plan cover development in Reading up to 2036. Policy H1 Provision of Housing states that the Council will aim to provide an additional 15,847 homes in Reading Borough Council in the plan period. Policy H3 secures the delivery of affordable housing and requires development sites of more than 10 units to include 30% affordable homes.
- 5.12 Other relevant Local Plan policies include:
- CC1 Presumption in favour of sustainable development
 - CC2 Sustainable design and construction
 - CC3 Adaptation to climate change
 - CC6 Accessibility and the intensity of development
 - CC7 Design and the public realm
 - EN14 Trees, hedges and woodland
 - H2 Housing density and mix
 - H5 Standards for new housing
 - H10 Private and communal outdoor space
 - H14 Suburban renewal and regeneration
 - TR5 Car and cycle parking and electric vehicle charging

Supplementary Planning Documents

- 5.13 Supplementary planning documents include: Affordable Housing SPD (July 2021); Revised Parking Standards and Design SPD (October 2011); Planning Obligations under S106 (April 2015), and Sustainable Design and Construction SDP (July 2019).

6. Affordable Housing Statement

- 6.1 This chapter provides a statement on the affordable housing provision proposed on the site. Specifically, it focuses on the assessment of the proposed housing provision and provides an assessment of the proposals in terms of amount, mix and tenure to local plan policy requirement H5.
- 6.2 It is a key objective for Reading to deliver more housing, especially affordable homes. Policy H5 of the Local Plan requires residential development to make appropriate contributions to affordable housing to meet the needs of the Borough. The policy states that on sites of more than 10 dwellings, 30% of the total dwellings should be in the form of affordable housing and that provision should be made on site where this is feasible.

Policy H5

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

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

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

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

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

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

The following types of residential development will be exempt from the requirement to provide affordable housing:

- *Replacement of a single dwelling with another single dwelling; and*
- *Conversion of a dwelling to self-contained flats where there is no new floorspace.*

Affordable Housing Requirement

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

	1B	2B	3B	4+B	Total
No.	1,490	1,129	741	72	3,433
%	43.4%	32.9%	21.6%	2.1%	100.0%

Table 6.1 Extract of table 108 in AMR Estimated size of accommodation required by number of bedrooms (2013 to 2036) – Affordable Sector

Affordable Housing Completion

- 6.6 According to the recent Annual Monitoring Report (AMR), 178 new affordable homes were delivered in 2021-22 which is significantly higher than the affordable housing completion in 2019-20 (80) and 2020-21 (54) and is the highest level since 2013. However, the supply of affordable housing is significantly lower than the annual requirement of 406 over the Local Plan period.
- 6.7 In relation to housing mix and type, the AMR (2021-22) indicates that 37.1% of all dwellings completed in the reporting period were studios or 1-bed units, 50.2% were 2-bed units and 12.6% were family sized units.
- 6.8 This data demonstrates the difficulty in securing family sized housing in Reading as only 13% of the total delivery of new dwellings in the reporting year was family units, which is considerably below the target of 50% set out in policy H5. Nevertheless, it should be noted that this figure rises to 30% when dwellings in designated centres are excluded as stipulated in policy H5.
- 6.9 The percentage of newly permitted three or more bedroom homes in 2021-22 is very similar to the completions discussed above, at 12%. When developments in centres are excluded, the proportion rises to more than 60%, which exceeds the policy target, but is only a small proportion of all new permissions for new build homes.
- 6.10 This therefore emphasises the continued importance of securing larger family homes in future developments in Reading, especially outside of designated centres.

Affordable Housing Offer

- 6.11 The application proposes 31 new affordable home and would make a significant contribution to the overall provision of affordable housing in Reading and the local affordable housing need of 406 dwellings per annum.
- 6.12 All of the new affordable homes will be brought forward at social rents and will be owned and managed by Reading Borough Council.
- 6.13 The Proposed Development is broadly in line with the indicated housing mix requirement for affordable homes as set out in the SHMA 2016. The largest proportion of homes will be family sized homes with three or more bedrooms (51%), the remaining 48% will be delivered as 1-bedroom flats.
- 6.14 The proposed affordable housing offer is set out below in **table 6.2**.

Unit size	Bed space per unit type	Habitable rooms per unit type	Total units	Total habitable rooms	Total number of occupants per unit	mix
1B2P	2	2	15	30	30	48.4%
3B5P	5	4	9	36	45	29%
4B8P	8	6	6	36	48	19.4%
5B10P	10	8	1	8	10	3.2%
			31	110	133	100%

Table 6.2: Proposed Affordable Housing

- 6.15 Local Plan Policy H2 (Density and Mix) sets out the overall target mix for new development across Reading which is 18.6% one bedroom, 30.5% 2 bedrooms, 36.5% 3 bedrooms, and 14.4% 4+ bedrooms units. The Council has a

particular focus on delivering more family sized housing and expects major development (10 + units) outside the central area to provide 50% family homes (3+ bed units).

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

Table 6.3: Reading Target Housing Mix

6.16 In conclusion, the Proposed Development includes 31 new homes, and the Applicant proposes to provide 100% social rented homes at the site. The proposed housing mix for the development is available in table 6.2 and includes 16 family homes comprising 9x 3-bedroom homes, 6x 4-bedroom units and 1x 5 bedroom home alongside 15 one-bed apartments specifically designed for council tenants wishing to downsize. The proposed housing mix is considered acceptable when compared to the targets in Reading's local plan. While the proposed provision of one-bedroom units (48.4%) is higher than the combined requirement for market and affordable one-bed units in Reading (18.6%), the demand for affordable 1-bedroom units is considerably higher in the Borough at 43.3%. Furthermore, the Proposed Development includes 51.6% family sized units and therefore exceeds the requirement for major development outside the central area to provide 50% family homes (policy H2).

7. Compliance with Development Plan Policy

- 7.1 This section discusses the key planning considerations and assesses the Proposed Development against development plan policy and other material considerations. It should be read together with the DAS and other supporting technical documentation accompanying this application, which collectively provide further detail on how the Proposed Development is being delivered and the principles that have influenced the design.
- 7.2 In order to assess the acceptability of the proposed redevelopment of the site to provide 31 new affordable dwellings (C3 use class), it is necessary to consider housing need in Reading and relevant national, regional and local plan policies.

Principle of Development

- 7.3 One of the core objectives of the NPPF is to boost the supply of all housing types and to make the most effective use of land. Chapter 5 contains specific guidance on supporting this, noting that local strategic policies should seek to support the size, type and tenure of housing needed for different groups including, affordable housing, families with children and people with disabilities.
- 7.4 Furthermore, Reading's Local Plan Policy H1 places considerable emphasis on the need for new housing across the Borough including the Southcote ward and the western region of Reading, where infill development alongside strategies for complete renewal are supported to ensure the delivery of up to 2,400 homes between 2013 and 2036, which is around 15% of the total planned supply (para 7.2.4, Reading Local Plan 2019).
- Housing provision (Use Class C3)
- 7.5 While these policies provide the supporting context for development, the principle for development at the Proposed Site has been established in the policy allocation WR3P in the Reading Local Plan (2019).
- 7.6 The site allocation notes that the site is suitable for 18-27 dwellings and the Proposed Site is within an established residential community with existing facilities nearby, making it a suitable location for the provision of residential (C3) development.
- 7.7 The Proposed Site is within an established residential area with existing facilities nearby, making it a suitable location for general needs housing (Use Class C3) and dedicated flats for council tenants wishing to downsize (Use Class C3).
- 7.8 Table 5.1 sets out the Borough's performance against Local Plan Policy H1 targets over the last 5 years. The table demonstrates that in 2021/ 22 the Borough delivered a significant increase over the previous two years and exceeds both the annual housing provision figure in policy H1 of 689 dwellings per year and the objectively assessed housing need figure of 699 dwellings per year¹.
- 7.9 However, over the past 5 years, there have been periods of under delivery, for example from 2019 -2021, and the proposed development would support the Borough's aims to ensure the overall housing delivery meets the target of 15,847 homes over the period 2013 to 2036, in accordance with Policy H1.
- 7.10 The Annual Monitoring Report (AMR) 2021-2022 notes that Reading has a housing land supply (Use Class C3) of 6.17 years against the Local Plan housing targets.

Year	Policy H1	Total completions	% of target
21/ 2022	689	850	123%
20/ 2021	689	408	59%
19/ 2020	689	521	76%
18/ 2019	689	910	132%
17/ 2018	689	700	101%
Total	3,445	3,344	97%

Table 7.1: Housing Completions in Reading

¹ Reading Borough Council (2022) Annual Monitoring Report 2021-2022 <https://images.reading.gov.uk/2022/12/Annual-Monitoring-Report-2021-22.pdf>

- 7.11 Despite the good levels of overall housing deliver, the provision of family homes and affordable housing remains a significant issue for the Borough.
- 7.12 With respect to the delivery of family homes, most developments have been in the town centre targeting young professionals. In 2021-22 almost 90% of completed dwellings were for one- or two bed dwellings, and almost all completions were flats rather than houses. Most new homes continue to be small and flatted and therefore unsuitable for families. There are a growing number of families in the Borough residing in temporary accommodation, yet the current delivery of homes does not reflect this, which is exasperating challenges for these families and their outcomes.
- 7.13 Berkshire Strategic Housing Market Assessment (SHMA) 2016 identified a need for 16,077 new homes (699 a year, slightly above the Plan target) between 2013 and 2036. Of those new homes the SHMA identified the need to provide 406 affordable homes per year. The amount of affordable housing delivered in 2021-2 was 178, which was significantly higher than 2019-20 (80) and 2020-21 (54), and is the highest level delivered since 2013, but is still well below the identified level of affordable housing need of 406 per year over the Local Plan period.
- 7.14 Reading is a small, tightly constrained urban Borough with limited land available for new homes. As a post-war development town, there is a need to ensure that those sites which are derelict or have the potential for an uplift in density should be utilised to maximise the land use efficiency in accordance with NPPF para. 102.C and LP H2.
- 7.15 The existing site is vacant and hoarded off brownfield land, therefore not providing any function or contribution to the Borough and its residents and could be developed for more housing and to support the local character. It is within good access to local services and existing supporting local infrastructure which makes it a suitable site for residential development (Use Class C3).
- 7.16 The Borough needs additional housing, especially affordable family sized homes, and the proposed site provides an excellent opportunity for residential development. The Site is currently vacant and not providing any beneficial use to the local community or contributing to the character of the area. The site is deemed suitable for the provision of new homes by virtue of the policy allocation in the Local Plan for residential development (C3). Furthermore, it is within good access to local services and existing supporting local infrastructure.
- 7.17 In conclusion, redevelopment of the site would contribute to Reading's current housing delivery target in accordance with Paragraph 59 and 62 of the NPPF and Local Plan policy H1. The Applicant's proposals strongly align with the Government's objective of significantly boosting the supply of homes including the provision of affordable homes, as described in Chapter 5 of the NPPF. The Proposed Development also includes a significant amount of family housing (51.6% of total homes) which is needed in the Borough and the provision of 15 generously sized one-bed flats for council tenants wishing to downsize will make available existing affordable family sized homes in the Borough. Therefore, the principle of residential development to provide housing (Use Class C3) at this Site is established.

Density

- 7.18 Policy H2 Density and Mix states that the appropriate residential density is informed by:
- the character and mix in the area that it is located, including important landscape or townscape areas;
 - current and future levels of accessibility;
 - the need to achieve high quality design;
 - the need to maximise efficiency of land use;
 - need to minimise environmental impacts
- 7.19 The Local Plan gives an indicative maximum density of 30-60dph for suburban areas.
- 7.20 The policy notes that the criteria which informs density may not be appropriate, 'the capacity of each site will depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation'. The policy goes on to state that net density of below 30dph is not acceptable.
- 7.21 The Local Plan states at paragraph 4.4.7 that 'it is important that efficient use is made of land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, the character of the surrounding areas and any other particular sensitivities. Each site has its own particular characteristics, and it is not appropriate to set down exact densities in this policy'.

- 7.22 The site is in a suburban location. The proposed number of homes at the Site is 31 resulting in density of 53.4 units per hectare, therefore the Proposed Development is considered appropriate in terms of density and will help address the acute need for affordable homes in Reading.

Quality of Accommodation

- 7.23 The Local Plan states that housing standards serve an important role in ensuring resident health and well-being (paragraph 4.4.40). Therefore, Policy H5 Standards for New Housing states that new build housing should be built to the following standards:

(a) floorspaces must comply with nationally described space standards;

(b) all new buildings will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations;

(c) all major new-build residential development should achieve zero carbon homes;

(d) all new build housing will achieve a minimum 19% improvement in the dwelling emission rate over the target emission rate, as defined in 2013 Building Regulations;

(e) all new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3);

(f) on developments of 20 or more new build dwellings, at least 5% of dwellings will be for wheelchair users dwellings in line with M4(3) of the Building Regulations.

- 7.24 It is noted in the adopted plan that new development does not reduce the quality of environment for others and ensure that development creates a quality living environment for future residents. Adopted Policy CC8 Safeguarding Amenity addresses these issues. It states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential property.

Unit Sizes

- 7.25 Policy H5 Standards for New Housing requires that dwellings must meet nationally described space standards. These standards will be met; and the table below sets out the proposed floorspace for the new dwellings:

Unit Size/type	Use	Nationally described space standards (sqm)	Floorspace sqm (GIA)
1B2P Type A	Flat	50	61.7
1B2P Type B	Flat M4(3)		61.7
1B2P Type C	Flat		63.3
3B5P Type B	House	93	95.3
4B8P Type A	House	130	143.5
4B8P Type B	House		150.8
5B10P Type C	House	134	172.5

Table 7.2 Proposed dwelling sizes

- 7.26 All units proposed exceed nationally described space standards and therefore in line with the requirements of Local Plan Policy H5.

Accessibility

- 7.27 Policy H5 Standards for New Housing requires for schemes of 20 or more units, the provision of at least 5% of dwellings to be accessible for wheelchair users in line with M4(3) of the Building Regulations.
- 7.28 The application proposes a total of 31 homes, and two of these will be wheelchair accessible homes. The M4(3) homes will be located on the ground floor in the proposed apartment block and will be 1b2p units. Therefore, 6.5% of the proposed dwellings are wheelchair accessible, which meets and exceeds the policy requirement.

Sustainability Standards

- 7.29 In line with the policy H5, the proposed dwellings will reduce the use of water to below 105 litres/person/day using water efficient fitments. Additionally, a downpipe is proposed to the rear of every house to provide the opportunity for rainwater collection for gardening purposes. Furthermore, the Proposed Development will 104% overall carbon reduction above 2021 Building Regulations, achieving a net zero regulated carbon.
- 7.30 In conclusion, the Proposed Development meets or exceeds the standards for new housing set out in the Reading Local Plan in Policy H5.

Daylight, Sunlight and Overshadowing

- 7.31 Local Plan Policy CC8 Safeguarding Amenity is concerned with access to sunlight and daylight.
- 7.32 A Daylight, Sunlight and Overshadowing Assessment of the Proposed Development was carried out by HTA Sustainable Futures in line with the Building Research Establishment (BRE) Guide 2022.

Daylight

- 7.33 A daylight assessment of the impact on neighbouring properties at 141 Appleford Road northwest of the site and Charles Clore Court north of the site has been undertaken. A total of 61 windows at neighbouring residential units that face the Proposed Development were assessed. The results show that 84% of the analysed windows achieved Vertical Sky Component (VSC) levels of at least 27% in line with the BRE recommendations. Most of the windows which fail to meet the BRE recommendations would still achieve satisfactory levels of daylight, however there are four windows on the first floor and ground floor within Charles Clore Court which would experience a reduction in VSC of more than 20%.
- 7.34 It should be noted that a reduction in VCS levels of more than 20% does not mean that the level of daylight in the affected rooms will be unacceptable but rather that there may be a notable change in daylight levels to the occupants. Furthermore, it is important to consider that although the 27% VSC target is the standard criterion, it is not fully applicable to new developments in urban or built-up areas where a lower VSC target is often acceptable. Overall, the Proposed Development has some impacts on immediate neighbours but they are considered acceptable for the size and nature of the development.
- 7.35 With regards to the proposed development, 80% of the assessed rooms pass the BRE Illuminance target. Out of the eight rooms that fall below the 50% target, four are bedrooms, three are living-kitchen-dining (LKD) rooms and one is a kitchen. One LKD and two bedrooms marginally fall below the criteria with 5-10% below the passing target (50%). Of the remaining five rooms, one is a kitchen located on the ground floor of the middle terrace house, one is a bedroom located on the first floor of the apartment block and the remaining three are LKDs, all of them located respectively from the first till the third floor of the apartment block. Most of these windows are located on lower floors underneath balcony slabs and external shading devices.
- 7.36 Overall, the Proposed Development is expected to provide all habitable spaces with good levels of daylight.

Sunlight

- 7.37 Only windows facing within 90 degrees of due south need to be assessed in accordance with BRE guidance. Overall, the sunlight analysis of the impact on surrounding properties is found to be negligible.
- 7.38 For the proposed development, the main requirement for sunlight in dwellings is in the living rooms to south-facing living rooms. A total of 11 south facing living rooms were assessed and all tested living rooms achieve adequate sunlight throughout the year.

Overshadowing

- 7.39 The overshadowing analysis shows that the Proposed Development does not overshadow the surrounding existing properties.
- 7.40 External amenity spaces of the Proposed Development have been assessed for sunlight levels. 17 spaces have been tested for this analysis. The results of the sun-on-the-ground analysis indicate that 13 out of the 17 assessed amenity spaces comply with the requirements described in the BRE guidelines on 21 March. All amenity spaces are well lit over the summer (21st of June) when the spaces are more likely to be used.

Conclusion

- 7.41 Overall, it can be concluded that the Proposed Development will not cause detrimental impact in relation to the amenity of existing residents or create unacceptable living conditions for new residents. Therefore, the Proposed Development complies with Policy CC8 and should be supported.

Transport, Parking and Access

- 7.42 The Applicant appointed transport consultant Hydrock to assess the scheme for its suitability in relation to highways matters.
- 7.43 Local Plan Policy T1 seeks to promote and improve sustainable means of transport and requires development proposals to ensure an adequate level of accessibility and safety by all modes of transport, particularly public transport, walking and cycling. Hydrock have prepared a Transport Statement and Travel Plan to accompany this application, and the issues in relation to transport and parking are discussed below.

Parking

- 7.44 Reading Borough Local Plan Policy TR5 requires new development to provide car and cycle parking at a level appropriate to the location within Reading. The Council's Revised Parking Standards and Design SPD (2011) sets out the parking standards in four different zones according to their accessibility. The Proposed Development is in Zone 3 which requires 1.5 spaces for 1-2 bed flats and 2 spaces for houses with 3 or more bedrooms and would therefore result in a requirement to provide a car parking ratio of 1.76.
- 7.45 The supporting text of Local Plan Policy TR5 suggests that new development should provide car and cycle parking that is appropriate to the accessibility of locations within the Borough, particularly in terms of public transport and that this requires achieving careful balance.
- 7.46 Paragraph 120 (d) encourages development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained.
- 7.47 As noted above, there is a shortage of family housing across Reading and the supporting text to Local Policy TR5 notes that proposals should provide car parking and cycle parking that is appropriate to the accessibility of a location to sustainable transport facilities, particularly public transport.
- 7.48 The site benefits from good levels of pedestrian and cycle accessibility and public transport links with the closest bus stops located within walking distance on Dwyer Road.
- 7.49 As noted previously, the Site is allocated in the Local Plan under policy allocation WR3P. The allocation requires access to the Site to be provided from a singular access point from Appleford Road to the west.
- 7.50 The Applicant and their team have worked with Reading's Highways team to determine the most appropriate layout and parking provision for the site, which responds to the site's context, proposed development, users and capacity.
- 7.51 To establish appropriate parking provision for the site, the transport consultant Hydrock undertook a review of the 2011 and 2021 Census data relating to housing tenure, number of bedrooms, and car ownership. Specifically, this covers all zones where social housing was reported by the census to at least 50%.
- 7.52 The analysis indicated that 0.5 spaces per dwelling for 1 bed flats and 0.9 spaces per dwelling for 3 and 4 bed houses provide an appropriate level of parking given local car ownership data for output areas in Reading with a similar housing mix and predominantly affordable housing tenure. The findings are available in section 3.4 of the accompanying Transport Statement prepared by Hydrock.
- 7.53 Hydrock consulting have reviewed both the 2011 and 2021 Census data relating to housing tenure, number of bedrooms, and car ownership. Specifically, this covers all zones where social housing was reported by the census to at least 50%.

- 7.54 The Proposed Development includes 27 parking spaces or an overall ratio of 0.87 spaces per dwelling which is below Policy requirements of the SPD but was deemed appropriate following the analysis of local car ownership levels outlined above. The Applicant's intention is to provide car parking 0.54 spaces for each 1-bed flat, 1 space for each house in the mews and the 4-bed room properties on Dwyer Road, and 2 spaces for the 5-bed property on Dwyer Road.
- 7.55 Car parking is proposed in the following locations:
- 8 spaces for the apartment block in the mews (15 x 1 bedroom flats)
 - 11 spaces for the houses in the mews (11 x family homes – 3 and 4 bedrooms)
 - 6 spaces for the homes on Dwyer Road (4 x family homes – 3 and 4 bedrooms and 1 x 5 bedroom home)
 - 2 visitor spaces in the mews.
- 7.56 Parking for the flats and the 11 houses in the mews will be provided in the proposed mews street and this will also include the provision of two parking spaces for wheelchair users which will be allocated to the residents in the proposed M4(3) units.
- 7.57 In summary, it can be concluded that parking provision is appropriate in terms of local car ownership and the site's accessibility to public transport.

Cycle Parking

- 7.58 In line with Local Plan Policy TR5 and the Revised Parking Standards and Design SPD, a total of 36 secure cycle parking spaces will be provided for future residents. Each house will have secure and easily accessible two cycle spaces provided in the gardens and the apartment block will have dedicated secure cycle storage next to the substation adjacent to the apartment block.

Refuse and Recycling

- 7.59 Each house will be provided with three 240l wheeliebins located in the front gardens of the terraced houses and the private gardens of the semi-detached and detached homes on Dwyer Road.
- 7.60 The apartment block will be provided with an integrated communal bin store located on the ground floor with space for five 1100l eurobins. In line with RBC waste guidance, two bins will be allocated to refuse and two bins to recycling assuming weekly collections.
- 7.61 In terms of collection, residents of the houses on Dwyer Road would bring their bins to the kerbside for pick up on collection day. The residents of the houses in the proposed mews street would bring their bins to a collection point on the mews street complying with operative drag distances.
- 7.62 A refuse vehicle can successfully and safely enter and egress the Site using the three point turning head incorporated into the layout.
- 7.63 Pre-application discussions with Reading's Environmental and Commercial Services Team confirmed that the refuse strategy for the site is acceptable.
- 7.64 Further details are set out in the Design and Access Statement.
- 7.65 Overall, it is considered that the Proposed Development would not have a negative impact on the operation of the local highways network and is in accordance with Policy TR1 in the Local Plan and with paragraph 110 and 111 in the NPPF.

Trees (Arboricultural Impact Assessment and Method Statement and Proposed Tree Planting)

- 7.66 Local Plan Policy EN14 require trees, hedges and woodlands to be protected from damage or removal where they are of importance. The policy requires new development to make provision for tree retention and planting, particularly on the street frontage, 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 carbon reduction and adapt to climate change. There is also a requirement that the trees are adequately maintained. The importance of green infrastructure is also important to local eco-systems, amenity, biodiversity, and climate change as referenced in local policies CC3, CR3, CR14, EN12, EN15 EN18.
- 7.67 Arboricultural Impact Assessment and Method Statement have been undertaken by Middlemarch and forms part of this submission. The proposed layout, and its impact on the trees has been developed through consultation with Middlemarch, residents and Reading Borough Council.

7.68 The Proposed Development will:

- Retain all existing Category B and TPO protected trees;
- Require works within the RPAs of five retained trees (T2, T5, T6, T7, G5) which will not result in significant impacts to the trees as a result of the proposed works;
- Result in the removal of nine (G1, G2, G3, G4, G7, H1, T11, T13, T15) low value trees which should be considered acceptable as the planting of higher quality species is proposed;
- Provide a total of 39 new trees on site with a commitment by the Applicant to plant further trees off-site, which will form part of the draft Heads of Terms. The proposed trees include a mix of large, medium and small canopy trees of a mix of species including fruit trees;

7.69 A detail proposed planting plan is included in the submission and further detail in relation to the tree strategy is set out in the Design & Access Statement.

7.70 The submitted Arboricultural Impact Assessment and Method Statement also provide consideration on the following issues: tree pruning; protection for retained trees, and foundation depths for buildings near trees.

7.71 The Arboricultural Method Statement also includes appropriate working practices to ensure that works within RPAs of retained trees are carried out in a way which would not cause significant harm to existing trees.

7.72 Overall, the Proposed Development is considered to be in line with Local Plan Policy EN14. While some tree loss will be necessary to facilitate the proposed development, all existing category B and TPO protected trees will be retained. The proposed tree planting strategy will enhance the character and appearance of the area and contribute to biodiversity in line with Policy EN14. In line with Policy CC3 and EN15, the new trees together with the wider landscape scheme will provide shading of amenity areas, connect habitat and help mitigate climate change.

7.73 It is therefore considered that the impact on trees should be considered acceptable as the new development will make a lasting contribution to the visual amenity value and canopy coverage across the site, alongside a tree planting strategy off-site, for the benefit of all residents. On this basis, the proposal is compliant with Local Plan policies and should not be refused on arboriculture grounds.

Ecology and Biodiversity Net Gain

7.74 Paragraph 174-5 and 180 in the NPPF set out the national position on the protection of biodiversity and how the assessment of ecology should be undertaken by Applicants. Essentially, all development should contribute and enhance the natural local environment, minimising impacts and providing net gains, such as connections to and creation of habitats and green infrastructure through their integration into the design.

7.75 While ecology intersects with several Local Policies in Reading, Policy EN12 provides the main source of guidance in the Borough. New development is expected to maximise opportunities to create new green link assets and development should not result in a net loss of biodiversity and geodiversity.

Preliminary Ecological Assessment

7.76 An initial Preliminary Ecological Appraisal was undertaken by RSK ADAS in September 2022 to assess the ecological constraints in relation to the proposed development. An updated survey was prepared in December 2022 to provide results and recommendations in relation to the habitat changes which had occurred as a result of vegetation clearance at the Site.

7.77 A desk study showed eight statutory designated sites within 5 km of the site and 14 non-statutory designated sites within 2 km. Additionally, records of numerous bat species, as well as common reptiles and amphibians were found within 2km of the site.

7.78 A Phase 1 Habitat Survey was carried out on 10th January 2023 by an Ecologist. The survey identified grassland, scrub and trees/woodland habitat suitable for a variety of protected species. These included bats, nesting birds, common reptile, amphibian and mammal species, including Badgers. A Badger sett previously identified in September 2022 within the north of the site was recorded again in 2023. Invasive species like Cotoneaster plants were also recorded again, but limited to the north, east and west boundaries of the site.

7.79 Further badger, bat and reptiles surveys have been commissioned by the Applicant to determine the presence or absence of protected species at the site. The results of these surveys are due to be submitted over the next few months, while the application is being determined, but it is expected that where these species are found appropriate mitigation will be proposed for the LPAs consideration ahead of confirmation of a decision on this application.

7.80 Necessary avoidance and mitigation measure have been recommended for nesting birds and trees during development to avoid causing an offence under relevant legislation and in line with the Reding Borough Local Plan to protect and retain biodiversity at the site.

7.81 Additional enhancements have been included to further contribute to a potential net gain in biodiversity, to comply with policies in the Local Plan and the Environment Act 2021. These include habitat features, such as integrated and tree mounted bird and bat boxes, insect hotels, loggerys and bee bricks.

Further Surveys

7.82 ADAS conducted a Badger survey in March 2023, and no further Badger activity was recorded.

7.83 A Ground Level Tree Assessment was undertaken by ADAS in March 2023. During the survey, the majority of trees on site were assessed as having negligible potential to support roosting bats and were ruled out from further survey. Six trees were assessed as having low suitability to support roosting bats; these included trees which will be removed or will require works; Tree 5, 15, a Wild Cherry tree from Group 1, a Horse Chestnut from Group 5, and trees which will be retained; both trees in Group 6. No further survey work is required in accordance with good practise guidelines (Collins, 2016). However, it is proposed that each tree will be soft felled when clearing to ensure the work is compliant with bat conservation guidelines.

7.84 A Reptile Survey has been undertaken 23rd by ADAS which included the placement of 45 reptile refugia mats in areas of suitable reptile habitat on the site in March 2023 and seven reptile survey visits in suitable weather conditions between 4th April and 5th May 2023. No reptiles were recorded at the site during the visits and therefore it can be concluded that reptiles are likely absent from the site. The reptile survey report recommended that precautionary working methods during site clearance are outlined in a Method Statement for reptiles which would allow the Applicant to be confident that a breach of legislation would not occur.

Biodiversity Net Gain (BNG)

7.85 A Biodiversity Net Gain Assessment has been undertaken by ADAS.

7.86 The Local Plan Policy EN12 Biodiversity and the Green Networks states that development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.

7.87 The Applicant is seeking to achieve a 10% Biodiversity Net Gain at the Site even though the mandatory requirement to achieve 10% BNG on development sites will not come into force until November 2023.

7.88 The BNG Assessment showed that the Proposed Development would result in a net loss of biodiversity at the site, and therefore off-site mitigation will be required to achieve a net gain.

7.89 The proposals for off-site mitigation are outlined in the Landscape section of the DAS and within the BNG report. In summary, it is proposed to enhance the three green spaces to the south of the site and to plant street trees in the local area. The two spaces to the southwest of the site would be enhanced to species-rich 'neutral grassland' with at least 0.01km of native hedgerow proposed on the westernmost space. The larger space to the south of the site would be enhanced to be 'lowland deciduous woodland'.

7.90 These enhancements, along with the planting of 36 urban trees (20 small and 26 medium trees) in the local area would result in a net gain of 11.81%. It should be noted that the proposals would provide a 21.87% net gain in linear habitat features.

7.91 An obligation to secure biodiversity net gain as set out in the BNG report by ADAS will be secured through a Unilateral Undertaking between the Applicant and the Council.

7.92 Details in relation to off-site tree planting will be secured via a commitment within the Unilateral Undertaking which will set out the timeframe within in which the additional required trees would need to be planted and their locations. The Applicant is seeking to work with the RBC Parks Team, tree officer and ecology consultant to prepare and obtain approval for an off-site tree planting scheme to compensate for loss of tree canopy cover and achieve biodiversity net gain.

Energy and Sustainability

7.93 Reading Borough Council declared a Climate Emergency in 2019 and is committed to working towards achieving a carbon neutral Reading by 2030. The Local Plan includes Policies CC1-3 and Policy H5 to support the council's aims. Policy CC1 sets out that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the NPPF.

7.94 Policy CC2 is concerned with sustainable construction and design and requires proposals to use natural resources appropriately and efficiently and Policy CC3 states that all developments must demonstrate how they have been designed to incorporate measures to adapt to climate change.

7.95 In addition, Policy H5 confirms that new homes should be designed to achieve zero carbon standards.

7.96 The Applicant has an ambition to achieve and exceed national and regional sustainability targets. Sustainability has played a key role in the design development from the outset through the principle of all homes being designed to Net Zero Carbon in operation, informed by Passivhaus principles. HTA Sustainable Futures has assessed the proposal in relation to energy, overheating and sustainability policy requirements and the following results have been summarised below.

Energy and Overheating Assessment

7.97 A three-step approach has been taken to reduce energy use and associated carbon emissions, which consist of the 'Be Lean', 'Be Clean', 'Be Green' Energy Hierarchy.

7.98 A reduction in energy use (Be Lean) will be achieved through the use energy efficiency measures including levels of insulation exceeding current Building Regulation requirements, the installation of high-performance glazing, energy efficient lighting and efficient MVHR system for general ventilation purposes in all habitable spaces. As a result of these measures, the Proposed Development will achieve a reduction of 38% of regulated CO2 emissions when compared to a baseline built to Part L Building Regulations (2021).

7.99 The possibility of employing a decentralised energy network was investigated but no current or future decentralised energy schemes were identified within the vicinity of the site which makes it impossible to connect to a nearby district heat network. Therefore, at the 'Be Clean' stage, the CO2 emission remain the same as the Be Lean Stage (38% below the baseline).

7.100 Through a review of renewable technologies (Be Green) it was established that Air Source Heat Pumps (ASHPs) and Photovoltaic Panels (PVs) are appropriate for the proposed development. The inclusion of ASHPs and PVs on roofs, the estimated reduction in regulated CO2 emissions will be 63% when compared to a notional building built to current Part L Building Regulations (2021).

7.101 The overheating assessment demonstrated that all domestic spaces and communal corridors comply with the overheating criteria in the CIBSE TM59 Guidance Approved Part O.

7.102 Overall, the Proposed Development achieves 101% carbon reduction above 2021 Building Regulations, achieving a net zero regulated carbon. It can be concluded that the scheme addresses the requirements set out in the Local Plan Policies CC1, CC2, CC3 and H5 and would make a positive contribution to the Borough's aim to be carbon neutral by 2030.

Sustainability

7.103 The Sustainability Statement prepared by HTA Sustainable Futures sets out how the Proposed Development responds to the relevant local and national sustainability requirements. The key measures implemented to address social and environmental sustainability and protection are outlined below:

- The proposed new homes will be affordable and built to high sustainability standards, secure good daylighting, and use high quality materials to ensure residents will enjoy a healthy living environment;
- It is estimated that the Proposed Development will save 100% of carbon emissions compared to the Part L 2021 baseline by: using passive design measures, supplying energy efficiently; using renewable energy systems;
- Improved connectivity across the site and to its surrounding built and natural environment;
- A more sustainable travel plan for residents where walking and cycling movements are prioritised;
- Enhanced external landscape and biodiversity values;
- Optimisation of the resources used and minimisation of their impact on the existing environment across all construction and operation stages.

7.104 In conclusion, the proposal will provide new homes at higher sustainable standards and ensure a healthy indoor environment, create a saving of 100% of carbon emissions compared to the predicted baseline; provide opportunities for more sustainable modes of transport, enhance the external landscape and biodiversity values; optimise resources used and minimise their impact on the existing environment across all construction and operation stages. Therefore, it can be concluded that the Proposed Development is in line with RBC's sustainability aims as supported by Policies CC1, CC2, CC3 and H5.

8. Other Matters

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

Sustainable Urban Drainage

- 8.2 Hydrock Consulting have prepared a Drainage Strategy in accordance with both national guidelines and incorporate 'best practise' approach to reducing the impact of the flooding caused by the new development. Chapters 2-3 provides an overview of the site context and water infrastructure and confirms that this site is in Flood Zone 1.
- 8.3 Table 3.4 assesses various SuDS measures for the site and confirms that the use of permeable paving and underground storage will be used in the drainage design. The implementation and selection of SuDS techniques is based on the site layout and context. The target run-off rate for this site is 4 l/s (2l/s discharge rate from each flow control device). The proposed flows have been checked against the anticipated capacity of the existing downstream pipe and are deemed to be acceptable.
- 8.4 The use of the underground storage systems, which are proposed in north and south of the site underneath permeable pathing, is subject to adoption by either the Highways Authority or Thames Water. Cellular storage will attenuate storms up to and including the 100yr+ 40CC% storm.
- 8.5 The foul and surface water drainage systems for the new development will be designed to accommodate the required flows for the lifetime of the development and all surface water run-off from storm events up to and including the 100-year plus 40% climate change will be retained within the overall site.
- 8.6 Section 5 of the report sets out the ownership and maintenance strategy of drainage assets. Ownership and maintenance liabilities for the drainage system will be clearly defined so that in the event of failure, appropriate action can be taken, and the system continues to work efficiently.
- 8.7 In conclusion, the drainage design adopts SuDS principles, taking into consideration the site context and location. The SuDS are designed to maximise the opportunities and benefits to secure surface water run-off management in terms of quality, quantity, flood risk, and amenity. It is therefore considered that the SuDS strategy for the site accords with Policy EN18 on flooding and drainage and should not prevent approval of this scheme.

Ground Contamination

- 8.8 A Desktop (Phase 1) and Ground Investigation Report (Phase 2) have been prepared in support of this application.
- 8.9 The Desktop Study considered it unlikely that the site would be classified as Contaminated Land under Part 2A of the EPA 1990.
- 8.10 The overall risk from land contamination for the current development is considered to be low.
- 8.11 The overall risk for the Proposed Development is assessed to be moderate, but this would need to be confirmed through an intrusive ground investigation, testing and assessment of the results.
- 8.12 The intrusive ground investigation was undertaken between 14th and 17th March 2023 and included two cable percussive boreholes and six trial pits, along with dynamic probes. The results of the ground investigation will be submitted to RBC.

Noise Impact Assessment

- 8.13 A Noise Impact Assessment in line with local authority guidance, British Standard BS 8233: 2014 and the WHO Guidelines was undertaken by 24 Acoustics Ltd and has been submitted with this application. A noise assessment was undertaken by a suitably qualified consultant between 1st and 8th March 2023.
- 8.14 The main noise sources affecting the site are vehicle traffic on Dwyer Road and Burghfield Road.
- 8.15 The assessment found that internal noise levels in accordance with the defined criteria set out in the BS 8233:2014 and WHO:2000 guidance would be achieved through the use of enhanced thermal double glazing and the proposed use of mechanical ventilation (MVHR).
- 8.16 Additionally, the assessment indicated that noise levels in the external amenity spaces will be within the acceptable ranges identified in the British Standard 8233.
- 8.17 Overall, the assessment concluded that an appropriate internal and external acoustic environment can be provided at the proposed development, and it is therefore in line with the requirements of policy CC8 Safeguarding Amenity.

9. Draft Planning Obligations and Community Infrastructure Levy

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

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

Community Infrastructure Levy

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

Planning conditions

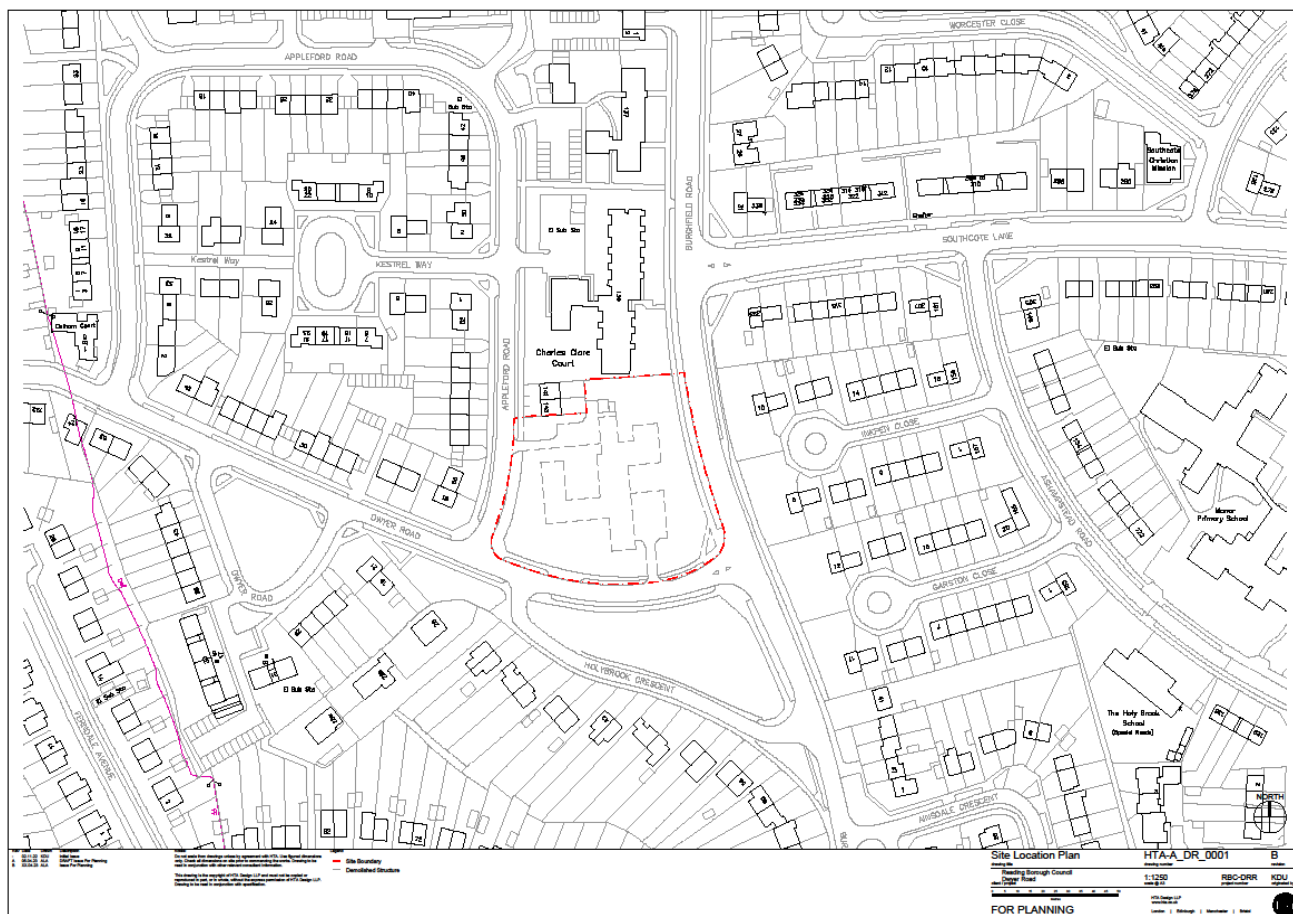
- 9.10 The Applicant expects that if approved, the application will be subject to several conditions including those relating to trees, landscape management and contamination.

- 9.11 To ensure an efficient approach to managing the Borough's approvals of these matters, the Applicant has prepared and submitted Arboricultural Method Statement and Landscape management and maintenance plan for approval with the main planning application and will be submitting a Phase 2 contamination Assessment, during the determination stage for approval.
- 9.12 Subject to these documents being acceptable, it is expected that the Borough will condition these reports as a matter of compliance for the scheme approval of the application.

10. The Planning Balance

- 10.1 There is a clear affordable housing need in the Borough. Planning permission is sought for:
“Redevelopment of the Site at Dwyer Road to deliver 31 new homes comprising 16 two and three storey houses and 15 flats in a 4-storey apartment block, alongside new access, soft and hard landscaping, parking and ancillary works”.
- 10.2 This Planning Statement, and the suite of supporting application documents submitted, demonstrates that residential development is appropriate at the site. Section 5 of this Planning Statement has demonstrated that the Proposed Development is in accordance with RBC’s statutory development plan and will amount to sustainable development in accordance with the NPPF. Furthermore, the NPPF explicitly provides support for the redevelopment and optimisation of underutilised land, particularly public sector land, to provide much needed housing, as proposed by the Applicant.
- 10.3 The Applicant has undertaken a collaborative approach to developing the proposals through engaging pre-application consultation with RBC officers and residents; all of whom have helped to shape the design and layout submitted with this planning application.
- 10.4 The proposals were also presented to the Design Review Panel in March 2023. The Panel were predominantly supportive of the scheme, but the feedback resulted in some design iterations which were also supported by the RBC officer team.
- 10.5 The Proposed Development includes the provision of 31 affordable dwellings in houses and downsizer flats. There is a clear need for affordable housing and family housing in Reading, and the proposed development would be a helpful contribution to the local housing requirements.
- 10.6 The proposed dwellings will be of high quality, built to meet nationally described space standards, and provided with adequate private amenity space. Additionally, the proposed development will include suitable levels of car and cycle parking for new residents.
- 10.7 The proposals are sustainability and landscape led and aim to sensitively integrate within the context of the surrounding area while delivering a viable amount of new housing. The new homes are of a high-quality, contemporary design that positively addresses the constraints of the Site and integrates design solutions to energy, carbon dioxide reduction and drainage requirements as well as providing a biodiversity net gain. On this basis, the Proposed Development positively reflects the social and environmental pillars of sustainable development expressed in Paragraph 8 of the NPPF and the requirements of the Local Plan.
- 10.8 It has been demonstrated in this Planning Statement that there are no material considerations which would indicate that the Proposed Development should not be approved, and it is concluded that a decision to grant planning permission for the Proposed Development would be in accordance with the development plan when read as a whole. Notwithstanding, any adverse impacts of granting planning permission will not significantly and demonstrably outweigh the benefits associated with the Proposed Development, as summarised above.
- 10.9 In conclusion, we respectfully ask that planning permission for the Proposed Development of 31 new homes at the Site at Dwyer Road is granted.

Appendix 1: Site Plan



Appendix 2: Drawing Schedule

Document & Drawing Register Issue Sheet
Dwyer Road, ReadingHTA Design LLP
telephone: 020 7485 8555
email: info@hta.co.uk75 Wallis Road,
London E9 6LN
web: www.hta.co.ukProject Ref RBC-DRR
Dwg Series Planning

Drawing Number	Scale	Sheet Size	Document / Drawing Title	Status	06/04/2023	06/05/2023													
EXISTING																			
0001	1:1250	A3	Site Location Plan	FOR PLANNING APPROVAL	A	B													
0002	1:200	A1	Existing Site Plan	FOR CONTEXT	-	B													
SITE DRAWINGS																			
0100	1:200	A1	Proposed Site Plan	FOR PLANNING APPROVAL	J	L													
0110	1:200	A1	Proposed Roof Plan	FOR PLANNING APPROVAL	-	A													
0150	1:200	A1	Proposed Street Elevation	FOR PLANNING APPROVAL	-	-													
BLOCK PLANS																			
200	1:100	A3	Proposed Block Plan - Building A - Sheet 1	FOR PLANNING APPROVAL	E	F													
201	1:100	A3	Proposed Block Plan - Building A - Sheet 2	FOR PLANNING APPROVAL	-	F													
202	1:100	A3	Proposed Block Plan - Building A - Sheet 3	FOR PLANNING APPROVAL	-	A													
203	1:100	A3	Proposed Block Plan - Building A - Sheet 4	FOR PLANNING APPROVAL	-	A													
204	1:100	A3	Proposed Block Plan - Building A - Sheet 5	FOR PLANNING APPROVAL	B	C													
BLOCK ELEVATIONS																			
250	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
251	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
252	1:100	A1	Proposed Block Elevation - Sheet 1	FOR PLANNING APPROVAL	A	B													
UNIT PLANS																			
301	1:50	A3	Proposed Dwelling Plan - 3B5PH Type B	FOR PLANNING APPROVAL	D	E													
302	1:50	A3	Proposed Dwelling Plan - 4B8PH Type A	FOR PLANNING APPROVAL	D	E													
303	1:50	A3	Proposed Dwelling Plan - 4B8PH Type B	FOR PLANNING APPROVAL	C	D													
304	1:50	A3	Proposed Dwelling Plan - 4B8PH Type B	FOR PLANNING APPROVAL	C	D													
305	1:50	A3	Proposed Dwelling Plan - 5B10PH Type A	FOR PLANNING APPROVAL	C	D													
306	1:50	A3	Proposed Dwelling Plan - 5B10PH Type A	FOR PLANNING APPROVAL	C	D													
310	1:50	A3	Proposed Dwelling Plan - 1B2PF Type A	FOR PLANNING APPROVAL	D	E													
311	1:50	A3	Proposed Dwelling Plan - 1B2PF Type B (WCH)	FOR PLANNING APPROVAL	D	E													
312	1:50	A3	Proposed Dwelling Plan - 1B2PF Type C	FOR PLANNING APPROVAL	C	D													
DETAIL ELEVATIONS / SECTIONS																			
600	1:50	A1	House Type 3B5PH Type B Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
601	1:50	A1	House Type 4B8PH Type A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
602	1:50	A1	House Type 4B8PH Type B Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
602	1:50	A1	House Type 5B10PH Type A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
603	1:50	A1	Block A Elevation / Sections - Sheet 1	FOR PLANNING APPROVAL	-	-													
604	1:50	A1	Block A Elevation / Sections - Sheet 2	FOR PLANNING APPROVAL	-	-													
REPORTS																			
RP_0100	N/A	A3	Design and Access Statement	FOR PLANNING APPROVAL	-	-													
RP_0101	N/A	A4	Statement of Community Involvement	FOR PLANNING APPROVAL	-	-													
SCHEDULES																			
SC_0010	N/A	A4	Schedule of Accommodation	FOR PLANNING APPROVAL	H	I													
SC_0011	N/A	A5	Schedule of Accommodation	FOR PLANNING APPROVAL	-	-													
Issued by																			
			Staff initials		KDU	KDU													
Issue checked by																			
			Project leader initials or faculty leader initials		KDU	KDU													
Issue method																			
			De-digital/email; Dp-digital/post; Pp-paper/post; Ph-paper handout		De	De													
Issued for																			
			A-Approval; BC-Building Control; CM-Comment; C-Construction; I-Information; P-Planning; PR-Preliminary; T-Tender		CM	P													
Issued to																			
(Organisation)			(Name)																
Reading Borough Council			Shweta Sharma Bhatia		x	x													
			Daryn Ineson		x	x													
Gleeds			Richard Deacon		x	x													
			Toby Joyce		x	x													
Hydrock			Rosa Teller		x	x													
			Stephen Moody		x	x													
			Graeme Granger		x	x													
			Dan Webb		x	x													
OUT folder copy																			
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HTA Design LLP
info@hta.co.uk
www.hta.co.uk75 Wallis Road
London E9 6LN
020 7485 855599 McDonald Road
Edinburgh EH7 4NS
0131 344 4742235 Ducie House, Ducie Street
Manchester M1 2JW
0161 236 9185