

**Land at and Adjacent to the
Former Leaderboard Golf
Centre Richfield Avenue
Reading Berkshire RG1 8EQ**
River Academy Planning
Statement

**On behalf of Bowmer + Kirkland and the Department for
Education**

December 2021

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1 Introduction

- 1.1 This Planning Statement has been prepared on behalf of our client, Bowmer + Kirkland (The Applicant) in support of a full planning application to Reading Borough Council as the Local Planning Authority (The LPA). Bowmer + Kirkland are the Department for Education's appointed contractor to deliver the proposed new school building and associated works.
- 1.2 The full site address is the Former Leaderboard Golf Centre Richfield Avenue Reading Berkshire RG1 8EQ (The Site), the site includes land to the south of the Former Golf Centre, including the means of access from Richfield Road..
- 1.3 The full description of development is as follows:

"The demolition of existing driving range structures and the development of a new three-storey 8 form entry school for years 11 – 16, including a SEND unit and 300 place 6th form (total school capacity of 1500 pupils) including the creation of a new access from Richfield Road, new parking area, cycle parking landscaped areas, external play areas, Multi Use Games Area (MUGA) and sporting pitches."
- 1.4 The proposed new school will also deliver a new dedicated Special Education Needs and Disability (SEND) unit, this unit is located at the ground floor, close to the site entrance and provides a largely self-contained unit separate from the main school circulation areas.
- 1.5 The site indicated in red on the site plan (FS0949-ALA-XX-ZZ-DR-L-0016 Site Location Plan -S2-P01) shows the area of the application site necessary to carry out the proposed development, the area of the application site which will fall under the control of the school is shown within the secure line diagram, (FS0949-ALA-XX-ZZ-DR-L-0019 Secure Line Plan-S2-P02).
- 1.6 The proposed school and sixth form will operate as "The River Academy", in reference to the site's riverside location. The school will be operated on behalf of the Local Education Authority by the Maiden Erlegh Trust, who operate several successful schools in the local area.
- 1.7 The proposals have been developed following pre-application discussions with the Local Planning Authority and public and stakeholder engagement.
- 1.8 A Screening Opinion has been submitted to Reading Borough Council, prior to the submission of this this planning application. As the proposals are not likely to give rise to significant environmental

effects from an Environmental Impact Assessment perspective, it is not anticipated that an EIA would be required.

- 1.9 It is proposed to develop a new school on the site, which will address the pressing unmet need for local school places. The proposed secondary school would accommodate 1200 pupils aged between 11 to 16 years old and 300 sixth form students. The proposed development will comprise a part two and part three storey building, totalling 11,733 sqm (GEA).
- 1.10 This application includes proposals to improve the existing public car parking area to the north of Richfield Road. The improved parking area which will remain under the control of Reading Borough Council and will provide the parking and access facilities for the proposed school. Access to the site is proposed to be from the existing access point on Richfield Road, and via an improved existing access track, which runs parallel and to the east of Cow Lane.
- 1.11 We describe in this Planning Statement that the proposals enjoy high levels of national and local policy support, that the scheme complies with the applicable planning policy requirements, that the scheme delivers significant benefits, and that there are no material considerations, which demonstrably show that planning permission should not be granted.

The DoE Offsite MMC Framework

- 1.12 The scheme is to be delivered through the Department for Education's Off-Site Framework, which focuses on the delivery of new schools through Modern Methods of Construction (MMC).

Application Documents

- 1.13 This Planning Statement should be read in conjunction with the below listed drawings and supporting documents:
- Completed Application Form;
 - Completed CIL Form;
 - Ownership Certificates;
 - Cover Letter by Nexus Planning;
 - Design and Access Statement, including Materials Schedule, by Jestico and Whiles Architects.
 - This Planning Statement by Nexus Planning;

- Sequential Assessment by Nexus Planning;
- Open Space Assessment by Nexus Planning;
- Energy Statement by CPW;
- BREEAM Pre-assessment by Build Energy;
- Construction Environment Management Plan by B+K;
- Human health risk assessment by Ashfield Solutions Group;
- Flood Risk Assessment by Ashfield Solutions Group;
- Outline Flood Response Plan by Ashfield Solutions Group;
- Water Quality Management Strategy by Ashfield Solutions Group
- Drainage and SUDS details by Hexa
- Air Quality Assessment by DustscanAQ;
- Phase I Contaminated Land and Geotechnical Study by Terra Firma;
- Phase II Geo-Environmental Assessment by REC;
- Contamination Remediation Strategy by REC;
- Ecological survey by HCC ecology;
- External Lighting Proposals by CPWP;
- Arboricultural Impact Assessment by SJ Stephens;
- Transport Assessment by Hexa Consulting;
- Travel Plan by Hexa Consulting;
- Landscape Visual Assessment by Ares Landscape Architects;
- The following landscaping plans by Ares Landscape Architects:
 - FS0949-ALA-XX-ZZ-DR-L-0002 Landscape General Arrangement Plan -S2-P12
 - FS0949-ALA-XX-ZZ-DR-L-0007 Fencing General Arrangement Plan-S2-P07
 - FS0949-ALA-XX-ZZ-DR-L-0011 Site Sections 1 of 2 -S2-P03

- FS0949-ALA-XX-ZZ-DR-L-0012 Site Sections 2 of 2 -S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0013 Planting Plan-S2-P05
- FS0949-ALA-XX-ZZ-DR-L-0014 Planting Schedule-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0016 Site Location Plan -S2-P01
- FS0949-ALA-XX-ZZ-DR-L-0019 Secure Line Plan-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0020 External Sports Provision-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0021-BB103-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0022 BB103 Area Analysis-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0023-Levels Plan-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0027-Whole site Illustrative Masterplan-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0028-Detailed General Arrangement 1 of 2-S2-P02
- FS0949-ALA-XX-ZZ-DR-L-0029-Detailed General Arrangement 2 of 2-S2-P02
- The following drawings by Jestico and Whiles Architects;
 - FS0949-JWA-ZZ-00-DR-A-1001-P01– Ground Floor Plans
 - FS0949-JWA-ZZ-01-DR-A-1002-P01– First Floor Plans
 - FS0949-JWA-ZZ-02-DR-A-1003-P01 – Second Floor Plans
 - FS0949-JWA-ZZ-RF-DR-A-1004-P01– Roof Plans
 - FS0949-JWA-ZZ-ZZ-DR-A-3001-P02 – South and East Elevation and Sections
 - FS0949-JWA-ZZ-ZZ-DR-A-3002-P02 –Sections
 - FS0949-JWA-ZZ-ZZ-DR-A-3003-P02 – North & West Elevations and Sections
 - FS0949-JWA-ZZ-ZZ-DR-A-3010-P01 – Bay Studies
 - FS0949-JWA-ZZ-ZZ-DR-A-4001-P02 - Sections

Report Structure

1.14 This Planning Statement comprises the following sections and should be read in conjunction with the application documents:

- **Section 2:** The site and its context;
- **Section 3:** Planning History and Pre-Application Consultation;
- **Section 4:** The Proposed Development;
- **Section 5:** The relevant Development Plan Policies and the Material Considerations;
- **Section 6:** Assessment of the Proposed Development against the Development Plan Policies and other Material Considerations and scheme benefits;
- **Section 7:** Summary and Conclusions

2 Site and Surrounding Area

- 2.1 There is a pressing need for secondary school places within the local area. The report, dated 2019, prepared by Reading Borough Council's Brighter Futures for Children, which is attached to this planning statement as Appendix 2 confirms the need for a new secondary school in the area, and notes that the delivery of the school at the Rivermead Site has been delayed from 2021.
- 2.2 Reading borough has a higher density of built form than the rest of Berkshire, with a significant amount of the borough developed with urban and suburban development. The supply of land suitable for a new secondary school in Reading is limited as a result of the density of existing development and other constraints, the subject site has been identified as meeting the requirements for a new secondary school, these requirements are set out more fully in the Design and Access Statement and Sequential Assessment which accompany this application.

The site

- 2.3 As set out in the site plan, which accompanies this application, the site comprises two distinct elements a large rectangular northern area and a southern triangular area, which are separated by a drainage ditch. The proposed new school buildings, playing pitches, MUGA and landscaped and communal spaces are located within the northern rectangle, while parking and access are located within the southern triangle.
- 2.4 The northern rectangular area was formerly used as a golf driving range and more recently a laser shooting range. This area is largely open and laid to grass, the former driving range is enclosed by a fence against which vegetation has established along the north, east and south site, scattered trees are located to the north of the site boundary, with a more substantial row of trees along the western site boundary. A covered golf driving shelter, and reception building is located to the south of the former driving range and runs almost the entire width of the site, this structure is to be demolished.
- 2.5 The southern triangular area is separated from the rectangular driving range element by a drainage ditch. The southern triangle is an informal parking area with an unbound surface.
- 2.6 The site area also includes the means of access from Richfield Road, which is via the existing access point and an improved access road which runs along the western edge of the site, to the proposed improved parking area.
- 2.7 The site within the Application boundary measures approximately 5.43ha, and is made up as follows:

- Northern area: 3.987ha
- Southern triangle: 1.242ha
- Ditch: 0.2ha

2.8 The site is generally flat and level and save for the ditch area, is free of natural or physical features, which could pose impediments to construction and use. There are no Tree Preservation Orders registered against the site on the site.



Figure 1 – view of informal parking area north of Richfield Avenue



Figure 2 – View of the northern rectangle and boundary fencing

- 2.9 Richfield Avenue is situated to the south of the site. Richfield Avenue connects the site to West Reading and Tilehurst to the west, Caversham, via Caversham Bridge to the north and Reading and Earley to the east.
- 2.10 Reading and Reading West train stations are located approximately 1 km to the east and south of the site respectively. The nearest bus stops are located on Richfield Avenue, approximately 240 metres to the east of the site. Richfield Avenue carries both cycle paths and wide footpaths.

The site context

- 2.11 The site is situated to the west of the Rivermead Leisure Centre, the leisure centre is currently being redeveloped with new swimming and diving pool, six court sports hall and a new gym. An external artificial playing pitch, is located immediately to adjacent to the site.
- 2.12 The Caversham Bridge Garden Centre is located to the southeast of the site, the garden centre utilises the triangle portion of the site for delivery purposes. The garden centre itself is currently the subject of a planning application to replace the existing temporary structures with new permanent building, to replace the former temporary structures, in order to accommodate the future needs of the business.
- 2.13 The land to the west of the site comprises open fields, beyond an unsurfaced track. These fields are used to host the annual Reading Festival. Open fields are also located to the north and northeast of the site, these fields are utilised for camping during the Reading Festival. The River Thames runs some 120 metres to the north of the site, beyond which, some 200 m further north of the site, is the southern edge of Caversham, along The Warren, with a mix of dwelling houses, open spaces and recreational areas.
- 2.14 As confirmed by Reading Borough Council in their pre-application response dated 26 March 2020, both former uses, being the golf driving range and clay shooting range, were privately managed. Due to safety reasons and the need for strictly controlled access of the former uses, access to the land for the wider public was restricted.
- 2.15 The below aerial photograph identifies the site in red. (Refer to the site plan for further details).



Figure 2 – Site Location Plan

- 2.16 The site is not considered to fall within the setting of any heritage assets, due to distance, lack of intervisibility, lack of association and the barrier provide by the River Thames. The Caversham Conservation Area, Caversham Court Gardens (Grade II registered park) and several Grade II and a single Grade II* (St Peters Church) are situated approximately 350 metres to the north east of the site, and around 450 metres to the proposed new school buildings. Further listed buildings, at Grade II are Isomer and Chiltern Court, which are approximately 350 m and 450 metres from the site respectively, and 450 and 550 m from the proposed new school buildings.
- 2.17 The Environmental Agency interactive flood map identifies the majority of the site, as being located within Flood Zone 2, land and property in flood zone 2 have a medium probability of flooding. The northern corner of the site and a portion of the southern triangle are situated within Flood Zone 3, Land and property in flood zone 3 have a high probability of flooding.
- 2.18 The design and siting of the building has taken into account the flood risks of the site, through:-
- Locating the proposed buildings in the area of lowest risk of flooding,
 - Raising floor levels above the critical flood level.

- The building has been elevated to create a void underneath to create additional flood storage volume.
- The arrangement of the building over three levels makes efficient use of the site and reduces the building area affected by flooding.

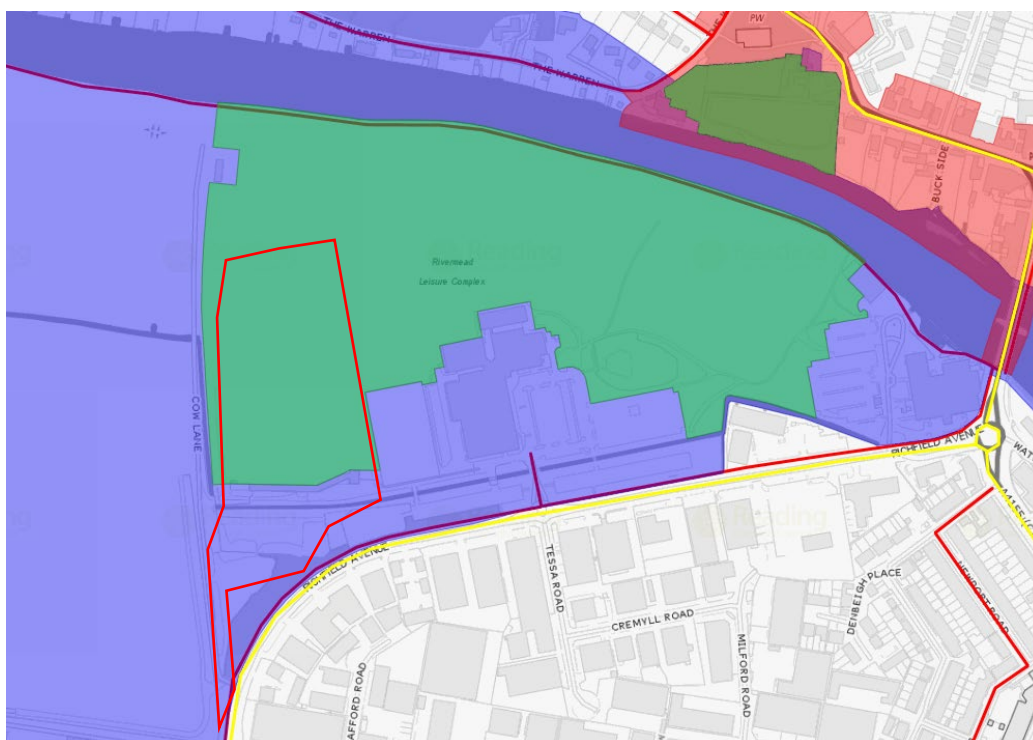
2.19 The applicant has provided a Flood Risk Assessment, a Drainage Strategy and a Flood Response Plan to demonstrate that the proposals have taken the flood risk and drainage constraints, and applicable policy, into account and these technical reports demonstrate that the proposed school is capable of being delivered and operated in a manner which appropriately manages the risks of flooding. The applicant has also undertaken a sequential assessment to confirm that there are no alternative sites, which are suitable, available and deliverable for the proposed new school.

2.20 The adopted Policies Map (extract provided under figure 3 below) indicates the following policy designations:

- EN13: Major Landscape Feature (purple wash)
- EN7: Local Green Space and Public Open Space (Green Wash)
- EN15: Air Quality Management Area, affects the southern portion of the site

2.21 There are a number of off-site designations which are also relevant to the proposals for the new school, as set out below:

- TR4: Cycle Routes (Red line along Richfield Ave & Thames Path)
- TR3: Classified Highway Network (Yellow line along Richfield Ave)
- EN1 & EN3: Conservation Areas (Red wash)



Bowmer + Kirkland and the Department for Education

3 Planning History

Planning History

- 3.1 A review of the Council's online planning application register does not identify any formal applications submitted at the subject site. There are several planning applications relating to adjacent land, which are considered relevant to the application at hand.
- 3.2 In April 2021, planning permission was granted for a *"new replacement leisure centre including a 25m 8 lane competition pool and diving, with associated parking and landscaping, followed by the demolition of existing centre"*. For further details, refer to Planning Application Reference. 201734.
- 3.3 A planning application is currently pending for the construction of a new garden centre building and new kitchen and toilet facilities was submitted in September 2019. For further details, refer to Planning Application Reference. 191532

Screening Opinion

- 3.4 An EIA Screening Opinion has been submitted to Reading Borough Council in advance of this planning application. Based on the submitted Screening Opinion it is the applicants opinion that the proposals are not likely to give rise to significant environmental effects from an EIA perspective and therefore an EIA is not required.

Pre-application Consultation – ref. 21/07017/PREAPP

- 3.5 In August 2021, a request for pre-application consultation was submitted by the applicant to Reading Borough Council in respect of proposals for *"a new 8-form entry mainstream secondary school with sixth-form (1500 pupils total) with external multi-use games areas, car parking, vehicular access and landscaping"*.
- 3.6 A pre-app response dated 23 November 2021 has been received. A copy of the pre-application response is attached as Appendix 1. The Department for Education undertook earlier pre-application engagement with the Council, a copy of the subsequent response dated March 2020 is appended to the November pre-application letter. The pre-application responses confirm that the proposals are acceptable in principle.
- 3.7 Below is an summary of the key matters dealt with in the pre-application response:

- **Principle of Use:**

- Policy EN7 affords protection to both Local Green Space from inappropriate development. Policy EN7 is specifically worded to protect the unnecessary loss of those areas of open space, which can be accessed by the public. As the former use precluded public access, and therefore the change in the way that the site will function, as an element of the wider Local Green Space, will not affect the manner in which the Rivermead and Thameside Promenade is used by the community.
- Policy OU1 'New and Existing Community Facilities' provides clear policy support for new, extended or improved community facilities.
- A sequential assessment will be required to support the selection of the site and to demonstrate that planning policies have been taken into account.
- Justification for the need for the school is to be provided.
- **Scale, Layout and Appearance:**
 - The position of the new school building maximises the use of the site.
 - A central area and/or front elevation which would form the main entrance to the school. This should be designed as the main focal point.
 - The overall design of the building should give the school building a strong visual identity associated by a strong focal point.
 - Majority of trees to the front boundary with Richfield Avenue are to be retained and reinforced where appropriate.
 - To the rear, well surveyed areas are to provide various sheltered outdoor spaces for use by the school for educational and recreational purposes.
 - The norther portion of the site (around sports pitches) should show how areas around the pitches are to be accessed and used. Planting of trees and wildflowers to increase the biodiversity will be expected to the north, which will also create a soft edge to the areas around the playing pitches.
 - With regard to wider visual impact considerations, Policy EN13 requires that development minimises the visual impact, which is largely dependent on the location, design and scale of proposals.

- **Sustainability**
 - There is a need for the planning process to fulfil the Authority's commitment of ensuring that sustainability is placed at the heart of the local decision-making process, especially on significant social infrastructure projects such as schools.
 - The school must meet a minimum BREEAM 'Very Good' standard.
 - Consideration must be had to the potential for the use of decentralised energy.
 - Ecological impacts are to be fully considered via ecological assessment, biodiversity net gain and enhancements are to be provided.
- **Transport Impacts:**
 - A key factor is the ability for the site to operate without obstructing or prohibiting access to surrounding uses.
 - A comprehensive travel plan will be required.
 - Access should accommodate vehicular and pedestrian and cycling access.
 - Proposals are to consider the operation and construction of the leisure centre development and the commissioning, operational and de-commissioning phases of the Reading Festival.
- **Flood Risk and Drainage:**
 - A comprehensive Flood Risk Assessment (FRA) is required to support the application.
 - The report would need to demonstrate that the development would not exacerbate or increase the risk of flooding either on the site or in the locality.
- **Contaminated Land:**
 - The application should be supported by a Contaminated Land Survey.
 - Details of proposed mitigation measures are to be provided.
- **Planning Obligations:**
 - A planning obligation to deliver employment opportunities through the development has been requested, in the form of an Employment and Skills Plan.

- Contributions to highways works may be required
- Contributions to improvement to bus services may be required.

4 Development Proposals

- 4.1 Full details of the proposals are contained within the drawings and technical supporting reports which accompany this planning application (set out paragraph 1.13 above), notably the drawings and the Design and Access Statement by *Jestico + Whiles Architects* and the landscaping proposals by *Ares Landscape Architects*.
- 4.2 The proposal is for the redevelopment of the site for a new three-storey 8 form entry school for years 11 – 16, including a dedicated SEND unit and a 300 place 6th form. The new school will have a total school capacity of 1500 pupils. The proposals include the creation of an improved site access and access route from Richfield Road, new parking area, landscaped areas, external play areas, Multi Use Games Area (MUGA) and sporting pitches.
- 4.3 The proposed development will comprise a part two and part three storey building, totalling 11,733 sqm (GEA). The new school and will employ 156 no. (FTE) members of staff. 82 no. car parking spaces, including 6 no. accessible parking spaces will be provided within the parking area to the south of the proposed new school buildings. 120 no. cycle parking spaces will be provided on site. 8 no. Electric Vehicle Charging Points (EVCP) will be provided
- 4.4 The application includes proposals to improve the public parking area to the south of the proposed school buildings, to create a new hard-surfaced area and demarcated parking spaces (with permeable paving). The parking area, will remain within the ownership and control of Reading Borough Council and will be provided to the school under license. The improvements to the parking area and access will be carried out by the applicant. The school will have operational control of the parking area outside of the period when the Reading Festival will need the site for set up, operations and decommissioning.
- 4.5 The building has been designed to enable secure out-of-hours community use. The eastern side of the building can be secured and made available by the community out of school hours. Areas of the school which are to be made available to the community are the spaces all of the sports facilities including the main hall, activity studio and changing rooms, along with the hygiene room and accessible changing areas.
- 4.6 The proposed community use areas are considered to be of material benefit to the local community and which will afford formalised access to the site, where at present no formal public access is

recognised. The use of school facilities for out-of-hours community use will also create opportunities for synergy with the adjacent leisure centre.

4.7 Hard and soft landscaping is proposed throughout the site and the provision of sports and play facilities, including seasonable provision for:

- A Four Court MUGA.
- Two 11 a-side football pitches (containing space for two five a-side football pitches)
- Cricket pitch and cricket nets
- Space for a 400 athletics track, and other athletics areas

5 Planning Policy Context

- 5.1 Planning law requires that application for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The adopted The Local Development Plan for Reading Borough Council comprises the following:
- Local Plan (2019);
 - Proposals Map (2019); and
 - The Central and Eastern Berkshire Minerals and Waste Plan (2020).
- 5.3 The National Planning Policy Framework (2021) is also a material consideration in the determination of this application.
- 5.4 Below is an overview of the key relevant planning policies.

National Planning Policy Framework (NPPF) (2021)

- 5.5 The NPPF (July 2021) sets out the Government's planning policies for England and how these should be applied, and is a material consideration in the determination of planning applications.
- 5.6 At the heart of the NPPF is the presumption in favour of sustainable development. Achieving sustainable development means that the planning system is to achieve net gains in economic, social and environmental objectives.
- 5.7 Paragraph 11 of the NPPF calls on Local Authorities to approve development proposals that accord with the development plan without delay. While Paragraph 38 calls on Local planning authorities to approach decisions in a positive and creative way.
- 5.8 Paragraph 95 of the NPPF stresses the importance of a sufficient choice of school places being available to meet the needs of communities. Local planning authorities are directed to take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. Paragraph 95(a) confirms that great weight should be given to the need to create schools, while Paragraph 96(b) requires that Council's must work with promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

- 5.9 Paragraph 106 of the NPPF calls for the promotion of sustainable transport, safe and suitable access and the management of significant impacts on the transport network. Paragraph 112 highlights the need to give priority to pedestrian and cycle movements and efforts to maximise public transport.
- 5.10 Paragraph 126 of the NPPF encourages the creation of high-quality buildings and places, stating that *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 5.11 Paragraph 152 of the NPPF supports the transition to a low carbon future, with paragraph 154 requires that new development helps to reduce greenhouse gas emissions.
- 5.12 Paragraph 159 calls on inappropriate development in areas at risk of flooding to be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 5.13 Paragraph 167 requires, when determining a planning application, that local planning authorities should ensure that flood risk is not increased elsewhere, applications should be supported by a flood-risk assessment, the sequential tests, and development should only be allowed where it can be demonstrated that:
- a. within the site, the most vulnerable development is located in areas of lowest flood risk;
 - b. the development is appropriately flood resistant and resilient;
 - c. it incorporates sustainable drainage systems;
 - d. any residual risk can be safely managed; and
 - e. safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 5.14 Paragraph 174 encourages to incorporate biodiversity improvements in and around developments.
- 5.15 Paragraph 183, states that planning decision should ensure that a site is suitable for its proposed use, taking ground conditions, contamination and remediation into account. Paragraph 120 gives substantial weight to the value of using suitable brownfield land within settlements and supports opportunities to remediate contaminated land.

National Planning Policy Guidance (NPPG)

- 5.16 In August 2011, the Government issued a Policy Statement 'Planning for Schools Development'; this statement is a material consideration in this application. The statement confirms the Government's strong commitment to enable schools to adapt and improve their facilities, to allow for higher standards in education.
- 5.17 The policy statement confirms that "The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect:
- 5.18 There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework;
- Local Authorities should give full and thorough consideration to the importance of enabling the development of state-funded school in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.
 - Local Authorities should make full use of their planning powers to support state-funded schools applications. This should include engaging in the pre-application discussions with
 - promoters to foster a collaborative approach to applications and, where necessary, the use of planning obligations to help to mitigate adverse impacts and help deliver development that has a positive impact on the community."

Reading Borough Local Plan (2019)

- 5.19 Key policies from the Reading Borough Local Plan (2019) which are considered that are relevant to this proposal include:
- Policy CC1: Presumption in Favour of Sustainable Development
 - Policy OU1: New and Existing Community Facilities
 - Policy EN7: Local Green Space and Public Open Space
 - Policy EN13: Major Landscape Features and Areas of Outstanding Natural Beauty
 - Policy WR3: (Wr3d) Other Sites for Development in West Reading and Tilehurst

- Policy EN18: Flooding and Drainage
- Policy EN15: Air Quality Management Area
- Policy EN12: Biodiversity and the Green Network
- Policy EN14: Trees, Hedges and Woodland,
- Policy EM2: Location of New Employment Development
- Policy EN15: Air Quality
- Policy EN16: Pollution and Water Resources,
- 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 CC2: Sustainable Design and Construction
- Policy CC3: Adaptation To Climate Change
- Policy CC4: Decentralised Energy
- Policy CC7: Design and the Public Realm

5.20 Reading Borough Council has adopted a number of Supplementary Planning Documents, which are considered relevant to the application at hand, and are listed below:-

- Employment, Skills and Training (Apr 2013)
- Sustainable Design and Construction (Dec 2019)
- Revised Parking Standards and Design (Oct 2011)
- Planning Obligations Under Section 106 (Apr 2015)

6 Planning Policy Analysis

6.1 In this section of the Planning Statement, we assess the proposal against the relevant planning policies set out in Section 5 above. The main considerations in the determination of this application are:

- Principle of the Development;
- Impact on Local Green Space and Public Open Space;
- Design;
- Flood Risk and Drainage;
- Contamination;
- Transport, Parking and Access;
- Energy and Sustainability;
- Landscaping and Arboricultural Impacts;
- Amenity Impacts; and
- Other Material Considerations.

Principle of the Development

Planning Policy

6.2 Policy CC1: Presumption In Favour Of Sustainable Development requires that the Council takes a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council is to work proactively with applicants jointly to find solutions, which means that proposals can be approved wherever possible

6.3 Policy OU1: New And Existing Community Facilities supports proposals for new, extended or improved community facilities, particularly where this will involve co-location of facilities on a single site. Proposals for important facilities such as schools will be supported, subject to other policies in the plan. Policy OU1 recognises that some loss of open areas may result, but that this may be acceptable, where the impact on open areas is minimised and the area has no specific use. OU1 directs new community facilities to areas where there is choice of means of travel. OU1 notes that

proposals for schools meeting a clear need will be acceptable on sites identified for residential or other development.

- 6.4 Policy EN7: Local Green Space and Public Open Space** protects local Green Space (LGS) from development. Proposals that would result in the loss of designated areas of open space (including the Rivermead and Thameside Promenade – EN7Wp), erode their quality through insensitive development or jeopardise their use or enjoyment to the public, will not be permitted.
- 6.5 Policy EN13: Major Landscape Features and Areas of Outstanding Natural Beauty** states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature, including the Thames Valley.
- 6.6 Policy WR3: (WR3d) Other Sites for Development in West Reading and Tilehurst** designates various sites for development in West Reading and Tilehurst, the site to the east of the application site, is designated via WR3d for the “Rivermead Leisure Centre, Richfield Avenue”. Due regard is to be had to ensuring the deliverability of this designation.

Planning Analysis

- 6.7** At the heart of the NPPF is the presumption in favour of sustainable development and the NPPF affords great weight to the development of provision of new schools. Achieving sustainable development means that the planning system is to achieve net gains in economic, social and environmental objectives. The social, economic and environmental benefits of the proposal are detailed within this section of the Planning Statement.
- 6.8** The development will provide an important new secondary school serving the Local Area and will provide a new SEND unit and sixth form. The Council’s education place planning team have identified a clear need has been identified for a new school in Reading, per the 2019 report (version 3) School Place Planning, (attached as Appendix 2), shows a deficit of school places in 2019. The report notes a spike in capacity in 2022, reflects the intended delivery of the new places of the school forming the subject of this planning application, however as the Rivermead school site (River Academy) has not yet been delivered, and the need for school places has not been met elsewhere, it is clear that the pressing need for school places remains unmet.
- 6.9** The effect of a local deficit of local school places is often the export of pupils (and the associated school funding) to other education authorities, the need for pupils to travel longer distances to

- school, and overcrowding in local schools and the accommodation of pupils in temporary accommodation.
- 6.10 The proposed school will also provide facilities for the educational of pupils with Special Educational Needs and Disabilities (SEND). Paragraph 3.1 of the 2019 School Place Planning report confirms the need for additional special school places, with the capacity being insufficient to meet need.
- 6.11 Paragraph 95 of the NPPF confirms Local Planning Authorities are to take a proactive, positive and collaborative approach ensuring that a sufficient choice of school places are available to meet the needs of existing and new communities.
- 6.12 Policy OU1 confirms that proposals for new and improved community facilities, which (confirmed in paragraph 4.7.2) include schools will be acceptable. This positively worded policy confirms a dispensation in favour of granting permission for new schools.
- 6.13 The second limb of the policy OU1, while dealing with on-site intensification, provides a useful approach, which is considered of assistance in the consideration of the matter at hand. This provision of the policy deals with the change of use from a former restricted form of open space use. This element of the policy confirms that some loss of open areas may be acceptable where the impact on open areas is minimised and there the area has no specific use.
- 6.14 Policy OU1 further directs development for new schools to areas where there is a choice of means of travel, including walking and cycling and to existing centres where possible. The site is well located in terms of public transport and walking and cycling infrastructure.
- 6.15 Policy OU1 further confirms where a proposal for a new school meets a clear need, and would otherwise accord with national and local policy; it would be acceptable on sites identified for residential or other development. While the site is not identified for another form of development, including residential, this limb of the policy confirms that the principle of a change of use being acceptable to provide for new school development. This element of Policy OU1 confirms the importance of meeting the need for school places, reflecting the local authorities statutory duty to provide adequate school provision.
- 6.16 Policy EN13 states that *"Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature"* and that *"the extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals."*The supporting

text under paragraph 4.2.65 states that the policy *“does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.”*

- 6.17 A Landscape Visual Assessment accompanies the application, which demonstrates that the proposed new school development will not detract from the character or appearance of the Thames Valley Major Landscape Feature. The Visual Assessment includes views of the Major Landscape Feature both from within and from beyond the area. The proposals will not detract from the character or appearance of the Major Landscape Feature, due to the distance of the proposed buildings from important visual receptors, lack of intervisibility due to distance and intervening trees and vegetation.
- 6.18 The site is designated as Local Green Space in the Local Plan, forming part of EN7Wp the 16.83 ha Rivermead and Thameside Promenade. This designation applies to the northern part of the site, beyond the existing golf driving range buildings, as well as areas to the north and east of the application site. As confirmed in the Council’s pre-app response of March 2020 that Policy EN7 is specifically worded to protect the unnecessary loss of those areas of open space, which can be accessed by the public. The policy makes the important distinction between those areas with unrestricted public access, such as a park, and those with restricted public access. The former use of the site as a golf driving range and later as a laser clay shooting range restricted access to users of these former facilities. The site is currently not put to any use and there is no public access permitted.
- 6.19 The explanatory text to policy EN7 states, within Paragraph 4.2.29 that this policy has been informed by the Council’s Open Spaces Strategy where the protection of publicly accessible recreational open space was considered to be of great importance. Publicly accessible recreational open space is useable space which provides a resource for sport, leisure and informal recreation. This policy therefore deals in the main with those areas, which are accessible to the public.
- 6.20 It is accordingly considered that the proposals, which would result in the development of a new school facility along with playing fields and MUGA, including areas of the school buildings, MUGA and playing pitches which are available for community use, will enhance the accessibility of the site to the wider community for sport and leisure purposes. The former uses restricted access to individuals, who made use of the golf driving range and latterly the laser shooting range, to a small part of the southern areas of the site, the proposed school will open up extensive areas of the northern parts of the site for community sport and leisure use. There is considered to be both a qualitative and quantitative improvement of the site’s contribution to recreational and open space

use. It is noted further that the school will make the playing fields available to Reading Festival for camping (for disabled campers).

- 6.21 The Council's pre-app response dated March 2020 confirms the Council's view that *"Whilst any proposal would undoubtedly result in the loss of a notable amount of designated LGS and to a certain extent alter the way the public perceive the remaining LGS, the actual loss of this particular part of the LGS is unlikely to fundamentally affect the overall status or way in which the remainder of the Rivermead and Thameside Promenade is enjoyed by members of the public."*
- 6.22 The Council's pre-app response advises that *"Whilst constituting a direct conflict with the prescriptive aims of Policy EN7 (Local plan designation Policy EN7Wp), the policy's overall intention (to prevent loss or jeopardise the use of such areas) is not compromised."*
- 6.23 It is the applicant's opinion that there is not a direct policy conflict with EN7, as the proposals, improve an enhance public access and use of the site to the public. The proposals will provide for significant areas of the site and buildings for out-of-hours community use, and will allow camping during the Reading Festival. Furthermore considering the previous restricted and limited public access to the site (and the current lack of any public access) the proposals are considered to deliver several benefits which accord with the broader policy intent of EN7.
- 6.24 The site is not currently in use and was formerly used for a very specific use, which is considered to cater to a very limited section of the community. The proposed development will provide new and high-quality sports facilities, including the provision of a four court MUGA, football, cricket and athletics facilities. The proposed introduction of new pitches and play areas will represent an enhancement of the existing provision both qualitatively and quantitatively.
- 6.25 The design of the proposed retain significant areas of the site as open space with some 54 percent of the site put to landscaping, ecological areas, playing fields, play areas, MUGA etc. The siting of the proposed buildings retains much of the open character to the north of the site, with the school buildings set to the south of the site, and aligned to the existing (and redeveloped) leisure centre buildings. The proposals will result in only 1.1 ha / 6.55 % of the current EN7Wp LGS designation being removed).
- 6.26 An Open Space Assessment has been provided with this application, which confirms that the Proposed Development would have clear and demonstrable public open space and sports facility

benefits that would demonstrably outweigh the small reduction in existing open space land area that is associated with the new school buildings and MUGA

- 6.27 It is considered that the proposals will retain the majority of the open space of the site, with new built form comprising only 9.3 % of the site. Substantially enhanced landscaping accompany the proposals, it is therefore considered that the development proposals will result in a enhancement of the quality of the open space on the site, in particular the northern area, closest to the River Thames, which will benefit from additional landscaping, ecological areas, new fencing and the site will also benefit from regular maintenance, which will address the presently rundown appearance of the site.
- 6.28 Notwithstanding the tension which may arise from the proposed development and the objectives of EN7, the proposals are considered to deliver successfully against several other key policies, notable OU1 (New Community Facilities, CC1 (Presumption in Favour of Sustainable Development), CC2 Sustainable Design And Construction), EM2 (New Employment Development), EN12 (Biodiversity and the Green Network) and EN14 (Trees, Hedges And Woodland).
- 6.29 It is therefore considered that the proposed development is consistent with the development plan overall, accordingly the principle of the proposed development is acceptable.

Design

Planning Policy

- 6.30 **Policy CC2: Sustainable Design And Construction** 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."* In order to achieve this *"all major non-residential developments are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;....Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective."*
- 6.31 **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."* The various components of development form, including layout, landscape, density and mix, scale: height and massing, and architectural details and materials, is to be assessed to ensure that development makes a positive contribution to urban design objectives "

- 6.32 Policy CC7 requires development to be constructed using appropriate materials and seeks to ensure that the appearance of the development is successfully able to create a sense of place for its users, with its own identity and public realm

Planning Analysis

- 6.33 The proposed building is majority three storeys with a lower sports hall, which is equivalent to two storeys on the eastern side of the site. The pre-app response dated March 2020, confirms that the position of the new school building maximises the use of the site.
- 6.34 The proposed building would be of a modern design with high quality design and detailing. The use of modern materials and the proposed modular construction delivered through offsite modern methods of construction (MMC) would provide a robustness to the building compared to traditional materials, whilst providing a visually attractive building. Details of materials are set out in the accompanying Design and Access Statement.
- 6.35 The proposal also includes extensive new and high-quality landscaping at the site, which would provide landscaping enhancements in accordance with paragraph 131 of the NPPF.
- 6.36 The siting of the new school and related facilities has been carefully considered to respond to the surrounding context, wider Major Landscape Feature and Local Green Space designations, the position of the adjacent leisure centre, and to retain the open character of the towards the north, where nearest to the River Thames. The new school is positioned as far as practical to the south of the site, considering the position of the drainage ditch, and is a substantial distance from the River Promenade, thus maintaining the visual continuity of the open landscape to the north.
- 6.37 The siting and massing of the new buildings has been influenced by the key site informants, including flooding, policy designations, access, visual impact and the pedagogical requirements of the school.
- 6.38 The main teaching spaces are arranged in a 'C' shape, open to the north, around a central courtyard. This is an efficient and effective layout for a school of this size, which offers efficient circulation around the building. The arrangement of the school around the central landscaped courtyard and shared central services allows the school to function efficiently around the core reception space and main facilities.
- 6.39 The key southern elevation includes a covered portal entrance way, cut into the building at ground floor level which allows for a direct route into the central courtyard and to the rear of the site. This route will create an engaging arrival point for students.

- 6.40 The appearance of the building has been carefully considered in respect of the situation of the site within the Thames Valley Major Landscape Designation and in consideration of the site context within the open expanse along the southern bank of the River Thames, which opens up from the Reading Town Centre and Caversham Bridge towards the west. The materials palette has been selected to reflect the location of the site and the aspirational ethos of the school. The school is to be clad at ground floor level with a robust light brick finish, with the upper level treated with continuous cladding panels in a mix of deep grey tone accented by green panels around the entrance area, feature panels in line with windows and an arrangement of random green and grey vertical bands on the sports hall.
- 6.41 The design of the proposed school and associated facilities is considered to be in accordance with Policy CC7, whilst ensuring meeting the educational and curriculum requirements of the new school. The development achieves a high level of sustainability, as demonstrated in the accompanying energy strategy and BREEAM assessment. It is considered that the design of the school achieves a good balance between delivering a contemporary education building while respecting the wider setting within the Major Landscape Feature and views from the surrounding area.
- 6.42 Further details on the design and materials are contained in the Design and Access Statement. It is considered that the proposal complies with Policy CS18 (High Quality Design) in the Core Strategy (2013) and Policies BE1 (General Requirements for Development) and BE2 (Quality of Design) in the UDP (2005).

Transport, Parking and Access

Planning Policy

- 6.43 **Policy TR3: Access, Traffic and Highway-Related Matters** states that in determining proposals involving new or altered access onto the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where:
- i Access and works to the highway comply with the adopted Transport Authority standards
 - ii The development would not have a material detrimental impact on the transport network
 - iii The proposals would not be detrimental to the safety of uses of the transport network including pedestrians and cyclists
 - iv The proposals would not generate regular HGV movements on unsuitable roads.

Proposals which involve a material increase in the use of an existing site access will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

- 6.44 **Policy TR4: Cycle Routes and Facilities** 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.
- 6.45 Policy TR4 requires that development does not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions.
- 6.46 **Policy TR5: Car and Cycle Parking and Electric Vehicle Charging** states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport and 10 % of the car parking spaces should be provided with electric vehicle charging points.

Planning Analysis

- 6.47 In line with Policies TR3 (Access, Traffic and Highway-Related Matters) and TR4 (Cycle Routes and Facilities) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) a Transport Assessment and Travel Plan have been prepared by Hexa Consulting.

Access

- 6.48 The proposals create a separate access for cycle and pedestrian accesses is proposed to the site from Richfield Avenue, to the west of the garden centre. Vehicular access to the site is from the existing access on Richfield road to the southwest of the site. Details of the proposed access arrangements included in the accompanying Transport Assessment
- 6.49 As the southern triangle is utilised by the garden centre for deliveries and for the Reading Festival, care has been taken to make provision for these uses and to ensure that the school use does not affect the current requirements of these adjacent uses.
- 6.50 Detailed tracking drawings can be found in within the appendices to the Transport Assessment, which clearly demonstrates that the site can be safely accessed via larger school vehicles and refuse collection vehicles.

Trip Generation

- 6.51 The site is well connected to surrounding sustainable travel infrastructure including; cycle routes, bus and rail routes and pedestrian walkways.
- 6.52 The Transport Assessment contains the trip generation analysis of the proposal and its impact on the wider highways network. The assessment principles were agreed between the Transport Consultant and Highways Officer during the pre-application consultation.
- 6.53 The assessment concluded that the school would generate 70 vehicle arrivals in the morning network peak period (08:00-09:00) and a further 143 vehicle arrivals and departures in the morning school peak period between 09:00-10:00. During the afternoon peak period, the school would generate an additional 143 vehicle arrivals and departures during the school afternoon peak period between 15:30-16:30 with an additional 70 vehicle departures during the network peak period between 16:30-17:30. The Transport Assessment confirms that the proposed access arrangements are suitable to accommodate the vehicular trips associated with the proposed development.
- 6.54 The Transport Assessment confirms that the site is well served by pedestrian and cycle routes and the majority of trips to the site are capable of being carried out without reliance on private motor vehicles.
- 6.55 The Transport Assessment notes that the proposed new school development will not have a material detrimental impact on the transport network serving the site and that there is sufficient residual capacity in the transport network to accommodate the proposed development

Parking and Drop Off

- 6.56 Parking is to be provided within the southern triangle of the site, between the former driving range site and Richfield Avenue. The proposed development seeks to provide 120 no. cycle parking spaces on site. The site will also provide 82 no. car parking spaces, including 6 no. accessible parking spaces. 8 no. of the parking spaces are to be provided with Electric Vehicle Charging Points (EVCP). The number of car parking spaces is consistent with requirements of Policy TR5.
- 6.57 It is important to encourage use of non-car travel to the proposed school, there is no on-site provision for drop off and collection of children, with the exception of those who are unable to walk or cycle. It is anticipated that around 80 percent of pupils will access the site via sustainable travel means. There are a number of parking areas within walking distance of the site, which can be used for pupil drop off.

- 6.58 Improvements to the southern triangle of the site which is currently utilised for informal parking will improve the efficiency and functionality of this area. The parking area will continue to be made available to the Reading Festival, outside of school terms, to allow the festival operations to continue and to make use of improved parking and access facilities.

Accessibility

- 6.59 As noted in the Transport Assessment, the site is located within an area which is well connected for public transport, particularly in terms of bus and rail services with good connectivity to the surrounding area. The site also benefits from good pedestrian and cycle infrastructure.
- 6.60 A Travel Plan has also been prepared which outlines the potential impact of the proposed scheme on the surrounding highway network and mitigates the negative impacts of the development through the promotion and uptake of increased sustainable travel usage amongst staff, pupils and visitors.

Concluding Transport Comments

- 6.61 Overall, the Transport Assessment demonstrates that the proposals are considered acceptable in highways impacts terms and complies with the NPPF, TR3 (Access, Traffic And Highway-Related Matters) and TR4 (Cycle Routes And Facilities) and TR5 (Car And Cycle Parking And Electric Vehicle Charging).

Flood Risk and Drainage

Planning Policy

- 6.62 **Policy EN18: Flooding And Drainage** states that, in the first instance, development will be directed to areas at lowest risk of flooding following the Sequential and Exceptions tests set out in the NPPF and taking account of the effects of climate change. Where development occurs in areas at risk of flooding, flooding from all sources is to be considered, and floodplain capacity should not be reduced while the flow of floodwater and risks from flooding should not be increased.
- 6.63 Policy EN18 furthermore requires that all major developments must incorporate sustainable drainage systems (SuDS) as appropriate. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. SuDS should maximise ecological benefits and link to the existing Green Network, and incorporate tree planting and landscaping.

Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects.

- 6.64 **Policy CC3: Adaptation To Climate Change** states that all development will demonstrate how they have been designed to incorporate measures to adapt to climate changes, including minimising the impact of surface water runoff and where possible incorporating mitigation and resilience measures for any increases in river flood levels as a result of climate change.

Planning Analysis

- 6.65 The majority of the site is site identified as Flood Zone 2, with smaller parts in the southwest and northwest falling into Flood Zone 3a. As required by the NPPF a sequential assessment has been carried out, which demonstrates that there are no suitable and available sites located within the borough, for the proposed school development. As directed by the NPPF the design has positioned the proposed building within the area of the site which is at the lowest risk of flooding, the Flood Zone 2 area.
- 6.66 In addition to positioning the buildings within the area of the site at lowest risk for flooding, the building design incorporates several special measures to mitigate risks from flooding and to minimise the effects of flooding, both onsite and elsewhere. The design of the school building and external site levels have taken the risks of flooding into account, and will positively create additional compensatory flood volumes on the site during a flood event. Additional design measures will aim to achieve safe site and building for operation. The school building has been elevated with floor levels above critical flood levels and voids beneath the building have been creating which are designed to accommodate additional flood storage volume.
- 6.67 The Flood Risk Assessment (FRA) demonstrates that through assessment of pre and post development levels, a 'level for level, volume for volume' solution has been achieved to ensure no off-site increase in flood risk. The access to the site off Richfield Avenue is via an elevated route, which spans the drainage ditch to the south of the proposed school buildings, thus providing safe means of access and egress to the site.
- 6.68 The proposed development will introduce green infrastructure and landscaping, including permeable surfaces, which will reduce the impact of surface water runoff or potential flood risks. A Flood Risk Assessment by Ashfield Solutions will accompany the planning application. The design of the proposed school has incorporated a number of measures to mitigate flood effects, including:-

- The school buildings are set on ground beams with voids below to allow for flooding of the area below the school buildings during flood events;
- The elevated school and other site works increases the on-site flood storage volume by 1,061m³.
- The Finished floor levels (39.80mAOD) are above the 1 in 1000 year flood level.
- All external access stairs/ramps provide access to the finished floor level (39.80mAOD);

6.69 The FRA shows that flood risk can be effectively managed through the proposed design parameters and the proposed school is suitable for the proposed location and will be flood resilient. The development is unlikely to increase flood risk elsewhere as a result of the development, on account of a loss of floodplain storage, impedance of flood flows or increase in surface water runoff.

6.70 A Flood Response Plan (evacuation plan) has been provided in support of this planning application, which details the proposed warning systems and evacuation procedures in the event of a flood event.

6.71 The overall flood risk associated with the proposed building is deemed to be low as a result of the special design of the building, therefore, the design of the proposed school development is considered appropriate for the site and the scheme is considered to be consistent with the policy requirements of EN18 and CC3.

Energy and Sustainability

Planning Policy

6.72 **Policy CC2: Sustainable Design and Construction** requires the design of buildings and site layouts to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. To meet these requirements:

- Where possible major non-residential developments are required to meet the most up-to-date BREEAM 'Excellent' standards.
- Development should incorporate water conservation measures and should include recycling greywater and rainwater harvesting, where systems are energy and cost effective.

6.73 **Policy CC3: Adaptation to Climate Change**, states that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. Measures should include

building orientation, design for solar shading, inclusion of thermal mass, appropriate heating and ventilation, use of landscaping etc...

- 6.74 **Policy CC4: Decentralised Energy** encourages developments of more than 1000 m² to consider the inclusion of decentralised energy provision within the site, or to demonstrate that the scheme is not suitable, feasible or viable for this form of energy provision.

Planning Analysis

- 6.75 The energy strategy for the site employs, per the energy hierarchy, a fabric first approach where the focus is on constructing an energy efficient building, with high levels of insulation and air tightness, which reduces heat loss from the buildings. A highly efficient building is shown to be the most effective means of reducing energy inputs and this is consistent with the energy hierarchy, which directs development to firstly "be lean". The proposed off-site manufacture, within a quality controlled environment, enables the building to be fabricated within very precise tolerances, which creates a high quality construction and air tightness which contribute to thermal efficiency. The fabric first approach seeks to deliver a building, which does not require the inclusion of on-site low or zero carbon (LZC) energy production, such as photovoltaic panels or air or ground source heat pumps. The proposed school has been future proofed to allow connection to LZC should this be feasible in the future.
- 6.76 As set out in the energy statement, the scheme will use high efficiency boilers to provide space heating and domestic hot water. Highly efficient LED lighting with occupancy and daylight controls will reduce energy for lighting. Ventilation systems will include heat recovery heat exchangers to reduce heat loss.
- 6.77 In light of the modular design, which follows the Department for Education's Output (Design) Specification, there are several BREEAM credits, which are not able to be secured through the development. The Reading Borough Council Local Plan confirms in paragraph 4.1.4, that *'some types of development, such as industrial uses, warehouses and schools might find it more difficult to meet these standards. In these cases, developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard.'* Therefore, the proposal for this development is to meet BREEAM 'Very Good' standards.
- 6.78 This application is supported by a BREEAM Assessment, which confirms that the proposed development will achieve the BREEAM 'Very Good' standards.

- 6.79 An Energy Statement has been prepared by CPW, which outlines measures to reduce CO2 emissions. The report concludes that the proposal will adopt the best practice energy hierarchy, which requires development to take into consideration the Be Lean, Be Clean and Be Green energy hierarchy. The Energy Statement has investigated the use of decentralised energy systems, which have been shown to be unsuitable for the development. However, futureproofing of the heating systems allows for future connections to decentralised energy systems should they become viable in the future.
- 6.80 It is therefore considered that the proposal complies with Policy CC2 (Sustainable Design and Construction), Policy CC3 (Adaptation to Climate Change) and Policy CC4 (Decentralised Energy)

Contamination

Planning Policy

- 6.81 **Policy EN16: Pollution and Water Resources**, states that development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas 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.

Planning Analysis

- 6.82 A Phase I Contaminated Land and Geotechnical Study, by Terra Firma, and a Phase II Geo-Environmental Assessment, by REC, have been prepared and accompany this application.
- 6.83 The Phase I Assessment has identified that due to the use of the site for landfill between 1970 and 1979 there are identified sources of contamination which could pose a risk to human health and the environment. As a result, further investigation was required and a Phase II Assessment was undertaken. The assessment confirms the risks arising from existing contamination, and recommends a remediation strategy to ensure that the site is suitable for the proposed school. A Remediation Strategy has been prepared for the site and accompanies this application.
- 6.84 The NPPF places great weight on the value of using suitable brownfield land and supports opportunities to remediate contaminated land. The proposals are, subject to the remediation strategy being secured by planning conditions, consistent with the NPPF and policy EN16.

Landscaping and Arboricultural Impacts

Planning Policy

- 6.85 **Policy EN12: Biodiversity and the Green Network**, states that permission will not be granted for development that negatively affects that sites with identified interest or which fragments the overall network.
- 6.86 Policy EN12 requires that new development demonstrates 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.
- 6.87 Policy EN12 requires that development should not result in a net loss of biodiversity and geodiversity.
- 6.88 **Policy EN14: Trees, Hedges and Woodland**, requires that trees, hedges and woodlands are protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.
- 6.89 Policy EN14 requires that new development makes provision for tree retention and planting, particularly on the street frontage, or off-site in appropriate situations, 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.

Planning Analysis

- 6.90 The site does not comprise part of sites with identified biodiversity interest, but being designated Local Green Space, policy confirms that the site comprises an area with potential for biodiversity value, which can serve a function of stitching the Green Network together.
- 6.91 The existing site features low-quality green infrastructure with the site predominately laid to grass with a tree line to the west of the site, and scattered trees in the southern triangle area.
- 6.92 The landscaping proposals includes the planting of 39 new trees and new areas of hedgerows on the site, which will significantly increase the number of trees on the site and will create additional habitat areas. The scheme also provides areas of Meadow Planting, Rain Gardens and the SuDS facilities make use of planted swales.
- 6.93 An Arboricultural Impact Assessment has been prepared by SJ Stephens Associates, which shows that the northern area of the site, within which the proposed school is to be located does contain any

trees. The southern area of the site, containing the drainage channel and the area to be used for parking has a number of scattered trees, circa four of which are proposed to be removed to facilitate the proposed development.

- 6.94 The site is not located within a Conservation Area and none of the trees on the site are protected by a Tree Preservation Order (TPO). Trees are a material consideration in the determination of this planning application and the recently updated NPPF affords greater protection to existing trees and emphasises the importance of new trees.
- 6.95 The substantial additional tree planting of 39 new trees, new hedges and meadow planting is considered to represent an improvement in the landscaping and ecology of the site. The proposal will retain the majority of the trees adjacent to the site, particularly those on the western edge of the site which provide screening and are of some visual interest. Further details are included in the landscaping details submitted in support of this application.
- 6.96 The Arboricultural Impact Assessment also sets out a number of mitigation measures such as protective fencing in order to protect Root Protection Areas (RPAs) during construction. A Tree Protection Plan can also be found in Appendix A of the report.
- 6.97 The proposal should be considered acceptable in terms of Arboricultural impacts and seeks to enhance the green infrastructure on the site through the introduction of high-quality soft landscaping. Therefore, it is considered that the proposal complies with Policy EN12 (Biodiversity and the Green Network) and EN14 (Trees, Hedges and Woodland)

Other Material Considerations

Ecological Impacts

- 6.98 An Ecological Assessment has been prepared by HCC ecology. The report notes that there are no statutory designated sites such as Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), or Special Area of Conservation (SAC) nearby the site. There are non-statutory, locally designated sites within 1000 m of the site, including The Warren Woodlands Complex Local Wildlife Site and Cow Lane Depot Local Wildlife Site.
- 6.99 The data request from Thames Valley Environmental Records Centre identified the presence of a number of protected and notable species within a 500m radius of the site. A field survey noted that the site is characterised by an area of largely bare ground to the south and largely rougher amenity

grassland with hardstanding and open fronted buildings bounded by hedgerows to the north and a small stream runs east to west between the southern triangle and the northern rectangular area.

6.100 The Ecological Assessment noted that the site offers moderate potential for supporting foraging badgers, although badger setts were reported to be absent. The existing buildings were reported to be of negligible suitability for supporting bats, while the trees on site are concluded to offer low suitability for supporting roosting bats and the site is considered to offer low quality habitat for supporting commuting/foraging bats. The site offers negligible potential for supporting dormice, water vole and otter. The site exhibits high potential for supporting small numbers of common and widespread breeding birds. The site offers low potential for supporting small numbers of more widespread reptiles. The drainage ditch did not appear to offer suitable breeding habitat for most amphibians, including great crested newts, but that it may be used by common frog or common toad if the ditch as areas of limited or no flow. The boundary vegetation offers some low suitability habitat for amphibians.

6.101 A set of ecological mitigation and enhancement measures have been proposed, these are set out in chapter 5 of the report, and include construction phase precautions, biodiversity enhancements and design mitigation.

Air Quality

6.102 The southern area of the site falls within an Air Quality Management Area. Accordingly an Air Quality Assessment has been prepared by DustScan AQ. The report provides an overview of the air quality around the proposed development. The report notes that the predominant sources of air quality pollution are road sources, with the predominant road source being Richfield Avenue to the south of the site. Air quality impacts from other sources, such as agriculture, the industrial uses to the south of the site and the train depot, which are not anticipated to result in air quality impacts at the site.

6.103 Air Quality Assessment notes that all monitored and modelled NO₂ urban background concentrations are comfortably below the NO₂ annual mean objective. PM₁₀ and PM_{2.5} concentrations for the site, though all monitored and modelled concentrations are comfortably below the respective annual mean objectives.

6.104 The school would generate 70 vehicle arrivals in the morning network peak period (08:00-09:00) and 143 vehicle arrivals and departures in the morning school peak period between 09:00-10:00. During the afternoon peak period, the school would generate 143 vehicle arrivals and departures during the school afternoon peak period between 15:30-16:30 with an additional 70 vehicle departures during

the network peak period between 16:30-17:30. The additional trips generated by the school are not considered to result in a significant effects on Air Quality.

Employment

6.105 The Council's Employment, Skills and Training SPD (2013) sets out the requirements which will be secured from developments at the construction and operational phases of development to contribute to a range of employment, skills and training measures to assist local people in accessing job opportunities arising from new development.

6.106 The Applicant will work with RBC to develop an Employment Skills Plan (ESP) which would be secure by planning obligation.

Amenity Impacts

6.107 The nearest noise sensitive receptors are the residential dwellings located along The Warren some 200 m to the north of the site, and some 300 m to the north of the new school buildings. The nearest noise sensitive receptors to the south of the site are the residential dwellings some 650 metres from the site. Due to the substantial distances of the residential dwellings from the site, it is not anticipated that there will be any adverse impact on the amenity of these properties as a result of the proposed new school.

6.108 The distances between the site and the nearest residential properties are significant. While it is possible that activities on the application site may be audible from the residential properties beyond the River Thames, the lack of amplified noise or music will ensure that that there is no material impact on the amenity of the residential properties.

6.109 The distances between the proposed school building and the nearest residential properties will ensure that there is no impact arising from a loss of privacy. The lack of floodlighting associated with the MUGA and playing pitches will ensure that there is no adverse impact arising from lighting on the site. An External Lighting Layout Plan has been provided by CPWP, which indicates proposed luminance levels of the proposed external lighting at the site.

6.110 The two and three storey height of the proposed school building along with the distances between the school and residential properties, will ensure that there is no adverse effect from overbearing.

6.111 A Construction Environmental Management Plan (CEMP) has been prepared by the applicant. This report outlines the mitigation measures proposed to be in place throughout the construction process, in order to protect neighbouring amenity including construction hours, dust mitigation

measures, site management measures and waste management. The report also covers construction logistics including material storage and delivery vehicle management.

- 6.112 The proposal has been designed to consider and protect neighbouring residential amenity and complies with Policy CC8 (Safeguarding Amenity)

Scheme Benefits

- 6.113 The application gives rise to a number of significant public benefits, which are material considerations that lend additional weight to the positive dispensation of the application set out in national and local planning policy.

The Presumption in Favour of Sustainable Development

- 6.114 At the heart of the NPPF is the presumption in favour of sustainable development and the NPPF creates strong policy support for the development of new schools and the creation of additional educational choice. Achieving sustainable development means that the planning system is to achieve net gains in economic, social and environmental objectives.

- 6.115 Below is an overview of the social, economic and environmental benefits of the proposal.

Social Benefits

- 6.116 The valuable contribution that the new school would make towards meeting the need for new school places in Reading. Further the scheme will provide new facilities catering to children with special educational needs and disabilities. Meeting the need for school places, widening choice and providing SEND places is a material consideration which carries significant weight. The proposed school will meet the established deficit of school places in the local area, and will avoid the need for students to travel beyond the borough for educational opportunities, will allow education funding to remain in the borough, will reduce pressure on overcrowded local schools, and will avoid the need for pupils to be educated in overcrowded or temporary facilities.
- 6.117 The provision of special education facilities will allow pupils with SEND needs to be educated within an environment which provides a more comprehensive education setting and more extensive facilities than may ordinarily be delivered within a dedicated SEND facility. The SEND provision delivered alongside a mainstream school will provide a facility, which will allow some pupils with less significant SEND needs to be educated in setting which will ease pressure on specialist stand-alone facilities.

Economic Benefits

- 6.118 The proposed school will employ teaching, administrative and management staff and thereby will generate direct economic activity through wages. It is envisaged that the school will employ 156 (FTE) members of staff.
- 6.119 Indirect economic impacts arise through employment and activity, which along the school's local supply chain, as a result of purchases of goods and services from local suppliers. This includes services in the provision of meals, supplies and associated services relating to the up-keep and maintenance of the premises. A further indirect effect is the economic activity supported by staff and those employed in direct supply chains spending their wages on goods and services in the local economy.
- 6.120 The construction phase of the school will generate direct and indirect economic impacts, the Local Authority has requested that an Employment and Skills Plan be agreed with the applicant, and secured by way of planning obligation.
- 6.121 These economic benefits are considered to carry moderate weight in the consideration of the planning application.

Environmental Benefits

- 6.122 The proposed development provides the opportunity to redevelop a neglected, restricted access Green Space and create a new and attractive area, which would be accessible to the public out of school hours (the details will be set out in a community use agreement, which is to be secured via planning condition). The proposed development will also protect and enhance the identified biodiversity at the site, through soft landscaping, native planting and the creation of new native hedgerows. These environmental benefits are considered to carry positive weight in the determination of the application.
- 6.123 The scheme will also enable the remediation of contaminated land, a matter which is supported by the NPPF, which gives substantial weight to the value of suitable brownfield land within settlements for homes and other identified needs.

Other Scheme Benefits

- 6.124 The Application will also deliver a number of important public benefits, including

- The development will secure access to indoor and outdoor facilities at the new school for community use, out of school hours. As there is presently no entrenched right of access to the site, the application will accordingly secure public access to the wider community.
- The proposed school development will improve the existing informal parking area to on the site, which will remain accessible for Reading Festival.
- The school fields will be made available during the Reading Festival for camping, the accessible nature of the site, with level access and drained sports pitches will be made available for campers in need of accessible areas, and will promote inclusive access to the festival.
- The proposals are for a highly energy efficient building delivered through Modern Methods of Construction.
- The use of Modern Methods of Construction and off-site manufacture reduces site construction timeframes, the number of trades on site and reduces noise and disturbance.

7 Statement of Community Involvement

- 7.1 The NPPF confirms that consultation with the community and key stakeholders is important to improve the efficiency and effectiveness of the planning system for all parties. Consultation with the local community is expected for all major planning applications.
- 7.2 Good community consultation is important to the applicant and as such formed an important part of the pre-application process.
- 7.3 The applicant has carried out consultation with the community and key stakeholders. Due to Covid-19, to safeguard both the community, the applicants' representatives and the representatives of the Department for Education, consultation events were held virtually.
- 7.4 A virtual consultation event was held on 29 November 2021, details of the event and feedback received are contained in the Statement of Community Involvement, which accompanies this application.
- 7.5 Key matters raised in the consultation event are summarised below:
- Design & Energy
 - SEND
 - Access
 - Flooding
- 7.6 There is broad support for the proposed new school on the site, technical matters in relation to access and flooding have been dealt with comprehensively in the energy statement which accompanies this application.

8 Conclusion

- 8.1 The proposal is for the development of a new eight form entry secondary school, along with SEND unit and sixth form. The proposed school will accommodate up to 1,500 pupils. The proposed new building will create a much needed new school to address the confirmed need in the local area.
- 8.2 The NPPF (2021) and RBC policy OU1 imposes a strong presumption in favour of granting permission for applications for new schools and for new facilities which widen educational choice. The development of the school to meet the need for new school places is significant material consideration which weighs in favour of the proposals.
- 8.3 The proposed development will also provide a number of social, economic and environmental benefits to the site and surrounding area, which together should be afforded significant weight in the planning balance.
- 8.4 The application will also enable the delivery of an improved public parking provision to the south of the new school buildings which will be to the benefit of the Reading Festival and the local community.
- 8.5 Sustainability is at the heart of the proposals, with energy reduction measures implemented throughout and the significant introduction of new landscaping to improve the appearance of the site and its biodiversity.
- 8.6 This application follows a virtual consultation event with local residents and Ward Councillors and matters raised during those discussions have been addressed within this planning application.
- 8.7 It is therefore considered that the proposal complies with the relevant national and local planning policies and planning permission should be granted accordingly.

Appendix 1 – Pre-application Response, ref. 21/07017/PREAPP

Briefing Note

Our ref 63526/01/DL/ZW
Your ref 211413/PREAPPP
Date 23 November 2021
To Reading Borough Council
From Lichfields
Copy Nexus

Subject River Academy, Reading - Pre-application Advice Request Response

1.0 Introduction and Summary

- 1.1 Lichfields has been appointed by Reading Borough Council (RBC) to provide development management assistance in relation to the proposed development of River Academy at Leaderboard Golf Centre, Richfield Avenue, Reading, Berkshire, RG1 8EQ.
- 1.2 We would note at the outset that Lichfields is providing advice as an independent party and as such RBC remains responsible for the ultimate determination of any forthcoming planning application(s).
- 1.3 This response follows on from advice provided by RBC in March 2020 under ref. 191811/PREAPP (copy included at Appendix 1) which provides comprehensive comments on the principle of development alongside a number of technical issues. We understand that this previous advice has been viewed by the project team as it accompanied this pre-application submission, therefore we do not seek to replicate the content of this within this response.
- 1.4 This response also follows the initial pre-application presentation by the project team on Thursday 14th October and the content within that which has been shared by Nexus.
- 1.5 From the pre-application submission, we understand that commentary is sought on the following matters:
- 1 The principle of development;
 - 2 Local Green Space and Landscaping considerations;
 - 3 Scope of Sequential Assessment (Alternative Site Search);
 - 4 Confirmation of Education Needs;
 - 5 Transport and Access arrangements;
 - 6 Design quality;
 - 7 Contamination impacts and mitigation; and
 - 8 Application requirements.
- 1.6 In addition to those matters requested above, we set out commentary on the following matters further to discussions at the first pre-application meeting and subsequent email correspondence from the applicant's consultant team:
- 1 Views
 - 2 Noise

- 3 Employment and Skills Plan
- 4 BREEAM and Sustainability
- 5 Flood Risk and Emergency Evacuation Plan
- 6 Potential S106 Obligations
- 7 Secretary of State Referral

- 1.7 We understand that the intention is to front-load the application as far as possible to reduce the need for pre-commencement conditions, and this is reflected within the advice given within this note.

2.0 Principle of Development

- 2.1 The pre-application response (March 2020) provided by RBC provides a significant level of commentary on the principle of development and as such we do not seek to repeat this within this response.
- 2.2 As set out previously, it will be necessary to provide a formal evidence-based justification within the application submission to explain in detail the social role fulfilled by the proposed development. This information will assist in ensuring the social merits of the case can be afforded the correct level of weight within the planning balance.

3.0 Local Green Space and Landscaping Considerations

- 3.1 Further to the advice previously provided in 2020, RBC's Natural Environment Officer has reviewed the proposals and as summary of the comments provided is set out below.
- 3.2 Since the previous pre-application advice, the Council have adopted their new Climate Emergency Strategy, BAP and Tree Strategy.
- 3.3 There are aims within the Tree Strategy that apply to the proposals and these will impact on the landscaping design/specifications. The main general points to focus on are:
- Ensuring a net gain in trees number on site (it's a general point and the site is partially in the AQMA which makes tree planting more important)
 - Ensuring new tree planting meet the diversity aim of 30:20:10 (Family:genus:species)
 - Ensuring planting is either native or wildlife friendly
 - Tree planting should incorporate large canopy trees wherever feasible
 - Please avoid *Tilia* spp (Lime) and *Prunus* spp (Cherry) due to over dominance in the Borough
- 3.4 As has previously been mentioned, some tree species have done better than others in this area, therefore further liaison with the Parks department was recommended to get input on the best tree species to include. Further input from Parks has been requested by Lichfields and will follow in due course.
- 3.5 The planning application should be accompanied by a Tree Survey and Arboricultural Impact Assessment.

4.0 Sequential Assessment (Alternative Site Search)

- 4.1 As set out with the previous pre-application response and your initial pre-application letter an alternative site search/sequential assessment should be prepared to support the selection of the site and the justification for not according with policies of the development plan (e.g. the Local Green Space allocation). As this links to the need case (see below) for the school, we would suggest that the search area for the assessment is based on the school's proposed catchment area. The assessment should incorporate details of the site requirements and how flexibility in the proposals has been considered (e.g. could the school be split onto two smaller sites).

5.0 Education Needs

- 5.1 To assist with the planning balance case for the school, justification for the need for the school including the social role to be fulfilled should accompany the planning application.
- 5.2 Information from RBC Education team has been requested and will follow separately.

6.0 Transport and Access Arrangements

- 6.1 A response from RBC Highways to the Highways Scoping note issued by Hexa Consulting has been sent under separate cover (copy enclosed at Appendix 2).

7.0 Design Quality

- 7.1 Policy CC7 of the Local Plan reinforces the importance of good design stipulated by the NPPF as is required all development to respect the surrounding buildings in terms of scale, height, form and massing.
- 7.2 At this stage based on the information provided we do not have any significant comments in relation to the design of the proposals, albeit we have not yet had detailed feedback from the Council's Urban Design Officer.
- 7.3 We would recommend that consideration is given to taking the scheme to the Design Review Panel. Should this be of interest to the applicant, we are happy to provide further information on this process.

8.0 Contamination impacts and mitigation

- 8.1 It is known the proposed site and surrounding land sits upon an ex-landfill site, and this has been discussed at some length previously including separate discussions with the Environment Agency.
- 8.2 We have discussed the latest proposals with the RBC Environmental Health team and they have advised they have no additional comments at this stage beyond those provided last year (Copy enclosed at Appendix 3).
- 8.3 We would note that the pre-application submission references a 'Contaminated Land Survey' within the list of submission documents. As contamination is likely to be a key consideration in the determination of any application, and the subsequent construction we would recommend that as much information as possible is submitted as part of the application submission. Details of any proposed mitigation measures, for example, may assist with the reduction in the need for pre-commencement conditions.

9.0 Application Requirements

- 9.1 We have provided commentary on the suggested scope of submission within Appendix 4) of this response.
- 9.2 Please note that this is our view on the application requirements, and further discussions with other Council Officers/Statutory Consultees may lead to the need for further information.

10.0 Additional Matters

Views

- 10.1 We would recommend reviewing the Heritage, Townscape and Visual Impact assessment which accompanied the application for the Rivermead application which has previously been circulated by Julie Williams, as this will give a good indication of the views which were considered in relation to that development (copy enclosed at Appendix 5).

Noise

- 10.2 It was raised within the presentation that the design of the school with the hard informal play area facing onto the open space and The Warren beyond on the opposite side of the Thames may give rise to potential noise issues when the area is used by students. In line with Policy CC8: Safeguarding Amenity of the Local Plan this will need to be assessed as part of the forthcoming planning application.

Employment and Skills Plan

- 10.3 We understand that the school is proposed to be constructed using a pre-fabrication off-site mechanism. The Employment, Skills and Training SPD (adopted 2013) sets out the obligations which will be sought from developments at the construction and end use phases of development to contribute to a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.
- 10.4 We suggest that discussions are held with Reading UK CIC to develop an Employment Skills Plan (ESP) which can accompany the application (again reducing the need for potential pre-commencement conditions). Should an ESP not be proposed, the SPD sets out that a financial contribution secured by a S106 legal agreement (see below) will be sought instead.

BREEAM and Sustainability

- 10.5 There are several sustainability policies within the Local Plan which are relevant to new development.
- 10.6 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.”* In order to achieve this *“all major non-residential developments are required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible;....Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*

- 10.7 The explanatory text then goes on to state (para 4.1.4) that for some types of development, including school, it may be more difficult to meet these standards. *“In these cases, developments must demonstrate that the standard to be achieved is the highest possible for the development, as at a minimum meets the BREEAM ‘Very Good’ standard.”* We understand that due to some of the design requirements for the school ‘Excellent’ is not possible to be obtained. Justification as to why this cannot be met should be provided with the application submission, as required by Policy CC2.

Flood Risk and Emergency Evacuation Plan

- 10.8 As you are aware the site is located within Flood Zones 2 and 3 and we understand that discussions are being progressed with the Environment Agency separately on this.
- 10.9 Due to the nature of the proposals and the location within the flood zone it will be necessary for an Emergency Evacuation Plan to be prepared (and we understand that this is anticipated to accompany the application submission at the outset).

Potential S106 Obligations

- 10.10 We set out below a suggestion of the potential S106 obligations which may be sought as part of the proposed development. Please note this is based on a review of the Planning Obligations under Section 106 SPD, as well as discussions with Council Officers and consultees. Please note that this list is not exhaustive and is based on the responses received to date, therefore there may be additional requests as part of the planning application process.
- 1 Employment and Skills Plan
 - 2 Potential highways works (see Highways response)
 - 3 Potential improvement to bus services (see Highways response)

Secretary of State Referral

- 10.11 Finally, to confirm, in line with The Town and Country Planning (Consultation) (England) Direction 2021 that, as the proposal is for a major development within Flood Zones 2 and 3, should the Environment Agency make an objection that is not withdrawn following discussions with the local planning authority then the Secretary of State will need to be consulted on whether they would like to call-in the application.

Appendix 1 – Pre-application response ref. 191811/PREAPP



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Our Ref: 191811/PREAPP

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26 March 2020

Advice without prejudice

Your contact is: **Brian Conlon, Planning & Building Control**

TOWN AND COUNTRY PLANNING ACT 1990

ENQUIRY REFERENCE: 191811/PREAPP

ADDRESS: Leaderboard Golf Centre Richfield Avenue Reading Berkshire RG1 8EQ

PRE-APPLICATION: Pre-application advice for proposed new 8-form entry mainstream secondary school with sixth-form (1500 pupils total) with external multi-use games areas, car parking, vehicular access and landscaping.

Dear Mr Shar,

In light of the unprecedented situation which continues to develop and the need for the Authority to adapt to a rapidly evolving situation, please accept my apologies for any unexpected delay in this response. In the absence of any formal minutes provided from our last meeting and in agreement with Leon Weinstein, this letter would be an appropriate mechanism to both summarise the discussions held at our meeting of the 19th December 2019 but also provide an interim assessment as to what the Local Planning Authority (LPA) feel are the main strategic issues to consider on any development of this nature at this current time.

It should be noted, the advice contained in this response is now able to begin to reflect the Council's emerging aspirations for adjoining land at Rivermead Leisure Centre. This land makes up a site allocation in the new Local Plan (WR3d, RIVERMEAD LEISURE CENTRE, RICHFIELD AVENUE) and at the time of our meeting, little information was available on the intentions of this site.

Whilst it is hoped the following feedback will prove useful in informing your approach to such a proposal on this site, it must be recognised that the lack of information and detail currently available to Officers, means the advice provided at this stage is unable to cover all relevant technical issues in any level of detail. In recognising this project is at a feasibility stage, it is hoped this response forms a

useful framework to those strategic issues the LPA consider important when further pre-app discussions are held.

1. Site and proposal

This pre-application enquiry relates to a new 8-form entry secondary school with sixth form (estimated 1500 pupils) at the former Leaderboard Golf Centre on Richfield Avenue, Reading. The proposal would include a new main school building, separate sports block, MUGA, new playing pitches together with car and cycle parking works, new accesses onto the public highway and all ancillary works and landscaping.

The site is located to the north of Richfield Avenue, of which the northern largest proportion is the former golf driving range (Leaderboard Golf). The 'southern triangle' on the southern end of the site is an area of bare open land enclosed by established hedgerows and trees with a ditch used for drainage running from west to east. To the east directly adjoining the site is Rivermead Leisure Centre. To the south of the site across Richfield Avenue is a large commercial/ industrial zone. The site is not within proximity to any residential uses. Importantly from a construction and operational perspective, Reading Festival is staged annually to the west of the site, and parts of the application site is currently used during the festival for camping and ancillary purposes.

It is understood from the submission documentation that the 'southern triangle' part of the site off site would be used for car-parking only and an area of land roughly equating to one third of the northern section should be left as soft external area for use as playing field and for camping over the festival period. The main school complex would be located broadly where the existing Leaderboard golf centre building currently are. Three options are presented within the pre-application brochure. All three show the main school building as three-storey with separate entrance for visitors, pupils and 6th form students. A separate sports block, MUGA, soft informal play and habitat area are shown in addition to the large car park area to the south.

Vehicular access as well as construction access is proposed from the access off Cow Lane to the southmost corner of the 'southern triangle'. A secondary vehicular access and pedestrian route for students arriving at the schools would be created to the east via the existing Leisure centre access.

2. Context

The new Local Plan contains the most up-to-date and relevant policy approach to some of the town's largest and most strategic sites. This plan is now read against the backdrop of the Government's new National Design Guide (November 2019) which specifically helps to inform development proposals and their assessment by Local Planning Authorities, both which are underpinned National Planning Policy Framework (NPPF). Alongside this recently adopted policy framework is the Council's climate emergency declaration (Feb 2019) which signifies a strong commitment to ensure sustainability is at the heart of decision making. Against a backdrop of ever-increasing publicity and scrutiny of associated environmental impacts of major development schemes (recent media focus on the sustainability credentials of new schools are a prime example), the Council is expected to lead by example in fulfilling its own commitment to meeting the sustainability standards set by our own Local Plan. Such developments are also expected to be designed in such a way that future sustainability standards can be met without unnecessary cost implications to local providers.

Since our last meeting, the Council's Policy Committee announced that a new 25-year contract to design, build, operate and run Reading's leisure service has been awarded. This is part of the Council's commitment to invest over £40 million in modern new leisure facilities for Reading. The

award of this contract has meant the start of meaningful pre-application engagement over the Rivermead Leisure Centre site directly adjacent to the east. Both improved education and leisure provision are high strategic priorities for the Council and receive strong policy support at both local and national level. Ensuring both projects can simultaneously progress and collaborate as necessary to management common and cumulative impacts is a high priority, and this will be essential to the successful outcome of both strategic projects.

Another key consideration which must be flagged at an early stage is land contamination. It is understood that a previous feasibility study was undertaken in 2018 for the demountable swimming pool and that findings were notable and signposted within a formal written response along with other high-level advice. This is likely to prove one of the main technical constraints on this site and the adjoining leisure centre, which if not managed adequately during and after the planning process, could prevent the timely delivery of the project. This will be discussed in more detail further on in this report.

In terms of key topic headings both discussed and considered, the following are considered important to highlight at the stage:

- Principle of development
- Contamination
- Flood risk and drainage
- Sustainability
- Transport
- Other matters

3. Principle of development

In starting with the Development Plan, Policy EN7 of the Council's newly adopted Local Plan affords significant protection to both Local Green Space (LGS) and Public Open Space (POS) from inappropriate development. A large proportion of the site for which this new school would be located falls largely within the Rivermead and Thameside Promenade area of LGS. This area is specifically identified within this policy as 16.83ha of LGS (Policy EN7Wp).

This policy is quite clear that proposals which would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development, or jeopardise their use or enjoyment by the public, will not be permitted. As a result of its specific location, form and range of current uses, the vast majority of the Rivermead and Thameside Promenade LGS provides a valuable centrally located open space resource for the public and communities both north and south of the river at the heart of Reading.

It should be recognised that Policy EN7 is specifically worded to protect the unnecessary loss of those areas of open space which can be accessed by the public. The policy makes the important distinction between those areas with unrestricted public access, like a park, and those with restricted public access such as school playing fields, which incidentally are covered by other policies within the local plan. It is therefore important that Officers are able to understand which part of the Rivermead and Thameside Promenade are likely to be affected by this proposal, and how the area affected is currently utilised. This will inform the weight likely to be given to the LGS policy and determine whether other material planning circumstances would need to be weighed in the balance when determining a planning application of this nature in the near future.

The Rivermead and Thameside Promenade is primarily used for informal riverside recreation. However, there are notable exceptions where access is required to managed water-based activities and formal leisure uses adjoining and within this defined area of LGS e.g. Rivermead Leisure centre, hotel, restaurants, pleasure boating etc.

As stated above, the majority of the new school site and its associated playing field would be located on the former Leaderboard Golf Centre and Driving Range. Whilst formerly open to the public as to pay and play driving range, the facility ceased operating recently and begun operating as Reload Reading, a laser clay shooting range. Whether as golf driving range or clay shooting range, both uses were privately managed and by the very nature of the pursuits offered, public access to the land was strictly controlled for safety reasons.

As noted, a primary characteristic of LGS as acknowledged by Policy EN7 is the opportunity for unrestricted informal play and recreation by the general public. Given the above described uses, the land for which this proposal relates has functionally operated as a managed sports facility rather than as any sort of publicly accessible green space or park. Outside of the land in question, the Rivermead and Thameside Promenade has historically and continue to be accessible and used by members of the public and clearly fulfils its intended LGS designated within the Local Plan.

Whilst any proposal would undoubtedly result in the loss of a notable amount of designated LGS and to a certain extent alter the way the public perceive the remaining LGS, the actual loss of this particular part of the LGS is unlikely to fundamentally affect the overall status or way in which the remainder of the Rivermead and Thameside Promenade is enjoyed by members of the public.

Whilst constituting a direct conflict with the prescriptive aims of Policy EN7 (Local plan designation Policy EN7Wp), the policy's overall intention (to prevent loss or jeopardise the use of such areas) is not compromised. Therefore, in this instance, with regard to this specific land, it may be appropriate to afford less weight to the requirements of this policy and consider carefully whether any other policies are more applicable and/or whether any material planning considerations are applicable in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Policy OU1 'New and Existing Community Facilities' is clear in its support for new, extended or improved community facilities. This policy is important in that it identifies the Council's parameters in assessing such facilities over the plan period. The policy states that *"Where a proposal for a new school meets a clear need, and it would otherwise accord with national and local policy, it will be acceptable on sites identified for residential or other development."* Importantly this policy goes onto recognise that the on-site intensification of some facilities (particularly schools) may result in the loss of some open areas.

This policy also acknowledges the competing priorities of meeting educational need within the borough against existing and proposed social and environmental commitments. Any such assessment of a new secondary school on this land would more directly engage the requirements of this policy than Policy EN7. This policy is also set against the presumption in favour of sustainable development and the clear support at national level for authorities like Reading to actively seek to meet the day-to-day needs of their residents.

The presumption in favour of sustainable development lies at the heart of the NPPF. The three overarching objectives to achieving sustainable development within the framework are defined as economic, social and environmental. The economic role requires proposals to contribute to building a strong, responsive and competitive economy. The social role requires planning to support strong,

vibrant and healthy communities and a high-quality built environment. Whilst the environmental role requires the natural, built and historic environment to be protected and enhanced and importantly the mitigation and adaptation to climate change.

The proposal would undoubtedly contribute to and encourage associated economic activity within the Borough, both through the construction works, ongoing operation and management of the school and through employment opportunities. In terms of the social role, the proposal is clearly in response to a Borough-wide need for school places. Paragraph 94 of the NPPF emphasises the importance of a Local Authority having sufficient choice of school places to meet the needs of existing communities. It goes on to say that, *“Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen choice in education”*. In particular LPAs should give ‘great weight’ to the need to create, expand or alter schools through planning applications. Paragraph 121 of the NPPF supports the needs for LPAs to make more effective use of sites that provide community services such as schools, provided this maintains or improves the quality of service provision and access to open space.

Whilst intended to positively meet an underlying need, at this stage no formal evidence-based assessment has been provided to planners to explain in any detail the social role fulfilled by this development. It would be fully expected that any forthcoming planning application would contain a detailed analysis of the specific need that is to met by this new secondary school in order for the social merits of the case to be afforded the correct level of weight.

Finally, but of increasing importance as highlighted in Section 2 and Section 6 of this response, is the development’s environmental role. As a minimum, a completely new secondary school would demonstrate the required level of sustainability to comply with the Council’s own energy efficiency and sustainability standards within the Local Plan and correspondingly required by national Building Regulations standards. In addition, it is fully expected that the development will reflect updated and supported sustainable approaches to the movement of people, public transport connectivity and access to, and improvement of, the local cycle network. Tied in with a detailed Travel Plan will be the need for this campus to actively and positively contribute to reducing the need for both students and staff to arrive and leave by private vehicle. This would be covered in any transport comments in more detail.

Finally, the land at the former Leaderboard Golf Range is not recognised as currently having any substantial environmental value in terms of biodiversity. Through a comprehensive landscape strategy, management plan and biodiversity enhancement scheme, the development will be fully expected to perform an active environmental role not only for student users, but for the adjoining open space and nearby biodiversity features.

In summary, in order to allow the LPA to determined accurately whether the principle of development is supported, it is important for the status of the land to be defined and the nature and level of public interaction with the authorised use as a former golf centre/shooting range. In addition to those individual technical matters like land contamination, flooding and transport, it will also be essential that any submission is able to adequately set out the material economic, social and environmental considerations pertinent to the proposal. This will allow the LPA to accurately weigh up those factors which need to be balanced against any identified harm caused by any conflict with local plan policies.

4. Contamination

It is known the proposed site and surrounding land sits upon an ex-landfill site. In 2018 capping-off was recommended on the adjoining site, however it needs to be established whether such approaches

are feasible within the flood zone. It is likely that a more comprehensive remediation strategy may be required subject to feedback from LPA and EA. As such, the LPA are not in a position to confirm the resolution of such matters at this stage. What was discussed at our meeting was the likely issues that may arise from the amount and type of piling required for this development and the amount of spoil material required on/off site.

It is understood that recent similar projects do not support such material being removed from site, with a strong preference for on-site treatment. It is understood from our discussions that this would be the developers preferred approach, but without any relevant survey work undertaken or details provided at this stage, the matter remains unresolved. As part of any strategy we would require an accurate red line extent of the development and evidenced extent of the landfill to ensure a comprehensive approach to both land contamination and to reduce the risk of unforeseen or adverse flood risk implications.

The Environment Agency (EA) (through their own pre-application advice service) are also likely to wish to provide comments on land contamination. Where contamination poses a risk of pollution to controlled waters (as quite possible in this case) they will provide advice to us at the planning application stage as a statutory consultee. It should be noted that the EA do not offer advice on the risks to human health arising from development on land affected by land contamination.

At our meeting, gas monitoring was also briefly discussed. It was not confirmed whether Radon was or was not an issue, just gas associated with the previous use of the site as landfill. It was noted that an alarm system is already in place at the leisure centre given historic high levels of gas. Data on this was provided in 2018 but is likely to need updating. It was mentioned in the original planning permission, that back in 1950s, landfill centred on the leisure centre.

Please see attached consultee comments from the Council's Environmental Protection Team which helpfully covers the following matter:

- Noise arising from development
- Air Quality
- Contaminated Land
- Light
- Construction and Demolition phase
- Bin storage - rats

5. Flood Risk and drainage

For a scheme of this scale in proximity to several water courses and drainage ditches and within a number of recognised flood zones, a comprehensive Flood Risk Assessment (FRA) would need to accompany any application.

The FRA would need to clearly identify the extent to which each element of the proposal falls within each respective flood zone. The key aspects of the analysis undertaken as part of any FRA is likely to include:

- Risk of fluvial flooding based on its location in Flood Zone 1,2,3 and 3A;
- Groundwater flooding;
- Hydraulic analysis of any watercourse to the boundaries of the site;
- Risk from pluvial flooding (Whether any existing and proposed overland flow paths have been recognised in the design);

- The surface water management measures to ensure that the volume and rate of water discharging from the site will match/improve upon existing conditions and so there will not be any change to hydraulic conditions within any nearby watercourses that currently accepts water from the site.
- Water quality has been considered in the design and appropriate measures have been provided to minimise the release of polluting matter into any watercourses that currently and will continue to receive surface water inputs from the site.

The report would need to demonstrate to the satisfaction of both the Lead Local flood Authority and the EA that the development would not exacerbate or increase the risk of flooding either on the site or in the locality through the provision of an appropriate surface water mitigation strategy for the site as required by the NPPF.

The FRA will be assessed by the Council's own Engineers and the EA to ensure that the proposal provides an appropriate on-site drainage solution and they are satisfied that the proposal demonstrates that there would be no demonstrable harm to flood risk as a result of the development.

As discussed in the above section, the Environment Agency offer a paid pre-application service in order to identify and resolve issues prior to the submission of a planning application. For larger, more complex sites such as this, a meeting is likely to be required in addition to the written submission. It is strongly recommended enquiries are made with the EA to begin such a process.

Other aspects of flood risk and drainage which overlap with the inherent sustainability credentials of the building, are green roofs which themselves are recognised as having benefits for sustainable design, building efficiency and contribution to attenuation. This will be covered in more detail in subsequent sections. Any SuDS proposals should be in line with the National Standards and those stipulated within the newly adopted Local Plan.

6. Sustainability

The Council's new Local Plan contains a updated approach to some of the town's largest and most strategic sites an issued facing the borough. Policy CC2, CC3, EN12, EN14, EN15, EN16, and the Council's newly adopted Supplementary Planning Document 'Sustainable Design and Construction (2019)' emphasise the need and importance of securing positive environmental improvements as part of any new major development such as this.

Whilst referred to earlier in this report, it is important to recognise that since the Borough's climate emergency declaration and with increasing public focus on the consequences and responses to climate change, all aspects of sustainability are taking on ever greater significance in the planning process. There is now an overwhelming need for the planning process to fulfil the Authority's commitment of ensuring that sustainability is placed at the heart of the local decision-making process, especially on significant social infrastructure projects such as schools.

- BREEAM

Policy CC2 'Sustainable Design and Construction' of the Local Plan requires all major non-residential developments to meet the most up-to-date BREEAM 'Excellent' standards where possible. The Local Plan recognises that for a number of uses, the requirement to achieve 'Excellent' ratings is unlikely to significantly affect viability. However, the policy also acknowledges that for some types of development, including schools, meeting these standards may be more challenging. In such an event, we would expect any application to be accompanied by information clearly demonstrating that the

sustainability standard to be achieved is the highest possible for this development type, and at a minimum meets the BREEAM 'Very Good' standard.

- Decentralised energy

Decentralised energy is an important sustainability requirements of the Council's new Local Plan, especially for significant new non-residential development such as a new 8 form entry secondary school. Policy CC4 of the Local Plan (Decentralised Energy) requires schemes of this size and importance to demonstrate how consideration has been given to securing energy for the development from a decentralised energy source. The NPPF actively promotes bringing forward decentralised energy, with an expectation that new development will comply with adopted Local Plan policies on local requirements for decentralised energy. The NPPF also refers to identifying opportunities for energy supply for development to be drawn from a decentralised, renewable or low carbon supply system and for co-locating potential heat customers and suppliers.

Under Policy CC4, this development must 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. Where there is existing decentralised energy provision present within the vicinity, the scheme will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.

Decentralised energy can cover a variety of technologies, including various renewable technologies, and more efficient energy generation such as Combined Heat and Power (CHP) etc. In order to achieve the above referenced BREEAM requirements, there is a unique opportunity to consider what role decentralised energy (as a key energy efficient design measure) can play two of the borough most significant strategic non-residential uses that are uniquely located side-by-side. In addition, the opportunity to reduce carbon emissions associated with heating requirements of both the school and a leisure centre through low carbon fuels such as biomass in the form of woodchip or wood pellets may also be feasible when delivering a higher heat loads over shorter distances, as would clearly be the case on both these sites.

An alternative option is the integration Building Integrated Photovoltaic (BIPV) technology to optimise daylight, omit excess solar gain and harness the sun's energy to produce free electricity for the campus. This has been successfully been utilised on a number of education, commercial and campus based uses. Given the location of the school directly adjoining what will be the borough's primary redeveloped leisure facility, the Council would fully expect to see evidence of coordination between both project teams in order to ensure that the opportunity to jointly fulfil these policy objectives are taken at the most appropriate stage and not missed.

Specifically, the Energy Statement submitted with any application would be expected to contain details of both the schools energy system and that of the adjacent leisure centre 'as a whole' and consider the benefits of locating energy production close to where it will be used. The Council's Sustainable Design and Construction SPD contains more information on this integral part of the development and officers are happy to facilitate coordination between both sites within the Council.

- Landscaping and biodiversity

It appears from the information provided that the current proposals do not result in any loss of trees, however there may of course be a requirement to relocate some as a result of the works. As a default position, tree planting should be sought on all development sites of this size and use. This may come

in the form of a combination of boundary enhancements, structural landscape features and supplementary greening throughout main outdoor circulation areas. Trees to screen the site from outside of the site and across the LGS and riverside promenade will require careful planning to ensure integration and biodiversity and amenity value.

A full application would need to be supported by a full suite of ecological survey reports identifying potential impacts on protected species and habitats and designated features, and mitigation/compensation measures proposed to ensure a net gain for biodiversity. Potential for pollution, flooding/drainage issues on designated features and habitats need to be considered, especially where the proposed parking area to the south close to Richfield Avenue is likely come into close contact with existing trees and established hedgerows. Likely biodiversity enhancements can include long grass 'wildlife areas' providing connectivity throughout the site, wildflower seeding/brash piles /bird & bat boxes /hedgehog houses etc. Officers also recognised the opportunity available for net gains in biodiversity to the perimeter of the site where vegetation can be encouraged to meet privacy, enclosure and biodiversity objectives, thereby effectively softening any visual impact on the wider LGS. As part of any habitat enhancement scheme, an invasive species action plan would be required given the proximity to nearby watercourses. Whilst a comprehensive habitat enhancement scheme containing all such required measures would be secured via condition if not accompanying the application, we would expect detail to be forthcoming in order to be considered in any overall planning balance.

It was noted during our meeting that whilst native tree planting is preferable, successful establishment of certain trees in the immediate area is known to be an issue. Where tree planting is proven to be unfeasible, say due to soil conditions etc, then alternative 'greening' is an expectation in the form of green walls and/or roofs. Both will be expected as in the case of this development.

You will no doubt be aware that national and local policies have become much more explicit in their support for the adoption of green walls and roofs within suitable new development. These directly support the requirements of policies CC2 and CC3 of the Local Plan by improving the energy efficiency of large school buildings through say improving roof insulation. This works both ways in keeping roofs (hence internal temperatures) cooler in the summer requiring less air conditioning and warmer in the winter, requiring less heating. Such features also provide rainfall attenuation improved sustainability credentials. Fig 1 below shows a successful example of a green roof utilised on a secondary school in West Berkshire.



Fig 1. St Bartholomew's School, West Berkshire
<https://www.stbarts.co.uk/> and www.architecturelive.co.uk

In addition to reducing the use and cost of heating, ventilation, and air conditioning systems (HVACs), the integration of green roofs on buildings which possess significant footprints (like schools) have the ability to effectively capture airborne pollutants and atmospheric deposition, and they filter noxious gases at all times of year. Alongside tree planting, such features are becoming a vital component, particularly within an AQMA. They are also widely considered to improve the appearance of buildings, which is particularly important when many educational buildings can often appear featureless. In this respect, the council are keen to ensure the overall design of this new school is able to inspire its users and raise awareness to the positive role nature plays in everyday buildings.

7. Transport

At our meeting, parking and access were discussed. A key factor with this site was the ability for it to operate without obstructing or prohibiting access to surrounding uses. These include access to and servicing of the existing leisure centre, access to and the existing and ongoing needs of Reading Festival, and finally the garden centre to the south-eastern corner of the site adjoining Richfield Avenue. It should be noted that the garden centre has an extant planning permission, and as such any future proposals must take into account this permission ensuring adequate arrangements for deliveries and manoeuvring of larger vehicles are maintained as necessary in order to ensure this business can continue.

The proposal would appear to result in the provision of 0.5 space per staff member (equating to a total of 78 Spaces). As discussed, the parking would be located to the south (triangular area of land), which is currently a Local Authority car park used predominately by the festival over the summer period. At this stage, our Transport Officer is unable to confirm whether the parking area is enough for the development as the information to calculate the required number of parking spaces has not been provided.

At our meeting our Transport Team identified the importance of a comprehensive Travel Plan, and the essential role it will play assisting the LPA in determining whether likely impacts can be mitigated and managed adequately. As new secondary school will undoubtedly have an impact of increasing transport demand in the area, the Travel Plan should clearly outline the way in which the transport implications of the new development will be managed in order to ensure the minimum environmental, social and economic impacts. Full details of alternative means of travel, which do not involve private vehicle use, are essential. The Travel Plan should also include details of targets and arrangements for monitoring.

Whilst it is acknowledged a Travel plan has yet to be determined, the submission document identifies the existing level of traffic on Richfield Avenue during peak times, whilst it is only likely to be further exacerbated by this development. Detailed catchment analysis and modes of travel for each will be key.

At our meeting, Officers highlighted a recent decision by the Council to resist a new hotel development to the east along Richfield Avenue for insufficient transport information. It was noted that the existing roundabouts to the western end of the road is already over-capacity. Whilst it should be noted this application was refused on transport capacity grounds, offsite highway improvements would likely have been a key component of any Section 106 agreement for the scheme. It was clarified that such highway improvements may not necessarily take the form of actual highway works, but promotion of alternative modes, infrastructure and mitigation. This would be very much dependant on origins of users.

With regard to access points, the Cow Lane access to the south of the site is a busy road, and with two ways in and out from Richfield Avenue, there would be a large critical mass of pupils twice a day. This will fundamentally require the proposed path network to be considered in detail to ensure any vehicle/pedestrian conflicts minimised and segregation achieved. Whilst it is recognised the actual location of the proposed school is a strength in terms of catchment coverage, it is understood the Maiden Erleigh Trust (MET) have an intention to have a delayed school hours. E.g. a 0930 start in response to the recognised road capacity issues experienced on Richfield Avenue. Full details of any such measures are required.

Since our last meeting, it was noted that a plan of the triangular parking area was submitted for review. This indicated the number of spaces available in the car park and as such how circulation of vehicles could work. Our Transport Officer made the following comments:

- A route to the garden centre has not been provided. Please note that a planning application is currently being assessed for a permanent facility.
- The access route to the site would appear acceptable for vehicles only but would not be of an acceptable width to facilitate both vehicles and pedestrian / cyclists. To ascertain this I would need to be provided with a detailed access layout.
- Access to the site should be designed in accordance with the Council Geometric Design Guide for Accesses onto Classified Road. The access design and internal layout should also take into account vehicles associated with the adjacent garden centre.
- Dedicated pedestrian access should also be provided. This is likely to require alterations to the Public Right of Way that runs north - south to the west of the application site. The application will need to include full details of what changes are included.
- Car and cycle parking should be in accordance with the Councils adopted parking standards
- Electric Charging should be provided in accordance with the adopted Local plan.
- The application should detail the proposed catchment areas.
- Junction Assessments will be required of the Caversham Road / Richfield Avenue junction and the Portman Road / Cow Lane junction. For information I am aware that the Caversham Road / Richfield Avenue junction is also at capacity and therefore it is highly likely that mitigation measures will be required. These should be in the form of sustainable transport measures i.e. upgrades of footways along Richfield Avenue to cycleway, pedestrian crossing facilities on Richfield Avenue, better pedestrian cycle links to the north etc.

Of importance to any proposal is both Reading Festival and the operation and construction phase of the Leisure Centre redevelopment. This will be heavily dependent on access from Cow Lane and require a detailed phasing plan over a period covering both the festival setup, operation and clear up and the same elements of the leisure centre redevelopment. A detailed Construction Management Plan will need to be coordinated with adjoining land owners and operators to ensure all aspects of construction can occur and unnecessary duplication is avoided. This could include single points of access and egress, wheel washing, reporting of complaints, hoarding, noise, etc. Given impending timescale for a Leisure Centre planning application, the principles of a wide-ranging CMP will be key at an early stage and will likely be required up front as part of any planning application.

8. Layout, scale and design

Section 12 of the National Planning Policy Framework (NPPF) places significant weight on ensuring good design which is a key aspect of sustainable development and 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.

Policy CC7 of the new Local Plan reinforces the importance of good design stipulated by the NPPF as it requires all development to respect surrounding buildings in terms of scale, height, form and massing. This Policy requires development to be constructed using appropriate materials and seeks to ensure that the appearance of the development is successfully able to create a sense of place for its users, with its own identity and public realm. The provision of green infrastructure and landscaping, with effective permeability and legibility will be crucial for such a large school use. There is also the need for any new building to respond positively to their local context and create or reinforce local character and distinctiveness.

Option A and B show the main school building as a single U shape block made up of differing elements. Option C is an L-shape block. A separate sports block is a common feature of all options. The position of the new school building does maximise the use of the site. Whilst it appears that a modular approach to the school is proposed on all options, although no information is available as to how the building would look.

There are a number of elements that would need to form the overall design of the building. A central area and/or front elevation which would form the main entrance to the school. This should be designed as the main focal point with a strong façade that clearly gives the frontage a strong presence when viewed from the access. Flanking this would be the wings of the ‘U’ shape, being naturally subservient to the main façade.

Officers would need to be satisfied that the overall design of the building gives the school building a strong visual identity associated by a strong focal point. A bland and uninspiring appearance will not be supported. This also applies to any chosen boundary treatment for the northern playing pitch, as metal fencing, whilst an easy option, risks industrialising the site and affecting the openness and enjoyment of the surrounding LGS.

In terms of the front boundary with Richfield Avenue, we expect the majority of trees to be retained and where appropriate to be reinforced. To the rear of the building, the ‘U’ shaped layout facilitates the provision of a well surveyed quad/courtyard to provide various sheltered outdoor spaces for use by the school for educational and recreational purposes.

The majority of the northern portion of the site would be sports pitches. Details of how pitches are accessed and how areas around the pitches are to be utilised (e.g. additional planting of trees and wildflowers to increase the biodiversity) will be expected. This will also give a soft edge to the areas around the playing pitches which by their nature will be more formalised spaces of close-mown grass adjoining LGS and the river.

With regard to wider visual impact considerations, Policy EN13 of the Local Plan ‘Major Landscape Features and Areas of Outstanding Natural Beauty’ states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature (MLF). The supporting text to Policy EN13 states *“The extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals.”*

Any application for a proposal of this nature would need to include a comprehensive Townscape and Visual Impact Assessment (TVIA), which should assess the landscape elements which make up the site

and its surrounding context and the potential effects of the proposed scheme on the sensitivity of the landscape/townscape and visual amenity, and importantly the likely significance of any effects.

The most sensitive visual receptors are likely to be those experiencing direct views towards the site from within both the Thames Promenade LGS and from Caversham on the opposite side of the River within the MLF. Further views from Caversham Bridge and from within St Peters Conservation Area are unknown at this stage and an assessment to what contribution the site currently makes to any such views is required. This is reinforced by the requirements of core environmental Policy EN1, which states that “Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.”

In summary, officers would expect the proposed school to have a strong design ethos that creates a well-designed, prominent building within immediate the area, but which respects its wider setting within the MLF. The use of high-quality materials for the building together with high levels of landscaping throughout the site is considered essential to create a development that represents the best of Reading and offers a strong identity for the students who attend there.

At this time, it is not considered that the proposals are at a stage where they would benefit from specialist design input from the Reading Design Review Panel (DRP). For your future information the DRP has been set up in partnership with local architects and meets once every 4 weeks, usually on a Thursday afternoon starting at 2pm. The Panel comprises mostly architects, although there are a small number of other design professionals, e.g. landscape architects, urban designers. It will primarily comment on design and urban design matters associated with an application. Each Panel will comprise 4 - 6 Members taken from a larger rota of members.

9. Economic development

A key priority for the Council (and more so as a result of unprecedented events lately), is to maximise employment opportunities for local people both the construction and operational stages of this development.

The Council has adopted an Employment, Skills and Training Supplementary Planning Document located here:

<https://www.reading.gov.uk/media/1064/Employment-Skills-and-Training-Supplementary-Planning-Documents-Adopted-April-2013/pdf/Employment-Skills-And-Training-Supplementary-Planning-DocumentsApr13.pdf>

We would use a Section 106 agreement to secure local employment opportunities through an Employment and Skills Plan. Ideally, for a scheme this size, this would need to be produced and submitted with the application to set out a range of local employment, volunteering, apprenticeship, training and development activities during construction and operation stages.

Such a plan should be mindful of the need to support local businesses providing ancillary services such as cleaning and catering if these are not provided in house. The catering company should also support local food and drink producers where possible to increase local resilience.

10. Conclusions

It is understood from our meeting that the level of detail available is representative of the early feasibility stage of the project. In light of this and the rapidly evolving economic situation the country, the above advice is likely to need reviewing as more information is submitted.

Officers share and recognise the need to discuss and agree matters at an early stage of the design process. More so, we are aware that a set of rare opportunities are presented by this proposal which could allow the coordination and collaboration of various design and construction aspects of this scheme with the adjoining leisure centre redevelopment in order to fulfil key local plan sustainability requirements. The Council expects an ambitious and optimistic vision for this site to be brought forward and officers are of the view that such a proposal could realistically meet an important social need whilst allowing adjoining strategic land uses to fulfil their intended role within the new Local Plan.

11. Timescales/next steps

In light of the time which has elapsed since our last meeting, it would be useful to have a detailed update as to the next steps within the pre-app process and the anticipated timescales of a live application submission in light of the rapidly evolving situation with the Covid19 pandemic.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission being submitted. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council.

I trust that this advice note is of assistance to you.

Yours sincerely

A handwritten signature in black ink, reading 'BConlon' in a cursive style.

Brian Conlon BA (Hons) MSc MRTPI
Principal Planning Officer

(via email only)



Appendix 2 – RBC Highways Response 2021

SCOPING STUDY FOR: River Academy, Richfield Avenue, Reading

LOCATION: Leaderboard Golf Centre, Richfield Avenue

LOCAL HIGHWAY AUTHORITY: Reading Borough Council (RBC)

DATE: 24th September 2021

This note defines the scope of assessment required to appropriately identify and where required, mitigate the residual highways and transport impacts as part of the proposed development of the new River Academy. We have set out the main details and scoping for a Transport Assessment (TA) and Travel Plan (TP) below. We invite Highways Officers at RBC to provide comment.

Ref	Item	Requirements	Comments
1	Level of planning approval sought?	Full Planning Application for the development of a new Secondary School with Sixth Form.	
2	Size and description of development proposals	Proposals include the development of a new 8FE Secondary School with Sixth Form with capacity for 1,500 pupils and circa 156 FTE staff members. The proposal would include a new main school building, separate sports block, MUGA, new playing pitches together with car and cycle parking works, new accesses onto the public highway and all ancillary works and landscaping. The control scheme developed includes the provision of 82 car parking spaces (76 staff and 6 visitors) which is based on the 1:2 ratio for RBC Car Parking SPD Zone 2. It is noted however that the northern part of the site falls within zone 4 which would allow for a 1:1 car parking to staff numbers ratio. Cycle parking and electric vehicle charging points shall also be provided in compliance with local planning and design guidance requirements.	
3	Description of existing land uses.	The site is located to the north of Richfield Avenue. The 'southern triangle' on the southern end of the site is an area of bare open land enclosed by established hedgerows and trees with a ditch used for drainage running from west to east. To the east directly adjoining the site is Rivermead Leisure Centre. To the south of the site across Richfield Avenue is a large commercial/ industrial zone.	

4	Does the development involve the relocation of an existing use?	No	
5	How are existing trips going to be dealt with?	Though the site currently generates a small number of trips as part of the Leaderboard Golf use, it is not proposed that these will be calculated and netted off when considering future development proposals. As such the new trips associated with the school proposals shall be consider new trips on the local highway network. It is noted the site is also used as part of the annual Reading Festival though given this event occurs during school holiday periods, it is not considered that the development proposals shall contribute to an intensification of festival related trips. Similarly the principal vehicular site access from Cow Lane shall be shared with the adjacent garden centre to the east. These garden centre trips are already embedded within the local highway network and are not proposed to intensify as part of the development proposals.	
6	Are traffic surveys of the existing conditions available or required?	Yes, traffic counts to inform detailed junction capacity modelling proposed for the Richfield Ave / Caversham Rd roundabout and Cow Lane / Portman Rd roundabout. Peak period and inter-peak period turning counts and queue lengths surveys are proposed.	
7	Are further traffic surveys required?	An assessment of local PIA Highway Safety shall be undertaken, along with a detailed review of the site's accessibility by sustainable modes of travel.	
8	Details of any other developments to be taken into account.	The garden centre and leisure centre adjacent to the proposed development site benefit from recently consented planning applications. The construction and operational impacts of these consented schemes shall be taken into account when calculating the residual impacts of the proposed school.	
9	Details of any adjacent highway improvement proposals by others	None.	
10	When are the critical periods for assessments?	09:00-10:00 to coincide with school start times at 09:30 and then 15:00-16:00 to coincide with school finish times.	
11	What will be the trip generation for the proposals?	Based upon TRICS data for similarly located and comparable schools. This shall be validated against the 2011 Census data for travel to school in Reading statistics.	
12	Would traffic from adjacent sites be attracted to the site?	No.	

	Pass-by traffic?		
13	What is the assumed trip distribution?	The school proposes a catchment of circa 1 mile. The principal residential areas within the catchment shall be used to develop a model for calculating trip distribution.	
14	What is the extent of the study area to be considered?	Broadly 1 mile beyond the proposed development site.	
15	Capacity tests required for the proposed and existing junctions	Yes, see response to Item 6.	
16	Are adjacent junctions or links likely to become overloaded from the development traffic?	Historic traffic count data has suggested the local area experience the accumulation of highway peak period trips. This shall be assessed as part of future traffic counts.	
17	Is a new or modified highway access likely?	Yes, a new and improved shared site access shall be formed from Cow Lane to the south of the site. This shall also be used by the adjacent garden centre for deliveries (outside of school peak periods) and also the Reading Festival organisers (during school holidays).	
18	What are the visibility requirements? Are those requirements met?	Based on MfS, a 30mph speed limit would required 43m visibility splays from a 2.4m set back distance.	
19	What level of car parking is required?	Current scheme proposes 84 spaces though it is felt this is on the low side of what may be necessary to prevent staff and visitors from parking on Richfield Ave which is protected by double yellow lines. The scheme shall also consider the provision of a pupil drop-off and pick up bay in order to mitigate the chances of parents stopping and waiting on Richfield Ave.	
20	Are special provisions required for cyclists, pedestrians, mobility impaired individuals or public transport?	This shall be explored as part of the TA development and also within the Travel Plan which is proposed to be written with the Academy and submitted as part of a forthcoming application.	
21	Do the proposals comply with NPPF etc?	To be determined following undertaking of assessment.	
22	Are there any further transport related reports required?	None.	

23	Are there any other special circumstances relevant to this proposal?	None.	
24	Are any off-site highways works anticipated?	The formation of a new access and possible infrastructure improvements for pedestrian, cyclists and public transport users subject to outcomes of TA.	

From: Cook, Darren <Darren.Cook@reading.gov.uk>
Sent: 08 November 2021 16:33
To: Williams, Julie (Planning) <Julie.Williams@reading.gov.uk>
Subject: 211413 River Academy PREAPP comments

OFFICIAL

Hi Julie,

Apologies for the delay in responding to the scoping note submitted in relation to the proposed planning application for River Academy school Richfield Avenue. My comments on each of the queries / questions within the scoping note are as follows:

1. Noted
2. Noted
3. Noted
4. Noted
5. Accepted
6. As has been mentioned during previous pre-application discussions the following junctions will need to be assessed:
 - Cow Lane / Beresford Road / Portman Road Roundabout
 - Richfield Avenue / Rivermead Roundabout
 - Caversham Road / Richfield Avenue / Caversham Bridge Roundabout
 - Caversham Bridge / Church Street / Church Road signalised junction
7. Noted
8. Noted
9. Noted
10. It is noted that the Maiden Erlegh Trusts two other schools in the Reading area open earlier i.e. 8.40 ish, it should therefore be confirmed why the later start time for the proposed school. To facilitate for any fluctuation in start times in the future a sensitivity test should be undertaken for between the hours of 8-9am to ensure that this is not going to create any undue harm to the Highway network.
11. In principle this is fine but it would have been helpful to have seen proposed TRICS data at the pre-application stage. I would also add that this data is based on the fact that it has been stated that the catchment is to be within a mile radius which is significantly reduced from the 3 mile plus radius that was previously identified during the pre-application discussions.
12. Noted
13. Noted, although as stated above I am aware that a 3 mile plus radius has previously been proposed.
14. Noted, although again this is dependant on no changes in the catchment area.
15. Noted, see my response to Item 6 above.
16. Noted
17. No designs of the proposed access have been provided as far as I can see but any redesign of the access must take into account the Public Right of Way that runs north - south along the western boundary of the school. The Public Right of Way must be improved as part of this proposal given the proposed increase in footfall and should not be worsened.
18. Visibility should be assessed in accordance with the Councils Geometric Design Guide for Accesses onto Classified Roads.
19. It is stated that parking in accordance with our standard is on the low side and may result in parking along Richfield Avenue, however as identified Richfield Avenue does have parking

restrictions along its length and therefore it is highly unlikely that over spill parking would take place in this location. I am however aware that some areas of unrestricted parking does occur within the commercial zone to the south of the site. Irrespective the site is located within 225m of a bus stop on Richfield Avenue and 800m of a bus stop along Caversham Road with a cycle lane passing along the site frontage, the Highway Authority could not agree to any additional car parking unless justification for the increased demand were provided.

In terms of drop off / pick up bays the Councils standards do not include them for secondary schools and therefore justification would be required for them to be included as they could just encourage the use of the private car to drop off children. The site is located within close proximity to 2 public car parks that could be used for pick up and drop offs.

20. There are no dedicated controlled crossing facilities provided that link the cycle lane through Cow Lane Bridges to the cycle lane on the northern side of Richfield avenue. Given that the proposal will increase both cycle and pedestrian movements in the area the pedestrian refuge island should be upgraded to a tiger crossing.

What provisions have been made for those pedestrians and cyclists that are travelling from the north and in particular from the footpath along the River.

Bus route Buzz 42 is funded by the Council through S106 contributions and is currently in the form of a mini bus, the applicant should assess whether the proposal will result in the current service will exceed existing capacity and if it does a contribution will be required to upgrade the mini bus to a standard single deck bus or provide an additional mini bus to increase capacity.

21. Noted

22. Noted

23. The Highway Authority are not aware of any at this time other than those specified above.

24. The Highway Authority are not aware of any at this time other than those specified above.

Additional Comments

An assessment of pedestrian and cycle desire lines from Richfield Avenue through the school grounds should be undertaken to ensure that suitable and safe access is provided from each access point.

The scheme should include what changes to highway restrictions will be required i.e. the provision of school keep clear markings and these should be illustrated on submitted plans.

Tracking will be required to ascertain that delivery vehicles servicing the school can enter and exit the service yard in forward gear.

Tracking will be required to ascertain that vehicles associated with the adjacent garden centre will be required.

I hope that the above is of use to you but if you have any questions please do not hesitate to let me know.

Kind regards,

Darren Cook

Transport Development Control Manager

Transport | Directorate for Economic Growth and Neighbourhood Services (DEGNS)

Reading Borough Council

Civic Offices

Bridge Street

Reading

RG1 2LU

0118 937 2612 (72612)

07812 462820



Appendix 3 – Environmental Health Response 2020

To: Brian Conlon

Your Ref: 191811

From: Ross Jarvis

My Ref: EP /661594

Date consultation received: 06/12/2019 Date: 3 January 2020

Application Number: 191811

Premises Address: Richfield Avenue Reading

Application For: Pre-application advice for proposed new 8-form entry mainstream secondary school with sixth-form (1500 pupils total) with external multi-use games areas, car parking,

Environmental Protection concerns

- Noise arising from development
- Air Quality
- Contaminated Land
- Light
- Construction and Demolition phase
- Bin storage - rats

Noise generating development

The application includes a outdoor multi-use games area. A noise assessment looking at how this will impact on nearby sensitive receptors including suggestions for mitigation where necessary should be submitted with the application.

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology.

The noise assessment needs to establish the predicted noise rating level taking account of any characteristic factors like tonality or impulsiveness of the noise. The rating level should be compared with the background noise level.

Within Reading there is strong justification for requiring the plant specific sound level to be at least -10dB below the measured background level and for the plant noise rating level to not exceed the measured background level. Specifically to prevent cumulative impact from addition of plant over time which could result in background creeping up to levels which might cause adverse health impact, which is more likely in a densely occupied

town such as Reading. Levels of -10dB ensure that the background level is not increased and nuisance is unlikely.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedence of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM_{2.5} and PM₁₀).

The proposed development is located within or adjacent to an air quality management area and has the potential to increase emissions. An assessment should be provided as part of the application.

Where any increase in emissions is identified a mitigation scheme must be submitted. The mitigation scheme must quantify the emissions saving that it will bring about, in order to prove that the detrimental effect of the development can be offset.

Mitigation against increased emissions:

- Provision of cycling facilities / residents cycles
- 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
- Improvements to local public transport
- 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

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, or be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

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.

An air quality action plan has been implemented to try and reduce levels of NO₂ in this area. The proposed development will lead to an increase in vehicle movements directly conflicting with the RBC air quality action plan.

It is therefore necessary for the applicant to demonstrate through an air quality assessment and mitigation plan how it intends to reduce the impact of the proposed development.

Contaminated Land

Where development is proposed, the developer is responsible for ensuring that it is safe and suitable for the intended purpose or can be made so by remedial action.

The development lies on the site of an historic landfill site which has the potential to have caused contaminated land and the proposed development is a sensitive land use.

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

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

See recommended conditions below, these are required to ensure that future occupants are not put at undue risk from contamination.

Light

If any flood-lighting is proposed that could result in loss of amenity to nearby residents the developers should complete a lighting assessment to include; a layout plan with beam orientation and a schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles) and an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00). The plans should show neighbouring buildings so that the predicted impact on them can be assessed. The applicants should demonstrate that light levels will not exceed the relevant guidance lux levels specified in the table below. Information should also show how glare will be controlled.

Environmental Zone - Brightness	Light trespass (into windows) Ev [Lux]	
	Pre-curfew (before 23:00hrs)	Post-curfew (after 23:00hrs)
E3 - Suburban	10	2
E4 - Urban	25	5

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).

Details of how these factors will be controlled should be submitted with the application.

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. Fires at the site will be prohibited.

Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste.

Appendix 4 - Scope of Application Documents

The below table provides our commentary on the suggested scope of submission. The table has been reordered to reflect those essential documents, those where we have suggested a revised scope, additional documents we consider necessary, and those documents which do not appear to be essential to accompany the submission at this stage.

As set out in the response, this is our view on the application requirements, and further discussions with other Council Officers/Statutory Consultees may lead to the need for further information.

Nexus Suggested Scope (from pre-app letter dated 25 th August)	Lichfields Comments
Essential (no comments)	
Drawings. Site Location and Block Plan	Required
Forms and Application Fee	Required
Design and Access Statement	Required
Sequential Assessment	Required
Education Needs Assessment	Required
Sustainable Drainage System Proposals	Required
Air Quality Assessment	Required
Ecological survey & reports	Required
Energy and sustainability statement	Required
External Lighting Proposals	Required
Heads of Terms	Required
Landscape Design	Required
Levels survey information	Required
Materials details	Required
Existing & Proposed plans	Required
Planning Statement	Required
Transport Assessment	Required
Travel Plan	Required
Utilities Surveys and proposals	Required
Vehicle Parking & Waste collection details	Required
Construction Environment Management Plan	Required
Essential (Suggested amended scope)	
Visual Impact Assessment	Required – could be a Built Heritage, Townscape and Visual Impact Assessment (see Rivermead report)
Contaminated Land Survey	More information than just a survey is likely required, including proposed mitigation measures. Particularly as we understand there is a desire to reduce the need for pre-commencement planning conditions.

Nexus Suggested Scope (from pre-app letter dated 25 th August)	Lichfields Comments
Environmental Screening	Required (However this forms a separate process and we would recommend this is submitted in advance of the planning application).
Flood Risk Assessment	Required – should incorporate a sequential assessment and a Flood Risk and Evacuation Plan (could be a separate document)
Noise & Vibration Impact Assessment	Noise Assessment required – in relation to amenity of residents facing the site on The Warren from the noise of the play areas.
Tree Survey	This should also include an Arboricultural Impact Assessment
Additional documents Required	
Open Space Assessment (Lichfields Addition)	Required
Employment, Skills and Training Plan (Lichfields Addition)	Required – this could be reserved by condition/legal agreement
Non-essential (at this stage)	
Archaeological Assessment	Not considered necessary at this stage
Daylight/Sunlight assessment	Not considered necessary
Heritage Statement	Not required – however the relevant heritage policies/impacts should be addressed within the Design and Access Statement/Planning Statement/TVIA
Ventilation/Extraction details	Not considered necessary at this stage however additional information may be required by planning condition.

Appendix 5 – Rivermead HTVIA

Appendix 2– School Place Planning Report 2019, prepared by Reading Borough Council’s Brighter Futures for Children



School Place Planning

☐ For decision ☒ For discussion ☒ For information

SUMMARY

This report outlines place planning processes, forecasting of pupil numbers and capacity for mainstream and special primary and secondary schools to ensure sufficiency of places

OWNER

Gill Dunlop

VERSION

Version number 3

DATE

June 16, 2019

REVIEW DATE

© Brighter Futures for Children

Brighter Futures for Children
Civic Offices, Bridge Street,
Reading RG1 2LU

Company number 11293709

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1. School Place Planning - Introduction

School Place Planning is a complex process and involves the following teams / personnel:

- Director of Education
- Pupil Place Planning Lead
- School Admissions
- Asset Management Team
- Special Educational Needs & Disabilities (SEND)
- Performance Management & Data / Forecasting
- Under 5s Service Manager

The Place Planning 'Team' meets formally three times per year: September; February and June.

The purpose of these meetings is:

- To inform of future demand for pupil places in a timely manner ensuring that the statutory duty to provide sufficiency of places is met;
- To look at emerging trends using opinions and projections from SEND, Performance & Data, School Admissions, Pupil Place Planning and Asset Management Teams;
- To provide information to support Businesses cases for capital bids.

2. Forecasts and capacity – mainstream schools

2.1 Forecast figures for next 3-5 year period

- **Early Years** data show declining numbers. See Appendix 1.

The low birth rate since 2014 is predicted to decline further over the next five years and from 2019 to 2027 by around 500 children. This is derived from live birth data and migration in and out of Reading.

BFFC is considering commissioning a housing yield figure survey given the amount of new build homes including social housing because, although housing yield data is taken into account, the formula is based on national pupil yield which may not be representative of Reading. The School Admissions Manager will analyse the 2019 Primary Admissions Round and In-Year applications from the Conway Close development to compare the actual numbers with Housing Yield data from that development once the round is complete in August in order to gain accurate figures.

The Early Years population is levelling out following a growth. The demographics of cities is changing resulting in more over 50 aged people and fewer children below 5 years of age. With regard to Early Years provision, it is difficult to predict take up of places as some parents working in Reading may choose provision nearer to their work than their home in another authority and vice versa.

- **Primary:** See Appendix 2.

Office of National Statistics figures and Reading predictions show that from 2019 the numbers are declining from nearly 14,000 children to 13,000 in 2027. At the end of July 2019 primary bulge classes in five schools will move through into year seven. There are a further two schools with bulge classes moving through to secondary schools in 2020.

BFFC need to communicate low birth rates and the impact on reception and primary classes in order to help schools manage their budgets. The Ridgeway is seeking to reduce its Pupil Admission Number by 30 from 2020 (total places 180). This will occur when the Green Park Village Primary School opens, admitting reception class initially.

- **Secondary:** See Appendix 1.

Appendix 1 shows that the secondary-age (11-16) population is predicted to increase from just below 9,500 in 2019 to just over 10,500 in 2027. In the Secondary Routine Round, 209 more applications were made for Reading schools when in the past these parents would have applied to neighbouring authority schools. This shows an increased parental confidence in Reading Schools and is good news for Reading.

For September 2019, BFFC have negotiated bulge classes with the head teachers of Blessed Hugh Faringdon (30), Highdown (30) and the Wren (28). Maiden Erlegh School (Reading) is taking an additional 12 pupils by adding two in each form entry. Neighbouring authorities offered additional places in order to cover the remaining places.

2.2 Admissions data compared with forecasts: summary statements

- **Early Years:** there will be a surplus of places.
- **Primary:** Appendix 2 shows the predicted number-on-roll figures for all year groups with housing yield included against capacity. This shows a surplus of places in all years and the increased capacity at 2020 with the opening of Green Park Village School.
- **Secondary:** Appendix 3 shows the Year 7 allocated places and the deficit in capacity in September 2019. This is due to the additional 209 requested places resulting in the three bulge classes in September 2019 (c.f. Section 2.1 Secondary). Note that the spike in capacity in 2022 accounts for the new places at the new secondary free school. It was envisaged that the new secondary school (Rivermead site) would open in September 2021; this is now unlikely to open until September 2022 at the earliest.

If the pattern of increased applications to Reading Schools continues there is a risk that BFFC will need bulge classes in 2020 and 2021. These will be in addition to the classes required to cope with the deficit caused by the delayed school places at the Rivermead site. These bulge classes need to be negotiated.

The Place Planning Team has analysed the data from the neighbouring authority planning areas closest to Reading and it is evident that BFFC will not be able to rely on Wokingham and West Berkshire to provide additional places as their data is showing the same capacity issues as Reading. Appendix 4 shows the total number of pupils enrolled in Reading Secondary schools compared with capacity.

3. Forecasts and capacity – special school and resource units

3.1 Special Educational Need and Disabilities (SEND) - forecast figures and summary statement:

- Appendix 5 shows the SEND Projections table for Early Years, Primary, Secondary and post-16. The capacity for special school and specialist resource places is insufficient to meet need.
- Negotiations are underway to increase the number of resource places for children with Autistic Spectrum Condition (ASC). There are currently 21 pupils at Christ the King primary ASC Resource; this will reduce to 12. A further two new resource units are planned which will provide a maximum of 15 pupils in each of the three resources. The Blessed Hugh Faringdon secondary ASC resource has capacity for 20 pupils and this will increase to 30 from September 2019.
- The Avenue School (Profound and Multiple Disabilities) is admitting an additional 25 pupils from September 2019.
- BFFC has secured agreement to open a new special school catering for pupils with ASC and Social, Emotional and Mental Health (SEMH) difficulties which will take pupils through from primary to secondary; the official opening date remains September 2021 but is likely to be delayed to 2022.
- Phoenix College is due to relocate in September 2021. The College will then begin the process of admitting female student.

4. Asset Management and Planning

The RBC Asset Management Team need a two year lead-in for any new build including planning permission and actual build and a nine month lead-in for temporary modular buildings. It is, therefore, crucial that any building needs related to school place planning are clearly communicated to allow for any funding bids or to ensure it is built into the capital budget and programme.



To enable efficient information-sharing all raw data and strategies are stored on a shared drive to which the whole School Place Planning Team has access.

5. Summary and conclusions

5.1 Early Years and Primary Schools:

- The low birth rate and decrease in early years pupil numbers will impact on early years and primary provision; there will be more empty places and this will affect school budget as there will be fewer children. Across Reading there are currently 304 empty spaces although this may decrease over the summer as children move into Reading seeking in-year places.
- There will continue to be a surplus of places through the five year forecast period until 2023. BFFC needs to work with early years providers and primary schools to manage this in terms of space and budgets. BFFC must also work within a 5% leeway to ensure sufficiency of places rather than working to capacity.

5.2 Secondary Schools:

- Due to increased demand for places in Reading schools, three bulge classes plus an additional 12 places have been negotiated for September 2019.
- If the pattern of more applications to Reading schools continues there is a risk that BFFC will need further bulge classes in 2020 and 2021 as highlighted in section 2.2 Secondary. BFFC will need to negotiate these classes but there is a risk that we will only be able to approach two schools that do not already have bulge classes. Furthermore, our neighbours are not likely to be able to take more Reading pupils. BFFC is reviewing the situation.
- There will be added costs in providing bulge classes. Creating additional accommodation on some sites may involve moving or adding modular temporary buildings. Growth Funding can be provided to schools for taking on bulge classes, to be agreed at Schools' Forum.
- The new secondary school is unlikely to open until September 2022 at the earliest; as highlighted above, bulge classes are required to cope with the deficit caused by the delayed school places. As few schools remain that can accept a bulge class there is a risk of shortfall in places.
- BFFC need to monitor capacity for 2024 when there may be a shortfall in places as the increased population moves through the secondary phase. This will also affect post 16 and sixth-form provision.

5.3 Special Schools and Resource Unit:

- There is insufficient special provision in Reading particularly in the areas of ASC and SEMH. The Special Educational Needs and Disability strategy planned for a 70 place special school to increase capacity but this will be delayed until 2022 at the earliest. Pupils will continue to be placed outside Reading - potentially in expensive provision; this will clearly have an impact on the budget and delay any saving that the new school places would provide. With the number of SEND pupils increasing there is likely to be a shortfall of SEND places projecting forward.
- The SEND strategy includes working with neighbouring authorities strategically, enabling pupils to attend schools nearer their home and community. This will reduce expenditure on school transport and potentially on placements.
- The additional primary and secondary ASC resource provision is intended to reduce the need for out-borough provision creating a budget saving and enabling pupils to be educated in their communities.

Appendices:

1. Reading Population figures – Early Years to 25
2. Total Primary School pupils – forecast and capacity
3. Secondary Year 7 allocations - forecast and capacity
4. Total Secondary School - pupils – forecast and capacity
5. SEND projections

Appendix 1 - Reading Population figures – Early Years to 25

Forecast figures for next 3-5 year period

- Early Years
- Primary
- Secondary

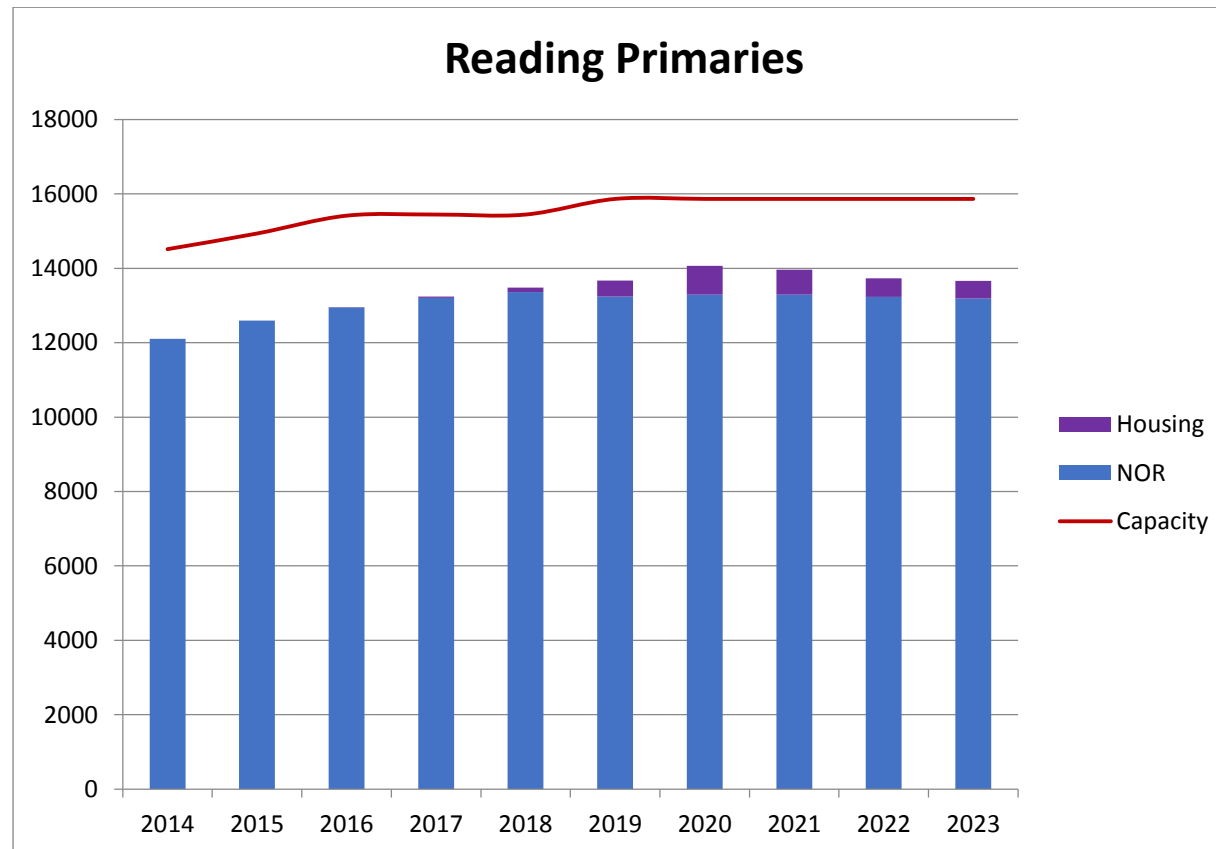
The table below shows the population historical numbers and future projected numbers for young people in Reading up to 2027. Source Office of National Statistics

Reading Population under 25																	
Actual and projected number of children and young people in Reading by age group																	
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Under 5	11,937	12,284	12,400	12,571	12,485	12,381	12,242	12,044	11,979	11,936	11,871	11,805	11,723	11,646	11,580	11,515	11,455
Aged 5-10	10,118	10,686	11,470	12,084	12,613	13,068	13,401	13,692	13,640	13,581	13,490	13,377	13,263	13,081	13,022	12,988	12,941
Aged 11-15	8,061	7,946	7,900	7,969	8,057	8,198	8,461	8,935	9,439	9,850	10,222	10,502	10,688	10,775	10,762	10,679	10,580
Aged 16-19	8,154	7,655	7,969	7,859	8,031	7,971	7,957	7,859	7,826	7,846	7,960	8,308	8,667	9,100	9,466	9,743	9,945
Aged 20-25	17,528	17,391	17,306	17,368	17,752	17,667	17,443	17,331	17,390	17,297	17,134	16,846	16,732	16,785	16,890	17,181	17,630
Total	55,798	55,962	57,045	57,851	58,938	59,285	59,504	59,861	60,274	60,510	60,677	60,838	61,073	61,387	61,720	62,106	62,551

Source: Population Projections (2011) ONS 2011 Census - QS103EW Age by single year. (2012 & 2013) ONS Population Estimates - local authority by single year of age. (2014 to 2027) ONS Population Projections (released January 2017) - local authority by single year of age.

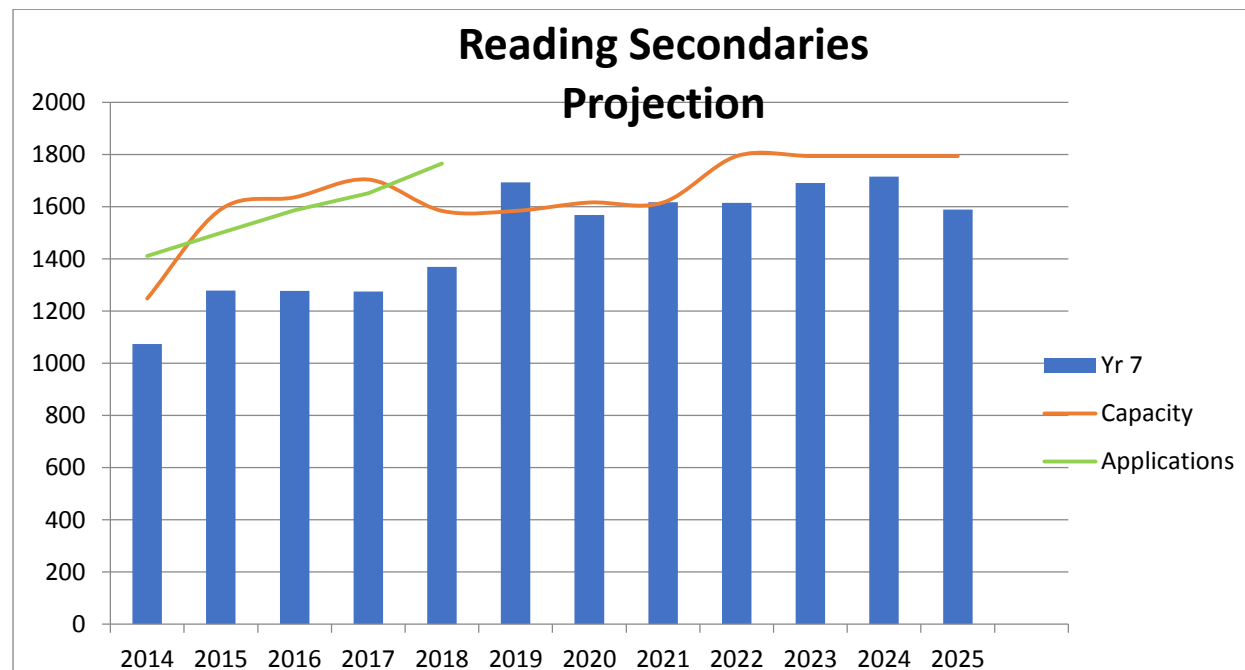
Appendix 2 - Total Primary School pupils – forecast and capacity

The table below shows the total number of pupils enrolled in Reading primary schools.



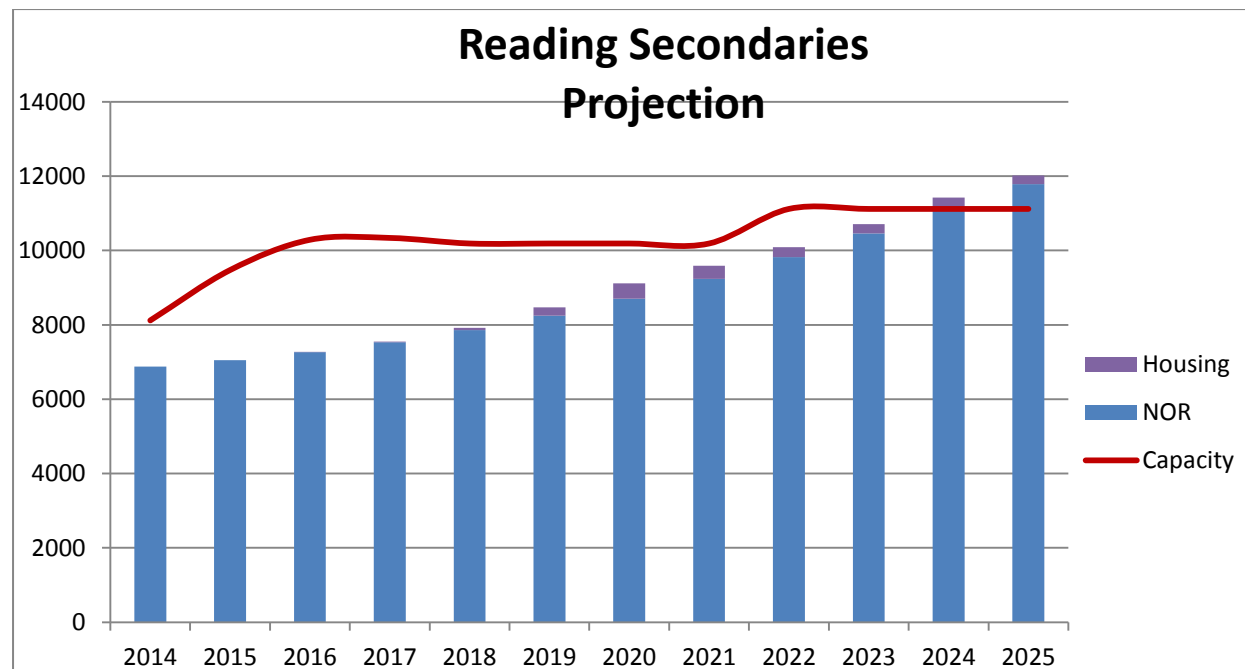
Appendix 3 - Secondary Year 7 allocations - forecast and capacity

The table below shows the number of pupils allocated year 7 places in Reading secondary schools



Appendix 4 - Total Secondary School - pupils – forecast and capacity

The table below shows the total number of pupils enrolled in Reading secondary schools.



Appendix 5 - SEND projections for pupils with an Education, Health and Care Plan

RBC SEND Projections												
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
EYFS	9	8	10	6	5	9	9	10	11	11	12	13
Primary	110	111	112	115	122	125	134	143	153	163	174	185
Secondary	79	83	98	118	123	147	157	168	180	192	204	217
Post 16	6	18	17	14	21	22	24	26	27	29	31	33
Total	205	220	236	253	271	290	311	332	355	378	403	429
Capacity	218	218	218	218	221	246	276	276	276	346	346	346
Surplus	13	-2	-18	-35	-50	-44	-35	-56	-79	-32	-57	-83

Historical totals are derived from the DfE Cross Border Movement (CBM) tables

Predictions are based on nine years of historical trends and projected forward.



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