

Planning Statement

45 CAVERSHAM ROAD, READING RG1 7BT



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1. Introduction

- 1.1 This planning statement has been prepared in support of a full planning application submitted to Reading Borough Council (RBC) by Elstree Land and Swaythling Housing Society Ltd (the applicant) for the redevelopment of 45 Caversham Road, Reading.

Overview of Development

- 1.2 The proposed development comprises the construction of a single L-shaped building rising to 5 stories in height. The building will include 40 residential flats together with associated refuge and cycle storage. To the rear of the building will be a landscaped area of private amenity space with car parking provided to the side and rear of the building.

Description of Development

- 1.3 Planning permission is sought for the following development:

“Demolition of existing buildings and construction of 40 flats including provision of 30% of units as affordable housing with associated landscaping and parking”

Supporting Documents

- 1.4 This Statement should be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following documents, which have been prepared to address the full range of material planning considerations:

- **Design and Access Statement** prepared by DHA Architects
- **Landscape Statement** prepared by Aspect
- **Transport Statement** prepared by I-Transport
- **Energy Statement** prepared by Hodkinson
- **Flood Risk Assessment** prepared by Odyssey Markides
- **Ecology Report** prepared by Aspect
- **Air Quality Assessment** prepared by Syntegra
- **Noise and Vibration Assessment** prepared by Cass Allen
- **Sunlight and Daylight Assessment** prepared by EB7

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- **Geo-Environmental Report** prepared by Enzygo
- **Affordable Housing Statement** prepared by McConnell Planning
- **Utilities Statement** prepared by TDS
- **Market Appraisal** prepared by Haslams
- **Archaeology/Heritage report** prepared by ACD
- **Sustainability Statement** prepared by Hodkinson

Structure of the Statement

1.5 The structure of this Statement is as follows:

- **Section 2** provides the background to the site and its context within the surrounding area
- **Section 3** sets out an overview of the planning history of the site and the pre-application engagement process
- **Section 4** provides full details of the proposed development
- **Section 5** sets out the relevant planning policy framework for the proposed development
- **Section 6** provides an assessment of the material planning considerations arising from the proposed development
- **Section 7** presents a summary of the planning position with concluding remarks in respect of the proposed development.

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2 Site and Surrounding Area

2.1 This section provides a brief description of the site and the immediate surrounding area.

The Site

2.2 The site measures approximately 0.15 ha in area and is located on the southern corner of Caversham Road and Great Knollys Street, within close proximity to Reading town centre, which lies to the east of Caversham Road.

2.3 The site is currently occupied by Avis Car Rental and comprises a single storey rendered workshop, a two-storey brick-built office building and associated hardstanding car park. The main Great Knollys Street frontage is bound by metal fencing and a vehicular access gate. The car rental business is being scaled down and will shortly cease to operate.

2.4 The site is bordered to the south by a three storey Georgian residential terrace and its associated curtilage. To the west lies a four-storey residential building. On the opposite side of Great Knollys Street is a four-storey residential building, with a four storey Georgian residential terrace on the opposite corner of Caversham Road and Great Knollys Street.

2.5 The site does not comprise any statutory or locally listed buildings, and is not located within a Conservation Area. There are no trees on the site. The site is located partially within flood zone two.

The Surrounding Area

2.6 Whilst the buildings adjacent to and opposite the site are in residential use, the immediate neighbourhood has a variety of land uses. On the northern side of Great Knollys Street is the former cattle market, which is currently used for car auctions and a Farmers market, with the southern side of Great Knollys Street being predominantly employment buildings. The western side of Caversham Road is residential in character whilst the eastern side of Caversham Road is dominated by a series of office buildings, delineating the extent of the town centre.

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2.7 Caversham Road is a dual carriageway road, referred to as the Inner Distribution Road, and is a principle route for road traffic travelling across Reading in a north-south direction.

2.8 The site lies adjacent to Reading town centre and is a 5-minute walk from Reading station, which is a key transport hub on the Great Western railway network, and is located to the east of the site within the town centre.

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3 Background

3.1 This section provides details of the planning history of the site and pre-application discussions that have taken place.

Planning History

3.2 Planning permission (ref 920156) was granted in September 1992 for the change of use from a Builders Merchants yard to Vehicle Display and Sales, ancillary offices and storage, valeting.

3.3 Planning permission (ref 950656) was granted in June 1995 for the change of use from second hand car sales to servicing, repairing and MOT testing of motor vehicles and car hire.

3.4 Planning permission (ref 950065) was also granted in June 1995 for the change of use from vehicle display in sales, ancillary offices and workshop to the sales and fitting of tyres and exhausts and offices for car hire with ancillary parking.

Pre-Application Discussions

3.5 Prior to submitting the planning application, there has been extensive pre-application discussions with Officers at Reading Borough Council together with the Reading Design Review Panel. The formal written responses sent to the applicant following various meetings held with these respective organisations are detailed below:

- Pre-application advice letter dated June 2020 from Anthony Scholes, Senior Planning Officer, Reading Borough Council
- Pre-application advice letter dated 12 August 2020 from Anthony Scholes, Senior Planning Officer, Reading Borough Council
- Reading Design Review Panel comments dated 01.05.2020
- Reading Design Review Panel comments dated 01.08.2020

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4 The Proposed Development

4.1 As set out in section 1 of the statement, the application seeks full planning permission for the demolition of existing buildings and construction of 40 residential dwellings together with associated landscaping and parking. Full details of the proposed scheme are set out within the design and access statement submitted in support of this application whilst this section provides a brief summary of the proposals.

Design Approach

4.2 The design approach follows a detailed analysis of the site and the surrounding area, and has been informed by planning policy and guidance and pre-application comments from Officers at Reading Borough Council and the Reading Design Review Panel.

4.3 The proposed development concerns an L-shaped building that fronts both Caversham Road and Great Knollys Street with a landscaped area to the rear of the building. The proposed building ranges from 3 to 5 stories in height. This is to ensure that the building has a satisfactory relationship with the adjacent buildings along Caversham Road and Great Knollys Street, and that the proposed building sits comfortably within the townscape, in particular along Caversham Road where existing buildings address the road frontage in a consistent manner in terms of their siting and height.

4.4 The siting and design of the building responds positively to adjacent buildings along Caversham Road and Great Knollys Street ensuring that the proposed development achieves uninterrupted views along Caversham Road whilst assimilating with the height of adjacent buildings. In addition, sufficient separation distances are achieved between windows of habitable rooms to existing and future residents of the new development, as well as ensuring that adequate outlook and levels of sunlight and daylight are attained.

4.5 The architectural language of the proposed building has been influenced by the Georgian architecture prevalent along this section of Caversham Road. The elevations exhibit the proportions and regularity of the adjacent Georgian facades whilst displaying a contemporary

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interpretation of this vernacular, for example through projecting multi storey bay windows and a mansard roof style fifth floor roof designed using contemporary materials.

Residential Accommodation

- 4.6 The proposed development will deliver 40 residential dwellings on the site. A range of units from one bedroom to 3 bedrooms are proposed. The mix of units is set out below:

Unit Type	1 bed	2 bed	3 bed	Total
Private	10	16	2	28
Affordable	4	8	-	12
Total	14	24	2	40

- 4.7 The development will provide 12 units of affordable housing, which represents 30% of the total number of units. All of the dwellings have been designed to meet the Nationally Described Space Standards and Building Regulations part M4(2) with 5% of units designed as wheelchair adaptable dwellings in line with part M4(3) of the Building Regulations. A substantial area of communal private amenity space is provided to the rear of the building where it is sheltered from the adjacent roads with a number of flats having access to private amenity space either in the form of balconies or roof terraces.

Access, parking and servicing

- 4.8 Vehicular and access to the site will be from Great Knollys Street, with the existing access from Great Knollys Street to be slightly altered and an existing access onto Caversham Road removed. There will be several separate pedestrian access points into the site. A total of 12 car parking spaces are to be provided, of which 2 will be disabled and 2 are to be Electric Vehicle Charging Points. There will be 22 bicycle spaces in a secure bicycle store. Smaller delivery vehicles, such as those used for supermarket shopping deliveries will be accommodated on-site within the car park whilst larger deliveries and servicing will be undertaken from Great Knollys Street. There will be a significant reduction in the volume of

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traffic movements to and from the site with the proposed development compared to the current use of the site as a vehicle hire depot.

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5 Planning Policy Context

5.1 The development proposal for the site has taken account of relevant national and local planning policy and guidance. This section of the Planning Statement sets out a brief summary of the planning policy documents relevant to the proposed development.

5.2 In accordance with section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise. The development plan for RBC currently comprises the Reading Borough Local Plan Adopted November 2019.

5.3 In addition to the above, there are a number of documents which are a material consideration in the determination of any planning application within the borough. This includes the National Planning Policy Framework (NPPF) (February 2019) and Supplementary Planning Documents prepared by RBC.

National Planning Policy & Guidance

5.4 At the national level, the NPPF provides an overarching framework for the production of local policy documents and the determination of planning applications.

5.5 The Government's NPPF act as guidance for local planning authorities and decision takers, both in drawing up plans and making decisions about planning applications. At the heart of this document is a presumption in favour of sustainable development running through both plan-making and decision-taking. For decision-taking, this means:

c. "Approving development proposals that accord with an up-to-date development plan without delay; or

d. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting planning permission unless:

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i. The application of policies in this framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”

(Paragraph 11)

5.6 The government expects the planning system to deliver homes, business, infrastructure and thriving local places that the country needs, whilst protecting and enhancing the natural and historic environment.

5.7 With regards to housing, Paragraph 59 of the NPPF identifies measures to “... boost significantly the supply of housing...” and Paragraph 11 further elaborates on this, stating that housing applications should be assessed in the context of the presumption in favour of sustainable development which, as set out above, run through both plan-making and decision taking.

5.8 The government published its National Planning Policy Guidance (NPPG) notes in March 2014 and has provided regular updates to these. The NPPG supports the NPPF and provides high-level guidance with regard to specific planning issues and processes. Where applicable, the NPPG notes are referenced within this document.

Local Planning Policy and Guidance

5.9 At the local level, the Reading Borough Local Plan was adopted in November 2019 and sets out the planning strategy for the future growth in the district up to 2036. The Local Plan sets out the spatial vision, strategy and planning policies for Reading on topics such as housing, jobs, transport, retail, leisure and culture and the built and natural environment. Notably, Policy CC1 underpins the presumption in favour of sustainable development embodied within the NPPF.

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5.10 In addition to the over-arching objectives, the Local Plan also sub-divides the plan area into area-specific sections with a detailed spatial development strategy for each individual sub-area. The site lies within the Central Reading sub-area.

Site Allocation

5.11 The site is specifically referenced within the Central Reading sub-area under Policy CR12, which is identified as the West Side Major Opportunity Area. The Local Plan has a vision for this Opportunity Area of being a mixed-use extension to the west of the centre containing high quality mixed-use environments and fostering stronger east-west links into central core.

5.12 Area CR12b is identified as the Great Knollys Street and Weldale Street sub-area which is to be developed primarily for residential. Any development which would result in the loss of small business units should seek to replace as many of those units as possible, preferably on site. There should be a careful transition to the lower density residential areas to the west. Listed buildings and their setting in the area will be conserved and where possible enhanced. The site area for this survey area is 3.02 ha with an indicative potential for 280-510 dwellings and no significant net gain of other uses.

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6 Planning Considerations

6.1 This section of the Planning Statement sets out the main planning considerations arising from the application proposals with reference to the planning policy framework set out in the previous section.

Principle of Development

6.2 The delivery of new homes is a core planning principle contained within the NPPF. Paragraph 59 identifies measures to “... boost significantly the supply of housing...”. Paragraph 11 states that Local Plans should meet the objectively assessed need for housing within its area. It further states that housing applications should be considered in the context of the presumption in favour of sustainable development.

6.3 At the local level, policy H1 of the Adopted Local Plan makes provision for the development of at least an additional 15,847 homes in Reading Borough for the period 2013 to 2036. In the supporting text to this policy, Para 4.4 .1 identifies that there is a pressing need for additional housing in Reading and the surrounding area.

6.4 The site lies within the Great Knollys Street and Weldale Street sub area of the West Side Major Opportunity Area, which the Local Plan states is to be developed primarily for residential. This supports the principle of the residential re-development of the site, although it is acknowledged that the loss of any small business units on site should be replaced wherever possible.

6.5 The site is currently underutilised in terms of building coverage with a single storey workshop and two storey office building positioned within the site together with an extensive area of hardstanding. The building coverage is therefore much less dense compared to neighbouring sites where building heights and site coverage are more extensive. In addition, the buildings on both their appearance and scale detract from the overall townscape so that there is a good opportunity to re-develop the site with a more intensive development that will enhance the visual amenity as well as delivering broader social, economic and environmental benefits.

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- 6.6 The current use of the site is as a vehicle hire business, which is a sui-generis use so that the re-development of the site will not result in the loss of a B1 business use class. Whilst the site allocation supports the principle of residential development, it is necessary to assess whether it is appropriate to incorporate any business space within the development.
- 6.7 A Market Report has been prepared to consider this matter. The report notes that the location of this vehicle hire business is unusual as such businesses tend to be situated in out of town locations such as industrial estates and airports where there is greater capacity for storage. In addition, the site has poor access to the M4.
- 6.8 In terms of making provision for business units within the development, the report identifies that Great Knollys Street is a difficult secondary business location that has been deteriorating as a commercial location in recent years. This is manifested by poor footfall and a notable preference for office space on the opposite side of Caversham Road within the town centre where there is much better serviced office accommodation available offering high-end and flexible “pay-as-you go” accommodation. Strategically located trade parks near the M4 offer more attractive trade counter/light industrial/warehouse space. In conclusion, the report advises against including any commercial accommodation within the development as little demand is envisaged for such space in this secondary location and the supply of modern commercial accommodation in prime positions within Reading.
- 6.9 The report further identifies that the area has become an area in transition, undergoing comprehensive residential led regeneration, which has enabled the area to improve aesthetically whilst providing a sustainable local labour force to support the town centre. The report concludes that the site would lend itself well to a residential use.
- 6.10 As the site lies within a sub-area, no specific capacity for the number of residential units to be delivered from the site is provided, rather there is an overall potential for 280 to 510 dwellings to be delivered in the sub-area.

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Architectural Design

6.11 Paragraph 124 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. 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. Paragraph 127 goes on to state that planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of a good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character in history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live work and visit;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green another public space) and support local facilities and transport networks; and
- f) Create places that are safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

6.12 Furthermore, Paragraph 131 states that great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

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6.13 At the local level, policy CC7 seeks to achieve high-quality design by ensuring that development meets the following requirements:

- Respond positively to their local context and reinforce local character, enhancing the historic environment and adding value to the public realm;
- Create safe and accessible environments;
- Making developments accessible for all;
- Making use of appropriate materials and landscaping.

The design approach follows a detailed analysis of the site and the surrounding area, and has been informed by planning policy and guidance and comments from officers at RBC and the Reading Design Review Panel. Key aspects of the design are addressed below.

6.14 The proposal includes an L-shaped building that fronts both Caversham Road and Great Knollys Street with a landscaped area to the rear of the building. The proposed building ranges from 3 to 5 stories in height. The building will be constructed primarily in red brick, with a contrasting brick plinth at ground floor.

6.15 The adjacent Georgian terrace on Caversham Road (33-41 Caversham Road) to the south of the site is 3 storeys in height. The proposed building has a 3-storey section adjacent to this building and then steps up to 4 storeys on Caversham Road with the Great Knollys Street elevation continuing at 4 storeys. A fifth storey that is recessed from the front elevation is proposed along Great Knollys Street.

6.16 These building heights ensure that the proposed building sits comfortably within the townscape, in particular along Caversham Road where existing buildings address the road frontage in a fairly consistent manner in terms of their siting and height. The three-storey element adjacent to 33-41 Caversham Road also ensures that a positive integration between this terrace and the proposed development is achieved with neither building appearing either too dominant or subservient in the street scene.

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- 6.17 The siting and design of the building also ensures that sufficient separation distances are achieved between windows of habitable rooms to existing and future residents of the new development, as well as ensuring that adequate outlook and levels of sunlight and daylight are attained.
- 6.18 The architectural language of the proposed building has been informed by the Georgian architecture prevalent along this section of Caversham Road. The elevations exhibit the proportions and regularity of the adjacent Georgian facades whilst displaying a contemporary interpretation of this vernacular, for example through projecting multi storey bay windows and a mansard roof style fifth floor roof designed using contemporary materials. The main elevation along Great Knollys Street is broken down into smaller elements through recessed sections in the façade where rainwater downpipes are provided.
- 6.19 It is considered that the design of the building responds very positively to the context within which it sits and this enables the development to reinforce local character, enhance the historic environment and add value to the public realm whilst facilitating a satisfactory level of residential amenity.

Heritage Considerations

- 6.20 The NPPF recommends that great weight should be given to the conservation of heritage assets when reaching a planning decision (paragraph 193). It notes that ‘substantial harm’ to heritage assets of the highest significance should be exceptional for Grade II listed buildings and conservation areas. Paragraph 196 states that where development proposal will lead to ‘less than substantial harm’ to the significance of the designated heritage assets, the harm should be weighed against the public benefits of the proposal, including securing its optimal viable use.
- 6.21 Policies EN1, EN4 and EN6 of the Local Plan cover situations whereby heritage considerations may influence the design on new development seeking to ensure that developments promote the character and local distinctiveness of the area and protect the setting of any listed buildings.

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- 6.22 There are a number of examples of Georgian architecture along this section of Caversham Road. Immediately to the south of the site is a Georgian terrace (33-35 Caversham Road), which is not listed, but beyond this terrace is a pair of Grade II listed mid-19th century villas whilst on the opposite corner of Caversham Road and Great Knolly Street is the Grade II listed Regent Place (47-57 Caversham Road) which is a Georgian terrace. None of the listed buildings noted above lie within any of Reading's conservation areas, the closest part of which lies circa 300 metres to the south and is the north eastern corner of the extensive Castle Hill and Russell Street Conservation Area.
- 6.23 A desk-based archaeology and heritage assessment has been completed to support the development. The assessment confirms that neither of the two designated heritage assets detailed above is likely to be harmed by the proposed development. Both assets face east onto Caversham Road so that there is no inter-visibility with the site, which is marked by blank secondary elevations and the context is already wholly urban. The proposed redevelopment of the site would not harm the significance of these designated heritage assets, nor an appreciation of that significance through any change to their settings. Furthermore, the design of the residential block has taken account of the immediate buildings to the south, even though they are not heritage assets, in order to respect and enhance these buildings.
- 6.24 The desk-based archaeology assessment establishes that nothing of archaeological interest is recorded within or close to the site whilst likely 19th century and later disturbance across most of the site from its development for housing and businesses also suggests low archaeological potential. If further investigation is required, a watching brief during construction is recommended.

Residential Density and Mix

- 6.25 Policy H2 of the Local Plan states that the density of residential development will be informed by:
- The character of the area, including consideration of any nearby heritage assets or important townscape areas;
 - Accessibility

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- The need to maximise the efficiency of land use
- The need to minimise environmental impacts including impacts upon the residential amenity

Figure 4.5 sets out indicative density ranges for town centre, urban and suburban locations with densities in excess of 100 units per hectare sought in town centres.

- 6.26 The policy emphasises that developments should contribute effectively towards meeting the mix of housing set out in Figure 4.6, which provides an estimated size of accommodation type required based upon the Strategic Housing Market Assessment 2016, which shows an equal split in the need for smaller 1 and 2 bedroom units and larger 3 and 4 bedroom units. It is expected that Reading will provide proportionately less family housing than is likely to be provided in neighbouring authorities due to the urban character of the town.
- 6.27 Density also links into accessibility with Policy CC6 of the Local Plan requiring that any new development must be at a scale, density and intensity appropriate to that level of accessibility. The site lies adjacent to Reading town centre so that it is fully accessible to the amenities of the town centre including Reading station. On this basis, the site is highly accessible and the density accords with this policy.
- 6.28 The proposed development has a density of 266 u/ha based upon a development of 40 units within a site of 0.15ha. Whilst the site sits on the edge of the town centre, the density of development is very much in keeping with the form of development in the immediate area, which is characterised by high density flatted developments. The development delivers an efficient use of the land whilst also keeping in with the character of the area. In particular, the development integrates well with the adjacent Georgian terrace immediately to the south on Caversham Road to the south and the overall storey heights of the building sit comfortably with the immediate townscape, in particular along Caversham Road.

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6.29 The proposed mix of units is set out below;

Unit Type	1 bed	2 bed	3 bed	Total
Private	10	16	2	28
Affordable	4	8	-	12
Total	14	24	2	40

6.30 The mix of units is focussed upon smaller 1 and 2 bedroom units, which is expected for a development in this central urban location where higher density developments are sought.

Affordable Housing

6.31 Policy H3 of the Local Plan seeks 30% of units to be affordable on sites of 10 or more dwellings with an appropriate tenure mix to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The table above identifies that 12 of the 40 units are affordable, which meets the policy target of 30%. The 12 affordable units are split evenly between affordable rent and shared ownership units, with the affordable rent units all two bedroom units and the shared ownership units consisting of 4 one bedroom units and 2 two bedroom disabled units. Para 4.4.25, which is supporting text to Policy H3, identifies that housing with two or more bedrooms that can house families is a priority. The proposed provision of affordable units is therefore in line with this requirement.

6.32 The application is supported by an Affordable Housing Statement, which notifies that the site is to be acquired by Radian once planning permission has been granted and Radian intend to make this an entirely affordable development with the private units becoming shared ownership units.

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Residential Design Standards

- 6.33 Policy H5 sets out a number of design standards that new residential development should meet. The principle criteria are:
- All new build housing outside the Central area to comply with the nationally-described space standard
 - All major newbuild residential development should be designed to achieve zero carbon homes
 - All new build housing will be acceptable and adaptable in line with the M4 (2) of the Building Regulations, with at least 5% of dwellings to be wheelchair user dwellings in line with M4 (3) of the Building Regulations.
- 6.34 All units within the proposed development comply with the nationally described space standard. All units are accessible and adaptable to level M4 (2) of the building regulations with two of the units to be designed to level M4 (3). The requirement for zero carbon is covered elsewhere in this statement, but otherwise, the development meets Policy H5.

Open Space

- 6.35 Policy H10 of the local plan seeks to secure private and communal outdoor maintain areas on all residential developments, the extent of which will be guided by the site proximity to quality public open space. This is supported by Policy EN9, which also requires that new development should make provision for appropriate open space based on the needs of the development and whether the area is identified as deficient in the provision of open space.
- 6.36 The development provides for a substantial area of communal open space to the rear of the residential block with the majority of flats having access to private amenity space either in the form of balconies or roof terraces. The area of communal open space is well designed and includes an amenity lawn with seating area together with a variety of tree, shrub and herb planting. In terms of private amenity space, two ground floor apartments have access to a patio area and 26 apartments have access to either a balcony or terrace area.

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- 6.37 Furthermore, the site enjoys good access to public open space with Victoria Park a short walk away along Great Knollys Street. Victoria Park is an extensive area of public open space and provides children's play facilities for a wide range of ages. In this regard, the site is well served by both private amenity space and public open space and satisfies policies H10 and E9.

Residential Amenity

- 6.38 Policy CC8 of the Local Plan requires that development will not cause a detrimental impact on the living environment of existing residential properties whilst creating acceptable living conditions for new residential properties. A number of criteria are listed with the key considerations discussed below:

Noise

- 6.39 With regards to noise, Policy CC8 is supplemented by Policy EN16 Pollution and Water Resources, which states that development will only be permitted where it would not be damaging to the environment through noise pollution unless adequate mitigation measures are provided to minimise the impact of such pollution.
- 6.40 Noise levels at the site are dictated by road traffic noise emissions from Caversham Road and to a lesser extent, Great Knolly Street. A Noise Assessment has been prepared and is submitted in support of the application. The assessment found that the design of the development is considered to be acceptable and allows for acceptable internal noise levels subject to the adoption of acoustically upgraded glazing and mechanical ventilation for habitable rooms subject to high noise levels.
- 6.41 The report also concluded that the development was considered to be acceptable in relation to noise levels in external amenity areas. This is facilitated by the layout of the development whereby the external communal garden is at the south of the development and therefore shielded from the surrounding road noise so that all residents will have access to a quiet amenity area. Where private amenity space is provided through balconies or private terraces, these have been concentrated further along Great Knollys Street and to the south of the building away from the main noise source from traffic along Caversham road.

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- 6.42 Overall, the assessment demonstrates that, with the recommended mitigation measures in place, future residents of the development will not be exposed to unacceptable noise disturbance. The proposed development is therefore compliant with policies CC8 and EN16.

Sunlight and daylight

- 6.43 In general terms, planning policy advises that new development will only be permitted where it is shown not to cause unacceptable loss of daylight or sunlight amenity to neighbouring properties. Policy CC8 of the Local Plan states that development should not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of access to sunlight and daylight.
- 6.44 The site has residential development both adjacent and opposite. Whilst this matter requires careful consideration, it must also be acknowledged that the site is within an urban area characterised by higher density taller developments where some obstruction to natural lighting may be unavoidable so that guidance should be applied sensibly and flexibly having regard to the specific site context.
- 6.45 A sunlight and daylight assessment has been carried out to assess the impact of the development on daylight and sunlight both to surrounding properties and within the proposal itself. A 3-D computer model of the existing site, the key surrounding properties and the proposed scheme has been generated to enable this assessment.
- 6.46 The results of the assessment show that the scheme responds appropriately to its context. There are localised effects to secondary windows serving Lion Court on Great Knollys Street, the affected spaces are served by multiple windows such that overall amenity remains high. There are some impacts affecting 33 to 41 Caversham Road, but these are driven by the design of that building whereby the rear access decks make these areas very heavily constrained in their existing outlook and when testing is carried out with the access decks removed, there is very little impact upon this property.

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Privacy and overlooking/outlook

- 6.47 Policy CC8 of the Local Plan states that development should not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of privacy and overlooking and that there should be a reasonable outlook from properties. Development should therefore be sensitively designed to ensure that these criteria are met.
- 6.48 These issues have been carefully considered with the proposed development. There are no windows on the west elevation facing Lion Court adjacent to the site on Great Knollys Street. The rear elevation of the proposed development has been set back within the site and is positioned at an oblique angle to the rear elevation of the adjacent building to the south, 33-41 Caversham Road, to ensure that there is no direct overlooking between these properties. Furthermore, the sunlight and daylight assessment has identified that the windows on the rear elevation of 33-41 Caversham Road are likely to serve secondary space with the main windows serving habitable rooms overlooking Caversham Road to the east. The oblique angle between buildings ensures that there is a good level of outlook from both the proposed development and this adjacent building.

Air Quality

- 6.49 The NPPF requires that planning decisions should prevent new and existing development from contributing to, being put at an unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Para 181 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into consideration the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas (AQMA) and Clean Air Zones is consistent with the local air quality action plan.
- 6.50 Policy EN15 of the Local Plan requires that development should have regard to the need to improve the air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is mitigated. This should

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take into consideration whether the proposal is within an AQMA and whether it can be demonstrated that a local worsening of the air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in the air quality, for instance through a reduction in the need to travel.

- 6.51 The site is within an AQMA, which raises the issue that the proposed development will introduce future residents to poor air quality. An Air Quality Assessment (AQA) was therefore undertaken in order to determine the baseline conditions at the site, consider its suitability for the proposed end-use and assess potential air quality effects associated with the scheme.
- 6.52 The main issues emerging from the AQA related to the proposal having the potential to expose future residents to elevated pollution levels. Dispersion modelling was undertaken in order to predict concentrations as a result of emissions from the local highway network. The results of the dispersion modelling assessment indicated elevated NO₂ concentrations along the Caversham Road building façade at ground, first and second floor level. Suitable mitigation in the form of mechanical ventilation has been specified for the affected apartments and is considered a suitable solution for the proposed development. On this basis, air quality issues are not considered to be a constraint to the development, subject to the inclusion of the specified mitigation.
- 6.53 It is also worthwhile emphasising that the proposed development will result in a significantly reduced number of vehicle journeys than is currently generated by the existing use of the site as a car hire depot. It is also providing for new homes in a location that is very well served by both local amenities and public transport, thereby reducing the need to travel. As such, the development will have a positive impact upon air quality.

Flood Risk & Drainage

- 6.54 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.
- 6.55 At the local level, policy CC3 of the Local Plan recommends that development should minimise the impact of surface water run-off from developments and where possible incorporate

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mitigation and resilience measures for any increases in river flooding levels as a result of climate change.

- 6.56 Policy EN 18 sets out the Council's approach to flooding and sustainable drainage systems directs development to areas of low risk of flooding in the first instance. Where development in areas at risk of flooding is necessary, it should not reduce the capacity of the floodplain to store flood water, impede flood water flows or risk of increased risks to life and property arising from flooding. All major developments must incorporate sustainable drainage systems as appropriate.
- 6.57 The site is partially shown to be located within Flood Zone 2. However, the site is considered to be at low risk of surface water flooding. Finished floor levels for the proposed buildings would be set at a minimum of 38.64M AOD, which would provide a free board of 300 mm above the design flood level based upon a quoted peak one in 100 year +35% for climate change flood level at the site of 38.34M AOD.
- 6.58 Para 4.2.98 of the Local Plan advises that a sequential test has already been carried out for those sites allocated within this Plan and there is no need for this to be repeated. The site lies within the Great Knollys Street and Weldale Street sub area of the West Side Major Opportunity Area, which the Local Plan states is to be developed primarily for residential. On this basis, it is not considered that a sequential test is required for this site and that residential development of the site is acceptable in principle.
- 6.59 The underlying geology on site, together with the presence of Thames Water surface water sewers, suggests that infiltration would not be feasible as a method of surface water discharge. It is proposed that surface water generated by the proposed development would discharge to the Thames Water public surface water sewer network running along Great Knollys Street to the north of the site. A proposed permeable paving structure has been designed to accept flows from all storms up to and including the one in 100 year +40% climate change event. Surface water discharge from the site would be at a rate that is significantly lower than the existing Brownfield rates.

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- 6.60 The development will not therefore present a risk to surface water flooding and can be drained in a sustainable manner, commensurate with national and local policy.

Transport

- 6.61 In assessing the transport impact arising from specific applications for development, the NPPF paragraph 108 advises that it should be insured that:

- Appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved by all users; and
- Any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree

- 6.62 Paragraph 109 goes on to state that development should only be prevented or refused on highway grounds if they would be in an acceptable impact on highway safety, or the residual cumulative impact on the road network would be severe. Paragraph 111 requires all developments that will generate significant amounts of movement to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

- 6.63 The Local Plan covers transport related matter through a number of policies. In particular, Policy T3 advises that where proposals involve a 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, inter alia, the development would not have a detrimental impact on the functioning of the transport network or be detrimental to the safety of users of the transport network.

- 6.64 Policy TR5 requires that development should provide car parking and cycle parking that is appropriate to the accessibility of the location within the borough to sustainable transport facilities, particularly public transport. Where communal car parking of at least 10 spaces is provided at residential developments, 10% of spaces should provide an active charging point. The Council's Revised Parking Standards and Design SPD (October 2011) identifies that the

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site is located within Zone 2. This SPD sets out maximum car parking and minimum cycle parking requirements for this location.

- 6.65 The site is located adjacent to the town centre, which is the most sustainable and accessible area in Reading. There are bus stops close by on Caversham Road and Reading railway station is within a short walking distance. This offers great potential to take up travel via sustainable modes and reduces the need for future residents to use or require a car.
- 6.66 Vehicle access to the site will be from Great Knollys Street and it has been demonstrated that adequate visibility splays can be achieved for this access. There is an existing access to the site from Great Knollys Street, which will be slightly altered whilst an existing access onto Caversham Road is to be stopped up. Furthermore, the amount of traffic generation arising from the proposed development will be significantly less than that arising from the permitted use of the site as a car hire facility. Separate pedestrian access points are provided across the site. These access arrangements are therefore considered to be satisfactory in terms of highway safety.
- 6.67 A total of 12 car parking spaces are to be provided, two of which are disabled spaces. Whilst the level of parking is below the maximum standards for a Zone 2 site, given the central location of the site and the excellent opportunities for both public transport and access to local services and facilities, this level of parking is considered to be acceptable. A total of 22 cycle spaces are to be provided, which is policy compliant. These spaces will be provided within a secure bicycle store located at the rear of the site.
- 6.68 Smaller delivery vehicles, such as those used for supermarket shopping deliveries will be accommodated on-site within the car park whilst larger deliveries and servicing will be undertaken from Great Knollys Street.
- 6.69 Overall, the development will have a positive impact upon the transport network by reducing traffic movements. A safe and suitable access to the site can be achieved and the location of the site will promote sustainable modes of travel.

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Energy & Sustainability

- 6.70 The NPPF provides a framework for achieving sustainable development, which has been summarised as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. At the heart of the framework is a presumption in favour of sustainable development covering economic, social and environmental objectives.
- 6.71 At the local level a number of policies within the Local Plan are relevant to the proposed development. Policy CC2 requires development to use energy, water, minerals and other natural resources appropriately. Policy CC3 requires development to incorporate measures to be able adapt to climate change and to be designed to minimise the impact of surface water run-off. Policy CC4 states that any development of 20 dwellings or more should consider the inclusion of decentralised energy provision. Policy CC5 requires development to demonstrate measures to minimise waste generation in the construction process. Policy EN12 states that development should provide a net gain for biodiversity wherever possible and include new tree planting, wildlife friendly landscaping and ecological enhancements. Policy H5 requires that residential development should be built to the higher water efficiency standard and should be designed to achieve zero carbon homes.
- 6.72 The Council has also produced a Sustainable Design and Construction Supplementary Planning Document, which was adopted in 2019. This SPD explains planning requirements with regard to energy, climate change, water management and waste reduction and is intended to supplement the policies of the Local Plan. This SPD addresses the target of achieving zero carbon homes for major residential development, with a preference being to achieve neutral development on site. If this is not achievable, a minimum of 35% improvement in regulated emissions over the target emissions rate specified in Part L of the 2013 Building Regulations, plus a section 106 contribution towards carbon offsetting must be made.
- 6.73 The feasibility of a decentralised energy production has been considered. There are no known heat networks in close proximity of the development, and due to the small scale of the development it is not considered feasible to install the site light network. It is proposed that the heating and hot water is supplied by electric boilers. In addition, a range of renewable

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energy technologies have been considered and it is proposed to include solar PV within the proposed development.

- 6.74 The range of advanced energy efficiency measures proposed allows the development to achieve a 22% CO₂ reduction over a Part L 2013 baseline. The renewable energy technologies to be used provides a further 13% reduction in regulated CO₂ emissions over the first stage of the energy hierarchy. The combination of these measures results in an on-site 35% CO₂ reduction over a Part L 2013 baseline, using SAP 10 carbon emission factors. The estimated remaining regulated CO₂ emissions are calculated to be 28 tonnes CO₂ per annum, resulting in a carbon offset payment of £50,400.
- 6.75 Beyond energy efficiency considerations, the proposed development accords with other sustainable development requirements set out in the local policy framework. Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target and maximum internal daily water consumption of 105 litres/person/day. Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling. Where practical, new building materials will be sourced locally to reduce transport pollution and support the local economy. Appropriate measures will be taken to ensure the development is safe and secure for its residents. Biodiversity and ecology enhancements will be implemented through the provision of landscaped areas, amenity space and additional tree and shrub planting across the site with appropriate measures to encourage wildlife.

7 Summary and Conclusions

- 7.1 This planning statement has been prepared in support of a full planning application submitted to Reading Borough Council by Elstree land Ltd for the redevelopment of 45 Caversham Road, Reading.
- 7.2 The site is located within an area that is allocated for residential development in the Local Plan and the redevelopment of this sustainable urban site close to the town centre will deliver social, economic and environmental gains to the local area arising from:

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- delivery of 40 new homes including 12 (30%) affordable homes and the provision of wheelchair adaptable units
- re-development of an underutilised site that will enhance the townscape and visual amenity of an area undergoing urban regeneration whilst supporting the town centre economy
- development in an accessible location that will reduce traffic movements from the site and facilitate sustainable travel
- a sustainable energy strategy makes use of renewable and energy efficient sources
- bio-diversity net gains through new landscaping and tree planting on a site currently lacking in ecological features

7.3 In addition to these social, economic and environmental gains, the proposed development will deliver high quality residential accommodation that is in accordance with both local and national planning policy, in particular through ensuring that the development:

- is of a high-quality design that will support and improve the character and appearance of the local area
- provides accommodation that meets the nationally described space standard
- does not materially impact upon the level of sunlight and daylight to existing properties in this dense urban area whilst creating new accommodation with good levels of sunlight and daylight
- facilitates high levels of privacy and outlook to both existing and future residents
- creates a living environment that is safe and healthy for its future residents by providing for good areas of communal and private open space that enrich the quality of life with good access to public open space
- provides accommodation that is not impaired by excessive levels of noise or poor level of air quality
- the access into the site is safe and allows for appropriate levels of car and cycle parking

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7.4 This Statement has assessed the material planning considerations arising from the proposals against the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant national and local planning policy guidance. It is therefore respectfully requested that the proposed development is recommended for approval at the earliest opportunity so that the development can be implemented and the social, economic and environmental gains to the local area realised.

