



PD14053/SS/AP

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Dear Sir/Madam,

**LAND AT 362 OXFORD ROAD, READING, RG30 1AQ
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) - APPLICATION FOR FULL PLANNING PERMISSION
PLANNING STATEMENT**

We write on behalf of the applicant, Stonegate Homes (Reading) Limited ("the Applicant"), to submit an application for full planning permission to Reading Borough Council ("RBC") for land at 362 Oxford Road, Reading, RG30 1AQ ("the Site"). To support the application, we have prepared this Planning Statement ("the Statement").

The proposed description of development is as follows:

'Erection of a mixed-use development comprising of two commercial units on the ground floor (157.5 sqm), 26 residential units, associated landscaping, car and cycle parking.'

The Site and Surroundings

The Site for which this application relates is a broadly rectangular vacant piece of land to the rear of 362 Oxford Road (the Curzon Club) and set to the west of Reading town centre. The Site is adjoined by a parade of shops and a short stay car park to the south west, the Tesco Extra superstore to the north-west, residential buildings to the north and east, and the Conservative club (the Curzon Club) to the south, beyond which is the predominately commercial Oxford Road. Whilst currently cleared, vacant and surrounded by hoarding, the Site is considered previously developed land. The Site contains a single Sycamore tree which is to be removed, with three trees offsite within the immediate vicinity which are to be retained. Vehicular access is available from Curzon Street to the north.

The Site itself is located within Flood Zone 1 – the lowest category of flood risk. There are no statutorily listed heritage assets on the Site, however, the Site is in close proximity to Grade 2 listed West Branch Library and 450 Oxford Road which are further along Oxford Road to the west of the Site. 450 Oxford Road is approximately 140 metres from the Site and West Branch Library is approximately 100m of the Site. Due to the distance of the listed buildings to the Site and the intervening development in between, it is not considered that the setting of listed buildings would be adversely impacted by the proposals.

The Site itself is allocated within the Reading Local Plan (2019) under allocation WR3j (Land at Moultsford Mews) allocating the site for residential development proposing that the Site could accommodate 10-16 dwellings, with proposals required to address air quality impacts on residential use and contamination on the Site.

Recent Planning Permission

The Site benefits from a recent planning permission. Application ref. 201391/FUL ("the Extant Permission") was granted on 3 June 2021 for the following development as listed on the decision notice:

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'Erection of a mixed-use development comprising of two commercial units on the ground floor (157.5 sqm), 26 residential units (including 30% affordable housing), associated landscaping, car and cycle parking (amended description).'

The only change in respect of this application further to the Extant Permission is the change in affordable housing provided as part of the scheme and the switch to a solely private housing scheme due to viability reasons. In all other respects, the proposal is identical to the Extant Permission.

Scope of this Planning Statement

This Statement is submitted in support of the application with the purpose of identifying changes in policy since the determination of the Extant Permission and its supporting Planning Statement at that time.

Since the previous application there has been an update to the National Planning Policy Framework (July 2021) and an updated Affordable Housing Supplementary Planning Document (March 2021). The latter was published prior to the determination of the Extant Permission albeit following the resolution to grant planning permission which is why it has been identified in this Statement. These shall be discussed alongside the findings and conclusions of the Officer Report associated with the Extant Permission to understand whether there are any material changes to why planning permission for an identical scheme to the Extant Permission (with the exception of a change in tenure mix) should not be granted.

Observations on the Officer Report

Principle of development

In respect of the principle of development, the Officer Report assessed the application against Paragraph 11 of the NPPF, namely the presumption in favour of sustainable development and that development proposals that accord with an up-to-date development plan should be approved without delay. This Paragraph has been retained in the 2021 revision therefore setting out the presumption in favour of sustainable development that accords with the policies of the Local Plan with Core Policy CC1 still relevant.

The Officer Report concluded that the proposal would see a mixed use residential led scheme on allocated and vacant land within the Local Plan. As such the principle of development was considered acceptable. The uplift in the Site's proposed capacity was noted to further contribute towards the borough's annual housing targets.

With this application having no material change to the proposal, the principle of development is still acceptable.

Land use principles

The proposed land use aligned with the housing allocation under Policy WR3j (Land at Moultsford Mews). The previous and current proposal included the provision of flexible commercial space at ground floor. This was considered to adhere to Policy RL1 (Network and Hierarchy of Centres) which seeks to maintain and enhance the vitality and viability of centres with Oxford Road West listed as a District Centre within this policy which the Site adjoins. Policy RL3 (Vitality and Viability of Smaller Centres) part C includes that new development adjacent to designated centres should provide some 'centre uses' at ground level. As such, the Officer Report welcomed and confirmed that the proposal's provision of commercial units on the ground floor is welcomed and in adherence with policy. This remains the case and therefore continues to be acceptable.

Housing mix and density

This was assessed in line with Local Plan Policy CC6 (Accessibility and the Intensity of Development) as well as Policy H2 (Density and Mix). It was concluded that that based on the characteristics of the Site and the appropriateness for range of units in the proposal the overall mix was supported and complies with Policy H2.

Paragraph 62 of the NPPF (2021) states that the size, type and tenure of housing need should be assessed and reflected in planning policies. With Paragraph 119 states that planning policies and decisions should support development that makes efficient use of land in meeting the need for homes.

There has been no change in respect of the density and mix that was previously found to be supported and compliant with Local Plan Policy H2. There has, however, been a change in the mix of the proposal by tenure with the removal of affordable housing provision. This is discussed in more detail in the following section.

Table 1: Proposed unit mix

Unit size	Number of Units
1 bed, 2 person	5
2 bed, 3 person	5
2 bed, 4 person	8
3 bed, 5 person	8
Total	26

Table 2: Target unit mix in Local Plan

Figure 4.6: Estimated size of accommodation type required in Reading (Source: SHMA 2016)

	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%

The mix proposed is still considered acceptable with the provision of a mix of 1,2- and 3-bedroom units proposed allowing for variety and choice. With 4-bedroom units not considered appropriate as the proposal is solely providing flatted accommodation. As such in line with Local Plan Policy H2 the proposal seeks to contribute to meeting the housing needs of the Borough, through a high proportion of 3-bedroom units. As such the unit mix is considered to align with policy requirements.

Affordable Housing

Policy H3 (Affordable Housing) seeks to secure 30% on-site provision of affordable housing on proposals of over 10 units. Under the Extant Permission, five units would be secured for affordable rent with three secured for shared ownership. This represented a provision of 30% affordable housing compliant with Policy H3.

As a result of the changed viability position in bringing the Site forward for development, this application proposes to reduce the quantum of affordable housing provision to zero. Policy H3 (Affordable Housing) states that for proposals that fall short of the policy target as a result of viability considerations an 'open-book' approach will be followed with the onus of justification on the developer. The justification for this change is viability-led and a Viability Assessment has been submitted to support this application which concludes that the proposed development is unable to support any affordable housing.

Whilst the removal of affordable housing from the proposed development is regretful when compared to the quantum of affordable housing proposed under Extant Permission, it is necessary to guarantee the redevelopment of the Site and the benefits that the development delivers. Furthermore, as the zero provision is justified from a viability perspective, it remains compliant with Policy H3 and is also compliant with the most recent Affordable Housing SPD 2021.

Character and design

This was previously assessed under an older version of the NPPF as well as Local Plan Policy CC7 (Design and the Public Realm) which seeks developments to be of high design quality and maintain and enhance the character and appearance of the area surrounding the Site. The proposal was assessed to respond positively to its local context in terms of layout, scale and design and was considered acceptable.

The 2021 update of the NPPF notes that good design is fundamental to the planning process and in achieving sustainable development, and should contribute to creating better places in which to live and work. Paragraph 130 sets the expectation that planning decisions should ensure that developments:

- a) 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;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) 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);*
- d) 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;*
- e) 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*
- f) 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*

With no material change in the proposal, the character and design are considered to be acceptable and in compliance with local and national policy and guidance.

Amenity

With the Site currently recognised as vacant and undeveloped, it was acknowledged that any new development would cause an increase in overlooking and loss of privacy in respect of surrounding buildings. It was considered that no new views would be created and that the inter-relationship would not substantially change beyond what already exists. The Officer Report ultimately concluded that the scheme was in line with Local Plan Policy CC8 (Safeguarding Amenity). In respect of Daylight and Sunlight the proposal complies with BRE targets. Private amenity space is provided in respect of each flat with resident utilising close access to Battle Square Park. The use of the park was supported through agreement of a contribution of £63,700 for improvements to these existing facilities.

The proposal included the Local Plan Policy H5 (standards for New Housing) requirement for wheelchair user dwellings and wheelchair adaptable dwellings defined within the Building Regulations with comments in respect of crime prevention secured by condition.

This application would similarly expect any conditions and contributions of the permitted proposal to be applied to a new grant of permission ensuring continued compliance with policy.

Natural Environment

The Site is located within an Area Tree Preservation Order (TPO), with the on-site Sycamore tree covered by a separate TPO. The Officer Report considered that the proposal provided a meaningful contribution to the District Centre's environment and a considerable improvement to the Site currently outweighing the loss of the Sycamore tree.

Further mitigation is also proposed including the provision of wildflower green roofs on all flat roof elements of the development, and two green walls. The provision of this ensures that natural landscaping is incorporated within the proposal and mitigates any harm associated with the loss of the Sycamore tree. . The inclusion of the green walls and

roofs also provides sustainability benefits increasing thermal insulation and providing pollution filtration. Soft landscaping is maximised through the inclusion of additional box planters, large shrubs and climbers within the car parking area.

As such, we consider that the overall contribution from the proposed greening of the Site should still be afforded great weight in the overall balance and sufficiently mitigates the loss of the existing tree.

Sustainability

This was considered under Local Plan Policies H5 (Standards for New Housing), Policy CC2 (Sustainable Design and Construction), Policy CC3 (Adaption to Climate Change), Policy CC4 (Decentralised Energy). It was considered that the proposals demonstrate a good standard of sustainability particularly in adhering to zero carbon homes standards and as such was acknowledged to be policy compliant.

The proposals are of the same standard of sustainability and supported by an updated sustainability and energy report as such this proposal remains policy compliant.

Transport

The proposal includes the provision of 22 car parking spaces which equates to 0.84 spaces per residential unit, with four spaces including electric vehicle charging facilities and two accessible parking spaces. This is in alignment with the requirements of Local Plan Policy TR5.

The Site is within Zone 2 of the Primary Core Area of the Revised Parking Standards and Design SPD 2011. Closely located to the A329 (Oxford Road), served well by public transport with Reading West Railway Station approximately 700m away to the east of the Site.

This parking provision takes into account the sustainability of the Site, with its proximity of public transport facilities as well as a local car club which contributes to lower levels of car ownership in the area. The commercial units are proposed to make use of the existing short stay car park to the west of the Site.

The proposal additionally incorporates 32 long stay cycle parking spaces within tiered racking. With the bin store accommodating the required number of bins. The Site access demonstrating that delivery, servicing and refuse vehicles would be able to turn at the eastern end of Curzon Street.

Similarly, to the extant permission it is considered that the transport and access proposed is acceptable with the conditions applied to the extant permission to be applied to this proposal.

Air Quality

The Site is encompassed within an Air Quality Management Area (AQMA) as such an Air Quality Assessment was submitted for the extant permission and an updated assessment has been submitted to support this application.

With no material change to the extant permission through encompassing the adoption of appropriate mitigation measures the proposal is considered to prevent any significant air quality effects on the area, with new receptors not anticipated to be introduced. The development also provides four electric charging parking spaces, 32 cycle spaces, green walls and roofs, a replacement tree and additional box planters, large shrubs and climbers incorporated into the proposal.

Similarly, to the extant permission it is expected that conditions applied in respect of air quality, construction hours, control of noise and dust during construction are applied to any permission granted in respect of this application.

S106 and CIL

The extant permission was liable for CIL with the approximate liability identified to be £198,398. This figure is anticipated to be higher as a result of no CIL relief for this application.

Similarly, to the extant permission a Section 106 agreement would be expected to secure the following:

- An Construction phase Employment Skills and Training Plan or equivalent financial contribution; and
- Open Space contribution to improve and extend facilities within the nearby parks.

As affordable housing is not proposed and justified from a viability perspective this will not need to be secured through Section 106.

This is in adherence with Local Plan Policy CC9 (Securing Infrastructure) and DM3 (Infrastructure Planning) which allows for the necessary contributions to be secured to mitigate the impacts of the proposal. As such it is considered that this would be in compliance with the NPPF and Community Infrastructure Levy.

Conclusion

Based on the assessment undertaken within this Statement and the conclusions drawn from the other technical documents, when considered against the statutory development plan, the Statement finds much direct support, and does not identify any material harm arising from the proposals. Indeed, the proposed development delivers a mix of uses consistent with the Site's adopted site allocation and complies with the key design principles of national and local planning policy. Whilst the proposed scheme would not provide affordable housing target of 30% set by Policy H3, this position is supported by a viability assessment which is an accepted position under the policy. As such, there is no conflict with this policy.

The loss of the Category B sycamore tree would represent harm caused by the development, however, its loss is mitigated by a replacement tree being planting and an overall increase in greenery on the Site including a new tree, two green walls and green roofs. Additionally soft landscaping is maximised through the inclusion of additional box planters, large shrubs and climbers within the car parking area. As such, we find no overall conflict with Policy EN12 of the Local Plan.

Furthermore, when considered in the context of other development plan policies not least the site allocation, the need to deliver housing and optimise brownfield sites, and the requirement to delivery design of high quality architecture that is visually attractive and makes a positive contribution to local area, we consider that the proposed development is compliant with the development plan when read as a whole. In our view, the scheme is a very sustainable form of development, support for which is the golden thread of the NPPF, to which very significant weight must be attached.

Notwithstanding our view above that the proposed development is compliant with the development plan when read as a whole, should the decision-maker consider otherwise, there are number of material considerations that weigh in favour of planning permission being granted and which we consider outweigh any perceived harm. These are set out below:

- Provides a high-quality modern mixed use residential led scheme on a currently vacant previously developed site;
- Proposes a genuine mix of unit sizes;
- During the construction phase the proposed development would contribute and encourage economic activity through the provision of jobs, with the commercial units additionally creating jobs;
- The proposal secures contributions for open space improvements as well as Construction phase Employment Skills and Training Plan or equivalent financial contribution as well CIL;
- Creates a flexible, commercially attractive space that directly adjoins a designated District Centre;
- Future occupants of the new dwellings will contribute the viability and vitality of businesses within the District Centre;
- The proposal will help to fulfil one of the core aims of the NPPF to 'significantly boosting the supply of homes' and contribute to meeting the Borough's identified housing need;
- Introduces on-site planting through two green walls and green roofs;
- Provides PV on the roof of the proposal;
- Attains a predicted BREEAM score of 57.3% which is categorised as 'Very Good'.

We therefore commend this application to the Council for approval.

Closing Remarks

This application is supported by:

- Application Drawings;
- Design and Access Statement;
- Planning Statement Letter (this document);
- Air Quality Assessment;
- Arboricultural Statement;

- Daylight and Sunlight Assessment;
- Drainage Statement;
- BREEAM Assessment;
- Energy Assessment;
- Noise Statement;
- Preliminary Ecology Appraisal;
- Preliminary Risk Assessment;
- Utilities Statement;
- Transport Statement; and
- Viability Report.

The application is submitted with no fee required in line with Regulation 8 (Exemptions – second application relating to development on same site) of the as set out in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended). As this application is submitted within one year of the earlier decision for application 201391/FUL.

We trust the submitted information is satisfactory and look forward to receiving confirmation that this application has been validated. Should you have any questions or queries, please do not hesitate to contact Sam Stackhouse (sam.stackhouse@montagu-evans.co.uk / 020 7866 8620) or Alex Partridge (alex.partridge@montagu-evans.co.uk / 07584 154 762) at this office.

Yours faithfully



Montagu Evans LLP