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

97a-117 Caversham Road, Reading, RG1 8AN

August 2022



Planning Statement

97a-117 Caversham 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 97a-117 Caversham Road and associated land to the rear (“the site”).

1.2. The Description of Development for this application is:

Redevelopment of 97a-117 Caversham Road and associated land to the rear, including demolition of existing buildings, to provide 60 dwellings, including affordable housing, together with associated access, parking and landscaping.

1.3. The site edged red on the site location plan at Appendix 1, comprises the now vacant Carters store, and other adjacent commercial units fronting Caversham Road, with car MOT workshop and a number of other associated industrial and commercial buildings and hardstanding to the rear of the site.

1.4. All of the site is within the Station/River Major Opportunity Area as defined in the Reading Local Plan (November 2019) and, excluding frontage buildings 97a – 107 Caversham Road, forms part of the specific ‘West of Caversham Road’ allocation for residential use under Policy CR11f. Additional land within the allocation is to the south of the site, comprising a self-storage facility and associated buildings and curtilage.

1.5. The proposed development has been subject to a “Level 3” pre-application discussion with Reading Borough Council, under reference 220265. The written response was issued by Reading Borough Council 27th June 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 site is located on the western side of Caversham Road, immediately to the north of the roundabout linking to Vastern Road.
- 2.2. All of the site is within the Station/River Major Opportunity Area and the majority of the site is part of the West of Caversham Road allocation for residential development. The image below shows the site in relation to the extent of the allocation.

Figure 1: Application Site in relation to West of Caversham Road Allocation



 Site allocated under Policy CR11f

 Application site

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2.3. The site comprises the following buildings fronting onto Caversham Road:

- 97a Caversham Road, a two storey end of terrace property with commercial use at ground floor, connected to buildings to the south outside of the site;
- 99-103 and 107 Caversham Road, linked three storey properties with vacant retail use at ground floor (Carters store);
- 115-117 Caversham Road, a three storey end of terrace property with commercial use at ground floor, connected to dwellings to the north.

2.4. The site has two existing accesses off Caversham Road, between nos. 97a and 99 towards the south-eastern corner of the site and between nos. 107 and 115-117 to the north-eastern corner.

2.5. The accesses lead to a number of single and two storey buildings and sheds to the rear which comprise a mix of industrial uses including an MOT workshop.

2.6. The area surrounding the site has a mixed character. Land to the east and south-east, towards Reading town centre, is predominantly commercial in character with large-scale office and retail uses with some residential use.

2.7. Land to the south includes lower-scale commercial uses, including the self-storage facility fronting onto Caversham Road and Northfield Road.

2.8. Land to the north and east is predominantly residential in character, with two storey terraced dwellings immediately to the north along Caversham Road and to the rear of the site along Swansea Road. The EP Collier Primary School is also located on Swansea Road at the rear.

Statutory and Non-Statutory Designations

2.9. 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.

2.10. The site is within Environment Agency Flood Zone 2 and is located within the Reading Air Quality Management Area.

Planning History

2.11. There have been no relevant previous applications on the Council's public access website relating to the redevelopment of the site.

2.12. Planning permission was granted in February 2009 (ref: 090634) for the change of use of storage (B8 Use) to an MOT Workshop (B1 Use) at 99-113 Caversham Road, Reading, RG1 8AR. While no site location plan is available to view on the public access website, it is assumed this relates to the existing MOT workshop towards the rear of the site.

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 220265/PREAPP) comprising 57 dwellings was submitted to RBC on 22nd February 2022. Subsequently, a meeting was held with the case officer on 1st April 2022.
- 3.3. A presentation of the pre-application advice scheme was given to the Reading Design Review panel on 19th May 2022. The panel's written comments were received on 31st May 2022, and factored into the case officer's pre-application response.
- 3.4. The advice sought through the pre-application advice process was in relation to;
 - The principle of development within the context of Policy CR11f;
 - The appropriate mix of market and Affordable housing;
 - The required mix of dwelling type
 - The design of the proposals as a whole including the amenity space, relationship with neighbouring properties, parking provision, amenity space and landscaping.
 - The scope of the Council's climate change policy commitments, Biodiversity Net Gain and 'Zero Carbon Homes' requirements;
 - The approach in terms of Flood Risk;
 - CIL and potential s106 planning obligations that may be required; and
 - Any other matters including the validation requirements necessary to support the submission of a full application
- 3.5. A formal response was received from the Council on 28th June 2022, which is at Appendix 2. The response was informed by consultee feedback from Local Highways Authority and Reading's Design Review Panel.
- 3.6. Officer advice confirmed that the principle of development at the site was acceptable given the Local Plan policy allocation. The advice also provided comments on the design and landscaping of the scheme and confirmed the proposed level of car parking was appropriate given the location of the site and that a financial contribution to the maintenance and enhancement of local open space would be appropriate.

Community Consultation

- 3.7. A mail drop has been issued to 472 neighbouring properties, providing details of the proposals and inviting feedback from stakeholders.

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3.8. Discussions have also taken place with between the applicant and various local stakeholders.

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 97a-117 Caversham Road and associated land to the rear, including demolition of existing buildings, to provide 60 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 the retention of the existing access road from Caversham Road to the north of the Caversham Road/ Vastern Road roundabout.

4.4. The design has been prepared having regard to the requirements of Local Plan allocation CR11f, pre-application advice received from RBC, Reading's Design Review Panel, 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 60 dwellings with the following housing size and tenure mix:

	Market	Affordable	Total
1-bed apartment	12	5	17
2-bed apartment	11	8	19
3-bed apartment	9	5	14
4-bed house	10	0	10
Total	42	18	60

4.8. 30% of the proposed dwellings (18no.) are affordable housing with the remaining 70% (42no.) being market housing, with a range of dwelling sizes between 1 and 4 bedrooms proposed.

4.9. The site comprises three apartment blocks and two terraces of dwelling houses. Access into the site will be from the existing access from Caversham Road, to the north of the roundabout. The internal access road will terminate at the southern boundary. Pedestrian access will also be from this point at Caversham Road with potential linkage to possible future development of the remainder of the allocation to the south.

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- 4.10. Two of the apartment blocks front onto Caversham Road, either side of the retained access into the site. 'Block A, a part 3, part 4 storey block, is in the north-eastern corner of the site and the larger Block B to the south of the site access, which is also a maximum of 4 storeys. Block A comprises 6 flats (2x1 bed, 3x2 bed, 1x3 bed) and Block B provides a total of 25 flats (10x1 bed, 9x2 bed, 6x3 bed). These blocks are predominantly constructed with red brick with grey brick used for detailing and patterning of the elevation fronting Caversham Road.
- 4.11. Block C is to the rear of Block B away from Caversham Road. This comprises a maximum 4-storey L-shape block to follow the angle of the new street within the site and contains 19 flats (5x1 bed, 7x2 bed, 7x3 bed). The block would be predominantly constructed using a lighter brick than the other proposed buildings, with a 3 storey section of the block being finished in red brick.
- 4.12. There are ten proposed dwelling houses, with a terrace of six, 4 bedroom, houses along the western boundary of the site and four on the northern boundary. The houses are 2.5 storeys high and are proposed to have consistent gabled street elevations, predominantly constructed in red brick.
- 4.13. All properties benefit from either a private balcony or a rear garden, in addition to the communal landscaped areas on the frontages. All of the flats will achieve Building Regulations M4(2) standard, with 5% of dwellings being M4(3) wheelchair accessible. The dwelling houses will be built to M4(1) standard. M4(2) standard is not achievable for the houses due to the need to raise finished floor levels in response to requirements on the flood risk and drainage strategy.
- 4.14. A total of 30 car parking spaces are proposed, these are located in parking courts to the rear of Blocks A and B and in the south west corner. Cycle storage will be provided for each dwelling in cycle stores around the site.
- 4.15. Feature street trees are proposed within the site, including around the site entrance, fronting Caversham Road and along the south east boundary.

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 policy in the Local Plan relevant to this application is **CR11: Station/River Major Opportunity Area** and specifically sub-policy **CR11f: West of Caversham Road**.

5.5. **CR11: Station/River Major Opportunity Area** requires development here to contribute towards providing a high-density mix of uses and to help facilitate greater pedestrian and cycle permeability through the area. The policy also requires careful consideration to the areas of transition to low and medium density residential development.

5.6. **CR11f: West of Caversham Road** relates specifically to the majority of the application site, excluding frontage building 97a-107 Caversham Road, which is allocated for residential development. The policy also states that development should be of a lower density to that of elsewhere in the Station/River area to reflect the proximity of low-rise residential areas. The policy confirms the edge of the site requires careful design treatment and must respect the historic context of areas to the west of the site. The site will also require flood risk mitigation techniques.

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

5.8. **CR2 – Design in Central Reading.** This policy specifically relates the development within the Central Reading area and states that development should respect the existing grid layout of the area, provide continuity and enclosure through appropriate relationships between buildings and contribute and enhance the movement through the area. Policy CR2 requires new development to be well designed in public and private realms and make well designed public spaces with regards to hard and soft landscaping, creating

a sense of place and providing green infrastructure. The policy requires the architectural design of new development to be of a high quality which respects the form of the area and seeks the use of quality materials. New development should also take into consideration adjacent developments and not cause unreasonable burdens for future development on those sites.

- 5.9. **CR3 – Public Realm in Central Reading.** Policy CR3 requires new developments in Central Reading to make a positive contribution towards the quality of the public realm.
- 5.10. **CR6 - Living in Central Reading.** Under policy CR6 new residential development in Central Reading will make an appropriate contribution towards the mix of dwelling types. The policy requires a mixture of one, two and three bedroom units with a maximum 40% being 1 bed and a minimum 5% 3 bed, unless this would render the development unviable.
- 5.11. **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.
- 5.12. **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.
- 5.13. **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 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.
- 5.14. **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.
- 5.15. **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.
- 5.16. **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.

- 5.17. **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.
- 5.18. **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.
- 5.19. **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.
- 5.20. **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 important archaeological remains and their settings will not be allowed unless there is clear and convincing justification in the form of overriding public benefits.
- 5.21. **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.
- 5.22. **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.
- 5.23. **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.
- 5.24. **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 Section 106 agreement.
- 5.25. **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 where ever 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.

- 5.26. **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.
- 5.27. **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 or measures to tackle poor air quality or for air quality monitoring.
- 5.28. **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.
- 5.29. **EN18: Flooding and Sustainable Drainage Systems.** This policy states that new development will be directed to 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.
- 5.30. **H1: Provision of Housing.** Policy H1 requires a minimum of 15,847 new dwellings across Reading Borough for the period 2013 - 2036.
- 5.31. **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.

Where appropriate, developments of over ten residential dwellings will make a provision for self-build plots, this will be secured through a legal agreement.

- 5.32. **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.
- 5.33. **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).*
 - 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'.*
- 5.34. **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 where ever possible. The design and character of the external amenity space should be similar to those in the vicinity of the development.
- 5.35. **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.
- 5.36. **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.
- 5.37. **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.

- 5.38. **TR5: Car and Cycle Parking and Electric Vehicle Charging.** This policy states provision towards electric vehicle charging points should be provided by new developments. Development which includes new houses should provide electric vehicle charging points. For 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

- 5.39. 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
- Reading Borough Council Strategic Housing Market Assessment (2016)
- 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)

- 5.40. 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.
- 5.41. 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%.

- 5.42. The SPD confirms a Section 106 Agreement will be required to secure the Affordable Housing on site and to set out the qualifying criteria which should be agreed between the developer and Council.

Reading Borough Council Sustainable Design and Construction SPD (2019)

- 5.43. 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.

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- 5.44. 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.
- 5.45. 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)

- 5.46. The application site is within zone 2 on the very edge of zone 1 of the parking zone map. In terms of transport and accessibility, zone 1 is classified as being in the very heart of Reading Borough and as having the best transport hubs in the Borough.
- 5.47. The car parking requirements for new residential development in zone 1 are set out in the below table.

	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**

- 5.48. The SPD confirms that a level of car parking on site which falls below the recommended provision of the SPD is to be provided as part of a development, then justification 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. Parking at a rate of one parking space per two dwellings was encouraged by the Transport Development Control Manager at the pre-application advice stage, which has been adhered to.

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

- 5.49. 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.

- 5.50. A financial contribution will alternatively be sought, which is 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.

- 5.51. 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)

- 5.52. 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.
- 5.53. 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 mitigation measures, highway works and ESP.

Reading Borough Council Reading Tree Strategy 2021

- 5.54. 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 its 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.

Reading's Culture and Heritage Strategy 2015-2030

- 5.55. This document aims to improve the cultural and heritage assets of the Borough, where possible.

Local Transport Plan 2011-2026

- 5.56. The Transport Plan considers the Councils policy approach specific to all transport modes and themes, ranging from strategies for bus, rail and cycling to parking design and standards.

The Reading Climate Emergency Strategy 2020-25

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

Local Cycling and Walking Infrastructure Plan 2020-2030

- 5.58. 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

- 5.59. 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).

- 5.60. 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).***

- 5.61. 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.

- 5.62. 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”*.
- 5.63. 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.”*
- 5.64. 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”

- 5.65. 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”

- 5.66. 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”*.
- 5.67. 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”*.

- 5.68. Paragraphs 113 requires those developments expected to generate a significant amount of movements to be accompanied by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.
- 5.69. 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”

- 5.70. 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”

- 5.71. 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.
- 5.72. 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 accommodation 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’.*
- 5.73. Paragraph 131 emphasises the important contribution that trees make to the character and quality of urban environments, and outlines that they can also help mitigate and adapt to climate change.
- “Meeting the challenge of climate change, flooding and coastal change”*
- 5.74. 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

- 5.75. 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.
- 5.76. The PPG includes encouragement of high quality design and states that: ‘local planning authorities should give great weight to outstanding or innovative design which helps to raise the standard of design more generally in the area’.
- 5.77. 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
 - 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 CR11 identifies the site as being within the Station/River Major Opportunity Area and Policy CR11f confirms that new residential development will be supported on land to the west of Caversham Road. The application site includes the majority of the northern section of the allocation, along with 99 – 107 Caversham Road.
- 6.4. The principle of a residential development at the site is therefore supported by the Local Plan, which was confirmed in RBC's pre-application advice. The site is mostly disused brownfield land at a sustainable location and is therefore appropriate to provide additional housing to support meeting Reding's identified housing need.
- 6.5. The scheme is considered to be of an appropriate scale and density whilst a suitable drainage strategy is proposed, meeting the specific requirements of allocation policy CR11f. Further consideration of these matters is outlined below and in the accompanying Design and Access Statement and Flood Risk Assessment and Drainage Strategy.

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- 6.6. Further, the development has been designed so to not prejudice the redevelopment of the remaining part of the West of Caversham Road allocation to the south, with pedestrian linkages provided for within the scheme design.
- 6.7. Whilst retail and commercial uses are lost as a result of these proposals, such uses are not protected by planning policy and it is considered that such a loss will be particularly beneficial in consolidating retail within the Town Centre, which currently suffers from relatively high vacancy rates. Attached at Appendix 4 is a Retail Report, prepared by commercial property consultants Hicks Baker. This report states that a retail use at the site would be extremely difficult to let due the lack of parking here, lack of demand for retail floorspace in Reading and wider issues regarding changes to retail sector.
- 6.8. The proposed development is therefore in accordance with Policy CR11 and the site allocation Policy CR11f. Further, new housing here at a site which includes buildings no longer required for commercial uses will contribute to the wider regeneration of Reading and specifically the central Reading area. 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

- 6.9. 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. Policy CR6 requires central Reading sites to provide no more than 40% 1 bedroom/studio units and at least 5% 3 bedroom units.
- 6.10. The scheme would provide a range of units sizes between 1 and 4 bedrooms, in the following mix:

Unit Size	Total	% of Total	Market	% of Market	Affordable	% Affordable
1-bed	17	28	12	29	5	28
2-bed	19	32	11	26	8	44
3-bed	14	23	9	21	5	28
4-bed	10	17	10	24	0	0
Total	60	100%	42	100%	18	100%

- 6.11. This mix of sizes is considered to be appropriate for the site having regard to the character and accessibility. The policy complies with Policy CR6 by providing less than 40% 1 bedroom units (c.28%) and significantly more than 5% 3 bedroom units (40%)
- 6.12. The proposals would therefore comply with Policies H2 and CR6 with respect to the mix of dwelling sizes and is appropriate for this central Reading location.

Affordable Housing

- 6.13. 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.
- 6.14. The proposals provide 30% on-site affordable housing, with 18 in total, including 13 of which are 2 or more bedrooms. The proposals therefore comply with Policy H3 requirements in terms of the quantum and size of affordable housing provision. 12 of the affordable housing units (67%) will be for affordable rent and 6 shared ownership (33%), which is an appropriate tenure split in accordance with the affordable housing SPD. The provision of these units can be secured through a Section 106 Agreement.

Standard of Accommodation

- 6.15. Local Plan Policy H5 states development should be built to comply with nationally-described space standards and provide accessible and adaptable accommodation, with all dwellings built to M4(2) standards unless it is unviable to do and to provide 5% M4(3) standard dwellings. Policy H10 states that new dwellings should be provided with functional private or communal open space.
- 6.16. All dwellings are designed to achieve the nationally-described space standards, however due to the drainage and flooding constraints of the site and the subsequent requirement to provide finished floor levels at 300mm above worst case estimated flood levels, it is not technically viable for the ten houses to be built to the standard of M4(2). As per the requirements of Policy H5, 5% of the apartments comply with the standard M4(3) and 68% comply with M4(2). Due to the technical constraints within the site, and the allowance for this under the viability of Policy H5, the proposal scheme accords with this policy.
- 6.17. 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 in the centre of site along with a landscaped and tree lined street frontage. The proposals would therefore comply with Policy H10.

Design and Landscaping

- 6.18. 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.
- 6.19. The relevant Policy as regards to design in Central reading are Policies CR2 and CR3. Policy CR2 aims to provide high quality developments in terms of architectural design, materials, street frontage, landscaping and the public realm. Policy CR3 focuses on the contribution of new development to the public realm.

- 6.20. 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 and the Council's Design Review Panel. Accordingly, the amount of development on the site is appropriate having been derived from the consideration of a suitable layout and scale.
- 6.21. The scale and density of the development have been carefully considered to reflect the edge of town centre location, with the site forming a key part for the transition between higher density and scale of the town centre and more suburban character of development to the west.
- 6.22. The proposals also include landscaping involving the planting of a number of new trees and hedges around the site, including on the Caversham Road frontage. This will assist in the site becoming significant greener than existing and to complement the built development, enhancing the character of the site and area.
- 6.23. The development therefore is considered to represent a high quality design which complies with Policies CR2, CR3 and CC7, H2 and EN14, meets the requirements for high quality new landscaping in the Reading Tree Strategy and also is consistent with the NPPF requirement to create high quality and beautiful places.

Open Space

- 6.24. 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.
- 6.25. The proposal scheme provides each new dwelling with private amenity space either through the provision of an external balcony or a rear garden in addition to open external communal space within the site. There is soft landscaping and new trees planted along the street frontage which adds to the visual amenity of the site. Additionally the site is within close proximity to high quality open public space.
- 6.26. The application is accompanied by an Open Space Assessment which confirms that the development would make contributions to the maintenance and betterment of local open space facilities, which are easily accessible from the site, to be secured by Section 106 Agreement. This approach was supported by RBC in the pre-application response. Such a contribution 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

- 6.27. 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 within new developments, with provision for 10% of spaces in communal car parks.
- 6.28. The accompanying Transport Statement confirms the proposed development includes a total of 30 car parking spaces, one parking space provided for each of the four-bedroom houses, and 20 unallocated parking spaces provided for the flats (equating to 0.4 spaces per flat). While not achieving the maximum standards, this provision is considered appropriate for the site given its highly sustainable location including easy access to public transport, including Reading train station. Further, a contribution to car club provision is proposed, which can be secured through a Section 106 Agreement. Electric vehicle charging facilities will be provided for parking spaces, exceeding the minimum requirements set out in Policy TR5. Appropriate car parking is therefore provided with the development.
- 6.29. Cycle parking is provided on the basis of one space per apartment in a communal bike store (41 in total) and within separate shared cycle storage for the dwellings. This provision complies with the requirements of the SPD standard and would support sustainable transport modes, in accordance with Policy TR4.
- 6.30. The Transport Statement also provides technical details which shows that the proposed access within the development site will allow for safe access and egress onto the public highway, with adequate visibility. The Transport Statement also confirms that the level of use of the access is reduced in comparison associated with the commercial uses at the site. The scheme is therefore in accordance with Policy TR3.

Traffic Impacts

- 6.31. Policy TR1 requires developments to ensure that an adequate level of accessibility and safety by all modes of transport is achieved and to make an appropriate contribution to achieving the objective of the Reading Borough Local Plan Local Transport Plan 2011-2026.
- 6.32. 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. As stated in section 6 of the accompanying Transport statement, the proposed development will result in a net reduction in vehicle trips when compared to its existing / previous use, as such there will be a reduced number of vehicle movements at the proposed access and on the local highway network, as such the proposal will have a beneficial impact on the operation and safety of the local highway network and should be considered acceptable to RBC. The development is likely to generate vehicle movements of 6 arrivals in the morning peak period and 3 departures in the evening peak period. Across the day it is estimated that there could be 27 two-way movements generated by the previous office use.
- 6.33. The proposal therefore complies with Policy TR1 and is consistent with the NPPF's desire to promote sustainable transport.

Residential Amenity

- 6.34. 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. In Central Reading Policy CR6 states that new development will be required to demonstrate that new dwellings will provide mitigation where required in terms of noise and air pollution.
- 6.35. 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, and acceptable subject to the adoption of acoustically upgraded glazing and ventilation, which may be secured by the Local Planning Authority via a noise related planning condition that the development would not result in excessive noise for existing or future residents.
- 6.36. A Daylight and Sunlight Assessment is included with the application which considers the impact on these matters for existing nearby properties and also for those 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.
- 6.37. The Design and Access Statement also demonstrates that the scheme has been designed to achieve adequate back-back distances between the proposed dwellings and existing dwellings along Swansea Road which back onto the site, with the arrangement being consistent with the prevailing character of the area. It is therefore not considered that an unacceptable loss of privacy would occur as a result of this development.
- 6.38. 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 it is considered to comply with Policy CC8.

Climate Change and Sustainability

- 6.39. 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.

- 6.40. The accompanying Energy and Sustainability Statement demonstrates a range of measures can be included in the development to achieve a c.74.37% 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.
- 6.41. 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.
- 6.42. The energy and sustainability measures and commitment to offset payment means that the development complies with Policies H5, CC2, CC3 and CC4 and Sustainable Design and Construction SPD.

Flood Risk and Drainage

- 6.43. Local Plan Policy EN18 directs new development towards Flood Zone 1 in the first instance. For sites within Flood Zone 2 or 3 Sequential Test and Exceptions test will be required. The policy also requires all new major development applications to include sustainable drainage systems in line with the Government's Technical Standards.
- 6.44. The site is located within Flood Zone 2, the Council's planning policy background papers assessed that most of the site will be within the 1 in 100 year area with a 25% allowance for climate change.
- 6.45. As stated in Reading Borough Councils Local Plan Background Paper ' Sequential and exception test of sites in the Submission Draft Local Plan' (March 2018), the development passes the sequential test for allocation for residential use, due to the fact that the identified development needs cannot be accommodated on sequentially preferable sites. There are potential opportunities to reduce flood risk on site. An Exception Test was also undertaken for the site, which was also passed.
- 6.46. The Flood Risk Assessment and Drainage Strategy submitted with this application has found that the proposed development will not increase the risk of flooding and has made recommendations for appropriate flood management measures.
- 6.47. 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 requirements of Policy CR11f regarding impact of the development on water infrastructure.

Ecology

- 6.48. Local Plan Policy EN12 seeks to ensure that new development protects biodiversity and results in a net gain with regards to biodiversity and protect against net loss.
- 6.49. The accompanying Ecological Appraisal confirms that the site is not within an area protected for its ecological value and that it 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.
- 6.50. 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.
- 6.51. The accompanying Biodiversity Net Gain calculation confirms a very substantial net gain resulting from the proposals. The development therefore does not result in ecological harm but results in enhancements to biodiversity, complying with Policy EN12 and the NPPF with regard to providing a net gain to biodiversity value.

Ground Conditions

- 6.52. 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.
- 6.53. The accompanying Geo-Environmental Report 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.
- 6.54. 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

- 6.55. 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.

6.56. 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 as a commercial and residential site in the 20th century. These impacts are likely to have removed earlier buried remains, even if once present.

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

Air Quality

6.58. 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 arising from development. Reading Borough Council's Air Quality Action Plan contains measures to improve air quality across the Borough.

6.59. The accompanying Air Quality Assessment considers the impact on air quality associated with development at the site which is within an Air Quality Management Area. The assessment confirms that the development does not raise any significant adverse impacts on the health and/or quality of life for existing and proposed receptors, resulting from changes to air quality.

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

Planning Obligations and CIL

6.61. 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.

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

Summary

- 6.63. 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.
- 6.64. 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.
- 6.65. This application therefore constitutes a sustainable development, providing public environmental, social and economic benefits without any material adverse effects.
- 6.66. 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 where necessary. Scope of any required works to be agreed during planning application.
 - Provision of other site related transportation mitigation measures as required (e.g. Car club, 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 97a-117 Caversham Road and associated land to the rear, including demolition of existing buildings, to provide 60 dwellings, including affordable housing, together with associated access, parking and landscaping.

- 8.2. The site is allocated for residential development and is brownfield land, which is currently inefficiently used for commercial and industrial purposes. The proposals comprise a comprehensive redevelopment and ensure that the most efficient use is made of the site, with the scale, density and design of the development being appropriate for its context.
- 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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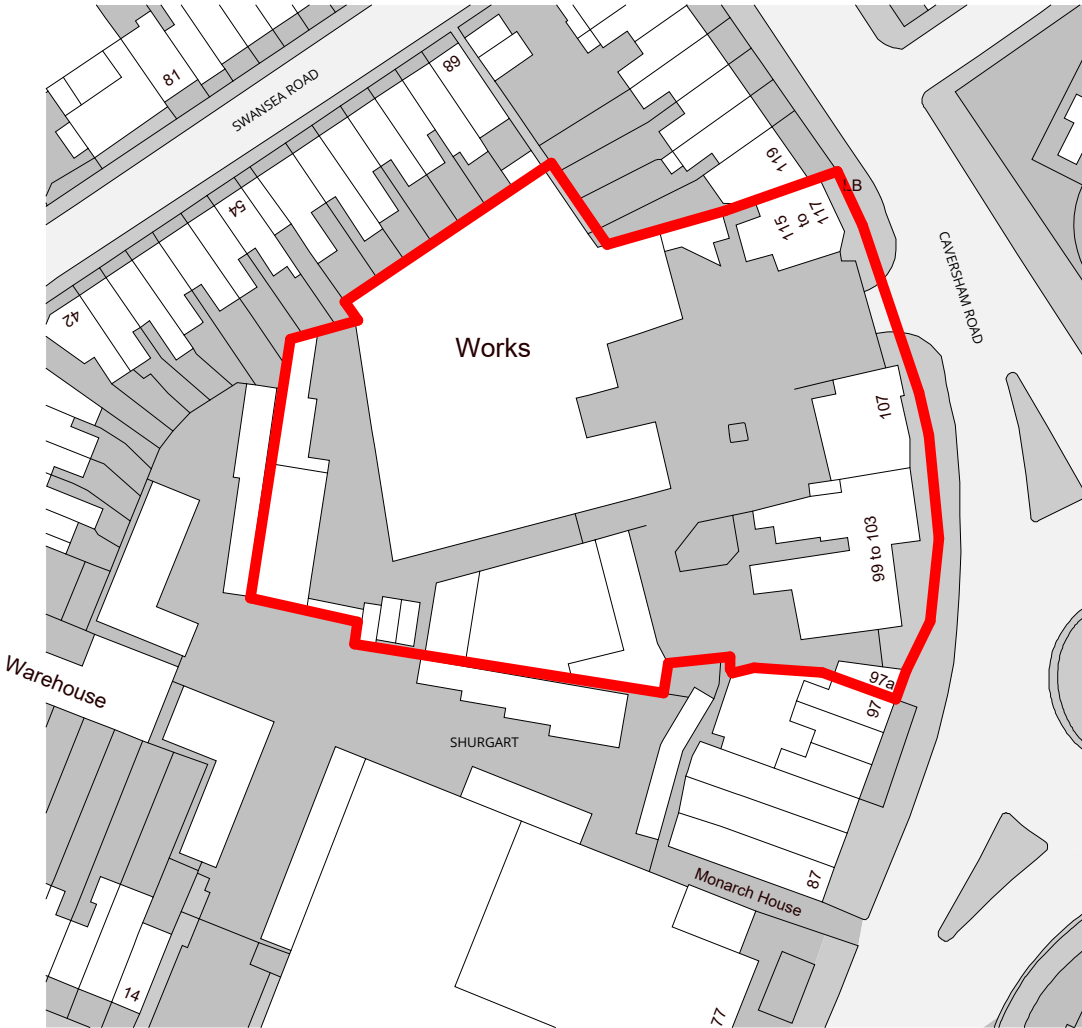
Appendices

Planning Statement

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Appendix 1 Site Location Plan



Notes:

- Do not scale from this drawing; work to figured dimensions only.
- All information is to be checked on site for accuracy and fit.
- Report any discrepancies and omissions to RMA Architects.

CDM ERIC Notes

- Where RMA services on a project do not include for site inspections and works surveys, RMA do not warrant that 'as built' issue drawings are a complete and accurate record of what has been constructed
- Unless notified specifically by the responsible party, changes made on site to RMA design information has not been incorporated in this drawing.

GENERAL NOTES

All work to be to current British Standards, NHBC Technical Standards, Building Regulations. All products to have a use specific BBA Agreement certificate.

Refer to other RMA drawings:

0000 BIM Models /2D - Strategy /Planning diagrams
1000 GA Plans / GA Flat Layout
1400 Fire strategy Plans
2000 GA Elevations & Sections
2400 Fire strategy Elevations
3000 Detail Drawings
4000 Lift and Stair core
5000 Schedules
6000 Bathrooms

Read in conjunction with other consultants information:
Structural Engineer TBC
- For drawings for structural and civil information
MEP Engineer TBC
- For MEP services & utilities information
Landscape Architect TBC
- For external finishes and landscape information

KEY

Boundary Line

P0	05.09.22	Planning Submission	NK	CT
Rev	Date	Description	By	Chkd

RM_A

320C Highgate Studios
53-79 Highgate Road, London, NW5 1TL
London NW5 1TL

020 7284 1414, rmaarchitects.co.uk © RMA

Key Plan

Project

Carters Site, Reading

RMA Project Reference 2207

Client

Bellway Thames Valley

Scale	Date	By	Checked
1 : 1000 @ A3	09/22	KD	CT

Drawing Title

ZZ

00

SITE LOCATION PLAN - EXISTING

Purpose of Issue	Status
PLANNING	
Drawing No	Revision
CR- RMA- ZZ- 00- DR-A- 0001	P0

Planning Statement

97a-117 Caversham Road, Reading



Appendix 2

Reading Borough Council Pre-application Response

PRE-APPLICATION REPORT

WITHOUT PREJUDICE

97a-117 Caversham Road, Reading

220265/PREAPP - Pre-application advice to demolish existing buildings and provide 57 new dwellings, including 30% affordable housing, together with associated landscaping, parking and infrastructure

The Proposal:

- 57 dwellings with mix of 1-3 bed apartments and 3 bed houses, with 30% on-site affordable housing
- 50% parking provision
- Public realm
- Use of existing access from Caversham Road

Information reviewed is as follows:

Received 22nd February 2022:

- Cover letter, prepared by Savills, dated 22nd February 2022
- Carters Site Pre-application document (February 2022), prepared by RM_A Architects

Received 12th May 2022:

- Site Access and Parking Review, Document ref: JDW/IN/PL/ITB17593-001am dated 10th May, prepared by i-Transport, received 12th May 2022

Received 17th May 2022:

- Updated Pre-application Document for DRP presentation, prepared by RM-A Architects

A scoping meeting was held on 1st April 2022 and the proposals were presented to Reading's Design Review Panel (DRP) on 19th May 2022 (their comments received 31st May 2022).

Advice sought as part of this pre-application, as set out in the cover letter, is in terms of:

- *The approach in terms of flood risk;*
- *Confirmation that the principle of the proposed use is acceptable within the context of Policies CR11f (allocation) and Policy H2 (housing mix);*
- *The appropriate mix of market and affordable housing;*
- *Appropriate mix of dwelling sizes;*
- *The design of the buildings, including the proposed heights, materials and architectural approach;*
- *The design of the proposals as a whole including the amenity space, relationship with neighbouring properties, parking provision, amenity space and landscaping.*
- *The scope of the Council's climate change policy commitments, Biodiversity Net Gain and 'Zero Carbon Homes' requirements;*
- *CIL and potential s106 planning obligations that may be required; and*
- *Any other matters including the validation requirements necessary to support the submission of a full application.*

Site Description/ Background:

The site is located on the western side of Caversham Road facing the roundabout at the junction of Caversham Road and Vastern Road. The existing uses on the site include a mix of industrial buildings, shelters and sheds. The four buildings to the frontage (vacant) are 3 storeys and the remainder of the buildings are 1-2 storey equivalent. There is a staggered frontage occupied by 4 three storey red brick buildings with the vacant retail units as a single storey projection to the ground floor.

The area comprises a mix of scales and massing of buildings. To the north-west are traditional terraced streets with Swansea Road immediately backing onto the site, with the houses having relatively short gardens, some directly adjoining the existing main works building and with windows close to the site boundary. They are currently separated from the site by a tall boundary wall separating the current residential and industrial uses. The predominant design of the existing dwellings is with pitched roofs and gables.



Part of the site comprises just under half of the local plan allocation under CR11f: West of Caversham Road within the Station/River Major Opportunity Area. 97-107 Caversham Road are not within the allocation.

The Local Plan allocation is:

“This area will be developed for residential with on-site open space. Densities will be lower than elsewhere in the Station/River area to reflect the proximity to low-rise residential areas, and the edge of the site nearest to the areas of terracing will require careful design treatment and respect the historic context of areas to the west. Development should take account of mitigation required as a result of a Flood Risk Assessment.

Site size: 0.92 ha Indicative potential: 75-115 dwellings.”



The remainder the local plan allocation comprises industrial units (frontage building is 'Shurguard'). You have advised that your client Bellway Homes has liaised with the estate agent for the vendor of the pre-application site who made an approach to the landowners of the remaining part of the allocation with regard to bring the site forward

comprehensively. However, at present that landowner has no intention to relinquish the site for redevelopment and the self-storage facility remains profitable.

The area to the south will be subject to significant change. There is a current committee resolution to grant an outline mixed use scheme comprising 620 residential units in buildings ranging up to 24 storeys A1, A2, A3, D1 on the former Royal Mail site (the southern half of allocation CR11e - see extract below). The remainder of CR11e is currently subject to a public inquiry for an outline scheme for a flexible mixed-use scheme for C3, and (former use classes) B1a, A1-A5, D1 and D2 uses.



Illustrative material

As well as being an allocated site it is within an Air Quality Management Area (Policy EN15 of Reading Borough Local Plan 2019 (RBLP)) and is in Flood Risk 2. The site also has the potential for contamination (Policy EN16).

It also lies immediately adjacent, at the north-west, to the boundary of the Reading Station Area covered by the Reading Station Area Framework (2010).



There are also other relevant Central Reading and Borough wide policies set out below.

Relevant Planning History:

Some advert consents, and changes of use from A1 to A2 and a change of use from B8 to B1 to the rear.

Consultation Responses:

Ecology -

The site fronts onto Caversham road in a largely residential area surrounded by houses and 200m from the river Thames and is located within habitat which matches that where bat roosts have previously been found in the borough.

The habitats where the new dwellings will be built appear (from Google maps) to comprise mainly of hardstanding and buildings. It is likely that the site could be used by a number of protected and priority species including birds, and bats.

There is therefore a risk that the proposals could affect priority habitat and protected and priority species. An ecological assessment (comprising an extended Phase 1 Habitat

and Species Scoping Survey, bat surveys of the buildings and any trees, and any phase 2 surveys) would therefore need to be submitted with the 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 bats may need to be carried out.

Scheme design and Biodiversity enhancements

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.

With this in mind the applicant should design the development from the outset so that its value for wildlife is maximised, for example by providing integral bird and bat boxes (including swift boxes as there is a colony of swifts nearby), mixed native hedges and new tree planting. It may also be possible to install green roofs on a development such as this one. Details of these enhancements should be provided with the planning application.

Environmental Protection and Nuisance - The concerns are:

- Noise impact on development
- Bins stores - pests
- Redevelopment of land - pest control
- Air Quality - introducing new receptors
- Air Quality - increased emissions

- Contaminated Land
- Construction and Demolition phase

Noise impact on development

The development is likely to be affected by road noise from the busy Caversham Road and possibly from surrounding commercial uses.

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (L_{Max}) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

It may be possible though clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB L _{Aeq,8hour}	
Living rooms (07:00 - 23:00)	<35dB L _{Aeq,16hour}	
Gardens & Balconies	<50dB L _{Aeq,T}	<55dB L _{Aeq,T}

Air Quality - Increased exposure

The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.

The applicant will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.

Where the development involves converting an existing building and allowing a buffer zone is not an option then it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.

Mitigation against increased exposure:

- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones - consider increasing distance of the building façade from very busy roads
- Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
- Mixed use - locate any sensitive uses on higher floors, allowing commercial use on lower elevations
- Balconies - consider avoiding use in areas of exceedance, especially on ground and first floor level
- Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance 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 is located within or adjacent 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 a former engineering works therefore there is the potential for contaminated land. 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.

Natural Environment (Trees/landscape) -

The site is within the Air Quality Management Area (AQMA), within the part of the former Abbey Ward, which was a low canopy ward (canopy cover not recalculated for new Wards yet) and is on a 'treed corridor' (as defined in the Tree Strategy) hence a sufficient level of greening, including tree planting and landscaping on the frontage is demanded or any proposal.

The relevant Policies and adopted documents relating to trees and landscaping are: CC3, CC7, EN12, EN14, EN15, EN18, CR3, CR11 (CR11f), Sustainable Design & Construction SPD, adopted Tree Strategy (2021) and the Biodiversity Action Plan (2021 BAP).

With reference to the submitted information there is acknowledgement of the need to provide green open space and green infrastructure and that the site presents an 'opportunity' to provide tree planting on the frontage, but this is shown outside the site within the pavement. Whilst frontage planting is required by policy and positive in principle, the default position should be to provide this planting within the site.

Policy EN14 states:

'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...'

With supporting text in para 4.2.68 stating:

'Off-site tree provision will be appropriate in some cases where it has been demonstrated that acceptable development cannot provide an appropriate level of mitigation planting (where trees are to be removed) and/or new planting within the site. This will be of particular importance where such sites are within or on priority tree planting areas/routes, as defined in the Tree Strategy...'

If the applicant intends to pursue off-site planting; prior to submission of an application, they must first liaise with Highways to check feasibility of planting in relation to services, street furniture and visibility splays. If landscape principles include off-site planting without confirmation that it can actually be achieved, it is likely to raise an objection on undemonstrated landscape principles.

Having said the above, it is noted that tree planting is indicated within the site boundary.

The proximity of the dwellings to the pavement appears not to leave space for meaningful tree planting or tree planting that would not conflict with the dwellings. In landscape terms a larger set-back would be welcomed, however I appreciate that this may not be acceptable in planning terms. Any future application should fully assess what landscaping is actually practical on the frontage and include that within landscape principles - if there is no space for tree planting, hedge planting should be incorporated for the benefit air filtering function.

It is noted that other areas allocated to amenity / green space and indicative planting. Planting principles should consider the aims of our Tree Strategy and BAP.

The plan appears to indicate green roofs on block C1 & C2 and partially on Block A, which is positive (if this is the case). It would also be positive to consider incorporation of green wall elements on the street frontage, as were included in the proposals, for example at 71-73 Caversham Road (191792), to further respond to policy requirements, especially if trees are not included.

Future proposals, in terms of water, should fully consider the requirements of CC2, CC3 EN18, and Reading's Climate Emergency Strategy ('water theme'), and development should include creative measures to minimise use of 'clean' water and reduce output into the sewers (which includes grey water) particularly in view of likely increases 'storm' events.

The drainage should be designed to harvest rainwater and direct this to water the landscaping; storing it for this purpose during high rainfall or when watering is not required (winter for example). Greywater could also be considered for this use in addition to/as well as recycling for use within the buildings.

SuDs and landscaping should be designed as an integral system, not separately, and follow the hierarchy required by EN18, taking guidance from Chapter 19 of the CIRIA SuDs manual 2015. Landscaping alone will require significant volumes of water for maintenance, which should not be underestimated, particularly in case of water restrictions. Designing systems to 'catch' rainwater or grey water for use, with any over and above that then being discharged, would be prudent and would then address policy requirements. It is a necessity in view of climate change and policy requirements for all developments to take all measures possible to reduce water use and discharge for the reasons above.

In conclusion, any future applicant should provide detailed landscape principles that fully respond to the requirements of policy and other adopted documents, and which are practical within the design of the site.

Transport

Original comments

This pre-application scheme is proposing an access in conflict with the allocation. This would therefore mean that the site could only be developed should the other half of this site come forward.

From a purely transport perspective there is an existing access and we would have no grounds in which to object to its retention as long as it is for a level of vehicular movement no greater than existing. I would anticipate that the proposed use would generate a reduction but should the access be used for the other half of the allocation then this may exceed the existing trips and so it may require a secondary access from Northfield Road, with maybe a pedestrian connection in the centre.

Should access be accepted from Caversham Road it would need to be designed in accordance with the Councils geometric design guide for accesses onto classified roads and it should not be relocated any closer to the Caversham Road / Vastern Road roundabout to the east.

An on-site turning head would also need to be provided to ensure that a refuse vehicle can enter and exit in forward gear. Tracking will be required to establish this.

Given the level of development being proposed dedicated 2m footways should be provided within the development to all units.

In relation to the other points, it is considered that parking is acceptable given the controlled parking areas surrounding the application site, although it should be stressed that it is unlikely that the units will be eligible for permits. The scheme should also include disabled parking and electric charging facilities in line with the Councils standards.

Cycle parking should be provided as per the Councils SPD.

A trip rate analysis should be undertaken to establish the existing level of movements on the site and the proposed.

Should an application be submitted, it should be accompanied by a Transport Statement to address the above.

N.B. Comments with regard to the 'Site Access and Parking Review' document will be forwarded under separate cover.

Relevant Policies:

National Planning Policy Guidance

National Planning Policy Framework (NPPF)

Section 2 - Achieving Sustainable Development

Section 5 - Delivering a Sufficient Supply of Homes

Section 8 - Promoting Healthy and Safe Communities

Section 9 - Promoting Sustainable Transport

Section 11 - Making Effective Use of Land

Section 12 - Achieving Well-Designed Places

Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

Adopted Reading Borough Local Plan - November 2019

Policy CC1: Presumption in Favour of Sustainable Development

Policy CC2: Sustainable Design and Construction

Policy CC3: Adaptation to Climate Change

Policy CC4: Decentralised Energy

Policy CC5: Waste Minimisation and Storage

Policy CC6: Accessibility and the Intensity of Development

Policy CC7: Design and the Public Realm

Policy CC8: Safeguarding Amenity

Policy CC9: Securing Infrastructure

Policy EN9: Provision of Open Space

Policy EN12: Biodiversity and the Green Network

Policy EN14: Trees, Hedges and Woodland

Policy EN15: Air Quality

Policy EN16: Pollution and Water Resources

Policy EN17: Noise Generating Equipment

Policy EN18: Flooding and Drainage

Policy EM3: Loss of Employment Land

Policy H1: Provision of Housing

Policy H2: Density and Mix

Policy H3: Affordable Housing
Policy H5: Standards for New Housing
Policy H10: Private and Communal Outdoor Space
Policy TR1: Achieving the Transport Strategy
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR4: Cycle Routes and Facilities
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
Policy CR2: Design in Central Reading
Policy CR3: Public Realm in Central Reading
Policy CR6: Living in Central Reading
Policy CR11: Station/River Major Opportunity Area
Policy CR11f: West of Caversham Road (Sub area within the Station/ River Major Opportunity Area)

Supplementary Planning Guidance/Documents

Revised Parking Standards and Design (2011)
Sustainable Design and Construction (2019)
Employment, Skills and Training (2013)
Affordable Housing (2013)

Other Relevant Documents

Tree Strategy (2020)
National Design Guide (MHCLG, October 2019)
Reading Biodiversity Action Plan (2021)

ASSESSMENT

The main issues to be considered are:

- a) Principle
- b) Design
- c) Housing Density and Mix
- d) Amenity
- e) Transport/ Parking
- f) Sustainability
- g) Landscaping & Ecology & Open Space
- h) Environmental Matters - Noise, Air Quality, Contamination and Flood Risk & Drainage
- i) S106 & Community Infrastructure Levy
- j) Submitting a planning application

a) Principle

Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development, which lies at the heart of the National Planning Policy Framework (NPPF).

To achieve sustainable development a proposal needs to meet economic, social and environmental objectives. It is considered that a proposal for new housing would contribute to providing: sufficient land for housing; a range of homes; and would make effective use of land in accordance with Para. 119 of the NPPF, boost the supply of new homes and the local housing requirement under Policy H1 of the RBLP.

The proposal would involve the loss of employment land, and under Policy EM3 this would require assessment against a number of matters. However, in this instance

the site has been subject of assessment through the Local plan and its allocation for housing under Policy CR11f deemed acceptable, subject to meeting specific criteria related to flood risk and design including respecting the historic context of the areas to the west, and ensuring that it would not prejudice the remainder of the allocated site.

Although the principle of the use is acceptable the formal planning submission would also have to demonstrate that it would meet other policy requirements as set out below and as required by Policy CR11f.

b) **Design**

Section 12 of the National Planning Policy Framework (NPPF) places significant weight on ensuring that developments are of good design, which is a key aspect of sustainable development, and that they should positively contribute towards making places better for people. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.

The National Design Guide includes a number of characteristics to consider in achieving good design, and one of these relates to the context of a site where well-designed development is that which *“responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones.”*

RBLP Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.

Developments need to make a positive contribution to the design objectives of character; continuity and enclosure; quality of public realm; ease of movement and permeability; legibility; adaptability and diversity. They will be assessed to ensure that they: *“Respond positively to their local context and create or reinforce local character and distinctiveness,...providing value to the public realm; Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion; Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.”*

Policy CR2 specifically relates to development within the Central Reading area and this states that development should demonstrate the following attributes:

a. Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area; b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas; c. Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to

enhance the otherwise very urban environment; d. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site; e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and f. Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.”

The Allocation CR11f states that the edge of the site nearest to the areas of terracing will require careful design treatment and respect the historic context of the areas to the west.

The proposal includes the provision of 2 blocks (one in a rough ‘u’ shape labelled B, C1 and C2, and the other A) comprising 40 flats of 1-3 bedrooms up to a maximum of 4 storeys. They are proposed with linked pitched roofs with front gables using red, silver/ beige brick.



There are ten, three storey terraces in two blocks of six and four respectively with pitched roofs and front gable ends, all three beds.

Blocks C1 and C2 within the middle of the site are indicated with flat roofs.

The material submitted sets out a good study of the styles and materials within the immediate context and this is described as being characterised by long terraces of 3 storey town houses along Caversham Road, with dormers in pitched roofs, some with ornamental patterning to the brickwork, with evidence of red, grey and cream bricks. The terraces to the north and west are two-storey with simpler details and without dormers.

You are seeking to create a focal point as you approach from Vastern Road and the scale of the frontage buildings are considered to be acceptable in the context. However, these need to be set further back to enable the creation of a successful street frontage. The site offers scope to be able to set back and create more meaningful defensible space and to provide tree planting, and make it more liveable, for example with front doors to the street. DRP make it clear that *“this buffer space will be key part of the success of scheme.”* Also is there an alternative

design solution for the end sections, shown with flat roofs, which would be more sympathetic to the adjacent buildings, as they appear as ‘bolt ons’?

The Panel highlighted that the parapet height of block B is shown differently on two images and that it is not to be higher than the ridge height of the adjacent building.



Elevation to Cavenham Road



The scheme is presented with heights being stepped with the intention to respond to the scale of existing development. However, it is considered that the houses, albeit they do pick up on the detailing of gables and pitches with a regular rhythm, because of the height of these, are too dominant and the projecting gables appear too prominent. The DRP agreed that the transition in scale and proportions was not currently successful and suggested the need to revisit the proportions, possibly through the pairing of gables, and adjusting the proportions to create more modest terraced housing, which reflects the surrounding context.



Elevation to a new street.
Family Houses



It is evident that the redevelopment of the site would provide a good opportunity to improve the relationship to the existing houses to the north through the change of use and scale of buildings. The Panel suggested the consideration of making the smaller row of terraced houses to the north parallel with the site boundary, as this would gain more space towards the front half of site. This could also assist with a better separation to and relationship with Block C1.

It is considered that there needs to be a better transition in scale from the frontage across the site, with the blocks behind being more subservient, and this would assist in creating a pleasant street frontage and relationship to the houses opposite.

With respect to Blocks C1 and C2 these are not detailed in the submission, but in terms of their footprint it is considered that these would need to be smaller, particularly because of their relationship to the houses. They require more setting and there is rather a ‘sea’ of parking between the buildings, and it is wondered whether in this instance some breaking up of the parking areas would improve the overall site? A further reduction in car parking may be acceptable in this central sustainable location.

These blocks are shown with flat roofs, and the Panel considered that these seem the least resolved of the whole scheme. Additionally, the Panel raised an issue

over the siting of the corner junction of these blocks and the street and that it appears rather awkward and under-utilised. It is suggested that the blocks are more aligned in parallel with the streets.

The study of materials presented is considered to be well thought through, and picks up on the dominant brick colours and patterns. The DRP suggested that the silver brick to the front elevation be continued to the ground to remove the plinth effect being created by the red brick at the ground floor.



Policy H5, which sets out a number of standards for new housing, includes the following requirement:

“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.”
The covering letter refers to the provision of flats meeting this standard.

c) Housing Density and Mix

Policy H2: Density and Mix identifies that the appropriate density of residential development will be informed by: the character and mix of the area in which it is located; its accessibility by walking, cycling and public transport the need to achieve good quality design; the need to maximise the efficient use of land and the need to minimise environmental impacts include detrimental impacts of adjoining occupiers.

The allocation CR11f sets out an indicative range for the overall 0.92ha site as 75-115 dwellings, which would equate to up to 124 dwellings per ha. This pre-

application site relates to roughly half of the overall site area and, therefore, the 57 proposed dwellings would be at the top end of this indicative range, which would be considered acceptable subject to demonstrating compliance with other policies.

With regard to 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.”

Policy CR6 states that *“Proposals for residential development within the central area will be assessed against the following criteria: i) All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.”*

The proposed mix, in the table below, equates to 23% x 1 beds; 39% x 2 beds; 21% x 3 bed flats and 17% x 3 bed houses would accord with Policy CR6.

	Market	Affordable Rent	Affordable S/O	Total
1-bed apartment	10	0	3	13
2-bed apartment	15	6	1	22
3-bed apartment	5	6	1	12
3-bed house	10	0	0	10
Total	40	12	5	57

d) Amenity

Policy CC8 requires development to 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.

Privacy and Overlooking

Notwithstanding matters raised under the design section it is considered that the scale of the proposed terraced houses at 3 storeys has the potential to create unacceptable overlooking to the private amenity spaces and the properties to the north-west and west of the site. It would need to be clearly demonstrated that there would be adequate back-to-back distances and that overlooking would not cause a detrimental impact on the existing houses.

In addition, it would need to be shown that there would be no worsening of the relationships between Blocks A and B to the adjoining properties and surrounding residential development in this regard.

Although no dimensioned drawings have been provided it appears as if the spacing between Blocks B and C2 would achieve a satisfactory arrangement, but this would need to be detailed further within the formal submission.

Access to Sunlight and Daylight

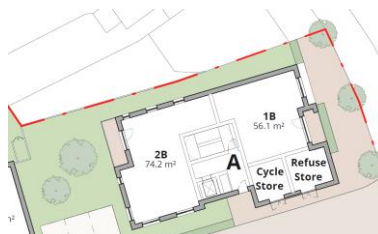
A formal submission would need to be supported by a report detailing daylight and sunlight to BRE standards, which would assess the internal compliance for the proposed units, quality of external amenity spaces and the effects on surrounding flats.

Visual Dominance and Overbearing

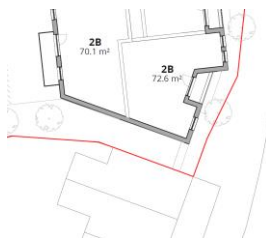
The current buildings fill a large proportion of the site with built form to the existing rear gardens of the Swansea Road houses, and are visually dominant and overbearing. Notwithstanding, the comments regarding the overall height of the terraces, from a design perspective, it is unlikely that these would create visual dominance or be overbearing, given the separation with a domestic garden.



However, in terms of Block A this would project further past the rear of the adjacent building than the existing building, and this may create an unacceptable relationship, and this matter would need to be adequately addressed in the submission.



It appears from a comparison between the existing southern building and the proposed southern end of Block B that there may be a similar relationship to the buildings to the south as there is currently. Further detail to demonstrate this would need to be provided.



In terms of the relationship between Blocks C1 and C2 to the houses this has been raised in the design section above and sufficient distance between the houses and the flats would need to be included to ensure that flats do not feel overbearing neither on the houses nor within the streetscene generally.

Harm to Outlook

It is not considered that there would be harm to outlook.

Noise and disturbance

This is addressed under Section f) below.

Crime and Safety

Creating a safe environment is a key part of good design and any submission would need to demonstrate that the internal layout of the units and the layout of the site overall has incorporated such measures which would comply with relevant national policy and local policy under CC8.

Consultation with the Thames Valley Police Crime Prevention Design Officer would be undertaken at application stage.

Amenity space

H10 deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. *"The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity". It states that "...flats may be provided with communal outdoor space, balconies and/or roof gardens"*.

All the houses and all, but one of the flats, is shown with either a private garden or balcony space. The majority of the spaces shown are likely to be acceptable, however Blocks A and B include single aspect units facing Caversham Road and therefore, have their balconies facing Caversham Road. Notwithstanding comments regarding the need to move the buildings back to create more defensible space to the ground floor units is there any amended design which could be achieved which would enable balconies to be re-located to the non-road side? This is especially because the overall open space on site is very limited and is creating more of setting rather than distinct and usable pockets of outside space. Although, it is accepted that this is a central location, where there would be access to open space beyond the site, it is important that residents also have access to good quality private/ and or communal on-site space.

The Panel suggested that the area to the west of Block A be for private garden for the ground floor flats or be repurposed within the road/ parking layout.

Any submission would need to show that the proposed garden sizes would reflect those of the adjacent terraces.

Open space provision in accordance with Policy EN9 is discussed under Section g) below.

Internal Space for Future Occupiers

Although Policy H5 does not apply to central sites the information submitted demonstrates that all the proposed dwellings would meet the nationally described space standards for the type of dwelling.

Internal Layout

For Blocks A and C2 is there a way to avoid having the ground floor units immediately adjacent to refuse stores as for Blocks B and C1?

e) Transport/ Parking

The national policy priority of securing sustainable modes of transport is translated into RBLP Policy TR1, which 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”.

Policy CR2 requires development to contribute *“towards enhanced ease of movement through and around the central area”*.

Policy CR11 requires development in the Station/River Major Opportunity Area to: *“Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors.*

Policy TR4 states that:

“Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable.

Policy TR5 addresses car and cycle parking and electric vehicle charging points (EVCP). Parking is to be provided appropriate to the accessibility of the site and further detail is set out in the Council’s Parking Standards SPD. In terms of EVCP policy seeks at least 10% of spaces to be provided with an active charging point.

It is clear that the site is in a highly accessible location close to Reading Station, served by a number of high frequency bus services, all roads in the vicinity benefitting from comprehensive footway provision, and a number of local cycle routes close to the site providing access to various locations around Reading. It is within walking distance of a vast range of important services and facilities, thus creating opportunities for journeys to be made on foot, by bicycle, and by public transport.

The proposal includes retaining the existing access from Caversham Road, car parking would be at a rate of approximately one space per two dwellings and the provision of cycle storage is indicated on the floor plans. The covering letter also makes reference to the provision of electric vehicle charging points (EVCP) in accordance with the minimum 10% standards set out in Policy TR5.

It is acknowledged in the pre-application submission that the proposal falls below parking standards, however, the Transport Development Control Manager’s advice is that as a highly accessible location this restrained level of parking would be acceptable, given the controlled parking areas surrounding the application site, and the unlikelihood of units being eligible for permits.

A tracking drawing would be required to demonstrate that a refuse vehicle could enter and exit in forward gear.

A 2m wide footway would need to be provided for within the site on both sides of the proposed road.

As requested, Transport provided an early view that the proposed layout of the road and retention and re-use of the access would be acceptable in itself, but advised that this could prejudice the remainder of the allocation. This is because it was envisaged that the overall allocation would have a single access from Northfield Road. The suggested approach as presented would lead to two accesses.

As the pre-application scheme is coming forward first then it is of course only possible for the Caversham Road access to be used, and as Transport has confirmed that this would be acceptable in itself, subject to demonstrating no increase in trips compared to the existing, it is considered that this would be an acceptable approach. An option for road alignment between this site and the remainder of the allocation has been illustrated and it would be for the other part of the site to address suitable access and egress at the time of a scheme coming forward. Conversely, not allowing a proposal for part of the allocation to come forward, which is safe from a transport perspective, would then prejudice it.

f) **Environmental Matters - Noise, Air Quality, Contamination, and Flood Risk & Drainage**

Air Quality

The site is within an Air Quality Management Area and Policy EN15 states: *Development should have regard to the need to improve air quality and reduce the effects of poor air quality. ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused. iii. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring."*

Policy CR6 states: *"Proposals for residential development within the central area will be assessed against the following criteria: ii) Proposals for new residential development within the central area will be required to demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated."*

There will be the requirement to submit an Air Quality Assessment along with mitigation measures. The design should include measures to reduce the effects of poor air quality, including tree planting.

Noise

As a sensitive use located on a busy road, and in the context of surrounding commercial uses, and to comply with relevant policy set out above, there is the need to submit a noise assessment as part of any formal submission.

Any design should incorporate ways to reduce the need for noise mitigation measures, including internal layouts, which locate sensitive rooms away from the noisiest facades.

Contamination

Policy EN16 is clear 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 the wider environment, during demolition and construction phases as well as during

the future use of the site. As the site is potentially contaminated any formal application submission would need to be accompanied by a Phase 1 desk study.

Flood Risk & Drainage

The application site currently lies within Flood Risk Zone 2 (Medium Probability) (between 1 in 100 and 1 in 1000 annual probability of river flooding). Therefore, the proposal needs to be assessed in the context of national policy within NPPF Section 14. 'Meeting the Challenge of Climate Change, Flooding and Coastal Change', the NPPG - 'Flood Risk and Coastal Change (Aug 2021)', and RBLP Policy EN18: Flooding and Sustainable Drainage.

The key thrust of national and local planning policy is that when determining applications LPAs should ensure that inappropriate development in areas at risk of flooding should be avoided by directing development to the areas of lowest flood risk, but where development is necessary it should be made safe for its lifetime without increasing flood risk elsewhere.

The NPPF requires strategic policies to be informed by a strategic flood risk assessment. The RBLP was informed by a Level 1 Strategic Flood Risk Assessment (SFRA)^[1], which assesses flood risk across the Borough from a range of sources, and provides a basis for the Council to inform planning decisions. The Council also undertook a Level 2 Strategic Flood Risk Assessment (SFRA)^{[2] [3]} for proposed allocated sites, including this site, which considered the risk of flooding in greater detail within its local context, to ensure that the site could be developed in a safe and sustainable manner for the proposed mix of uses and indicative quantum as set out within the allocation, subject to other relevant policy and material considerations.

The SFRA states that *"the site is shown to be at medium risk of fluvial flooding, at a range of very low to high risk of surface water flooding and may be susceptible to groundwater and sewer flooding. The site is therefore potentially at risk of flooding from a number of sources. Subject to further analysis of the safe access arrangements, it is considered feasible that the site can be developed safely and in accordance with the requirements of the NPPF, to mitigate the potential risks of these sources of flooding."*

Where it is not possible to site specific types of development in lower flood risk areas, national policy requires the application of the Exception Test, informed by an SFRA or site-specific flood risk assessment. Paragraph 164 of the NPPF states that to pass the Exception Test it should be demonstrated that:

"a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

^[1] https://images.reading.gov.uk/2019/12/SFRA_main_June_17.pdf Reading Borough Council Level 1 SFRA, June 2017

^[2] https://images.reading.gov.uk/2019/12/27560_RBC_L2_SFRA_Report_Dec17_AppB.pdf Level 2 Strategic Flood Risk Assessment, Dec 2017

^[3] Part of the site was assessed - AB075 - 115-117 Caversham Road (Local Plan ref: CR11f - part)

As the application site is allocated it has been subject to both the Sequential and Exceptions Tests^[4]. However, Paragraph 166 of the NPPF states that *“the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan making stage, or if more recent information about existing or potential flood risk should be taken into account.”* This is reiterated in RBLP paragraph. 4.2.98 where it is stated that *“there is no need for this to be repeated unless the proposed use and/or flood risk vulnerability classification would differ from the allocation”*. It is not considered that the exception test needs to be reapplied as the proposal is broadly in alignment with the development as envisaged through the local plan. Therefore, as the exception test was applied through the Local Plan process and this determined that the sustainability benefits would outweigh the flood risk, and the Level 2 SFRA states that *“it was considered feasible to design the site in such a way that it remains safe throughout the lifetime of the development”* no further assessment against the sequential and exceptions test are required. However, the Level 2 SFRA made it clear that it was essential that a number of design recommendations be incorporated into any scheme.

A site-specific Flood Risk Assessment would still need to form part of the application, so that, in accordance with NPPF (Paragraph 167) and RBLP Policy EN18, the LPA would be able to be satisfied that flood risk would not be increased elsewhere and that it meets the requirements within Policy EN18. The FRA would need to identify measures to manage the risk of flooding and accord with the relevant design recommendations from the Council’s Level 2 SFRA:

LEVEL 2 SFRA Design Recommendations (summarised)
1. Floor levels within the site should be situated a minimum of 300mm above the 1 in 100 annual probability plus allowance for climate change, in this instance +25%, assuming a 100 year lifetime for residential development.
2. Flood storage should be analysed to show that the proposed building footprint of the development will not cause a detriment to the available storage during the 1 in 100 annual probability +25% climate change allowance flood event. The presence of a significant existing building footprint suggest that floodplain storage capacity could be improved through effective design measures.
3. Where appropriate, buildings should adopt resilient design techniques.
4. Sustainable Drainage Systems (SuDS) should be incorporated into the site design, aiming to achieve greenfield runoff rates, if feasible.
5. Safe access is available in the current 1 in 100 annual probability flood event and a ‘Flood Management and Evacuation Plan’ is prepared to consider the impacts in the climate change scenarios.
6. It is essential to ensure that all basement areas within flood affected areas of the site are watertight, and the entrance point is situated above the 1 in 100 annual probability +25% allowance for climate change flood level. Basements should not be used to provide habitable areas in locations classified at Flood Zone 2 ‘Medium Probability’.
7. Residual risk to the development should be investigated against the 1 in 100 annual probability +35% allowance for climate change flood event.

At formal application stage it would also be for the Environment Agency to review the FRA, as a statutory consultee, and determine whether sufficient detail is

^[4] https://images.reading.gov.uk/2019/12/EV028_Sequential_and_Exception_Test_Local_Plan_2018.pdf

provided in terms of the flood risk and mitigation measures. You would need to liaise separately with the EA as part of any pre-application discussion.

In terms of SuDS any proposal would need to accord with Paragraph 079 of the 'Flood Risk and Coastal Change' NPPG, which states that *"new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems and major developments should provide sustainable drainage systems unless demonstrated to be inappropriate."*^[5], and the requirements of Policy EN18.

g) Trees, Landscaping, Ecology & Open Space

Trees Landscaping and Ecology

There is a significant level of national (NPPF Para 131 and National Model Design Code (July 2021)) and local policy support for tree planting and green infrastructure.

Policy EN14 of the RBLP states that *"Reading's vegetation cover will be extended..... New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, ... to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change....."*

Trees and landscaping are important with respect to improving air quality (Policy EN15) and can be incorporated into SUDS provision (Policy EN18).

The overarching design policy CC7 makes it clear that the *"quality of the public realm and provision of green infrastructure and landscaping"* is a key component of development form, which contributes to maintaining and enhancing the character and appearance of an area.

Central Reading specific policy CR3 relates to development needing to positively contribute towards the quality of the public realm.

Policy EN12 requires that development should provide a *"net gain for biodiversity wherever possible.... and wherever possible enhance features of biodiversity interest on and adjacent to the application site... Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable."* This is also addressed in paragraphs 174, 179 and 180 of the NPPF.

The site does not currently include any trees or other landscaping, and the submission identifies that it is proposed to include tree planting within the site, within the public realm and along the site frontage. Furthermore, it is proposed to include information to demonstrate biodiversity net gain. Such proposals would in general terms accord with the relevant policies EN12 and EN14.

However, there does not appear to be sufficient space to the front for meaningful tree planting or tree planting that would not conflict with the dwellings. It is advised that the building line needs to be set back to enable large scale, tall trees,

[5] [Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#)

to be planted to the front of the property, as well as addressing the need to have sufficient layoff to the front boundary to enable good quality design in terms of place making (as referred to above).

As set out under the consultation section above, this is a low canopy ward, on a designated 'treed corridor' and within the AQMA, it is, therefore, a priority area for tree planting. It is vital, therefore, that there is tree planting, especially to the frontage, to ensure that the scheme would contribute to the amenity provided by the existing adjacent trees on Vastern Road and Caversham Road, improve the appearance of the site, and meet the objectives within the Borough's adopted Tree Strategy, AQMA and Reading's climate change adaptation strategies.

With respect to Ecology the relevant policy is EN12, which requires that there should be no net loss of biodiversity and there should be a net gain wherever possible. It includes, that sites, should: *"Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable"*. The submission would need to be supported by a preliminary ecological assessment including bat survey, demonstration of how the development would result in a 'net gain' in biodiversity units as measured using the DEFRA 3 Metric, and details of enhancements, which should be designed from the outset, to maximise its value for wildlife.

Open Space

Paragraph 98 of the NPPF emphasises the importance of access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

Policy CR2 states that *"b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;"*

Policy EN9 requires 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 or improvement of existing leisure or recreational facilities. Policy EN9 specifically requires that 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. The open space requirements of Policy EN9 should be guided by the most up-to-date Open Spaces Strategy.

The Planning Obligations under Section 106 SPD (adopted April 2015) makes clear that *"Enhancement and management of and access to local outdoor recreation and open space directly serving the development, including provision in line with adopted site- specific policy"* is a matter to be covered by Section 106. This SPD continues to have effect in relation to Policy CC9 of the Local Plan, which states that *"Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time"* and identifies *"Open space, green infrastructure and other measures to improve or enhance biodiversity"* as one of the highest priorities for securing contributions.

As an inner urban location, it is accepted that it would not be possible to meet open space needs set out in relevant policy. Therefore, there would be an expectation that off-site contributions would be made towards improvements to nearby Christchurch Meadows, Kings Meadow and the adjacent Thames Parks to mitigate the impact of the development and make the scheme acceptable in Planning Terms. These existing open spaces are currently well used, and investment would be required to increase capacity in order to accommodate the increase in demand directly caused by the proposal and/or provision of safe movement corridors to integrate the proposal with these existing areas of open space.

The Local Plan contains no prescriptive requirements as to what any one development must provide in respect of open space provision. Any such requirement is expected to be informed by a detailed Open Space Statement. Therefore, the submission would need to include an Open Spaces Statement to assess the impact of the development on nearby open space and to comply with the requirements of Policies CR3, EN9, CC9 and the Planning Obligations under S106 SPD.

h) Sustainability

No specific detail, as to how the proposal would meet relevant sustainability policies, has been submitted, but the cover letter identifies that advice is sought on the scope of the “Council’s climate change policy commitments” and “Zero Carbon Homes” requirements. It is however, noted that green roofs appear to be indicated on Blocks A, C1 and C2 and would be welcomed as a positive step to improve the biodiversity of the site and to counter the long- term effects of climate change and the urban heat island effect.

In the context of reducing carbon dioxide emissions and as one of the authorities who has declared a climate change emergency, there are a number of policies within the RBLP, which are relevant to new development.

The overarching sustainability policy CC2 requires proposals for new development to be designed and have site layouts which *“use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.” Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*

Other policies to be addressed would be Policy CC3: Adaptation to Climate Change and CC5: Waste Minimisation and storage.

Policy CC4 deals with decentralised energy, and expects developments of more than 20 dwellings and/or non-residential development of over 1,000 sq m to 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. It also expects developments of over 10 dwellings or more or non-residential development of 1,000 sq m or more to link into an existing district energy network, where one is present within the vicinity of an application site, or demonstrate why this is not feasible. The supporting text to the policy in particular (paragraph 4.1.15) states that air-source or ground source heat pumps should be considered in the first instance, as these methods are less carbon intensive than CHP.

Specifically with regard to new dwellings Policy H5 requires:

*“.....b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations;
c. All major new-build residential development should be designed to achieve zero carbon homes.....”*

The supporting text to Policy H5 (Para. 4.4.6) states *“where homes are not designed to be carbon neutral, this will mean as a minimum a 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 (calculated as £60 per tonne over a 30 year period).”* Such carbon offsetting would need to be secured within a S106 agreement.

**It should be noted that the building regulations have just changed, and this changes the method that needs to be used to meet the legal minimum. Any development would need to be in the context of the new Building Regulations Part L.*

All major developments must also incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards. More details are set out under policy EN18.

The Council’s Sustainable Design and Construction SPD provides further detail for the above policies and outlines *“some of the methods that may be used to meet the requirements of policies CC2-CC5, EN18 and H5”* and makes it clear that (para 4.2) *“Fabric improvements are much more likely to ensure long-term carbon reductions and are generally achieved at lower cost than on-site generation. Therefore, applicants should seek to improve fabric efficiency in the first instance” in terms of meeting the energy hierarchy requirements.*

Specifically, the SPD identifies the Local Plan allocation CR11f as part of the ‘North of the Station’ cluster, one of four, which is a potentially suitable location for a town centre heat network scheme. This Council aspiration has since progressed further and it should be noted that the Council is currently progressing the feasibility of a scheme which will centre on sites north and east of the station, for a heat network, utilising heat from water in the River Thames. Therefore, not only does the pre-application site need to follow sustainable energy principles, it is also a key site to delivering this scheme which aims to provide stable, low carbon heat, across a series of major developments in the north-central area.

Should a development come forward prior to an existing network being available to connect into then the SPD (paragraph 8.10) sets out provisions to be made in the design of the building. These should be incorporated into the design development.

i) S106 & Community Infrastructure Levy (CIL)

S106

Policy CC9, supported by the Planning Obligations SPD (2015), is the overarching policy on securing infrastructure, and makes it clear that developments 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.”*

As a housing scheme there would be a need to meet the affordable housing requirements as set out under Policy H3, as acknowledged and addressed in the

pre-application submission. A scheme of this scale would require an onsite provision of 30% affordable housing, and an appropriate tenure mix to include social rented, affordable rent and shared ownership. More detail is provided in the supporting Affordable Housing SPD. Any provision below policy compliance would need to be supported by a viability assessment. The current priority needs are for housing with 2 or more bedrooms.

Policy H3 seeks on site provision in the first instance, with a financial contribution being negotiated to make up the full requirement as appropriate. The current proposal includes policy compliant provision in terms of overall percentage. In line with Policy H3 and supporting SPD the proposal includes the appropriate tenure split of 71% (12 of 17) as affordable rented dwellings and 29% (5 of 17) shared ownership units. It is important that such units are integrated into the development.

Paragraph 4.29 of the SPD states that the *“affordable housing to be provided will depend the mix of sizes and types within the overall development, and the expectation is that the homes to be provided will broadly reflect the overall mix of sizes and types.”* The proposed size and type of affordable housing would largely reflect the mix on the site. However, as the scheme includes family housing it would be expected that a proportion of the affordable housing provision would be in this form and not just flats as currently identified.

It should be noted, however, that in the instance *“where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.”* There would be a fee required of £10,000 to assess and negotiate viability appraisals, and the Council reserve the right to charge additional fees at a fixed hourly rate where matters get particularly complicated or overly time consuming.

Further detail on the Council’s requirements for affordable housing is set out in the Council’s Affordable Housing SPD (2021), along with what detail is required as part of a Viability Assessment.

In addition to affordable housing obligations, there would also be the requirement for obligations with respect to an Employment, Skills and Training Plan for construction. Please see the relevant SPD for further details:

<https://www.reading.gov.uk/media/1064/Employment-Skills-and-Training-Supplementary-Planning-Documents-Adopted-April-2013/pdf/employment-skills-and-training-supplementary-planning-documents-apr13.pdf>

It is recommended that contact is made with Reading UK CIC <https://livingreading.co.uk/the-partners/key-organisations/reading-uk-cic> who are the economic development arm of the Council and who will be able to advise on developing an Employment, Skills and Training Plan.

In addition to the above there may also be the requirements for other obligations including, but not limited to transport (in terms of any highway works), open space, carbon offsetting, energy infrastructure (including decentralised energy), flood mitigation and prevention measures; and public realm enhancements (where on-site landscaping is insufficient).

CIL

The development would be liable for CIL. The Council's CIL Charging Schedule sets a base rates per square metre for different uses. The rate is index linked from the date of adoption of the Schedule and the current rate for residential for 2022 (applicable until 31/12/2022) is £156.24 per square metre (Gross Internal Area - GIA) for residential and sheltered accommodation.

The liability for this site would also be subject to any relevant allowances for existing GIA that meets the CIL '*in lawful use*' test, which could allow an offset for existing GIA (as referenced in the cover letter). The resultant liability may also be reduced should the developer apply for mandatory Social Housing CIL relief allowed within the CIL regulations.

A completed CIL form would be required as part of any formal submission.

j) **Submitting a Planning Application**

The Council's validation requirements are set out at the following link: <https://images.reading.gov.uk/2021/12/Validation-Checklist-2021-Final-Version-02.12.21.pdf>

The following documentation would be expected as part of a formal submission:

- Affordable Housing Statement
- Air Quality Assessment
- Contaminated Land Survey - Initially a 'phase 1' desk study
- Daylight/ Sunlight Assessment - Please note that the Validation Checklist states *"For full planning applications and major developments, it is likely that these reports will require independent review which will be funded by the applicant."*
- Design and Access Statement
- Ecological Survey and Report - ecological assessment, initial bat survey, and demonstration that there would be a net gain in biodiversity as measured using the DEFRA metric or its successor.
- Energy Efficiency Statement
- Flood Risk Assessment - taking into account advice above
- Heads of Terms Proposals
- Landscape Principles
- Materials Details
- Noise & Vibration Impact Assessment
- Open Space Statement
- Planning Statement
- Plans and Drawings - the red line plan needs to include the relevant highway accesses.
- Sustainability Statement
- SUDs
- Transport Assessment & Travel Plans
- Utilities Statement
- Vehicle (Including Cycle) Parking and Waste Collection Details
- Viability Appraisal & Report - if non-policy compliant Affordable Housing provision is presented.

It is advised that pre-consultation engagement is undertaken and this should include with the Bell Tower Residents' Association and the Civic Society.

Conclusion

The principle of the redevelopment of this site, and the proposed use for residential would be acceptable. However, there are some areas of the layout and overall design, which require some further development. This is to ensure that the site creates a suitable, landscaped, street frontage, that the overall scale of the houses accords with the scale of the existing terraces, and that there is a reducing scale across the site.

It is considered that there needs to be more setting around Blocks C1 and C2 and a realignment of these Blocks to be more parallel to the street.

These changes will involve a reduction in the scale of development, a reduction in parking provision and an increase in landscaped areas, which may in turn require a reduction in the number of dwellings which can be accommodated.

Addressing flood risk, sustainability, noise and air quality matters need to be fully incorporated into the design development.

The proposed scheme layout is considered to have satisfactorily addressed the need for this site, a part of the proposed allocation, to not prejudice the bringing forward of the remainder of the site at some future date, albeit at present the adjoining landowner has confirmed no immediate desire to relinquish the site for redevelopment.

Planning Statement

97a-117 Caversham Road, Reading



Appendix 3 Proposed Site Layout Plan



Notes:

- Do not scale from this drawing; work to figured dimensions only.
- All information is to be checked on site for accuracy and fit.
- Report any discrepancies and omissions to RMA Architects.

CDM ERIC Notes

- Where RMA services on a project do not include for site inspections and works surveys, RMA do not warrant that 'as built' issue drawings are a complete and accurate record of what has been constructed

- Unless notified specifically by the responsible party, changes made on site to RMA design information has not been incorporated in this drawing.

P1	02.09.22	Draft Planning Submission	NK	CT
P0	05.08.22	First Issue	VC	AS
Rev	Date	Description	By	Chkd

RM_A

320C Highgate Studios
53-79 Highgate Road, London, NW5 1TL
London NW5 1TL
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Key Plan



Project

Carters Site, Reading

RMA Project Reference 2207

Client

Bellway Thames Valley

Scale	Date	By	Checked
1 : 200 @ A1	07/27/22	KD	AS

Drawing Title

SITE PLAN

RF

ROOF LEVEL

Purpose of Issue INFORMATION	Status Code
Drawing No CR-RMA-ZZ-RF-DR-A-0104	Revision P1

Planning Statement

97a-117 Caversham Road, Reading



Appendix 4 Hicks Baker Retail Report

RETAIL REPORT

**FORMER CARTERS SITE
CAVERSHAM ROAD
READING**

As Requested by

Bellway Homes Ltd

Prepared by Fiona Brownfoot MRICS

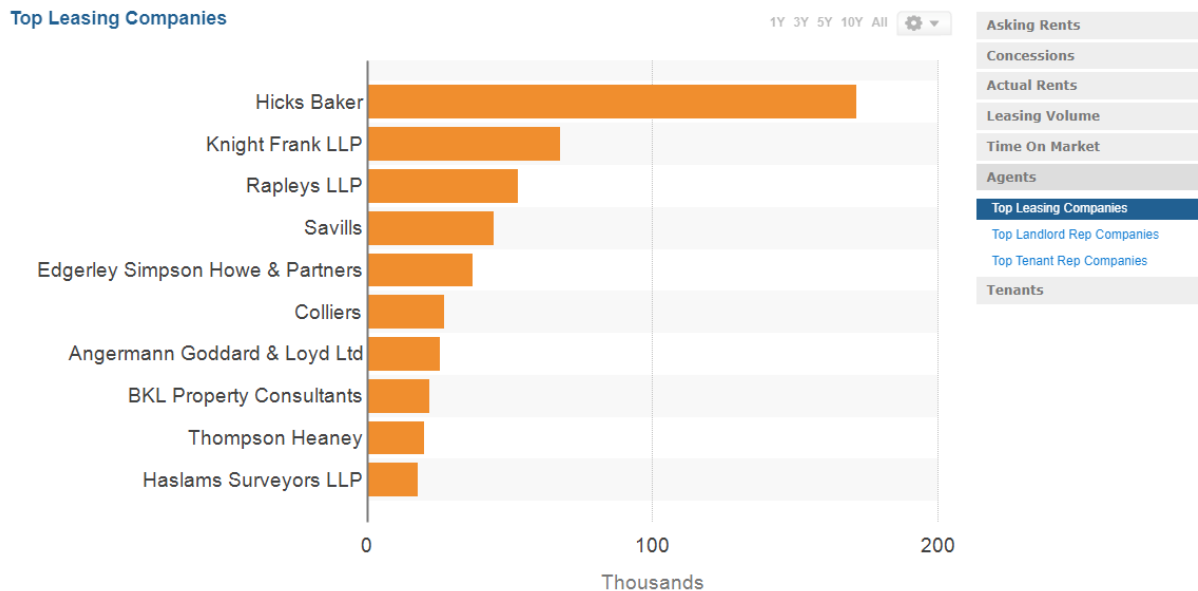
12th August 2022

INDEX

- 1. Credentials**
- 2. Retail Sector**
- 3. Reading Retail Market**
- 4. Conclusion**

1.0 CREDENTIALS

- 1.1 I have been a Partner in charge of the Retail and Leisure Department at Hicks Baker for the last 22 years and have lived and worked in the Reading area for the last 35 years.
- 1.2 According to CoStar, over the last 5 years we have let more retail property in the greater Reading area than any other agent.



- 1.3 We are continue to be the agents acting for the (new) owners of Broad Street Mall shopping centre in addition to acting for many funds, property companies and private landlords, and are currently marketing 42 retail units in the greater Reading area.
- 1.4 We keep quarterly statistics on the availability and vacancy rates for the town centre, together with completed transactions and these figures are published along with a short market commentary to stakeholders within the town.
- 1.5 I therefore feel suitably qualified to comment on the state of the retail market, the loss of retail use and the prospects of retained retail in this location on Caversham Road, Reading.

2.0 RETAIL SECTOR

- 2.1 The retail market over the last 3 years has obviously experienced unique conditions, and the lasting legacy is yet to be fully established however there is consensus amongst market commentators on one aspect.....that there is too much retail space in the UK. This was the case even prior to 2020, and the situation has merely been reinforced by the impact of the pandemic.
- 2.2 The most impactful trend over the last 5+ years is in changing consumer habits both in where disposable income is spent and what its spent on. The trend on the latter is for money to be spent less on tangible goods and more on experiences.
- 2.3 Another trend which has been substantially accelerated, and will exceed all previous predictions, is online spending. The proportion of retail sales that are made online has increased from its standard level of 27% pre-pandemic to a new normal of 32% , though down from the dizzying heights of 37% seen in the midst of various lockdowns.
- 2.4 Currently the retail market is suffering as a result of adverse economic factors, with cautious consumer spending significantly affecting operators appetite to take the risk involved in committing to the cost, both of set up and ongoing occupation, of physical units.
- 2.5 Markets and conditions are cyclical and the current situation will change but it is likely to remain in this state for the next 2-3 years.

3.0 READING RETAIL MARKET

- 3.1 The vacancy rate for the town centre stood at 11.5% in Q4 2019 and has increased to 15.60% at the end of Q2 2022.

Over the course of the last 5 years the lowest rate was 8.71% (Q3 2017) and previous highest was 13.06% (Q4 2018).

According to the British Retail Consortium and the Local Data Company the figure for the UK is 14.1% the highest its been since 2015.

- 3.2 Following the dramatic structural change in the retail world which has bitten hard in the last few years, like many retail locations, Reading's current stock exceeds demand and there are many units which have now been vacant for 3+ years.

3.3 Take up in the town centre in last 5 years has been as follows:-

2017	38
2018	21
2019	12
2020	11
2021	21

3.4 Operators are only seeking to take sites which they can be certain will generate the level of income they require – therefore unproven pitches or units which don't meet the four 'P's - **prominence** to cars / footfall; **parking** (for out of town units); **proximity** to other attractions; **price**, will not be considered.

4.0 RETENSION OF RETAIL

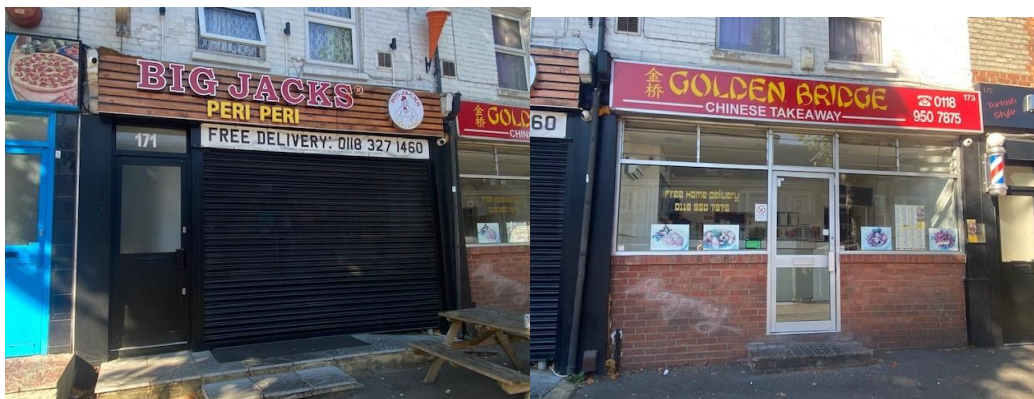
4.1 If retail space were incorporated within the ground floor as part of the redevelopment proposals for this site, in my view it would be extremely difficult to let due to the lack of parking and the lack of demand in general for such units. The likelihood is that it would remain boarded up as per a similar site to Carters, known as Metropolis to the north of Slough station, where the ground floor space has remained boarded up since it was built in 2015. It had no parking and there was no demand for space in this location.



4.2 Existing commercial tenants in this section of Caversham Road are almost exclusively food operators – either hot food takeaway or restaurants, as shown below. Therefore, demand,

if there was any, would be likely to come from these type of operators which a) adversely impacts on the visual impact aspect of any redevelopment scheme and b) would adversely impact on the 'quiet enjoyment' of the residential tenants.





5.0 CONCLUSION

5.1 In conclusion, given the current vacancy levels of retail property within and surrounding Reading Town Centre, the loss of retail from this location on Caversham Road, which is not considered prime retail or protected by relevant planning policy, is considered to be acceptable.

5.2 In respect of retaining retail as part of the proposed redevelopment of the site, it is considered that due to the site's location and limited opportunity for parking, that in today's market, there would be very limited interest in such a property, leading to long term vacancy. Any interest is likely to come from the hot food takeaway industry, as is apparent from the take up and occupancy of numerous nearby units, which would not be compatible with the Council's aspirations for high quality residential development on this site.

For further information contact:

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