
Planning Statement

(including Affordable Housing Statement and Section 106 Heads of Terms)

Redevelopment of former fire station to provide 63 dwellings, including affordable housing, together with associated access, parking and landscaping.

Former Dee Road Fire Station, Reading

July 2022

Planning Statement

Former Royal Berkshire Fire & Rescue Station, Dee Road, Reading



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1. Introduction

- 1.1. Savills UK Ltd is submitting this planning application on behalf of Bellway Homes Limited (Thames Valley) in support of a full planning application at the former Royal Berkshire Fire and Rescue Station, Dee Road, Reading (“the site”).
- 1.2. The Description of Development for this application is:

Redevelopment of former fire station to provide 63 dwellings, including affordable housing, together with associated access, parking and landscaping.
- 1.3. The site edged red on the site location plan ref 092102-BEL-TV-06 at Appendix 1, comprises the now vacant fire station, including a number of associated buildings, hardstanding and landscaping to the front of the site.
- 1.4. The Site is allocated for residential use in the Reading Borough Local Plan (November 2019) under Policy WR3m (called 103 Dee Road). The policy confirms that the redevelopment of the site for housing is contingent on the relocation of the fire station. A new Community Fire Station has been built in the neighbouring settlement of Theale enabling the closure of the Dee Road Fire Station in November 2021.
- 1.5. The proposed development has been subject to a “Level 3” pre-application discussion with Reading Borough Council, under reference 220232. The written response was issued by Reading Borough Council 20th May 2022. Further information on the pre-application process is provided at Section 3 of this Statement.

Planning Application Submission

- 1.6. This Planning Statement provides details of the proposed development and assesses the proposal in the context of the development plan and other relevant national and local planning policies together with other material considerations.
- 1.7. This Statement should be read in conjunction with the application drawings and the documents and technical reports which accompany this application.
- 1.8. The remainder of this Statement is set out as follows:
 - Section 2 describes the Site and its planning history;
 - Section 3 summarises the pre-application discussions and subsequent changes made to the scheme layout;
 - Section 4 confirms the proposals for the Site;
 - Section 5 considers the prevailing Development Plan context within which the planning application should be considered
 - Section 6 sets out the planning balance and assesses the scheme proposal against the Development Plan, having regard to other relevant material considerations;
 - Section 7 sets out the Section 106 Heads of Terms; and
 - Section 8 concludes the case for granting planning permission.

2. Application Site and Surrounding Area

The Site and its Surroundings

- 2.1. The Application Site is to the west of Reading measuring 0.85h in area and comprising a number of buildings and hardstanding associated with the previous use of the site as a fire station and headquarters for the Royal Berkshire Fire and Rescue Service.
- 2.2. The currently disused buildings associated with the former fire station use include a three storey office building fronting onto Dee Road, with attached single storey three-berth fire engine garage, a four storey tower plus six further single and two storey buildings.
- 2.3. The site slopes down from west to east and part of the western boundary includes a bank up to properties beyond. A row of cypress trees is on the western boundary of the site, in the south-western corner, and a number of other trees are located within the site near to the western boundary.
- 2.4. The site has two existing vehicular access points from Dee Road and two from Spey Road. A public footpath runs between the western boundary of the site and the residential dwellings on Gairn Close
- 2.5. The site is in a predominantly residential area of medium density, with adjacent dwellings on Dee Road to the south, Spey Road to the east and Gairn Close to the west. To the north of the site lies the Dee Park residential development area, which is a recently constructed development of relatively higher density comprising mostly terraced housing and blocks of flats of up to 4 storeys in height. The ground floor of the flat blocks contain shops, a café and a neighbourhood office.
- 2.6. In the surrounding area, the Ranikhet Academy Primary School is some 150m to the north of the site and an industrial estate (the designated Marcus Close Core Employment Area) is approximately 100m to the south. The closest recreational space is Prospect Park, which is located approximately 350m to the south of the site. The Lousehill Copse Nature Reserve also provides a local amenity area within 130m of the site to the west. Existing bus services run along Spey Road with the nearest stops immediately adjacent to the eastern boundary of the site providing connections to Tilehurst and central Reading.

Statutory and Non-Statutory Designations

- 2.7. The site is not subject to any statutory designations relating to its environmental or heritage value and there are no such designations in proximity of the site.
- 2.8. The site is within Environment Agency Flood Zone 1 (i.e. at the lowest risk of flooding).

Planning History

- 2.9. The Site has been subject to a number of applications for residential re-development. These are:
 - 051232: 10 November 2005: Outline application for residential development. Means of access only to be considered. Appeal dismissed.

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- 060538: 23 October 2006: Outline application for residential development (all matters reserved). Refused.
- 070728: 9 October 2007: Outline application for a residential development comprising 42 units (all matters reserved). Approved.
- 100126: 7 July 2011: Application for an extension of the time limit for implementation of permission 07/00817/OUT for outline application for a residential development comprising 42 units. Approved.

2.10. Both the original and extended planning permission were not implemented and have now expired.



3. Pre-Application Discussions and Community Consultation

Pre-Application Advice

- 3.1. The National Planning Policy Framework (NPPF) promotes consultation before and after a planning application is submitted and at key stages when preparing the Local Plan and other planning policy documents.
- 3.2. A request for pre-application advice on the residential redevelopment of the site (reference 220232) comprising 71 dwellings was submitted to RBC on 17th February 2022. Subsequently, a site meeting was held with a Planning Officer which focussed on the following particular areas:
 - Details of the scheme proposals in terms of appearance and layout (e.g. design, bulk, scale, mix, landscaping and quality of the public and private amenity space);
 - The appropriate level of parking provision and whether/how this is balanced against the provision of amenity space on site;
 - Relationship of the proposed development to the neighbouring land uses and existing residential dwellings; and
 - The range and scope of technical assessments required to support a planning application.
- 3.3. A formal response was subsequently received from the Council on 20th May 2022, which is at Appendix 2. The response was informed by consultee feedback from Natural Environment (Trees and Ecology), Transport Development Control, Environmental Protection and RBC's Access Officer. RBC considered that the principle of development at the site was acceptable given its Local Plan policy allocation and based on the information provided, but advised that the proposed development would need to be amended to adhere to relevant planning policy design requirements in terms of density and character. Other matters raised related to the parking design and landscaping/open space provision.
- 3.4. Following the meeting and pre-application feedback, changes were made to the design of the scheme to reflect the discussions held and comprise the proposed development in this application. Amendments include:
 - Reduction in the number of units from 71no. to 63no. with main revisions from the originally submitted scheme being:
 - Amendments to the flat block to the north, including design changes to connect Blocks 1 and 2 and reduction in bulk of Block 1 at the upper floor.
 - Removal of parking courts to enable better division between public/private space. Provision of parking in line with Council standards.
 - Increased landscaping provision and open space fronting Spey Road and throughout the development.

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Community Consultation

- 3.5. A mail drop has been issued to 532 neighbouring properties, providing details of the proposals and inviting feedback from stakeholders.
- 3.6. Residents have also been invited to register for a drop-in session, whereby the scheme can be explained in further detail.



4. Proposed Development

4.1. This section of the Planning Statement summarises the scheme proposals for which planning permission is sought.

4.2. The application is submitted for the following Development:

Redevelopment of former fire station to provide 63 dwellings, including affordable housing, together with associated access, parking and landscaping.

4.3. The works include the demolition of all existing buildings within the site and removal of the row of cypress trees in the south-western corner.

4.4. The design has been prepared having regard to the requirements of Local Plan allocation WR3m, pre-application advice received from RBC, the relevant provisions of the development plan and other relevant policy and guidance, including the Council's Affordable Housing SPD (March 2021) and Revised Parking Standards and Design SPD (October 2011).

4.5. Full details of the design rationale are included in the accompanying Design and Access Statement.

4.6. The Proposed Site Plan shows how the development will be laid out on site and is at Appendix 3.

4.7. The proposed development proposes 63 dwellings with the following housing size and tenure mix:

	Market	Affordable	Total
1-bed apartment	6	6	12
2-bed apartment	7	11	18
3-bed house	31	2	33
Total	44	19	63

4.8. 30% of the dwellings are affordable housing with remain 70% market housing, with a range of dwelling sizes proposed. Of the 19 affordable homes, seven are shared ownership and 12 are affordable rent.

4.9. An apartment building is proposed to the north of the site, which is divided into two connecting blocks. The blocks would provide a total of 30 private and affordable apartments and range in height from 3-4 storeys, with a landscaped frontage to Leven Street and Spey Road and a parking court located to the rear.

4.10. Beyond the apartment buildings to the south of the site is a central vista and pedestrian through-route, which connects to the existing footpath to the west of the site. and provide a tree-lined street scene to serve the proposed dwellings. A landscaped buffer is proposed to the west to screen the existing properties from the proposed development. This section of the site serves 12x 3-bed dwellings which are 2-storeys in height.

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- 4.11. To the east of the site the scheme proposes 13x 3-bed dwellings, of a height of 3-storeys, which front onto Spey Road. The frontage to these dwellings would be interspersed with landscaping, tree planting and parking and includes a publicly accessible open amenity area adjacent to Spey Road.
- 4.12. To the southern extent of the site 8x 3-bed dwellings are proposed at a height of 2-storeys fronting onto Dee Road. The design of these units seeks to respond to the density and character of development to the east and south of the site, as well as to offer a step down in height from the main site frontage along Spey Road.
- 4.13. All properties benefit from either a private balcony or a rear garden, in addition to the landscaped areas on the frontages, including the open amenity area, and along the central vista of the site.
- 4.14. Vehicular access to the site will be from three locations along Dee Road to serve the parking areas for the dwellings fronting onto Dee Road and from two points on Spey Road to serve the central vista and parking court for the flats at the north of the site. Parking for the nine dwellings fronting onto Spey Road in the south-eastern corner of the site will also be taken directly from the highway.
- 4.15. A total of 106 car parking spaces are proposed, including two spaces for each of the dwellings and 30 spaces for residents of the flats with nine visitor spaces.
- 4.16. Cycle storage will be provided for each dwelling to meet Reading Borough Council's Parking Standards. This provision will be within secure garden stores or apartment bike stores so that cycles are as appropriate to choose as a car for short trips.
- 4.17. Feature street trees are proposed within the site, for example around the site entrance, the central area and along sensitive boundary buffers. Within parking areas, soft landscaping is provided to break up the street scene and be used to clearly define areas of public and private space.



5. Planning Policy Context

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the “*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*”. The adopted statutory Development Plan for Reading Borough Council consists of:

- Reading Borough Local Plan (adopted November 2019).

5.2. Material considerations also include planning national policy, which is primarily expressed through the NPPF and national Planning Practice Guidance, as well as additional guidance produced by the Council in the form of Supplementary Planning Documents (SPDs). These are also considered in this section.

The Adopted Development Plan

Reading Borough Local Plan (adopted November 2019)

5.3. The Reading Borough Local Plan was adopted in November 2019 to guide development across the Borough until 2036. It sets out the overarching spatial strategy and housing requirements for the District for the plan period.

5.4. The key policies in the Local Plan relevant to this application are **WR1: Dee Park** and **WR3m: 103 Dee Road**.

5.5. **WR1: Dee Park** confirms the Dee Park area will continue to be regenerated to provide a sustainable community, including new and improved housing, to increase overall density and provides a greater mix of size type and tenure, including a higher proportion of family housing. The policy requires development to be integrated with the surrounding areas and provide a safe and secure environment.

5.6. **WR3m: 103 Dee Road** relates specifically to the application site. The policy confirms the site is allocated for residential development subject to the fire station being surplus to requirements and suggests 34-50 dwellings can be accommodated. The policy also states that development should address any contamination issues and take account of the potential impact on water infrastructure and make upgrades where required.

5.7. Other policies relevant to the determination of this application are summarised below:

5.8. **CC1: Presumption in Favour of Sustainable Development.** Policy CC1 states that a positive approach will be taken to considering development proposals that reflects the presumption in favour of sustainable development as provided in the NPPF. This policy provides a requirement for the Council to work proactively with applicants to find solutions which means that proposals can be approved wherever possible.

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The Savills logo, consisting of the word "savills" in a lowercase, sans-serif font, with the 's' in red and the rest in black.

- 5.9. **CC2: Sustainable Design and Construction.** This policy states that proposals for new residential developments will be acceptable where the design of the buildings and site layout uses energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 5.10. **CC3: Adaptation to Climate Change.** Policy CC3 requires that all new developments within the Bourgh will demonstrate how they have been designed to incorporate measures to adapt to climate change. Additionally, this policy outlines the measures that will be incorporated into the development to help to address the issues surrounding climate change; orientation to maximise the opportunities for natural heating and ventilation, the use of tree planting and minimising the impact of surface water runoff.
- 5.11. **CC4: Decentralised Energy.** Under Policy CC4, developments of more than 20 dwellings shall consider the inclusion of decentralised energy provision within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.
- 5.12. **CC5: Waste Minimisation and Storage.** This policy states development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.
- 5.13. **CC6: Accessibility and the Intensity of Development.** Policy CC6 requires that the scale and density of new development is related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Higher density developments will be in the most accessible locations, unless it can be demonstrated that the accessibility of the site will be significantly upgraded.
- 5.14. **Policy CC7: Design and the Public Realm.** This policy requires all new development to be of a high quality design that will maintain and enhance the character and appearance of the area of Reading in which the site is located.
- 5.15. **Policy CC8: Safeguarding Amenity.** Under Policy CC8, new development must not result in a detrimental impact on the living environment of existing residential properties, or result in unacceptable living standards for the occupiers of new residential dwellings. The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.
- 5.16. **Policy EN1: Projection and Enhancement of the Historic Environment.** This policy confirms that historic assets and their settings will be protected and enhanced where possible, with any harm to or loss of a heritage asset requiring sound justification, usually in the form of public benefits.
- 5.17. **Policy EN2: Areas of Archaeological Significance.** This policy requires that major applications close to sites of archaeological significance are supported by an archaeological impacts assessment. In addition, development proposals which will have an adverse effect on scheduled monuments and other nationally

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important archaeological remains and their settings will not be allowed unless there is clear and convincing justification in the form of overriding public benefits.

- 5.18. **Policy CC9: Securing Infrastructure.** Policy CC9 states that new 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.
- 5.19. **Policy EN7: Local Green Space and Public Open Space.** This policy states that proposals which would result in the loss of any of the allocated areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.
- 5.20. **Policy EN9: Provision of Open Space.** This policy states all new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks.
- 5.21. **Policy EN10: Access to Open Space.** This policy states new development sites with relatively poor access to open space should make provision for, or contribute to the improvement to the access of open space. This contribution will be secured via a Sector 106 agreement.
- 5.22. **EN12: Biodiversity and the Green Network.** This policy requires new development to demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. All development sites shall result in a net gain for biodiversity wherever possible and not result in a net loss. In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be in the first instance avoided, alternatively mitigated or compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity.
- 5.23. **EN14: Trees, Hedges and Woodland.** This policy protects existing trees, hedges and groups of trees against damage or removal due to development. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough.
- 5.24. **EN15: Air Quality.** Policy EN15 requires new development to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. Should a proposed development introduce sensitive uses, or the intensification of sensitive uses, it will be necessary to mitigate the effects of the new development. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.



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- 5.25. **EN16: Pollution and Water Resources.** This policy states that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution. Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.
- 5.26. **EN18: Flooding and Sustainable Drainage Systems.** This policy states that new development will be directed the Flood Zone 1, new development outside of Flood Zone 1 will require a Sequential and Exceptions test as per the requirements of the NPPF (2021). All major development schemes must include sustainable drainage systems in line with the Governments Technical Standards.
- 5.27. **H1: Provision of Housing.** Policy H1 requires a minimum of 15,847 new dwellings across Reading Borough for the period 2013 - 2036.
- 5.28. **H2: Density and Mix.** This policy requires that the density of residential development to be informed by;
- the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;
 - its current and future level of accessibility by walking, cycling and public transport;
 - the need to achieve high quality design;
 - the need to maximise the efficiency of land use; and
 - the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations. Where appropriate, developments of over ten residential dwellings will make a provision for self-build plots, this will be secured through a legal agreement.

- 5.29. **H3: Affordable Housing.** This policy states that, on sites of ten or more dwellings, an on-site provision of 30% Affordable Housing will be sought in the first instance. Where the 30% contribution is unattainable, a financial contribution will be sought and secured under a Section 106 agreement.
- 5.30. **H5: Standards for New Housing.** This policy provides the criteria and standards to which new housing should be built to. These are as follows:
- a. 'All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.*
 - b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations⁷⁹.*
 - c. All major new-build residential development should be designed to achieve zero carbon homes.*
 - d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.*
 - e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).*



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

- 5.31. **H10: Private and Communal Outdoor Space.** Policy H10 requires new residential dwellings to be provided with functional private or communal open space. This should be suitable for the daily needs of occupiers and include green space wherever possible. The design and character of the external amenity space should be similar to those in the vicinity of the development.
- 5.32. **TR1: Achieving the Transport Strategy.** This policy states that new development will make an appropriate contribution to the objectives of Reading Borough Councils Local Transport Plan 2011 – 2026. Additionally the development will ensure that adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.
- 5.33. **TR3: Access, Traffic and Highway-Related Matters.** This policy states that development which includes new or altered access on to the transport network will only be permitted where the development complies with the adopted standards of the Transport Authority and the proposal will not result in a detrimental impact on the highway network.
- 5.34. **TR4: Cycle Routes and Facilities.** This policy states that new development will seek to utilise opportunities to improve access for cyclists and integrate the development with the existing cycling provisions and that development will not result in a detrimental impact on identified cycling routes.
- 5.35. **TR5: Car and Cycle Parking and Electric Vehicle Charging.** This policy state provision towards electric vehicle charging points should be provided by new developments. Development which includes new houses should provide electric vehicle charging points. Development with communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.

Other Local Material Considerations

- 5.36. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations are taken into account in decision-making. The following material considerations are relevant to this planning application and are considered in turn below:
- Reading Borough Council Affordable Housing SPD (2021)
 - Reading Borough Council Sustainable Design and Construction SPD (2019)
 - Reading Borough Local Development Framework Revised Parking Standards and Design Supplementary Planning Document (2011)
 - Reading Borough Council Employment, Skills and Training SPD (2013)
 - Supplementary Planning Document on Planning Obligations under Section 106 (2015)
 - Reading Borough Council Reading Tree Strategy 2021
 - Dee Park Planning Brief (2008)
 - Reading Borough Council Strategic Housing Market Assessment (2016)



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- Reading's Culture and Heritage Strategy 2015-2030
- Local Transport Plan 2011-2026
- The Reading Climate Emergency Strategy 2020-25
- Local Cycling and Walking Infrastructure Plan 2020-2030

Reading Borough Council Affordable Housing SPD (2021)

- 5.37. The SPD confirms that, for developments of ten or more dwellings, provision of affordable housing is expected to take the form of on-site provision, as specified by Local Plan Policy H3.
- 5.38. On-site affordable housing should comply with requirements of Policy H3 unless supported by Viability Assessment. The tenure split will be as follows:
- Affordable rented accommodation at 'Reading affordable rent' levels – at least 62%; and
 - Affordable home ownership (shared ownership or another product) – maximum 38%.
- 5.39. The SPD confirms a Section 106 Agreement will be required to secure the Affordable Housing on site and set out the qualifying criteria which should be agreed between the developer and Council.

Reading Borough Council Sustainable Design and Construction SPD (2019)

- 5.40. The SPD states that new development is expected to adapt design and construction in order to make sustainability measures viable. If compliance cannot be achieved, applicants will need to demonstrate why not and will be expected to install the proportion of measures that are viable.
- 5.41. When submitting applications for new development, it will be necessary to demonstrate compliance with the relevant policies of the Local Plan as regards to sustainable development.
- 5.42. The requirement for major residential developments (10 or more dwellings) is zero carbon (or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero).

Reading Borough Local Development Framework Revised Parking Standards and Design Supplementary Planning Document (2011)

- 5.43. The application site is within zone 3 of the parking zone map. In terms of transport and accessibility, zone 3 is classified as having a variety of land uses, within 400m walk of high frequency bus services.
- 5.44. The car parking requirements for new residential development in zone 3 are set out in the below table.



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	Residential Parking Provision			
	Zone 1	Zone 2	Zone 3	Zone 4
Residential				
C3 Retirement Home with Warden (spaces per individual units)	0.5 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff
C3 Dwelling Flat 1-2 bed	0.5	1	1.5	1.5
C3 Dwelling Flat 3+ bed	1	1.5	2	2
C3 Dwelling House 1 bed	0.5	1	1	1
C3 Dwelling House 2 bed	1	1	1.5	2
C3 Dwelling House 3 bed	1	2	2	2
C3 Dwelling House 4+ bed	2	2	2	3
Visitor Parking	0	1 space per 10 dwellings (Flats only)	1 space per 4 dwellings (Flats only)	1 space per 4 dwellings (Flats only)
Houses in Multiple Occupation (HMOs)	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**

- 5.45. The SPD confirms a level of car parking on site which falls below the recommended provision of the SPD, will be required to satisfy the Highways Authority that there would be no detriment to highway safety as a result of the proposed car parking arrangements.

Reading Borough Council Employment, Skills and Training SPD (2013)

- 5.46. This SPD states that, for developments of over 10 residential dwellings, an Employment Skills Plan (ESP) or financial contribution towards employment skills will be required. The ESP will relate to the construction phase of the development and include details such as;

- Number of apprenticeships
- Employment/training initiatives
- Training and work experience for younger people, including those who are not in employment, training or education (NEET)
- Best endeavours to maximise local labour
- Local procurement agreement – potential for local businesses to be included in tender lists.



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- 5.47. A financial contribution will alternatively be sought, be calculated using the following formula; £2,500 x Gross internal floor area of scheme (m²) / 1000m². The cost of £2,500 is used as the average cost of construction training.
- 5.48. The SPD confirms The ESP or contribution will be secured via a Section 106 agreement between the developer and the Council.

Supplementary Planning Document on Planning Obligations under Section 106 (2015)

- 5.49. The SPD confirms that RBC adopted a CIL charging schedule in January 2015, the result of which is that the use of S106 contributions have been scaled back.
- 5.50. The SPD confirms Section 106 will continue to operate alongside CIL and will be collected for a number of matters, including Affordable Housing, open space provision, environment mitigation measures, improvements to infrastructure, transport mitigations measures, highway works and ESP.

Reading Borough Council Reading Tree Strategy 2021

- 5.51. The Tree Strategy confirms that, through the use of both national and local policies, the Council will continue to ensure the appropriate retention and protection of trees within development proposals and secure landscaping within new sites in order to contribute to our corporate aims and the aims of this Tree Strategy, although this needs to be supported by resources for monitoring and enforcement. It is an expectation that all development has due regard to tree related planning policies and to the aims of this Strategy.

Dee Park Planning Brief (2008)

- 5.52. This document provides a planning brief for the wider Dee Park area in which the application site is located and contains details such as the provision of open space provided by new development, the requirement of high quality design, density of residential development, building heights and the larger estate planning in terms of layout.

Reading's Culture and Heritage Strategy 2015-2030

- 5.53. This document aims to improve the cultural and heritage assets of the Borough and improve on the facilities and heritage assets where possible.

Local Transport Plan 2011-2026

- 5.54. The Transport Plan identifies Dee Park as an area which is subject to major regeneration for residential use which will include transport remodelling and improvements.

The Reading Climate Emergency Strategy 2020-25



- 5.55. This document outlines the ways in which development can help to address the issues surrounding climate change and the measures that can be incorporated into development schemes to achieve net zero by 2030.

Local Cycling and Walking Infrastructure Plan 2020-2030

- 5.56. The plan confirms Reading Borough Council aims to double the number of people cycling into Reading Town Centre from 4% to 8% by 2030, and to 10% by 2036 and to Increase the number of people walking into the Town Centre from 29% to 35% by 2030, and to 40% by 2036.

National Planning Policy Framework

- 5.57. The latest iteration of the NPPF was published in July 2021. and sets out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).
- 5.58. The NPPF makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has the following mutually supportive and interdependent objectives:
- ***“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
 - ***a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and***
 - ***an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” (para. 8, the Framework).***
- 5.59. Paragraph 9 clarifies that these objectives “...should be delivered through the preparation and implementation of plans and the application of the policies in this Framework” and explains that both Local Plans and decisions should take account of local circumstances, so that they respond to the different opportunities for achieving sustainable development in different areas.

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- 5.60. Paragraph 10 sets out the presumption in favour of sustainable development at the heart of the NPPF which, at paragraph 11c), is defined for decision-making as: *“approving development proposals that accord with an up-to-date development plan without delay”*.
- 5.61. In addition, paragraph 38, requires LPA's to *“...approach decisions on proposed development in a positive and creative way”* and *“... seek to approve applications for sustainable development where possible.”*
- 5.62. The presumption in favour of sustainable development is set out at paragraph 11. For decision taking which directs decision makers to approve proposals which accord with an up to date Development Plan without delay (para. 11c). Where there are no development plan policies, or those policies most important for determination the application are out of date, the proposal should be approved unless one of two exceptions applies (para. 11d), these being:
- when the policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed (with reference to Footnote 7); or
 - when the adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the Framework policies when taken as a whole.

“Decision-taking”

- 5.63. Paragraph 38 requires LPAs to *“...approach decisions on proposed development in a positive and creative way”* and *“...seek to approve applications for sustainable development where possible”*.

“Promoting Sustainable Transport”

- 5.64. Paragraph 105 requires significant developments to be *“...focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”*.
- 5.65. Paragraph 106 states that planning should ‘minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities’ and ‘provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking’. In assessing applications for development paragraph 110 notes that specific applications for development should ensure:
- a) Appropriate opportunities to promote *sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) Safe and suitable access to the site can be achieved for all users;
 - c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, *including the National Design Guide and the National Model Design Code*⁴⁶; and
 - d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”*.



- 5.66. Paragraphs 113 requires those developments expected to generate a significant amount of movements to be accompanied by Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.
- 5.67. Paragraph 111 states that *“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development are severe”*. Paragraph 112 states that applications should also:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - a) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - b) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - c) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations”*

“Making effective use of land”

- 5.68. Chapter 11 refers to making effective use of land and outlines that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 122 references that planning policies and decisions need to reflect changes in the demand for land and that they should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Paragraph 124 references achieving appropriate densities and outlines that; *“Planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) *“the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) *local market conditions and viability;*
 - c) *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) *the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) *the importance of securing well designed, attractive and healthy places.”*

“Achieving well-designed places”

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5.69. The NPPF recognises that good design is a key aspect of sustainable development, and “the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve” (paragraph 126), with further design guidance set out at paragraphs 127 to 136.

5.70. Paragraph 130 outlines that 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’.*

5.71. Paragraph 131 emphasises the important contribution that trees make to the character and quality of urban environments, and that they can also help mitigate and adapt to climate change.

“Meeting the challenge of climate change, flooding and coastal change”

5.72. This chapter seeks to avoid inappropriate development in areas at risk of flooding and direct development to areas with the lowest risk of flooding.

Planning Practice Guidance

5.73. The Government published the Planning Practice Guidance (PPG) in 2014 and have since updated relevant parts as appropriate. The PPG provides further detailed guidance accompanying the Framework and covers a wide range of topics.

5.74. The PPG includes encouragement of high quality design and states that: ‘local planning authorities should give great weight to outstanding or innovative design which help to raise the standard of design more generally in the area’.

5.75. The PPG also provides guidance on relevant issues such as: sustainability and renewable and low carbon energy; design; the natural environment and recreation; transport and travel plans; waste; viability; planning conditions; and planning obligations.

6. Planning Assessment

Introduction

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that all planning applications must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. The Development Plan is described at Section 5 of this Statement, and further material considerations exist in the form of the NPPF, Planning practice Guidance and the Council's supplementary planning guidance.
- 6.2. This section identifies those key issues that are material to the planning balance required in respect of this scheme, and presents the case in favour of granting planning permission under the following headings:
- Principle of Residential Development
 - Housing Mix, Affordable Housing and Standard of Accommodation
 - Design and Landscaping
 - Open Space
 - Highways and Transportation
 - Residential Amenity
 - Climate Change and Sustainability
 - Flood Risk and Drainage
 - Ecology
 - Arboriculture
 - Ground Conditions
 - Heritage and Archaeology
 - Air Quality
 - Planning Obligations and CIL

Principle of Residential Development

- 6.3. Local Plan Policy H1 states 15,841 new dwellings will be provided in Reading during the plan period. Policy WR1 confirms that new residential development will be supported in Dee Park to support regeneration of this area. The application site is specifically allocated for development in Policy WR3m of between 34 to 50 dwellings, subject to the fire station being surplus to requirements and requiring contamination issues being addressed and water infrastructure impact to be taken into account. The principle of the proposed residential development on the site therefore complies with the development plan subject to compliance with the site-specific requirements of Policy WR3m.
- 6.4. Regarding the previous use of the site as fire station, a new Community Fire Station has been built in the neighbouring settlement of Theale which replaces all requirement for a station at Dee Road and enabled its closure in November 2021. The former fire station use is therefore no longer required at this site, meaning it is available for redevelopment.

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- 6.5. The 63no. dwellings proposed is more than that envisaged in the allocation. However, pre-application discussions with RBC confirmed detailed consideration of scheme design, the site's context and appropriate density would determine the site capacity, with flexibility against the allocation capacity range to be applied if the scheme was demonstrated to be acceptable in these terms. RBC pre-application advice relating to draft proposals of 71no. dwellings confirmed the proposed development does positively reflect the character of the existing area of regenerated housing in the Dee Park area, but the scheme needed refinement to achieve an acceptable design (full details at Section 3 of this Statement). The scheme has therefore subsequently been amended to reduce the number of dwellings to 63no. and consideration of design matters is provided below which confirms this amount of development is appropriate for the application site.
- 6.6. Further to this, the application includes a Ground Investigation Report and a Drainage Strategy which confirms that contamination and impact on water infrastructure do not represent constraints to development. Further consideration of these matters is provided below.
- 6.7. The principle of the proposed development to redevelop the site for housing is therefore demonstrated to be acceptable. The development would assist in providing additional housing in Reading support of Policy H1 and be in accordance with the site allocation Policy WR3m, with increase in the number of units being justified by the development of an appropriate design in consideration of the site context. Further, new housing here at a disused site which is no longer required for its former fire station use would contribute to the wider regeneration of Dee Park, complying with the requirements of Policy WR1. The redevelopment of this brownfield site in a sustainable location also constitutes effective use of land, and is therefore consistent with the requirements of the NPPF in this regard.

Housing Mix, Affordable Housing and Standard of Accommodation

Housing Mix

- 6.8. Policy H2 relates to housing mix and development densities and confirms that this should be informed by a number of site-specific factors including the character of the surrounding area, the level of accessibility to the site, environmental impacts and effects on amenity of adjoining occupiers, as well as the need to achieve a high quality design through making efficient use of land. The policy confirms however that over 50% of dwellings should be of 3 bedrooms or more at the site.
- 6.9. The scheme would provide a range of unit sizes between 1 and 3 bedrooms, in the following mix:

	Market	Percentage	Affordable	Percentage of Affordable
1-bed	6	14%	6	32%
2-bed	7	16%	11	58%
3-bed	31	70%	2	10%
Total	44	100%	19	100%



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- 6.10. This mix of sizes is considered to be appropriate for the site having regard to the character and accessibility of the area and would comply with the specific requirement regarding the number of 3 bedroom properties, with 52% of the total units being of this size. The proposals would therefore comply with Policy H2 with respect to the mix of dwelling sizes.

Affordable Housing

- 6.11. Policy H3 confirms that on sites of ten or more dwellings, an on-site provision of 30% affordable housing will be sought, with particular need for housing of 2 or more bedrooms, and Reading's Affordable Housing SPD states that the tenure split should be at least 62% affordable rent with maximum 28% shared ownership.
- 6.12. The proposals provide 30% on-site affordable housing, with 19 in total, including 13 of 2 or 3 bedrooms. The proposals therefore comply with Policy H3 requirements in terms of the quantum and size of affordable housing provision. An appropriate tenure split is also provided in accordance with the Affordable Housing SPD requirements can be secured through a Section 106 Agreement.

Standard of Accommodation

- 6.13. Local Plan Policy H5 states development should be built to comply with nationally-described space standards and provide accessible and adaptable accommodation. Policy H10 states that new dwellings should be provided with functional private or communal open space.
- 6.14. All dwellings are designed to achieve the nationally-described space standards and be built to the M4(2) standard, complying with Policy H5 in these regards.
- 6.15. Each of the proposed houses has a private rear garden and the flat blocks provide balconies to each of the units. Further, the flats include an area of communal amenity space with a publicly accessible open amenity area located to the west of the site. The proposals would therefore comply with Policy H10.

Design and Landscaping

- 6.16. Local Plan Policy CC7 requires new development to be of a high quality design which will maintain and enhance the character and appearance of Reading. Policy H2 requires the density of the residential development to be informed by consideration of the site context. Policy EN14 requires provision of planting in application sites in appropriate locations.
- 6.17. The accompanying Design & Access Statement includes details regarding the design rationale for the scheme. In summary, the layout, scale and appearance of the proposed development has been carefully considered having regard to the site and its surrounding context, being refined following pre-application discussions with Reading Borough Council. Accordingly, the amount of development on the site is appropriate having been derived from the consideration of a suitable layout and scale.



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- 6.18. The proposals include landscaping involving the planting of a significant number of new trees and hedges around the site. This will assist in the site becoming significantly greener than existing and to complement the built development, enhancing the character of the site and area.
- 6.19. The development therefore is considered to represent a high quality design which complies with Policies CC7, H2 and EN14 and meets the NPPF requirement to create high quality and beautiful places.

Open Space

- 6.20. Policies EN7, EN9 and EN10 relate to the provision and access to public open space and state that all new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision of access or improvement of existing leisure or recreational facilities. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must also ensure satisfactory provision of children's play areas and neighbourhood parks.
- 6.21. The application is accompanied by an Open Space Assessment which confirms that the development would provide an area of publicly accessible open amenity space adjacent to Spey Road and that the site is accessible to Prospect Park and Lousehill Copse, locally defined areas of public open space. The on-site provision plus a contribution to the improvement and maintenance of these areas of public open space, to be secured by Section 106 Agreement, would mean the development would provide adequate access to open space for future occupiers, complying with Policies EN7, EN9 and EN10.

Highways and Transportation

Access and Parking

- 6.22. Local Plan Policy TR3 requires new or altered access on to the transport network to comply with adopted standards of the Transport Authority. Policy TR4 requires appropriate provision of cycle facilities with new development and Policy TR5 requires provision of electric charging points with new developments, with provision for 10% of spaces in communal car parks. The Reading Parking Standards SPD sets out the required level of car and cycle parking.
- 6.23. The accompanying Transport Statement confirms the proposed development includes a total of 105 car parking spaces, comprising 96 allocated spaces and 9 unallocated visitor spaces. This complies with the Reading parking standards for development in Zone 2. Electric vehicle charging facilities will be provided for all proposed dwellings, exceeding the minimum requirements set out in Policy TR5. Appropriate car parking is therefore provided with the development.
- 6.24. Cycle parking is provided on the basis of one space per apartment in a communal bike store (30 in total) and within rear garden sheds for each of the dwellings. This provision is in excess of the SPD standard and would support sustainable transport modes, in accordance with Policy TR4.



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- 6.25. The Transport Statement also provides technical details which shows that all of the proposed accesses from the development would allow for safe access and egress onto the public highway, with adequate visibility. The scheme is therefore in accordance with Policy TR3.

Traffic Impacts

- 6.26. Policy TR1 requires development ensure that adequate level of accessibility and safety by all modes of transport from all parts of a development and make an appropriate contribution to achieving the objective of the Reading Brough Local Plan Local Transport Plan 2011-2026.
- 6.27. The Transport Statement confirms that the site is well located to encourage travel by sustainable modes including the use of walking, cycling and public transport which will provide genuine opportunities for residents to travel more sustainably. The development is likely to generate vehicle movements equating to one every 2-3 minutes in the morning and evening peak, which is modest level of traffic generation not having a materially adverse impact on the local road network.
- 6.28. The proposal therefore complies with Policy TR1 and is consistent with the NPPF's desire to promote sustainable transport.

Residential Amenity

- 6.29. Policy CC8 requires that new development does not result in a detrimental impact on the living environment of existing residential properties, or result in unacceptable living standards for the occupiers of new residential dwellings. The policy confirms that a back-to-back distance of 20 metres between dwellings is usually appropriate to safeguard residential amenity.
- 6.30. The accompanying Noise Assessment considers impacts in this regard following the undertaking of a noise survey and finds risk of unacceptable noise are generally low and, subject to use of appropriate glazing for windows serving habitable rooms fronting Dee Road. Subject to this, the development would not result excessive noise for existing or future residents.
- 6.31. A Daylight and Sunlight Assessment is included with the application which considers impact on these matters for existing nearby properties and proposed. This confirms that there would not be any unacceptable loss of sunlight or daylight to habitable rooms for the existing and proposed dwellings and the development is therefore acceptable in this regard.
- 6.32. The scheme has also been designed to achieve adequate back-back distances between dwellings and, therefore, privacy would be respected.
- 6.33. In consideration of the above matters, the scheme would not result in a detrimental impact on the living environment or standards of existing residential properties and therefore comply with Policy CC8.



Climate Change and Sustainability

- 6.34. Local Plan Policy H5 confirms required standards for new housing, including need for new-build residential development to achieve zero carbon homes and, where this is not possible, to have a minimum 35% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Reading. The Council's Sustainable Design and Construction SPD includes the Policy H5 requirement. Further, Policies CC2 and CC3 seek to ensure that all new developments incorporate energy efficient measures into the built-form to adapt to climate change, and Policy CC4 requires that, for developments of more than 20 dwellings, the applicant shall consider the inclusion of decentralised energy provision within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.
- 6.35. The accompanying Energy and Sustainability Statement demonstrates a range of measures can be included in the development to achieve a c.55% reduction in the dwelling emission rate. The measures are expected to achieve this reduction through higher fabric standards and low carbon and renewable energy systems. The requirement to provide full details of these measures can be secured by condition.
- 6.36. In accordance with Policy H5 and the Sustainable Design and Construction SPD, carbon offset payments can be secured through a Section 106 Agreement. Details of the draft Heads of Terms are included in Section 7 of this Statement.
- 6.37. The energy and sustainability measures and commitment to offset payment means the development complies with Policies H5, CC2, CC3 and CC4 and Sustainable Design and Construction SPD.

Flood Risk and Drainage

- 6.38. Local Plan Policy EN18 directs new development towards Flood Zone1 and requires all new major development applications to include sustainable drainage systems in line with the Government's Technical Standards.
- 6.39. The accompanying Drainage Technical Note confirms that the site is located within Flood Zone 1 and provides details of the proposed sustainable drainage system. The Technical Note demonstrates that the proposals are consistent with the aims of the technical standards and the site can successfully drain the surface and foul water from the site to the Thames Water sewer network.
- 6.40. The proposal scheme fully complies with the aims and requirements of Policy EN18 and is supported by the NPPF as it avoids development in areas of flood risk and would meet the specific requirement of Policy WR3m regarding impact of the development on water infrastructure. .

Ecology

- 6.41. Local Plan Policy EN12 seeks to ensure that new development protects biodiversity and results in a net gain as regards to biodiversity and protect against net loss.

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- 6.42. The accompanying Ecological Appraisal confirms that the site is not within an area protected for its ecological value and that the site does not contain habitats considered to be of ecological importance. The site is also not considered to present opportunities for protected species, although buildings provide suitable features for bats. Subject to identified mitigation measures, the proposals would not cause material harm to biodiversity.
- 6.43. Further to this, measures included in the proposed development including new planting, lawn grassland, bat and birdboxes and hedgehog fence cut outs will result in biodiversity net gains, representing a new enhancement to ecological value from the development.
- 6.44. The development therefore not result in ecological harm and result in enhancements to biodiversity, complying with Policy EN12.

Arboriculture

- 6.45. Local Plan Policy EN14 and Reading Borough Council Tree Strategy 2021 seek to protect the existing trees and hedges in the District and ensure that there is a provision of tree coverage with development sites. Policy EN14 makes a specific reference to the provision of new tree planting along street frontages.
- 6.46. The accompanying Arboricultural Impact Assessment confirms there are no protected trees on the site. The row of cypress trees would be felled but this would not result in a detrimental impact on public amenity. Other trees on site will be retained and protected from harm during new development. New planting alongside the existing trees will result in an enhanced level of tree cover and improve visual amenity.
- 6.47. The proposed development therefore is in accordance with Policy EN14 and Reading Tree Strategy 2021.

Ground Conditions

- 6.48. Local Plan Policy EN16 states that development will only be permitted in areas where they will not be subject to high levels of pollution, unless mitigation measures are provided to minimise such pollution.
- 6.49. The accompanying Phase 1 and 2 Geo-Environmental Assessment. The Assessment confirms the potential for ground contamination resulting from the previous use of the site meaning that adequate investigation and remediation of the site would be required prior to a residential development being provide on the site. The Applicant agrees to conditions securing the remediation of the land to an appropriate standard.
- 6.50. Subject to such conditions, the development would comply with Policy EN16 in this regard and meet the requirements of Policy WR3m for contamination issues to be taken into account.

Heritage and Archaeology

- 6.51. Policy EN1 states all new development are expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Policy EN2 requires applicants to identify and evaluate sites of archaeological significance by consulting the Historic Environment Record.

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6.52. The accompanying Heritage Assessment confirms that the site does not contain any designated heritage assets, as defined in Annex 2 of the NPPF and there are no non-designated heritage assets previously recorded within the Site. Based on the evidence from the study area, including the results of multiple fieldwork investigations, the report considers that the site has a low potential to contain remains from any period. Historic mapping highlights that the Site has undergone impacts through its use as farmland and by its development for a fire station and a related complex of buildings and car parking in the 20th century. These impacts are likely to have removed earlier buried remains, even if once present.

6.53. The development would therefore not cause harm to heritage assets, complying with Policies EN1 and EN2.

Air Quality

6.54. Local Plan Policy CC9 includes the provision for development to include measures to tackle poor air quality or for on-going air quality monitoring and Policy EN15 requires development to improve the air quality within the Borough and reduce the effects of poor air quality development. Reading Borough Council's Air Quality Action Plan contains measures to improve air quality across the Borough.

6.55. The accompanying Air Quality Assessment considers impact on air quality. The site is confirmed as being outside any Air Quality Management Area and the proposed development does not raise any significant adverse impacts on health or quality of life resulting from changes to air quality.

6.56. The development therefore complies with Policies CC9 and EN15 and assists with meeting targets of the Council's Air Quality Action Plan.

Planning Obligations and CIL

6.57. Reading Borough Council has an adopted Community Infrastructure Levy (CIL) Charging Schedule which applies to this application. In addition, provision of contributions and infrastructure relating to site specific mitigation are relevant to the development, having regard to the Council's Planning Obligations under Section 106 SPD.

6.58. The Applicant is committed to payment of CIL in accordance with the charging schedule and securing other mitigation via a Section 16 Agreement, where this would meet statutory tests. Details of the Section 106 Heads of Terms are included in Section 7 of this Statement.

Summary

6.59. Having considered the above matters, it is clear that the development fully complies with the development plan and meets the requirements of supporting local guidance and the NPPF.



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- 6.60. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. There are no material considerations which would indicate that the application should not be determined in accordance with the development plan.
- 6.61. This application therefore constitutes a sustainable development, providing public environmental, social and economic benefits without any material adverse effects.
- 6.62. The NPPF presumption in favour of sustainable development, repeated by Local Plan Policy CC1, means that the planning application should be approved without delay.



7. Draft Section 106 Heads of Terms

- 7.1. It is expected that the planning permission will be accompanied by a Section 106 Agreement to secure certain obligations associated with the proposed development in the event planning permission is granted.
- 7.2. As noted in the RBC Planning Obligations under Section 106 SPD, Section 106 Agreements operate alongside CIL, with the extent of Section 106 obligations being scaled back following the adoption of the CIL Charging Schedule 2015.
- 7.3. Having regard to the SPD, the following Heads of Terms comprise the items which are expected to be included in a Section 106 Agreement for this scheme:
- Provision of 30% On-site Affordable Housing and securing Affordable Housing mix between shared ownership and affordable rent.
 - Provision of site-related highways works (see accompanying Transport Statement). Scope of works to be agreed during planning application.
 - Provision of other site related transportation mitigation measures as required (e.g. Travel Plan, electric vehicle charging points).
 - Contribution to improvements to access to local green space (see accompanying Open Space Statement)
 - Provision of on-site decentralised energy provision and contribution to carbon offsetting (see accompanying Energy & Sustainability Statement)
 - Contribution to construction employment skills and training
 - Provision of Sustainable Drainage Systems
- 7.4. CIL payments associated with the development would include the following matters, in accordance with the Planning Obligations SPD, Charging Schedule and Regulation 123 List:
- Access to outdoor recreation, open space and water courses serving the Borough
 - Strategic Borough wide transport improvements, as confirmed in the Local Transport Plan
 - Early years, primary and secondary education facilities
 - Improvements to the public realm and green environment
 - Air quality monitoring
 - Upgrading provision, including enhancement, access to and interpretation of strategic cultural, arts and sports centre provision.
 - Employment and Training facilities
- 7.5. It is expected that the scope and level of contribution associated with the proposed development will be negotiated and determined during the determination period of the planning application.

8. Conclusions

- 8.1. This planning statement supports a full planning application submitted on behalf of Bellway Homes Limited (Thames Valley) for:

Redevelopment of former fire station to provide 63 dwellings, including affordable housing, together with associated access, parking and landscaping.

- 8.2. The site is brownfield land, which is a former fire station no longer required for this purpose and which is allocated for residential development in the Reading Borough Local Plan 2019.
- 8.3. The Site has been assessed against all relevant policies of the development plan, as well as other relevant material considerations. This assessment confirms the proposals are in full accordance with the development plan and relevant material considerations.
- 8.4. The planning balance clearly favours development of the proposals which represent a deliverable, sustainable and suitable development which will deliver much needed market and affordable housing. Therefore, in accordance with paragraph 11 of the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning permission should be granted without delay.

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Appendices



Planning Statement

Former Dee Road Fire Station, Reading



Appendix 1 Site Location Plan

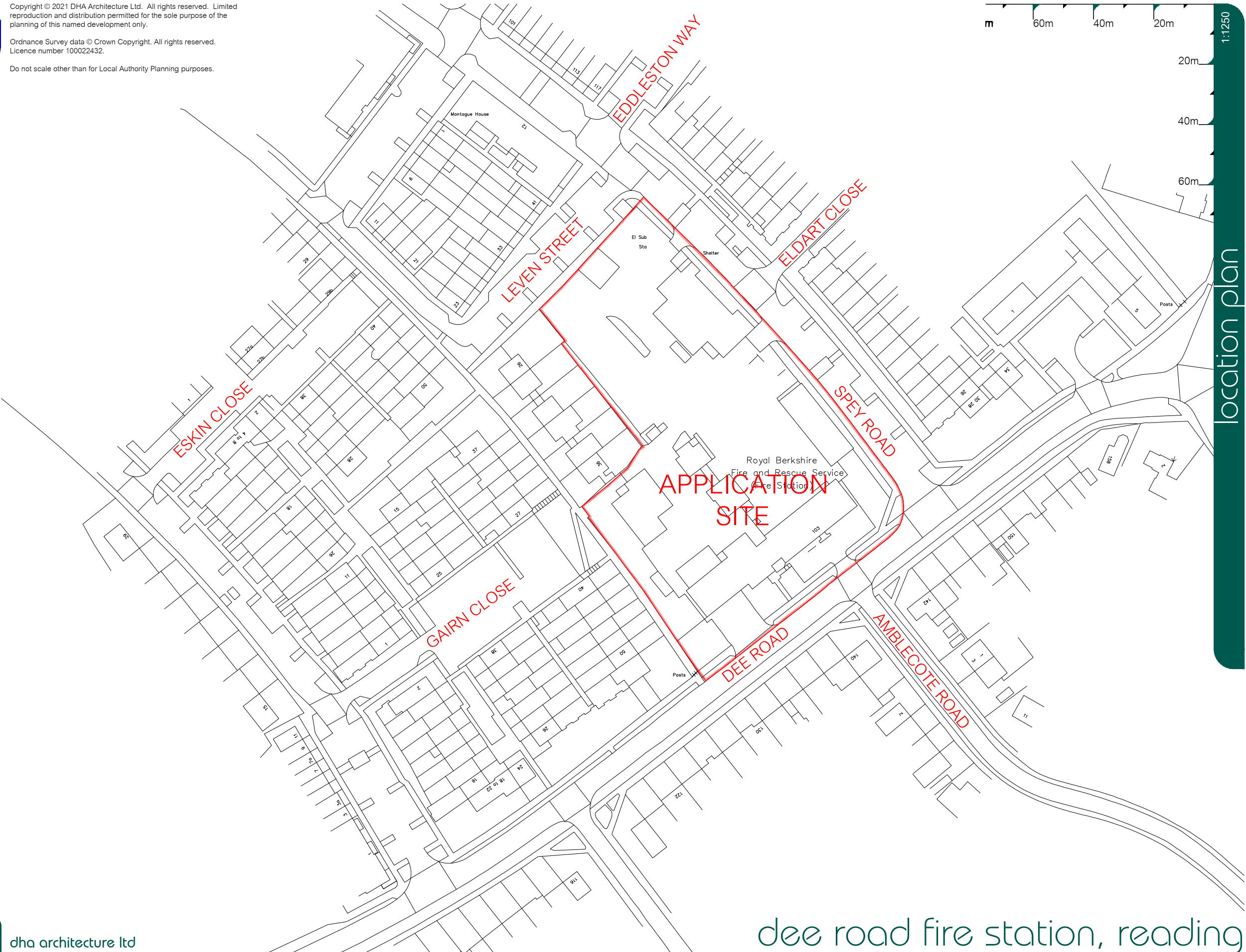




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dee road fire station, reading

rev date by details

Location Plan	15.12.2021 created
	1:1250 @ A3 scaling
	JeH contact
reference 092102-BEL-TV-06	- revision

Appendix 2

Reading Borough Council Pre-application Advice

Mr Tom Ryan
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Frances Martin
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☐ 0118 9373787

Our Ref: 220232

Direct: ☐ 0118 9372980

e-mail: stephen.vigar@reading.gov.uk

20 May 2022

Your contact is: **Steve Vigar, Planning**

Dear Mr Ryan,

PRE PLANNING APPLICATION ENQUIRY - INITIAL LEVEL 3 RESPONSE

Enquiry Reference: 220232

Address: Berkshire Fire and Rescue, Dee Road, Tilehurst, Reading, RG30 4BT

Proposal: Pre-application advice to redevelop the site to deliver 71 residential units (including 22 affordable housing units) together with associated landscaping, parking and infrastructure works.

Thank you for your enquiry and for a useful site visit and introductory meeting which took place on 5 May.

This scoping pre-application response is intended to form part of an initial 'feasibility stage' of the pre-application process. It is based on very limited information and has been subject to only limited consultee involvement. This response is intended as a guide to inform subsequent detailed pre-application discussions. It should not be relied upon to inform an application for Planning Permission at this stage.

Relevant Policy and Guidance

Reading Borough Local Plan 2019

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

CC3: ADAPTATION TO CLIMATE CHANGE

CC4: DECENTRALISED ENERGY

CC5: WASTE MINIMISATION AND STORAGE

CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT

CC7: DESIGN AND THE PUBLIC REALM

CC8: SAFEGUARDING AMENITY

CC9: SECURING INFRASTRUCTURE

EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE

EN9: PROVISION OF OPEN SPACE

EN10: ACCESS TO OPEN SPACE
EN12: BIODIVERSITY AND THE GREEN NETWORK
EN14: TREES, HEDGES AND WOODLAND
EN15: AIR QUALITY
EN16: POLLUTION AND WATER RESOURCES
EN17: NOISE GENERATING EQUIPMENT
EN18: FLOODING AND DRAINAGE
H1: PROVISION OF HOUSING
H2: DENSITY AND MIX
H3: AFFORDABLE HOUSING
H5: STANDARDS FOR NEW HOUSING
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE
TR1: ACHIEVING THE TRANSPORT STRATEGY
TR2: MAJOR TRANSPORT PROJECTS
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
TR4: CYCLE ROUTES AND FACILITIES
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING
OU1: NEW AND EXISTING COMMUNITY FACILITIES
WR3m: 103 DEE ROAD

Supplementary Planning Documents

- Affordable Housing (2021)
- Sustainable Design and Construction (2019)
- Parking Standards and Design (2011)
- Employment, Skills and Training (2013)
- Planning Obligations under S.106 (2015)

Other Reading Borough Council Documents:

- Reading Tree Strategy 2021
- Strategic Housing Market Assessment (2016)
- Culture and Heritage Strategy 2015-2030
- Local Transport Plan 2011-2026
- Climate Emergency Strategy 2020-25
- Local Cycling and Walking Infrastructure Plan 2020-2030

National Planning Policy and Guidance

- National Planning Policy Framework
- National Planning Practice Guidance
- National Design Guide

EIA

At this early stage it is assumed that the proposals should be subject to Screening under the Environmental Impact Assessment Regulations 2017. Any significant environmental effects will be screened through this and this will require input from relevant consultees in order to assist the LPA in issuing a Screening Opinion and deciding whether an Environmental Impact Assessment is required.

Site Allocation

The site is allocated for residential development (subject to the fire station being surplus to requirements) under Policy WR3m “103 Dee Road” as set out in the Local Plan 2019. An indicative amount of development of 34 to 50 dwellings is given under that policy.

It will be necessary as part of detailed pre-app and any future application to provide evidence that the fire station is surplus to requirements. The new station at Theale is noted and it is assumed for the purposes of this response that this replaces all requirements for a station at Dee Road.

Design

The proposed layout does in some ways reflect the character of the existing area of regenerated housing in the Dee Park area. However it is considered that some significant changes would be required to arrive at an acceptable design. Many of the wider planning matters and the question of policy-compliance are dependant upon, and flow from, the site layout and built form. I would recommend that you focus on arriving at a suitable layout, we can then discuss wider issues as part of the ongoing pre-application work.

Southern Block

The basic concept of a perimeter block to the southern end of the site with a central street running east-west is probably the correct approach. However the parking court cutting north-south would be undesirable due to the creation of ambiguous public/private space, exposure of rear boundaries, intrusion of vehicles into rear garden areas and taking land which would be better used as private gardens for residents.

I would recommend changing the housing fronting Dee Road and also the central street from terraces/FOG to semi-detached with in-curtilage parking (with added benefit of more effective EV charging provision). Further discussion over driveways, visibility and slowing of vehicles on Dee Road will need to be considered, as well as suitable street tree planting (which could perhaps be incorporated into traffic calming).

The housing fronting Spey Road within the southern block could be acceptable in general, however a good deal of land is given over to circulation space with the adopted pavement, the parking area and a second walkway adjacent to the houses. A simpler approach, ideally with in-curtilage parking would be more appropriate.

Dual fronted dwellings to provide activation to Gairn Close would be desirable (noting the significant change in ground levels).

Central Block

This block presents a number of problems in terms of the relationship with housing to the west on Gairn Close, the rear of which would be exposed to public areas, raising security and visual concerns.

The maisonettes would be sandwiched between parking areas with little amenity space and a lack of clear definition between public and private areas. The housing to the Spey Road

frontage relates poorly to the parking area to the north and the layout would result in an awkward arrangement of side and rear boundaries. Combined with this I am concerned over a lack of public open space within the scheme.

To resolve these layout concerns I would recommend moving the four houses fronting Spey Road to the west so that the rear garden boundaries back onto the rear passageway/boundaries of the Gairn Close properties. The space created to the Spey Road frontage would be well-located to provide public open space, and enhance the site visually.

Flats to the North.

I recommend omitting the FOG and also cutting the flats back from the western boundary with Gairn Close housing as I am concerned that this would cause overbearing effects, daylight issues and potential privacy concerns. The proximity to the large tree at the north west corner is also a concern. This corner area would be best used as a private garden to serve the flats.

I am concerned that the flats as currently proposed would present a dead frontage to Spey Road with an unattractive undercroft parking entrance. On site we discussed the possibility of sinking the building to provide a semi-basement parking arrangement using the ground levels within the site and some further excavation. This would allow the ground floor flats to sit at approximately half a storey above street which would provide activation whilst also providing some defensible space and better privacy for occupiers. This would also provide benefits in reducing the apparent scale of the building which would appear quite large in the street scene. Some modelling of the uppermost floor to reduce a potentially blocky appearance should also be considered.

Taking the Central Block comments into account it would appear that the flats could be set within a landscaped extension to the POS with planting within the parking area and grounds that further complements that within the POS.

Affordable Housing

The basic proposal to provide 30% Affordable Housing on site would comply with Policy H3. However the mix should reflect the overall mix on site - including 'family housing'. The tenure would be expected to accord with the Affordable Housing SPD 2021.

Design Review

It is expected that the pre-app proposals will be assessed by the Council's Design Review Panel. Arrangements for this can be discussed as part of the PPA/ongoing pre-app.

Other Matters

All other matters are heavily dependent on the layout and/or detailed design, which remains subject to change, and will be discussed in more detail as pre-app progresses. I would recommend that matters relating to ecology are resolved early at pre-app stage. I would also encourage early engagement with the Thames Valley Police Designing Out Crime Officer. All matters relating to environmental sustainability will be a high priority for the Council.

It is recommended that further detailed pre-application discussions should be undertaken and that these should be governed by a Planning Performance Agreement. A further fee to cover the costs of carrying out this work will need to be negotiated as part of the PPA.

Please note that the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

SDV

Steve Vigar

Planning Applications Team Leader

APPENDIX - Consultation responses

Please note that these comments are provided in their entirety - the relative weight to be given to the points raised will be a matter to be addressed through the pre-application and application process.

Natural Environment (Trees)

The illustrative layout indicatively shows incorporation of landscaping, including the retention of the existing landscape buffer on the Dee Road frontage, which is positive. Whilst it does not appear there is much scope, if any, for large canopy trees, which is unfortunate, if the density and layout is otherwise acceptable in planning terms, this may have to be accepted. The indicative planting does show a net gain in tree number, as is required by EN14 and our Tree Strategy, so in that respect is supportable.

On submission of an application, we will expect landscape principles to be provided hence the applicant should familiarise themselves with the aims of the Tree Strategy in order that species, diversity and wildlife considerations, for example, are taken into account in these principles. In addition, the provision of appropriate soil volumes for those trees within the parking areas will need to be demonstrated hence reference to how this will be provided should be included in the landscape information.

The location of all services, including lighting and CCTV, should be considered at an early stage alongside landscape layout to avoid conflicts arising during the agreement of details for each.

There are some trees on site and/or on the boundary (it's unclear) which will need to be addressed formally through a Tree Survey and Arboricultural Impact Assessment which should be submitted with any future application.

No doubt GS Ecology will require some biodiversity enhancements, the principles of which should be provided along with the landscape principles.

In conclusion, development of the site is likely to be supported on tree and landscape grounds subject to sufficient information being provided on submission of an application."

Natural Environment (Ecology)

The pre-application site comprises buildings and land currently in use as Dee Road Fire Station. It is proposed to demolish these buildings and convert the area to housing comprising 71 residential units. The site appears to comprise mostly hardstanding and buildings with some areas of amenity grassland. The site is located close to Louse Hill Copse Local Wildlife Site and there are a number of bat roosts in nearby properties. There is therefore a risk that protected and priority species, including bats, badgers and nesting birds, could be affected by the proposals. As such, an ecological assessment (comprising an extended Phase 1 Habitat and Species Scoping Survey, a bat survey of the existing office building and any trees to be affected by the proposals, and any phase 2 surveys) would need to be provided with any planning application submitted.

Survey requirements

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey protected species.

- Extended phase 1 habitat & protected species scoping survey

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

Phase 2 ecology surveys

If the surveys show that the site contains habitats suitable for protected species further surveys for species such as reptiles and bats may need to be carried out.

Ecological enhancements and Scheme Design

Paragraph 174 of the NPPF reads "Planning policies and decisions should contribute to and enhance the natural and local environment".

Paragraph 180 of the NPPF reads *"opportunities to incorporate biodiversity in and around developments should be encouraged by [...] minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

[...]

development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

The applicant would need to demonstrate how the development will result in a "net gain" in biodiversity units as measured using the DEFRA 3 Metric.

Furthermore, the applicant should design the development from the outset so that its value to wildlife is maximised. This can be achieved by for example providing green roofs, integral bird and bat boxes, native and wildlife friendly planting."

Transport Development Control (Highway Authority)

"The site comprises of a number of commercial buildings, including a 3-storey building previously used as the headquarters for the Royal Berkshire Fire and Rescue Service. The site fronts onto Dee Road and is located in a residential area.

Given the size and scale of the development any full application should be accompanied by a Transport Statement.

The Transport Statement should ensure that a full comparison for both vehicle and pedestrian movements between the existing and proposed uses on the site.

The site is located within the Zone 2, primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs.

Parking/cycle provision

In accordance with the adopted SPD, the development would require the following parking and cycle provision. In addition to the residential parking visitor parking is also required at a ratio of 1 per 10 Flats. Parking areas must be made of permeable material any proposal should not increase any surface water run-off from the site onto the Public Highway

Dimensions of all the parking spaces must be provided in accordance with the Councils current standards.

Flats/Maisonettes	Car Parking Required per unit	Car Parking Total	Cycle Storage per unit	Cycle Storage Total
6 x 1 bed units	1.0	6	0.5	3
2 x 1 bed maisonettes	1.0	2	0.5	1
2 x 2 bed maisonette	1.0	2	0.5	1
24 x 2 bed units	1.0	24	0.5	12
2 x 1 bed maisonettes	1.0	2	0.5	1
2 x 2 bed duplex	1.0	2	0.5	1
2 x 2 bed maisonettes	1.0	2	0.5	1
Visitor Parking Required	1 space per 10 units	4		
TOTAL		44		
Houses/Coach Houses				
2 x 2 bed coach Houses	1	2	2	4
29 x 3 bed Houses	2	58	2	58
TOTAL		60		82

Cycle storage should be provided in secured and covered units utilizing Sheffield type stands. For the C3 Houses storage can be provided within the private rear gardens of each dwelling in the form of a garden shed.

The submitted plans states 69 parking spaces are proposed for the dwellings and 40 for the proposed units. This provision falls short of the Councils current standards. This could not be supported given the extensive areas of unrestricted parking that surrounds the appeal site.

It would appear from the plans within the Proposed Plan document that parking for the 2 and 3 bedroom dwellings will be provided within a communal car park area, if this is the case how will these be allocated? Identification of these spaces will be required and should be located close to the dwellings.

The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. The Councils Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for **each new house to be provided with an electric charging point** and within communal car parks for residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.

The provision of parking for disabled motorists is a key element of all developments that are open to the public. Typically, this excludes residential developments, however where such a development is to be of a significant size, or with large amounts of visitor or communal parking bays then the developer should ideally provide some level of parking which takes into account the need of disabled motorists.

VEHICLE ACCESS:

Access to the site will be via the existing 2 entrances off Spey Road.

Another access point is proposed to the far east of the site, along Spey Road, to serve the apartment block. Therefore, a total of 3 vehicle access points from Spey Road will serve the development. Visibility splays of 2.4m x 43m for the new accesses proposed on Spey Road will need to be illustrated on plans if a full application is submitted.

Two of the accesses onto Spey Road also conflict with the existing speed cushions and therefore should the accesses not be relocated a drawing should be submitted fully illustrating the relocation of the speed cushions which the applicant will be required to undertake as part of any S278 Highway Agreement.

Parking bays are proposed that are accessed directly from Spey Road however these will conflict with an existing bus stop along this frontage. Should an application be submitted the parking layout should be designed so as to remove this conflict.

An additional access point is proposed via Dee Road to serve the 2 and 3 bed units to the west of the site. Dee road is a classified Rd (C404) and therefore any accesses proposed will need to be in accordance with the Councils Geometric Design Guidance for Residential Accesses on to Classified Rds. Visibility Spays of 2.4 x 70m will be required and the access will need to be a minimum of 4.8m wide.

On site turning should be provided and tracking diagrams illustrating delivery vehicles entering and turning on site would be required.

A comprehensive site plan will be required illustrating all the access points and visibility splays for the new accesses this should include all lamp columns, telegraph poles, utility covers in the footway etc. All works on the public highway will require a license from the Highways Department and this includes adjustments to existing dropped crossings or the introduction of new dropped crossings.

PEDESTRIAN ACCESS

The internal network should ensure that 2m wide footways are provided throughout.

A Sub-Station exists on the corner of Spey Road and Leven Street which has not been illustrated on the submitted plans, should this be relocated as part of the proposals the developer will be required to widen the existing footway.

SUDS

A sustainable drainage strategy for the site will be required and this should ensure that the surface water run off is reduced in line with National Defra standards.

REFUSE COLLECTION

Bin storage should comply with the Council's Waste Management Guidance's (available on the Council's website) and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods.

I recommend that the Council's waste department is consulted on this application to determine where they would collect. Tracking will be required illustrating a refuse vehicle entering, turning on site and exiting the site.

Given the site's location a comprehensive Construction Method Statement will be required."

RBC Access Officer

"

1. As I have said on several occasions, many disabled people do not like pedestrian and cycle ways to be combined, especially blind and older people. Cycles are very quiet, and if people do not hear them coming, they may not get out of the way quickly enough and may be injured as a result.
2. Despite at least some of the dwellings being designed to comply with Part M4(2), there seems to be no wider parking spaces for disabled drivers or passengers.
3. As wheelchair users find it very hard to find suitable accommodation, is there any scope for any of the dwellings to be built to Part M4(3) standard? Adaptation is very useful, but it would be very welcome to have dwellings that wheelchair users could move into immediately.
4. The gradient of the site might make access difficult for some disabled people, especially for some wheelchair users and those with walking difficulties; is there any way that this could be mitigated? I am not able to tell the steepness of the gradient.
5. Are there enough dropped kerbs/pram crossings in the area for wheelchair users?"

RBC Environmental Protection

"Environmental Protection concerns

- Bins stores - pests
- Redevelopment of land - pest control
- Air Quality - increased emissions
- Contaminated Land
- Construction and Demolition phase

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedence of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development (large scale/significant traffic generation) is located close to an air quality management area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

The assessment must use a full dispersion model to predict the pollutant concentrations at the building façade for the proposed year of occupation as well as any impacts during the development phase. The input parameters used in the assessment must be agreed with a member of the Environmental Protection Team. Where the assessment identifies an impact on air quality a mitigation plan demonstrating sufficient mitigation to protect the dwellings from poor air quality must also be included.

Possible mitigation against increased emissions:

- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant
- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Provision of cycling facilities / residents cycles
- Improvements to local public transport

It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, however, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

Bin storage - pest proofing

There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. Developers should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin.

Re-development of land - pest control

Where development will be taking place on sites with a former land use, particularly with a former drainage network, you are advised to ensure that former unused drains have been removed and / or properly capped or the proposed development may be at risk of rodent ingress.

It is likely that rats will occupy a cleared site. If there is a significant gap between site clearance and re-development, it is recommended that baiting be carried out to eradicate rats prior to redevelopment. This is to prevent rat populations which may be disturbed due to the redevelopment of the site causing subsequent problems to residents and businesses in the local area.

Contaminated Land

The site is situated on potentially contaminated land. Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.

Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.

It is possible that the desk study will recommend further intrusive site investigation, if consent is given the further investigation will be required by condition, along with a condition for a remediation strategy and a condition for validation certification that remedial works have been successfully completed. The remediation strategy shall be submitted and approved prior to development and the validation certification prior to occupation. If no contamination is found by the intrusive investigations, then all conditions will be discharged.

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.

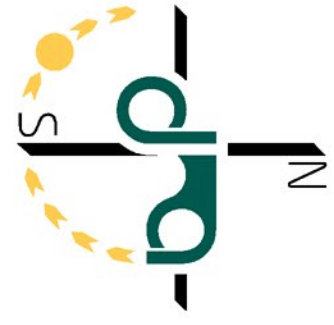
The hours of noisy construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays.

No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development should be burnt on site."

END

Appendix 3

Proposed Site Plan



Planning Statement

Former Dee Road Fire Station, Reading



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