

PLANNING APPLICATION FOR THE RETENTION OF 28 NO. TEMPORARY ACCOMODATION UNITS FOR TEMPORARY PERMISSION (10 YEARS)

PLANNING, SUSTAINABILITY AND DESIGN & ACCESS STATEMENT

LAND AT LOWFIELD ROAD, READING, RG4 6NL

ON BEHALF OF RERADING BOROUGH COUNCIL

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004



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 **DESIGN**  **ENVIRONMENT**  **PLANNING**  **ECONOMICS**  **HERITAGE**

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CONTENTS:

	Page No:
1.0 INTRODUCTION	1
2.0 SITE DESCRIPTION	2
3.0 THE PROPOSAL (DESIGN AND ACCESS)	6
4.0 PLANNING POLICY	15
5.0 SUSTAINABILITY STATEMENT	22
6.0 PLANNING ASSESSMENT	25
7.0 CONCLUSION	31

1.0 INTRODUCTION

- 1.1 This Planning, Sustainability, Design and Access Statement has been prepared by Pegasus Group on behalf of Reading Borough Council's Housing and Communities Department in support of a planning application for the retention of 28 no. accommodation units on land at Lowfield Road, Reading, RG4 6NL for a further 10 years.
- 1.2 The wider purpose of this application is to assist the Local Authority in its duty to provide temporary accommodation to those who are homeless, eligible for support and are in priority need.
- 1.3 This Statement will provide further justification for the proposed development (including the rationale for its temporary nature) by reviewing the site and its surroundings in terms of the relevant physical, social, economic and planning context as well as the relevant planning history and local and national planning policies.
- 1.4 The main justification section then explores whether the proposal is compliant with the policies in the adopted and emerging Development Plan and considers the proposal against other material considerations including the National Planning Policy Framework (NPPF), to which the appropriate weight is given.
- 1.5 This Statement should be read in conjunction with the associated drawings and supporting documents.

2.0 SITE DESCRIPTION

- 2.1 The site is located within Caversham, an urban extension of Reading located approximately 3km north east of the town centre. Access into the site is from the east via Lowfield Road.
- 2.2 The application site is approximately 0.6 hectares in area and comprises 28 no. (2 bedroom) self-contained temporary accommodation units with associated access; car parking; communal amenity space; refuse and bicycle storage; a play area and associated landscaping.
- 2.3 The development was permitted under planning permission ref: 160762 in August 2016 and expired in August 2021. The present continuation of the use of the site under this decision is therefore currently in breach of planning control and in need of regulation.
- 2.4 Prior to the temporary consent the site contained a central road with approximately 19 no. concrete pads either side. Mobile homes were once positioned on these concrete pads. However, satellite imagery suggests these were demolished in the mid to late 2000's. The site is contained within a belt of trees and vegetation along all perimeters with the exception of the access point.
- 2.5 The surrounding areas is a predominantly residential area and the site is surrounded by detached and semi-detached properties to the south and east. The architectural detail of these properties varies although they are typically of a brick construction.
- 2.6 Beyond the site's vegetation, land to the west comprises the grounds of the Reading Cemetery & Crematorium, while land to the north is open green space, comprising part of Caversham Park. The Park, Cemetery and Crematorium combined are identified as a 'Major Landscape Feature' in the Local Plan.

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- 2.7 Caversham Park is a Grade II Registered Park and Garden. Contained within Caversham Park is the BBC Records Building, a Grade II Listed Building. Beyond the Cemetery and Park, the surrounding area is in residential use. The southern section of the park, noted to be closest to the site, comprises meadow land and includes 2 no. copses of mature trees. The land slopes southwards and overlooks the suburban settlement of Caversham.
- 2.8 Beyond the site boundary to the north east of the site lies a strip of unmanaged scrub vegetation, approximately 10m wide. This has been identified by the Council's Proposals Map as a strip of vegetation which is of ecological value, however, wider searches undertaken as part of the ecological assessment confirm that this is neither a statutory nor a non-statutory protected wildlife site.
- 2.9 In terms of local amenities, local shops are present along the ground floor level of Rosemore House, approximately 219m east of the site. The ground floor frontage is occupied by takeaways and local convenience shops while part of the associated car park is occupied with a mini recycling centre.
- 2.10 In terms of public transport connections, the following bus services stop on Lowfield Road:
- Reading Bus Route 23 (20 mins frequency Mon-Sat; 30 mins frequency on Sundays); and
 - Community Link 28 (Council contracted service).
- 2.11 Mickland's Primary School is located approximately 330m south west of the site.
- 2.12 The site falls within Flood Zone 1, an area at least risk of flooding.

Planning History

- 2.13 Planning permission ref. 160762 was granted in August 2016 for the following development:

'Temporary permission (5 years) for 28no. (2 bedroom) temporary accommodation units with vehicular access, car parking, communal amenity space, refuse and bicycle storage, a play area, and landscaping.'

- 2.14 A discharge of conditions application ref. 170689 was approved in December 2017 for the following:

'Discharge of conditions 5 (site contamination assessment), 10 (construction noise and dust control), 13 (tree & vegetation protection), 15 (hard landscaping & boundary treatment) and 22 (sustainable drainage system) of planning permission 160762.'

- 2.15 A non-material amendment was made under application ref. 172193 was approved in January 2018 for the following:

'Non material amendments to planning permission 160762 (temporary permission for 28 temporary accommodation units and associated works) to vary the wording of conditions 3 (approved plans), 17 (landscaping and play) and 18 (landscape maintenance) to reflect updated documents approved as part of discharge of condition application 170689.'

- 2.16 A discharge of conditions application ref. 180116 was determined in December 2017 for the following:

'Discharge of conditions 19 (lighting), 20 (refuse) & 21 (litter) of planning permission 160762.'

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- 2.17 The Council agreed that although it was not technically possible to discharge conditions 19, 20 and 21 because the development had already commenced, the development was found to be satisfactory in these regards.

3.0 THE PROPOSAL (DESIGN AND ACCESS)

3.1 The application seeks planning permission for the retention of 28 no. accommodation units for a further 10 years. These units are of modular form and stacked to create 7 no. two storey blocks.

3.2 The full description of development reads:

"Retention of 28 no. (2 bedroom) self-contained temporary accommodation units with associated vehicular access; car parking; communal amenity space; refuse and bicycle storage; a play area and landscaping for temporary permission (10 years)."

Need for Temporary Accommodation

3.3 The Council's Homelessness Strategy 2020-2025 acknowledges the success of the previous strategy (in reducing the need to house homeless households) that, in combination with the Homelessness Reduction Act 2017 that required a duty to refer households at risk of homelessness by other bodies, secured more proactive intervention. This has been combined with increased use of the private rental sector, facilitated by the Council's Rent Guarantee Scheme and Deposit Guarantee Scheme, reducing the need for the statutory housing of households (i.e. reliance on alternative solutions). One of the strategy's listed successes against the previous 2015-2020 strategy's aims includes the provision of the dedicated temporary accommodation under the modular housing at the application site.

3.4 The number of households that the Council has a statutory duty to house has accordingly reduced since the original temporary consent for the facility, but a statutory duty remains to house 147 households as of 2020/21¹. The Homelessness Strategy notes that while the rate of households housed in Bed and Breakfast (B&B) emergency accommodation has significantly reduced, there remains a necessity for this solution in the absence of any alternative

¹ Local Authority Housing Statistics data returns, England 2020-21 (Department for Levelling Up, Housing and Communities)

accommodation available. The Homelessness Strategy notes that this has in part been reduced by alternative temporary accommodation such as at the application site, but also the use of Council controlled sites hosting short-term temporary accommodation while awaiting redevelopment, that are inherently not a long-term solution for supplying (temporary) accommodation.

- 3.5 The need for the Lowton Road accommodation therefore remains. The underlying causes of homelessness also remain in effect with no indication of future relief. The Homelessness Strategy states that the economic picture makes the local housing market highly competitive:

"Reading has low unemployment and a highly skilled local working population, and it is a major transport interchange. It was named one of the two highest performing cities in the 2018 Good Growth for Cities Index¹⁴ reflecting continued improvement across a range of measures, particularly income and transport. These socio-economic factors create a competitive housing market, pressure across all tenures and high market rents. Our biggest challenge is demand for affordable housing outstripping supply where Reading has some of the most deprived neighbourhoods in the Thames Valley.."

- 3.6 The Report also identifies that the availability of affordable housing is in scarce supply, stating that:

"Social housing Local authorities, especially in the South East, know that their existing social housing provision cannot meet homelessness needs. We know that social housing can alleviate the homelessness of some households and we afford them reasonable preference within our Allocations Scheme, but it cannot meet the accommodation needs of those who present to our Service. Reading has a progressive new-build agenda for social housing but high land prices, the Right to Buy and increased demand for affordable housing, for all housing needs, means that our demand overwhelms supply We have faced additional challenges where housing associations have become more cautious/stringent on their policies for accepting families and single people with more complex needs. Overcoming this is a priority area for Reading where our analysis shows complex homeless households as a growing need."

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- 3.7 The report goes onto to set out how the private rental sector has seen marginal growth since 2019 exposing more low-income households to higher housing costs amongst a national picture of increased in-work benefit and reduced access to housing allowances under the benefit system. This is combined with wider welfare changes (such as the introduction of the Universal Credit system) that maintain the risk of homelessness.

 - 3.8 Where suitable private solutions or permanent affordable accommodation is not available, the use of dedicated temporary accommodation is necessary and, failing this, emergency B&B accommodation as a last resort. B&B accommodation is unsuitable, unsettling and disruptive for homeless households. The Reading Homeless Strategy 2020-2025 notes that *"...perhaps our biggest [challenge] is sustaining our reductions in emergency Bed and Breakfast placements"*.

 - 3.9 To overcome this and to ensure the Council fulfils its duty to accommodate these households the site at Lowfield Road remains critical in both providing temporary accommodation and reducing the reliance on B&B accommodation..

 - 3.10 The Council's rationale for the scheme to be temporary remains the availability of funding. Realistically, it would not be feasible to develop permanent housing on such a limited budget, particularly compared with the existing modular housing now already in place.

 - 3.11 The proposal forms part of the Council's housing strategy as the temporary use of this site seeks to provide suitable temporary accommodation to meet the Council's ongoing statutory obligations. Overall, this remains an effective short-term solution to alleviate the chronic levels of homelessness given the restricted availability of funding.

Design Principles

- 3.12 The policies stated in Section 4 in conjunction with an assessment of the area's local character have been considered and, as far as practicable, have influenced the design of the development. Every site presents unique opportunities and

constraints which can be exploited or adapted to with an appropriate design. Opportunities and constraints for the site are indicated below:

3.13 **Opportunities** for the retention of the development include:

- Effective use of previously developed land;
- The site forms 'transitional' space between Caversham Park and the residential housing to the south and east;
- It will alleviate the chronic shortage of suitable temporary accommodation;
- Sustainably located within the settlement boundary;
- Highly vegetated perimeter providing screening and sense of enclosure; and
- Plot is of an adequate size to accommodate the units and amenity space;

3.14 **Constraints** for the development include:

- Preservation of the adjacent 'Major Landscape Feature' and Registered Park and Garden;
- Restricted funding; and
- Chronic need to retain the development.

3.15 The remainder of this section explains how the proposed development addresses the site context and local characteristics in respect of its:

- i. Use;

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- ii. Amount;
 - iii. Layout;
 - iv. Scale;
 - v. Materials and Appearance;
 - vi. Landscaping; and
 - vii. Access.

Use

- 3.16 The existing development consists of 28 no. temporary accommodation units on a previously derelict plot of land situated within the settlement boundary.
- 3.17 The site contains 32 no. car parking spaces, amenity space (including drying areas and refuse storage), additional landscaping and a play area.
- 3.18 The proposal seeks to retain the 28 no. temporary accommodation units with associated parking, amenity space, landscaping and play area for a further 10 years.

Amount

- 3.19 The development comprises 28 no. units each with a GIA of 50.6 sqm. Each bedroom is 12.2 sqm in area and the living area is approximately 24.4 sqm.

Layout

- 3.20 The site is laid in a linear format and follows the sites previous arrangements with

built form either side of the central road. This layout makes the most efficient use of space and was a cost effective solution in terms of ease of construction, connection to utility services and the sites ongoing management.

- 3.21 The site is occupied by 7 no. blocks of development with communal amenity space and car parking located adjacent to each block. Play space is provided at the south eastern end of the development.
- 3.22 The layout of each unit is illustrated on the General Arrangements Plan (Drg No. 16/007/01). Each block has a ground and first floor comprising of 4 no. modular units. Between each unit a 'service strip' of 1m is provided. Each unit is laid out to provide self-contained living accommodation with bathroom, kitchen-diner, living room and 2 no. bedrooms.

Scale

- 3.23 Each block is approximately 5m in height with a footprint of circa 126 sqm.
- 3.24 The blocks are of a height which is sympathetic to the single storey residential properties within the locality.

Appearance

- 3.25 Each block is timber clad with UPVC windows and doors and painted metal staircases. Canopies are provided above the external staircase.
- 3.26 Street lighting is present in the form of LED Streetlight Columns and Heads which match the Council's standard installation. LED bulkhead lights are provided above the external staircases. Boundary treatment comprises close board 1800mm timber fencing with concrete posts and gravel boards.
- 3.27 In this case, the sites functionality is priority and to a large extent has informed the proposals simplistic appearance. Nonetheless, the sites appearance and how

it sits within its context was a key consideration.

- 3.28 The site is noted to be a 'transitional' space located between an area of open space to the north and west and residential to the east and south. As such, strong focus was given to site landscaping. Timber cladding was considered an acceptable material as it is noted that a number of properties within the locality have clad detailing.
- 3.29 The height of the buildings, coupled with their natural appearance results in minimal impact to the nearby 'Major Landscape Feature' and Registered Park and Garden. It should be noted that the site remained derelict for approximately 5-10 years prior to this development and offered little in terms of contribution to the setting Caversham Park. The temporary proposals are an enhancement to the sites previous appearance.

Landscaping

- 3.30 The site's perimeter is occupied by an established tree/hedgerow belt which largely screens the site from the adjacent Cemetery and nearby Caversham Park. As such the sites implemented landscaping scheme creates an attractive setting for the existing dwellings and provides opportunities for play along with the creation of wildlife habitats.
- 3.31 Within the northern and southern amenity green spaces, the boundaries of the site have been enhanced by the use of shrub and tree planting. This softens the close boarded fence boundary of the site which has been retained and complements the offsite vegetation which surrounds the site. There are opportunities for informal play and recreation within the southern amenity space with the siting of naturalistic play features which provide a variety of play experiences for all ages along with the provision of seating and a bin.
- 3.32 A combination of trees, hedges, and areas of shrub planting along with amenity and species rich long grass creates attractive and seasonally diverse communal gardens and amenity green space. Planting species have been chosen to suit the

character of the street as well as meet the required function. Within the amenity green spaces, native species are favoured in order to create habitats for wildlife which help to integrate the development within the existing landscape framework surrounding the site.

- 3.33 The landscape design of the communal gardens and along the street creates a sense of place through definition of each garden with planting, amenity grass with hedgerow against the boundary close board fence. To the rear of the parking spaces there is low shrub planting to soften the transition from the street to the private communal gardens. Within the communal garden there are opportunities for storage and refuse areas as well as an area of hard surfacing for drying.
- 3.34 Overall, the landscaping onsite integrates the development into the surrounding area whilst defining the communal gardens and amenity green spaces to be functional and aesthetically pleasing spaces with the opportunity for play for residents.
- 3.35 The Existing Site Plan (Drg. No. 16/007/02A) and supporting Landscape Masterplan (Drg No. BRS.6499_01 Rev G) illustrates that the implemented landscaping scheme.

Access

- 3.36 The site's previously existing access from Lowfield Road is used to gain vehicular and pedestrian access into the site.
- 3.37 There are 32 no. car parking spaces, providing one space per unit plus 4 no. visitor spaces. This is in accordance with the Revised Parking Standards and Design Supplementary Planning Document (SPD) which applies a maximum of 1.5 parking spaces per dwelling plus 1 space per 4 dwellings for visitor parking.
- 3.38 Bicycle sheds are located within the amenity area for each block. Each unit is allocated a shed which has sufficient space to accommodate 2 no. bicycles. This exceeds local guidance which requires a minimum of 0.5 cycle spaces per unit.

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- 3.39 In accordance with local policy, all ground floor units are provided with ramps for the safe access/egress of pushchairs or the mobility impaired.

Summary

- 3.40 In summary, the existing development on site responds positively to its local context which is suitable for the site given its 'transitional' location between Caversham Park and an established residential area.
- 3.41 In terms of impacts upon the adjacent landscape and heritage designation, the existing vegetation largely screens the development from Caversham Park, particularly given the low rise scale of the development and additional landscaping. The development represents a temporary improvement to the site which in its previous form, was noted to bring no benefit to the setting of Caversham Park.

4.0 PLANNING POLICY

4.1 The following policies are considered relevant to the proposal.

National Planning Policy

4.2 The National Planning Policy Framework was revised in July 2021 and outlines how the Government expects to promote and stimulate economic growth. The following sections are considered relevant to this planning application:

4.3 The Ministerial Foreward confirms:

"Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every decision."

4.4 **Paragraph 11** states that, for decision taking, a presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay.

4.5 Core land use principles are set down at **Paragraph 119**. These include the need to 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.

4.6 The NPPF provides no specific policies on the matter of accommodation for the homeless but nonetheless states at **Paragraph 60** the need for Local Authorities to ***'support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed with unnecessary delay.'***

4.7 **Paragraph 62** advises that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service

families, travellers, people who rent their homes and people wishing to commission or build their own homes.

- 4.8 The NPPF places great emphasise on the conservation and enhancement of heritage assets and their settings. **Paragraph 202** states, *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, securing its optimum viable use."*

Local Planning Policy

- 4.9 Local planning policy is taken from the Reading Borough Local Plan adopted November 2019.

- 4.10 Additional policy and supporting information is drawn from:

- Affordable Housing SPD 2021;
- Revised Parking Standards 2011; and
- Strategic Housing Market Assessment (February 2016).

Reading Borough Local Plan (2019)

- 4.11 **Policy CC1** reflects the NPPF's presumption in favour of sustainable development.
- 4.12 **Policy CC2** states that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 4.13 **Policy CC3** confirms that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;
- Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.

4.14 **Policy CC4** advises on decentralised energy. It states that any development 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.

4.15 **Policy CC5** requires that measures to minimise the generation of waste through construction, use and the life of the building are demonstrated, including the promotion of layouts which provide sufficient space for waste storage, reuse, recycling and composting.

4.16 In terms of the density of development, **Policy CC6** states that within the Borough, this will be related to the level of accessibility by a range of means from the site to a range of services and facilities.

4.17 **Policy CC7** relates to design and the public realm. It states that the various components of the form of development including scale, density, layout and

appearance will be assessed to ensure that the proposal makes a positive contribution in terms of urban design.

- 4.18 **Policy EN1** advises that applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance features or setting of the park or garden, key views out of the park, or prejudice its future restoration.
- 4.19 **Policy EN9** advises on the provision of open space. On sites of less than 50 dwellings, new open space provision, improvements or enhancements will be sought.
- 4.20 **Policy EN12** states that on all sites, ensures that development retains, protects and if possible, incorporates features of biodiversity into the scheme. Development will not be permitted where there would be a direct or indirect adverse impact on an ecological designation, unless it can be clearly demonstrated that: i) the need for development outweighs the need to protect the value of the site; and ii) appropriate mitigation are provided.
- 4.21 **Policy EN14** seeks to protect trees, hedges and woodlands from damage or removal.
- 4.22 **Policy EN16** advises that development will only be permitted on land affected by contamination where it is demonstrated that the contamination can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and wider environment, during demolition and construction phases as well as during the future use of the site.
- 4.23 **Policy EN18** advises that all major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards.
- 4.24 **Policy H1** states that provision will be made for at least an additional 15, 847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.

- 4.25 **Policy H3** deals predominantly with the thresholds and levels of provision of affordable housing associated with various types and scales of development. **Of relevance to this proposal, for a 100% affordable site, is the statement that the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs.** An appropriate tenure mix will be sought which will include social rented, affordable rent, intermediate rent and shared ownership. Priority needs for 2019 were stated to be family sized housing with 2 or more bedrooms.
- 4.26 **Policy H5** sets the standards for new housing. 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.
- 4.27 **Policy H10** states that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space.
- 4.28 In relation to highways matters, **Policy TR1** states that all development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.
- 4.29 **Policy TR5** advises on 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. Within communal car parks for residential developments of at least 10 spaces., 10% of spaces should provide an active charging point.
- 4.30 **Policy CA1** allocates the application site for residential development. Site CA1c – Land at Lowfield Road is described within the Policy as a site is suitable for residential development of 24-36 dwellings but that the potential for contamination biodiversity and trees close to the site should be considered. Development should avoid detrimental visual effects on the North Reading Dry Valley and Chilterns Escarpment major landscape feature.

- 4.31 Supplemental text (paragraph 8.3.5) identifies that there is potential for allocated sites such as the application site to accommodate other uses which have not been anticipated by the Local Plan. This includes the potential for specialist housing provision for specific groups, outside the C3 dwellinghouse Use Class. Differing uses for these sites could reduce the amount of housing allocated for the site. This will be appropriate provided that it does not harm the chances of delivering sufficient housing to meet the targets set out in local policy.

Affordable Housing SPD 2021

- 4.32 The Affordable Housing SPD was adopted in March 2021. The SPD details the need for affordable housing in the Borough.
- 4.33 The document confirms there is a high level of demand for affordable housing and confirms at paragraph 3.2 that as of May 2020, there were 3,417 households on the Housing Register. During 2019-2020, 1,066 households approached the Council at risk of homelessness.
- 4.34 Paragraph 3.3 confirms that the need for affordable housing in Reading is very substantial and that the most up-to-date full assessment of need for affordable housing calculated that there was a need for 406 affordable homes each year up to 2036 to meet existing and newly arising needs, which would equate to almost 60% of the total housing needs over the same period.
- 4.35 Paragraph 3.6 confirms that over the period of the Local Plan so far (2013-2020), 648 new affordable homes have been delivered, which equates to an annual average of 93 homes. It is therefore clear that the supply is falling some way short of the assessed need of 406 per year. It is therefore essential that all sources of affordable housing are maximised.

Revised Parking Standards and Design SPD October 2011

- 4.36 This document sets out the absolute parking requirements for residential accommodation in the Borough.
- 4.37 For one to two bedroom flats, 1.5 parking spaces per dwelling are required. In addition, 1 space per 4 dwellings is required for visitor parking.

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- 4.38 A minimum provision of 0.5 cycle spaces should be provided for each 2 bedroom unit. Provision should be in the form of a communal store which is covered.

Annual Monitoring Report and Five Year Housing Supply

- 4.39 The Council's latest 5 year housing land supply is provided at Appendix II of Reading's Annual Monitoring Report 2020/2021 (dated December 2021).
- 4.40 The Council can demonstrate a housing land supply for 5,286 homes (including C3 and other forms of accommodation) over the next five years. When measured against the housing objectives identified within the Local Plan, this equates to 6.95 years housing land supply which represents a healthy housing land supply.
- 4.41 The amount of affordable housing completed 2020-21 is 54 which is significantly below previous years of 2018-19 (158) and 2019-20 (80), and more in line with the lower figures between 2015 and 2018.

5.0 SUSTAINABILITY STATEMENT

- 5.1 As far as practicable, the units have been designed to cope with and mitigate against the effects of climate change.

Sustainable Location

- 5.2 The site comprises previously developed land within an urban area which is residential in character. The site is within close proximity to bus routes, local shops, schools and open space.

- 5.3 Facilities within walking distance of the site include:

- i. Rosemore House, approximately 219m east of the site, where local shops and takeaways are present;
- ii. A mini recycling centre, approximately 219m east of the site;
- iii. Public transport connections, the following bus services stop on Lowfield Road:
 - Reading Bus Route 23 (20 mins frequency Mon-Sat; 30 mins frequency on Sundays); and
 - Community Link 28 (Council contracted service).
- iv. Mickland's Primary School approximately 330m south west of the site; and
- v. Caversham Park, north of the site.

- 5.4 As such, the proposed use and its location is considered sustainable.

Energy Efficiency Measures

- 5.5 The development is of modular construction. The construction methods for this type of development has improved significantly in recent years. Each unit is designed and engineered with particular attention to thermal and acoustic performance and have fire resistant walls. This means each unit is better insulated and are warmer, safer and quieter.

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- 5.6 All fenestrations have been installed with double glazed UPVC for optimum thermal performance and solar heat gain efficiency.
 - 5.7 For maximum solar gain, the buildings are orientated within 20 degrees facing north to maximise the windows facing the north.
 - 5.8 The development is surrounded by a dense belt of vegetation which performs as a shield against the elements and provides shade to the amenity space at various times of the day.
 - 5.9 No artificial cooling has been implemented in these units. Cross ventilation and appropriate internal shading such as blinds and curtains have been used to mitigate against the effects of overheating from the sun.

Water Efficiency

- 5.10 Water use is conserved by flow restrictors to taps and showers, including the installation of a dual flush toilet.

Waste & Recycling

- 5.11 During construction, waste residues were minimal on the basis that the modular units will be constructed offsite. Any waste generated onsite was dealt with responsibly and in accordance with the waste hierarchy, opting to reuse and recycle where possible.
- 5.12 Adequate waste and recycling storage has been incorporated into the layout, ensuring that recyclables and waste is separated before collection.

Renewable Energy

- 5.13 No on-site energy generation is proposed due to the temporary nature of the development and limited availability to funding (scheme viability).
- 5.14 As far as practicable, sustainability measures have been incorporated into the development. The measures identified above confirm that the development is partially compliant with sustainability policies CC2, CC3 and CC4. In this unique circumstance, partial compliance is accepted in light of the strong material

considerations which exemplify the immediate social need for this type of accommodation.

6.0 PLANNING ASSESSMENT

6.1 This section of the Statement assesses the acceptability of the proposal against the following key considerations:

- Principle of Development;
- Impact on Residential Amenity (future and neighbouring residents);
- Impacts on the adjacent Landscape Feature and Registered Park and Garden; and
- Other environmental factors;

6.2 It should be noted that the Design and Access Statement (Section 3) assesses the application against the latest landscape and design policies, and as such this is not intended to be repeated in this section.

Principle of Development

6.3 A number of factors conclude that this development is accepted in principle. Firstly, and as discussed in Section 5 (Sustainability Statement) the site is located within Caversham, an urban area situated to the north east of Reading town centre. The site is within close proximity to local amenities including public modes of transport. As such, the site is sustainably located in accordance with Local Policy CC1.

6.4 Secondly, the site is on previously developed land which both the NPPF and Local Plan seek to develop in preference to the development of greenfield land. The scale of development (28 no. units) is considered appropriate, in accordance with the NPPF's policy to maximise the efficiency of brownfield land, and compliant with Local Policy CA1a which stipulates that the site can accommodate between 24-36 dwellings.

6.5 Thirdly, local policy identifies that in some cases allocated sites may be used for alternative purposes such as for the development of specialist housing for vulnerable people. As such, the use for the application site is considered acceptable providing it does impact upon the Council's ability to meet its housing targets.

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- 6.6 Furthermore, the temporary nature of the proposed development ensures that the Council will be able to retain control over the future disposal and use of the land should the housing needs change.
- 6.7 As identified within Reading's Annual Monitoring Report 2020/21, the Council can demonstrate land supply for 5,286 homes over the next five years which equates to 6.95 years housing land supply which is considered to be a healthy supply.
- 6.8 However, notwithstanding this, as set out in the Affordable Housing SPD, the supply of affordable housing has been short of the assessed need and it is essential that all sources of affordable housing are maximised. Furthermore, during 2019-2020, 1,066 households approached the Council at risk of homelessness highlighting the importance of the need for temporary accommodation such as that proposed.
- 6.9 In light of the Council's healthy 5YHLS, the proposed temporary development of the application site will not impede the Council's ability to meet its housing objectives or delivery of homes based upon objectively assessed need.
- 6.10 Lastly, the temporary nature of the development is acceptable in light of other material considerations such as: (i) the Council's homelessness records, illustrating a sharp rise in the number of homeless households eligible for assistance; (ii) Legislation including the Housing Act 1996 as amended by the Homelessness Act 2002 which places a duty on Local Authorities to accommodate homeless households in priority need; and (iii) Reading's Preventing Homelessness Strategy 2020-2025 which identifies this site for temporary development as part of the Council's wider strategy to tackle homelessness and over use of unsuitable B&B accommodation.
- 6.11 These material considerations hold significant weight and place strong emphasis on the social need for this development. As such, the proposal is acceptable in principle.
- 6.12 Local policy H2 seeks to make provision for 3+ bedroom dwellings where developments are proposing 10 or more dwellings, however, identifies that regard may be given to other material considerations. Given the temporary nature of the development and importantly their temporary occupation by households in immediate need, limited weight is given to this policy. Other material considerations which identify the immediate social need for this development hold greater weight.

6.13 Overall, for the reasons set out above, it is considered that the continued use of the site for a further temporary period of 10 years for 28 no. units of accommodation is entirely acceptable in principle.

6.14 Other factors to be considered as part of the balancing exercise are assessed below.

b) Impact on Residential Amenity

6.15 The layout and landscaping scheme seek to provide a visually attractive and safe environment for occupants and neighbouring residents.

i) Would the proposal constitute an acceptable living environment for its future occupiers?

6.16 The layout and landscaping scheme seek to provide a visually attractive and safe environment for occupants. Parking and communal amenity areas are located immediately adjacent to each block, providing adequate provision of outdoor amenity space including passive surveillance of these area and parked vehicles.

6.17 In terms of National Space Standards, a two bedroom (4 person) flat would need to have a minimum floor area of 70sqm and a two bedroom (3 person) flat would need to be 61sqm. Each unit is 50.6sqm, falling short of the National Space Standards however, it is noted that these standards apply to permanent dwellings and are not strictly applicable to this type of development which is intended to be occupied by households for a temporary period.

6.18 Of consideration is the Council's Adopted Internal Floorspace Standards² which sets a minimum of 6.5sqm of useable bedroom floorspace for 1 person or 10.5sqm for 2 people, and 7sqm of kitchen space. While these standards are applicable to Houses of Multiple Occupation, they can be applied to this development as minimum standards to ensure sufficient space for temporary occupation. The proposed units exceed these standards with bedroom sizes approximately 12sqm and the living area approximately 24sqm in area. The areas proposed are therefore sufficient to meet the short term needs of prospective occupiers.

² Appendix 1 of Residential Conversion SPD (Nov 2013)

6.19 The layout demonstrates the site is large enough to accommodate outdoor amenity space for current and future occupiers. Additionally, bin storage is provided allowing the occupants of the units to safely access their refuse and recycling.

6.20 Overall, the proposals provide suitable living accommodation for the temporary occupiers of these units and as such is in accordance with local policy H5.

ii) Would the proposal unacceptably harm the residential amenity of adjoining occupiers?

6.21 The site is enclosed within an established belt of hedgerow along all boundaries. This vegetation screens the site from nearby properties. As a result the proposals do not affect privacy and overlooking, access to sunlight and daylight, noise and disturbance, visual dominance or overbearing effects from the development.

6.22 Overall, the proposal will not cause any harm to the amenity of existing residents and will provide an enjoyable living environment for future occupiers. Therefore, the proposal is compliant with local policy CC8.

c) Impacts on the adjacent Registered Park and Garden and Local Landscape Feature

6.23 This section demonstrates that the development does not harm the setting of the nearby Registered Park and Garden and heritage asset, Caversham Park.

6.24 Caversham Park is a Grade II Registered Park and Garden. Contained within Caversham Park is the BBC Records Building, a Grade II Listed Building. Beyond the Cemetery and Park, the surrounding area is in residential use. The southern section of the park, noted to be closest to the site, comprises meadow land and includes 2 no. copses of mature trees. The land slopes southwards and overlooks the suburban settlement of Caversham.

6.25 In terms of setting, the Listing Description identifies that the park is enclosed by 20th Century development with allotments and the Reading Cemetery and Crematorium to the south. The house and park are noted to be on a plateau to the north where views of Caversham and Reading are noted to the south.

- 6.26 The site in its previous, derelict condition contributed very little to the setting of the heritage asset. However; the mature vegetation surrounding the sites perimeter contributes positively to the setting of Caversham Park.
- 6.27 Given that views to the south, towards the residential area of Caversham are noted, the principle of additional accommodation is accepted as a suitable form of development which is unlikely to significantly harm the heritage asset. In terms of design, the development is deliberately low rise to ensure the units are not a focal point of any panoramic views experienced from the house within Caversham Park. Furthermore, the units are screened to a large extent by the sites existing perimeter vegetation.
- 6.28 As such, the development continues to conserve the setting of this heritage asset. Notwithstanding the above, if the Council were minded to assess the application against Paragraph 202 of the NPPF (whereby 'less than substantial harm' to the heritage assets was perceived) the public and social benefits of the proposal will substantially outweigh any perceived harm.
- 6.29 In summary, the development accords with both national and local guidance relating to development affecting heritage assets.

d) Other Environmental Factors

i) Land Contamination

- 6.30 Policy CA1c identifies possible land contamination issues. As such, a Phase I Geotechnical Survey was previously undertaken in support of application ref: to ascertain the likely risks. The Survey concluded that the risk to human health and the environment from potential contamination is low to moderate and demonstrated that land stability is not an issue (i.e. no mines are present beneath the site).
- 6.31 Following planning permission 160732, a discharge of condition application was submitted ref: 170689 which included a full contamination assessment to deal with Condition 5. The report did not identify any groundwater or ground gases and was discharged in December 2017. The proposed scheme was constructed in accordance with the recommendations set out within the report.

ii) Ecology

- 6.32 The site's perimeter is occupied with dense vegetation and part of the vegetation along the north eastern site boundary is identified within the Council's Proposals Map (2012) as part of the wider Green Network. To enhance this network the landscaping includes native species and has been incorporated with the wider vegetation to create a habitat corridor.
- 6.33 Other ecological enhancements included the installation of bird and bat boxes and these have been implemented in accordance with planning permission ref: 160762.
- 6.34 The Ecology report submitted with the previous application concluded that the development will not adversely affect any ecological designations within the area and recommends mitigation measures during construction ensured the proposals would not impact protected species. No further surveys were required as part of planning permission 160762 and therefore it is not considered that any other surveys are required for the retention of this development.
- 6.35 The landscaping scheme including the mitigation measures and ecological enhancements expressed ensured the proposal would not have an adverse impact upon local flora and fauna and it is not considered the retention of the 28 no. units at the site would alter these conclusions.

7.0 CONCLUSION

- 7.1 This Planning, Sustainability, Design and Access Statement has been prepared by Pegasus Group in support of an application for the retention of 28 no. accommodation units on land at Lowfield Road, Reading, RG4 6NL for a further 10 years.
- 7.2 This Statement has demonstrated that the principle of the proposal is entirely acceptable in this residential location with no unacceptable impacts on the amenities of the nearby residents.
- 7.3 It is considered that the proposal respects the character of the local area in terms of scale, mass and appearance. Additional landscaping has been incorporated into the scheme to respect the nearby landscape features and heritage assets. The proposals do not impact the setting of the nearby Registered Park and Garden.
- 7.4 This Statement has demonstrated that the development is compliant with both the NPPF and local planning policy and it is therefore considered that planning permission should be granted for the application proposal.
- 7.5 As far as practicable, sustainability measures have been incorporated into the scheme however, due to the temporary nature of the development and financial restrictions, the proposals represent a minor departure from local policy CC4 (sustainable construction and design). Despite this and **on planning balance the social need for this development is afforded significant weight over and above any minor departures from local policy** therefore, it is respectfully requested that this application be permitted without delay.