

Mr M Collins
Nova Planning Ltd
Ground Floor
Building 1000 Lakeside
North Harbour
Western Road
Portsmouth, PO6 3EZ

Your contact is: Claire Ringwood, Planning

Without prejudice

Dear Mr Collins

Re: 201146/PREAPP - Pre-application advice for the proposed development of 22 apartments with associated landscaping and parking.

Further to your pre-application request received on 13th August 2020 here is my advice in relation to your proposal.

The following information was submitted:

Planning Statement

Location Plan

Drawing No: A4080/SK01 - Site Plan

Drawing No: A4080/SK02 - Floor Plans

Drawing No: A4080/SK03 - Street View

The site is rectangular in shape and is located on the western side of Elgar Road South and consists of a single storey flat roof building with parking at the rear. There are residential properties to the north, south and west of the site. To the east of the site is Nimrod Way Industrial Estate. Half of the site is currently occupied by the Driving Standards Agency (DSA) and the other half was previously used as an office occupied by the Electrical Services Company who vacated in October 2019. Whilst in employment use, the site is not located within a designated Core Employment Area.

Proposal

The pre-application enquiry relates to the demolition of the existing single storey building and the erection of a 3-4 storey block of 22 apartments with associated landscaping and 20 car parking spaces.

The proposal is for a contemporary modern flat roof building with a staggered frontage. The existing access is to be retained along with cycle and refuse storage areas.

Property History

09/01870/FUL (Civica Ref: 091872) - Change of use from B1 offices to D1 Church Use. Refused 31/12/2009.

92/00871/GOV (Civica Ref: 920541) - Change of use from office (B1) to driving test centre (sui generis). Observations sent 06/01/1993.

89/01089/OUT (Civica Ref: 891394) - Construction of light industrial 'Hi-tech' unit plus onsite parking (renewal of planning permission 86TP802). Refused 23/11/1989.

Consultation Responses

Transport

Limited information has been provided, therefore generic comments have been provided.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

In accordance with the adopted Parking SPD, the development would be required to provide:

1 on-site parking space per 1-2 bedroom unit

1.5 on-site parking space per 3 bedroom unit

Parking dimensions should comply with those set out in the Councils Current Adopted Parking Standards and Design SPD. 1 space per 10 dwellings will also be required for visitor parking; Submitted plans do not illustrate the proposed layout, however the Design and Access Statement states that 20 car parking spaces are to be provided of which one will be suitable for disabled use. The proposed number of spaces do not comply to the Councils current standards. Should a developer require fewer spaces than are proposed then there would need to be demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result.

The development site is located in close proximity to roads that are included in the Councils Residents Parking Permit Scheme. Under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area. Therefore should a future planning application be approved there should be an assumption that any future occupants of the proposed dwellings will not be issued with resident or visitor parking permits which should be covered by condition and an informative applied. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

It should be noted that recent changes to the Local Transport Plans State:

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Development should make the following provision for electric vehicle charging points:

▢ Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.

Details of this will need to be provided should a planning application be submitted.

No site plan has been submitted illustrating any access points. It should be noted access points into the site would need to be a minimum of 4.1 m wide to enable vehicles to enter and exit the site. Visibility splays of 2.4 x 43m will need to be illustrated should a planning application be submitted.

Any future planning application will require a tracking diagram to demonstrate that suitable turning can be undertaken for delivery vehicles to pass one another while entering and exiting the site.

Plans have not been submitted illustrating cycle storage, should a planning application be submitted this should be provided in accordance with the Councils current standards. Full details of the type of provision proposed will be required.

With regards to bin storage it should be noted that these should not be located further than 15m from where the vehicle can wait to undertake collection. This is to avoid the stationing of service vehicles on the carriageway for excessive periods. Schedule 1, Part H of the Building Regulations 2000 defines locations for the storage and collection of waste. Key points in the approved document to part H include: Residents should not be required to carry waste more than 30m (excluding any vertical distance) to the storage point. Details of where and how refuse will be collected would be required should a planning application be submitted.

Any future planning application will also be subject to a Construction Management Statement.

Natural Environment (Trees)

220 Elgar Road South is within Katesgrove Ward which has a low canopy cover, less than the 12% canopy cover which the Borough Council wishes to achieve in the new Tree Strategy. The Borough Council seeks to enhance tree numbers in areas with limited tree cover. Also of note is policy EN14 of the adopted Local Plan which requires that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended.

There are no significant tree or landscape features currently on or adjacent to the site. The plans show a new and much larger building set forward of the existing property over a broad grass verge to the front of the property. This would increase the bulk of development in views from the public highway with an urbanising effect on Elgar Road South. There appears to be no scope for new trees or a substantial scheme of landscape planting which would be essential to enhance the new development.

In support of the Council's aims to increase tree canopy cover within the Katesgrove Ward, I would prefer for the new building to be set back on the existing building line and the existing verge retained in full for tree and landscape planting with which to enhance tree canopy cover in Katesgrove Ward and the amenity of Elgar Road South in softening views of the new, taller building from the public highway. We would welcome the inclusion of green roof (on flat roofs) and living wall elements where possible in order to enhance the green credentials of the site and mitigate the long-term impact of climate change.

Ecology

The site is adjacent to Waterloo Meadows. There is a risk that the proposals would impact upon protected species and an ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) would need to be submitted with any future planning application.

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 may need to be carried out

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of the buildings or trees to be removed are thoroughly searched for bats and signs of bats; this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats then further surveys will not be required. However, if bats are found or if the building and/or trees have features suitable for use by roosting bats, further emergence and or dawn surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) may need to be carried-out to confirm the presence or absence of bats and if bats are present to establish the characterisation of the roost and mitigation requirements.

Lighting

The proposals should be designed to minimise any light spillage onto the Waterloo Meadows (which will be important for bats and other light sensitive species) and the applicant should submit details of the proposed lighting scheme with any application.

Summary

The pre-application site may contain habitats that may be suitable for use by protected species and surveys to confirm their presence or absence will need to be undertaken. These surveys, and any mitigation plan, will need to be submitted with the planning application as the application could not be able to be determined without this information. The applicant should be aware that some ecology surveys are seasonal and should ensure that they factor this into their timeframes for the project.

The proposals should be designed to minimise any light spillage onto the Waterloo Meadows (which will be important for bats and other light sensitive species) and the applicant should submit details of the proposed lighting scheme with any application.

Thames Water

Waste Comments

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

Thames Water have assessed and responded to the pre-application based on the information provided to date. Should the development proposal change, Thames Water would need to re-assess the application and review the comments accordingly.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

Water Comments

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

Canal & River Trust

No comments to make on the proposal.

Environmental Health

Land Gas

Part of Waterloo Meadows was used as a landfill. As the site is adjacent there is the potential for land gas to migrate, so it may be necessary to carry out a land gas investigation.

Ideally at least a 'phase 1' desk study should be submitted 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 requiring protection measures to be installed and/or remediation and a condition for validation and verification that this has been successfully installed/completed. The investigation shall be submitted and approved prior to development and the validation certification prior to occupation. If no gas or contamination concerns are 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 hereby approved should be burnt on site.

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.

Relevant Planning Policy and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) which states at paragraph 11 “plans and decisions should apply a presumption in favour of sustainable development”.

The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework

Reading Borough Local Plan (Nov 2019)

CC1 (Presumption in Favour of Sustainable Development)
CC2 (Sustainable Design and Construction)
CC3 (Adaptation to Climate Change)
CC5 (Waste Minimisation and Storage)
CC6 (Accessibility and the Intensity of Development)
CC7 (Design and the Public Realm)
CC8 (Safeguarding Amenity)
EN9 (Provision of Open Space)
EN12 (Biodiversity and the Green Network)
EN14 (Trees, Hedges and Woodland)
EN16 (Pollution and Water Resources)
EM3 (Loss of Employment Land)
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)
TR3 (Access, Traffic and Highway Related Matters)
TR5 (Car and Cycle Parking and Electric Vehicle Charging)

Supplementary planning documents/guidance

Sustainable Design & Construction SPD (2019)
Revised Parking Standards and Design SPD (2011)
Revised SPD on Planning Obligations under Section 106 (2015)
Affordable Housing SPD (2013)
Employment, Skills and Training (2013)
Tree Strategy for Reading (June 2010)

APPRAISAL

Main Issues

- Principle of development
- Housing Mix
- Design and character
- Residential amenity
- Health and Wellbeing
- Transport matters
- Natural Environment
- Sustainability
- Flooding and Sustainable Drainage Systems
- Section 106 - Affordable Housing; Employment, Skills and Training

- CIL
- Equality Act
- Other matters - Design Review Panel; Validation requirements

Principle of the development

Policy EM3 seeks to ensure the overall level of employment land is maintained. Although 220 Elgar Road South is not located within a Core Employment Area, Policy EM3 states that in other areas, the following matters will be considered when assessing proposals which would result in a loss of employment land:-

- (i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?
- (ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
- (iii) Is there a surplus of a similar size and type of accommodation in Reading?
- (iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
- (v) Is the need for alternative uses stronger than the need for the retention of employment land?
- (vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

The site is easily accessible with good links into and out of Reading. There is a Core Employment Area opposite (policy EM2f: Elgar Road) and Policy SR3: South of Elgar Road Major Opportunity Area states that this site will be for 330-500 residential dwellings. Although this site is south of 220 Elgar Road South this section of Elgar Road South is predominantly residential. Any future planning application would need to justify the loss of this employment building however the principle of residential development is considered acceptable subject to meeting the relevant planning policies and other material considerations as detailed below.

Housing Mix

Policy H2 states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. 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 3 or more bedrooms or more, having regard to all other material considerations.

The scheme comprises 22 flats:

- 1 x 3 bedroom
- 5 x 2 bedroom (4 person)
- 5 x 2 bedroom (3 person)
- 11 x 1 bedroom

The proposed mix fails to comply with Policy H2 however, although this policy is focused on achieving a minimum of 50% of 3 bedroom flats paragraph 4.4.9 makes it clear that 'when taken as a whole however, homes with two or more bedrooms, capable of accommodating families, represent the majority of the need, and this Plan identifies this provision as a priority'.

The proposed mix includes for 50% to be two bedroom or more and is therefore likely to be acceptable in this instance.

Design and character

Policy CC7 states that *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*. The NPPF in paragraph 127 c) states that planning policies and decisions should ensure that developments *“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)”*.

The proposed development would introduce a 3-4 storey flat roof building in a modern design with a staggered frontage. The submitted Planning Statement says there is no local architectural character to the area, however the properties to the south are traditional two storey semi-detached properties and the properties directly to the north more modern three storey flats. Officers feel there are sections of local character along this side of Elgar Road South and the proposed scheme does not pick up on any of the immediate character. It is clear that consideration has been given to the relationship with the neighbouring properties and the Council is not adverse to modern designs, and providing interest to the street scene is encouraged. However, the scheme as submitted is not considered sympathetic to the neighbouring properties in terms of its height or design. The staggered frontage and height has no relationship with the existing heights of the neighbouring properties on either side and it would be significantly higher than both neighbouring properties. Along with its flat roof design it is considered to be an incongruous addition within the street that is not considered to respect the scale of the surrounding properties.

There are a number of constraints at the site including the two storey semi-detached properties to the side and rear and the ‘L’ shaped design of the flats to the north. Any future scheme would need to respect building lines of the existing residential developments along this part of Elgar Road South and the levels should create a gradual transition from the two storey semi-detached dwellings to the south towards the three storey block of flats to the north. Therefore, it is considered that a 3-4 storey square block as proposed would not be an appropriate scale due to the neighbouring properties and its proximity to the street frontage.

Residential amenity

Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell;
- Crime and safety; or
- Wind

Impact on neighbouring amenity

Although consideration has been given to the location of windows there is a concern that the overall size of the proposal will be visually dominant and overbearing on neighbouring properties and due to its height, massing and scale would be harmful to their outlook with potentially some loss of light/overshadowing to the flats to the north. The ‘L’ shaped design of the existing flats to the north of the site means that many of the flats would face the side elevation of the proposed scheme and at 4 storeys high this would create a large blank façade, which is not considered acceptable in terms of outlook for the residents of these neighbouring flats. Due to the 3-4 storey nature of the proposed

block there are also concerns with regards to loss of privacy and overlooking from the rear facing windows.

Officers are not convinced at the present time that the proposed development would not be harmful to the neighbouring properties in terms of visual dominance, overbearing effects, harm to outlook, overlooking and loss of privacy.

Amenity of proposed dwelling

In addition to policy CC8 above, policies H5 (Standards for New Housing) and H10 (Private and Communal Outdoor Space) also apply. Policy H5 states that new build housing will need to comply with the nationally-prescribed space standard.

The submitted information does not provide the sizes of the proposed flats however Drawing No: A4080/SK01 - Site Plan does state that they will be in accordance with the nationally-described space standards which would comply with Policy H5 of the Reading Local Plan.

With regard to Policy CC8 any future planning application would need to demonstrate that the proposed flats have access to a suitable level of daylight and sunlight. Details of internal layouts have not been provided at this stage although it seems all bedrooms and living areas would have access to a window. However the submitted floor plan, Drawing No: A4080/SK02 shows some large rooms with only one window. Any future planning application would need to demonstrate that an adequate level of light could be achieved to the residential flats.

Policy H10 sets out that *‘Dwellings will be provided with functional private or communal open space... Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.’*

Paragraph 4.4.87 of Policy H10 sets out that in the past, the Council has sought the following minimum provisions for private or communal outdoor space and they provide a useful guide for proposals:

Flats outside central Reading:

- 1 and 2 bedroom: 25sqm per flat
- 3 or more bedrooms: 40sqm per flat

The submitted scheme does not provide any usable amenity space, although the Planning Statement mentions this will be provided on site. Although Waterloo Meadows is located at the rear of the site and is a benefit to the site, it does not remove the need for on-site amenity space.

Health and wellbeing

It is noted that the Planning Statement specifically asks what level of amenity space is now acceptable taking into consideration the current climate and whether a much greater importance is being put on the provision of amenity space.

In the first instance Policy H10 is applicable however the current Covid19 pandemic has highlighted the critical role our urban environment has on the way we live and work. It also highlights how, as a Local Planning Authority, supporting well planned development can have a huge impact on peoples’ health, wellbeing, safety and overall comfort. In addition to the above discussion on amenity, the Council has an obligation to consider the following health and wellbeing topics in relation to any new development. Maximising exposure to natural daylight, providing users with an external view and connection to nature are crucial measures in supporting the mental wellbeing of occupants and supported strongly by Policy CC8 (Safeguarding Amenity).

In recognition of the challenges presented by climate change and with due regard to the Council’s recently declared climate emergency, extreme temperatures can also have an immediate and

detrimental effect on health and wellbeing of residents. Effectively controlling and regulating temperature both in warmer months and those colder months is crucial in maintaining a healthy and comfortable environment which is supported by Policy CC3 (Adaptation to climate change).

Crime and the fear of crime also have a major impact on quality of life and the wellbeing of a buildings occupants. Enabling occupants to feel safe and secure is therefore essential to successful, sustainable communities and is supported by Policy CC7 (Design and the Public Realm).

Green infrastructure and access to green space provides benefits not only to the natural environment, but to the building's occupants. Introducing design elements within a building which supports human interaction with nature can lead to the promotion of a healthy lifestyle through the promotion of exercise, opportunities for relaxation and subsequently reducing stress levels. Therefore in answer to the question posed a much greater importance is being put on the provision of amenity space. The proposed development does not provide any usable amenity space and this would not be considered acceptable if submitted as part of a planning application.

Transport Issues

See comments above. Further information would be required should a planning application be submitted.

Natural Environment

See comments above. Concerns have been raised with regards to the lack of tree and landscaping.

Sustainability

Policy H5 (Housing Standards) requires that all new build housing integrate additional measures for sustainability. In light of this, a condition will be recommended to ensure the development meets the following requirements:

- Higher water efficiency standards under Regulation 36(3) of the Building Regulations; and
- All major new build residential development should be designed to achieve zero carbon homes;

Although part of a planning condition, these requirements would normally be administered through Building Regulations.

Flooding and Sustainable Drainage Systems

The rear part of the site is within Flood Risk Zone 2 and any formal submission would need to be accompanied by a Flood Risk Assessment. Reference should be made to NPPF and the technical guidance on flood risk.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6000/2115548.pdf

Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. It is noted from the Planning Statement that a detailed drainage strategy will be submitted with any future planning application.

Section 106

Affordable Housing

Policy H3 of the Reading Borough Local Plan states that residential development will make an appropriate contribution towards affordable housing to meet the needs of Reading. On sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing. For sites of 10 or more dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirements as appropriate.

If a viability assessment seeking to justify a less than policy compliant contribution is submitted at the application stage then it will be reviewed by the Council's Valuer. The current fee for a review of a submitted Viability Assessment for this scale of scheme is £8,000. For information the Council is due to adopt an amended Affordable Housing SPD which should be available to view on the Reading Borough Council website <https://consult.reading.gov.uk/dens/affordable-housing-supplementary-planning-document/>

It is noted that the Planning Statement refers to the applicant's intention to be policy compliant if it were financially viable to do so.

Employment Skills and Training

The Employment, Skills and Training SPD sets out the obligations which will be sought from developers at the construction and end user phases of development, to contribute towards a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.

As the proposed development is a major scheme (10 or more residential units), should a planning application be submitted, there would need to be a commitment to working with the Council to either develop a site-specific Employment and Skills Plan (ESP) or provide a financial contribution. A S106 agreement will be required to secure this.

CIL

Should a planning application be submitted the proposal would be liable to the Community Infrastructure Levy regime that is applicable to all decisions for planning applications made from the 01/04/2015. The current CIL rate for C3 residential is £157.18 per sqm (2020).

Equality Act

In determining applications the Council are required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence (including from consultation on the current pre-application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular pre-application.

Other matters

Design Review Panel

This is a scheme that is considered suitable for review at the Reading Design Review Panel (DRP) and it is suggested that prior to submitting a planning application, and as part of the current pre-application enquiry, an amended scheme (or the current scheme if you wish) be presented to the DRP for expert advice on your proposal. The DRP has been set up in partnership with local architects and meets once every 4 weeks, usually on a Thursday afternoon starting at 2.00pm. The Panel comprises mostly architects, although there are a small number of other design professionals, e.g. landscape architects, urban designers. It will primarily comment on design and urban design matters associated with an application. Each Panel will comprise 4 - 6 members taken from a larger rota of members. Due to the current situation the meetings take place over Zoom. This is a free service and it is considered to be beneficial to this proposal. New dates are just in the process of being agreed and I can advise you further on the process if you wish to use this service.

Validation requirements

Should an application be submitted documents should be submitted in accordance with the requirements as set out in the Council's Validation Checklist:

https://images.reading.gov.uk/2019/12/Validation_Checklist_Final_Dec_16.pdf

Conclusion

The principle of residential development is considered acceptable however there are concerns with the scheme as submitted in terms of its height, design and appearance, impact on neighbouring properties, lack of amenity space, tree planting and landscaping. Other consultation comments would also need to be addressed should a planning application be submitted.

This advice is given on a without-prejudice basis and in good faith and will not over-ride the formal consideration of a planning application by the Council. If you wish to discuss the contents of this letter, please contact me on the number given above.

Yours sincerely,

C. Ringwood *AA*

Claire Ringwood
Planning Section