
12-18 Crown Street,
Reading

Planning Statement
incorporating a Design
& Access Statement

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Applicant:
Shall Do Crown Street Limited

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1.0 Introduction

1.1 This Planning Statement (incorporating a Design and Access Statement) has been prepared by D. Rose Planning LLP on behalf of the applicant, Shall Do Crown Street Limited, in support of an application to Reading Borough Council (RBC) for full planning permission in relation to 12-18 Crown Street, Reading.

1.2 The proposed development is as follows:

Change of use of building from 44 serviced apartments (Class C1) to 44 flats (C3) comprising of 4no studios, 27 x one bedroom and 13 x two bedroom units with associated parking

1.3 This Statement provides an assessment of the proposals against the Development Plan and relevant material considerations.

1.4 The Statement should be read alongside the following documents:

- Set of Drawings (Osel Architecture);
- Energy and Sustainability Statement (SRE);
- Environmental Noise Survey and Acoustic Design Statement Report (Hann Tucker);
- Financial Viability Appraisal (Aspinall Verdi) and;
- Transport Note (Evoke).

1.5 This Statement is structured as follows:

- Section 1 – continues by describing the site's context and outlining the relevant planning history;
- Section 2 – the Design and Access Statement describing the proposed development,
- Section 3 – sets out the planning policies which are applicable to this application;
- Section 4 – examines the main planning considerations; and
- Section 5 – sets out the conclusions and highlights the benefits of the proposed development.

Site Context

- 1.6 The application site (0.13ha) is located within the Central Area of Reading within the administrative boundaries of Reading Borough Council (RBC).
- 1.7 The site is bordered to the north by Nelson Mews/St Giles Close, to the east by student accommodation, to the south by Crown Street and to the west by residential properties located off Crown Street.
- 1.8 The surrounding area is of mixed-use character with residential use dominating. There are ground floor commercial/retail uses (within the new Class E) located on London Street and below the neighbouring student housing scheme. Buildings within the area are typically 3-6 storeys in height.
- 1.9 The existing building on site is part 4, part 5 storeys in height and currently accommodates a total of 44 one and two-bedroom serviced apartments within Class C1 use. There are 8 car parking spaces (including 2 disabled parking bays) to the rear accessed off St Giles Close for the benefit of guests. The building currently provides 10 covered and secure cycle parking space within a store at ground floor level.
- 1.10 The site is located within a highly accessible location benefiting from convenient access by foot and public transport to the amenities of Reading town centre. The site is located just over 1 kilometre from Reading Railway Station and within 100 metres of bus stops situated on London Street. Extensive local cycle routes are also available in close proximity of the site.

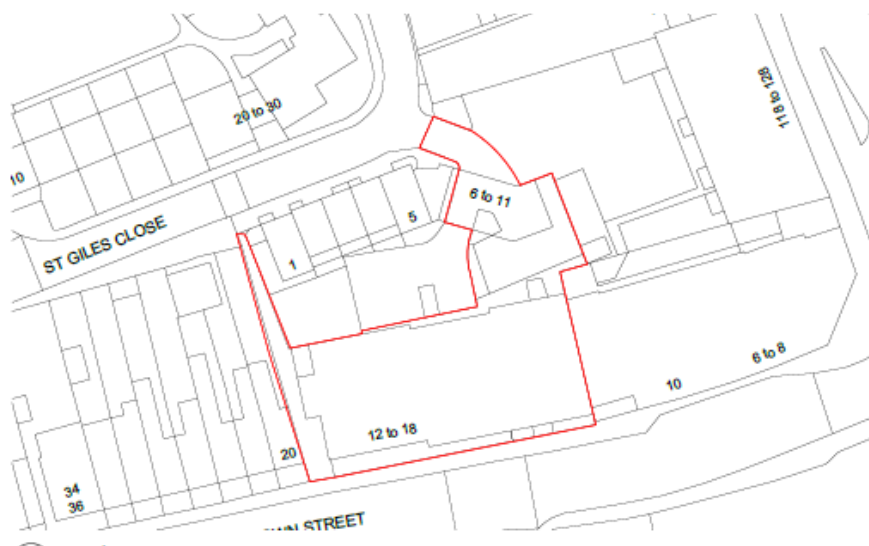


Figure 1 – Site Location (Osel Architecture)

- 1.11 The site borders the Market Place/London Street Conservation Area and there are a number of listed buildings in proximity including 108, 110 and 114 London Street, 119 and 121 London Street and 3 and 5 London Road (all Grade II listed).
- 1.12 The majority of the roads in the vicinity of the site either have single or double yellow line restrictions or have restrictions on parking for residents' permit holders only between 08:00-20:00.

Planning History

- 1.13 Relevant planning permissions in relation to the site are as follows:
- 05/00776/FUL – Change of use from offices (B1) to 34 serviced apartments as part of an apart-hotel (Use Class C1) comprising 22 x 1 bedroom units and 12 x 2 bedroom units with associated parking – Permission granted: 24th October 2005
 - 06/01116/FUL – Roof extension to provide an additional ten serviced apartments – Permission granted: 20th December 2006

2.0 Proposed Development: Design and Access Statement

2.1 The proposal entails the change of use of the building at 12-18 Crown Street from a Class C1 apart-hotel/service apartment to provide 44 flats within Class C3. This comprises of:

- 4 studio apartments;
- 18 x one bedroom / one person apartments;
- 9 x one bedroom / two person apartments;
- 4 x two bedroom / three person apartments; and
- 9 x two bedroom / four person apartments.

2.2 The schedule of proposed accommodation is as follows:

Unit No.	Location	NIA (Sqm)	Type
01	Ground Floor	46	1B1P
02	Ground Floor	46	1B1P
03	Ground Floor	72	2B4P
04	Ground Floor	52	1B2P
05	Ground Floor	48	1B1P
06	Ground Floor	61	2B3P
07	Ground Floor	47	1B1P
08	Ground Floor	51	1B2P
09	1 st Floor	90	2B4P
10	1 st Floor	46	1B1P
11	1 st Floor	46	1B1P
12	1 st Floor	72	2B4P
13	1 st Floor	52	1B2P
14	1 st Floor	48	1B1P
15	1 st Floor	61	2B3P
16	1 st Floor	47	1B1P
17	1 st Floor	51	1B2P
18	1 st Floor	77	2B4P
19	2 nd Floor	90	2B4P
20	2 nd Floor	46	1B1P
21	2 nd Floor	46	1B1P
22	2 nd Floor	72	2B4P
23	2 nd Floor	52	1B2P
24	2 nd Floor	48	1B1P
25	2 nd Floor	61	2B3P
26	2 nd Floor	47	1B1P
27	2 nd Floor	51	1B2P

Unit No.	Location	NIA (Sqm)	Type
28	2 nd Floor	77	2B4P
29	3 rd Floor	92	2B4P
30	3 rd Floor	46	1B1P
31	3 rd Floor	51	1B2P
32	3 rd Floor	40	1B1P
33	3 rd Floor	40	1B1P
34	3 rd Floor	48	1B1P
35	3 rd Floor	40	1B1P
36	3 rd Floor	47	1B1P
37	3 rd Floor	51	1B2P
38	3 rd Floor	79	2B4P
39	4 th Floor	38	STU
40	4 th Floor	63	2B3P
41	4 th Floor	52	1B2P
42	4 th Floor	38	STU
43	4 th Floor	37	STU
44	4 th Floor	39	STU

Table 1 - Accommodation Schedule

- 2.3 The proposal comprises of minor internal modifications to the layout of the existing building in particular at 4th floor level. This is to ensure that all 44 flats achieve minimum space standards
- 2.4 A minor reconfiguration of the common areas is also proposed at ground floor to facilitate the provision of enlarged bicycle stores in order to accommodate a total of 44 bicycles.
- 2.5 No external changes are proposed to the appearance of the building as part of this application.
- 2.6 The existing 8 car parking spaces (including 2 disabled spaces) would be retained for future residents of the development.
- 2.7 Due to the constraints of the site, with the undercroft restricting the height to the rear of the building, it is proposed that refuse collection will continue to be undertaken by a private company.

3.0 Planning Policy Context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act, 2004, requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 RBC has recently adopted a new Local Plan (LP) which contains planning policies to manage development in Reading up to 2036.
- 3.3 The National Planning Policy Framework (NPPF) is the key material consideration which must be taken into account by planning decision-makers. The NPPF, which is expounded upon by the Government's National Planning Practice Guidance (NPPG), sets out a presumption in favour of sustainable development including where the Development Plan is silent, absent or the policies are out of date.
- 3.4 Relevant Development Plan policies when assessing the proposal are as follows:

Reading Borough Local Plan (LP)

- Policy CC1: Presumption in favour of Sustainable Development
- Policy CC2: Sustainable Design and Construction
- Policy CC3: Adaptation to Climate Change
- Policy CC4: Decentralised Energy
- Policy CC5: Waste Minimisation and Storage
- Policy CC6: Accessibility and the Intensity of Development
- Policy CC7: Design and the Public Realm
- Policy CC8: Safeguarding Amenity
- Policy CC9: Securing Infrastructure
- Policy EN1: Protection and Enhancement of the Historic Environment
- Policy EN2: Areas of Archaeological Significance
- Policy EN3: Enhancement of Conservation Areas
- Policy EN9: Provision of Open Space
- Policy EN15: Air Quality
- Policy EN16: Pollution and Water Resources
- Policy EN18: Flooding and Drainage
- Policy H1: Provision of Housing
- Policy H2: Density and Mix
- Policy H3: Affordable Housing
- Policy H5: Standards for New Housing
- Policy H8: Residential Conversions
- Policy H10: Private and Communal Outdoor Space

- Policy TR1: Achieving the Transport Strategy
- Policy TR3: Access, Traffic and Highway-Related Matters
- Policy TR4: Cycle Routes and Facilities
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
- Policy CR1: Definition of Central Reading
- Policy CR2: Design in Central Reading
- Policy CR3: Public Realm in Central Reading
- Policy CR4: Leisure, Culture and Tourism in Central Reading
- Policy CR6: Living in Central Reading

4.0 Planning Assessment

- 4.1 Within this section of the Statement, the proposed development has been assessed against the relevant Development Plan policies as well as material considerations.

Principle of Development

- 4.2 LP Policy CC1 states that positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development.
- 4.3 LP Policy H1 sets out that a minimum of 15,847 homes new dwellings will be provided in Reading Borough between 2013 and 2036.
- 4.4 As noted in LP Policy CR1, the Central Area is shown on the Proposals Map. The Policy sets out that for the purposes of application of the sequential test, 'other main town centre uses' (which includes Class C1 apart-hotels) will take place in the Central Core.
- 4.5 LP Policy CR4 highlights that the Central Core will be the prime focus for major leisure, cultural and tourism development (including visitor accommodation). Directing serviced apartments and apart-hotels to the Central Core is also emphasised by LP Policy CR6.
- 4.6 Paragraph 11 of the NPPF emphasises a presumption in favour of sustainable development. Paragraph 11c) states that for decision-making this means approving development proposals that accord with an up-to-date Development Plan without delay.
- 4.7 Paragraph 85 of the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. For planning policies this includes recognising that residential development often plays an important role in ensuring the vitality of centres.
- 4.8 Paragraph 117 of the NPPF sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.9 Paragraph 118 of the NPPF states that planning decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

- 4.10 The NPPF also sets out that local policies should promote competitive town centres. This includes recognising that residential development can play an important role in ensuring their vitality (Paragraph 85).

Assessment

- 4.11 The application site is in a highly accessible location within Central Area of Reading in close proximity to services, employment opportunities and shops.
- 4.12 However, it is emphasised the site is not within the Central Core to which the Local Plan directs new visitor accommodation. It is further highlighted that there are no local planning policies which seek the protection of the existing Class C1 use.
- 4.13 The change of use of the building to flats within Class C3 is considered to be in full accordance with the Development Plan. The development will also assist RBC in making a contribution towards local housing needs on previously developed land.

Conservation and Design

- 4.14 LP Policy CC7 states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. This includes with respect to layout, landscape, density and mix, scale (height and massing) and architectural details.
- 4.15 The Policy further notes that development must make a positive contribution to RBC's urban design objectives. Developments should also respond positively to their local context, create safe and accessible environments, be inclusive and visually attractive.
- 4.16 LP Policy CR2 is a specific design policy for the Central Area and notes a number of attributes that development should follow including respecting the existing grid layout structure; providing appropriate public spaces, where possible, include ways of providing green infrastructure; use of high quality materials and incorporation of architectural detailing; and designed with consideration for the future development of neighbouring sites.
- 4.17 LP Policy CR3 encourages new development to make a positive contribution towards the quality of the public realm of the Central Area.
- 4.18 LP Policies CC6 and H2 explain that the scale and density of development should be related to its level of accessibility by walking, cycling and public transport to a range of

services and facilities, with the densest and largest scale development taking place in the most accessible locations.

- 4.19 LP Policy CC8 seeks to ensure that development does not impact upon existing residential properties including with respect to privacy and overlooking, access to daylight and sunlight, harm to outlook, and noise disturbance.
- 4.20 LP Policy EN1 states that setting of listed buildings and conservations will be protected and, where possible, enhanced.
- 4.21 LP Policy EN2 sets out that applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record. Planning permission will not be granted in cases where the assessment of the archaeological impacts is inadequate.
- 4.22 LP Policy H5 sets out standards for housing development including to ensure adaptable and accessible dwellings. The Policy notes that all new build housing outside the Central Area should comply with the nationally-described space standard.
- 4.23 LP Policy H8 states that proposals to convert buildings into self-contained flats will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing. It is noted that RBC has published Residential Conversions SPD but this pre-dates the adoption of the current Local Plan.
- 4.24 LP Policy H10 encourages the provision of functional private or communal open space, including green space, wherever possible, as part of residential development.
- 4.25 With reference to the national context, it is highlighted that the NPPF attaches great importance to the design of the built and historic environment with good design considered to be a key aspect of sustainable development.
- 4.26 Paragraph 122 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, taking into account of considerations including the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change as well as the importance of securing well-designed, attractive and healthy places.

4.27 Paragraph 127 of the NPPF states that planning “decisions should aim to ensure that developments:

- 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;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- 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;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

4.28 Paragraph 130 sets out that “permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.” In addition, in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability (paragraph 131).

Assessment

- 4.29 The proposed development is limited in nature in that it does not entail any changes to the appearance of the building with minimal amendments to the layout of the units (4th floor only). It is clear that the proposal would not impact upon the amenity of neighbours with respect to the availability of daylight and sunlight. Similarly, given the nature of the existing use, there would be no material change with respect to overlooking.
- 4.30 The proposal does not include any ground works and therefore will not impact upon any potential archaeology below the building.

- 4.31 The building on site was constructed within the last 25 years and extended less than 15 years ago. Its exterior is in reasonable condition and it is considered to have a neutral impact upon the setting of the neighbouring conservation area. If further considered that change of use and ongoing preservation of the building, subject to safeguarding the amenity of residents, would not prejudice the delivery of development and regeneration on neighbouring land.
- 4.32 The proposal would continue to make an efficient use of land in a sustainable location and the density of development would be unaffected by the application with the number of units, rooms and expected occupancy retained as per the existing.
- 4.33 By virtue of the limited scope of the application and the constrained nature of the site, the opportunity to provide on-site amenity space is limited. However, there are open spaces including King's Road Gardens in walking distance.
- 4.34 Whilst, noting that the Government's Technical Housing Standards are not applied to developments within Reading Central Area, it is highlighted that all the proposed dwellings, would achieve the space standards. This ensures that the development is capable of providing a high quality of accommodation for future residents.
- 4.35 The extent of works subject to this application are limited in scope. However, it is considered that the proposal conforms with the design policies of the Local Plan where relevant.

Housing Mix and Type

- 4.36 LP Policy H2 sets out that where possible, a development should contribute to meet a mix of housing sizes. Outside the Central Area and defined centres, there is a particular onus on delivering dwellings which have 3 bedrooms or more.
- 4.37 LP Policy CR6 states that all proposals for residential development within the Central Area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. The Policy further adds that as a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.
- 4.38 LP Policy H3 seeks on sites of 10 or more dwellings that 30% of the total dwellings will be in the form of affordable housing. The Policy further notes that where proposals fall short

of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution. Further guidance is set out in RBC's Affordable Housing SPD.

- 4.39 Paragraph 57 of the NPPF states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker.

Assessment

- 4.40 The proposal is limited in nature with only minimal changes to the existing units to ensure compliance with space standards. It is further considered that more substantial changes to the existing layout would be unviable. Accordingly, the proposal, whilst providing a mix of 1, 2, 3 and 4 person units does include the provision of three bedroom dwellings. In this regard, it is highlighted that the site is in a central location and by virtue of its constrained nature, there are no opportunities to provide child's play space or directly accessible amenity space. It is therefore considered that on balance that the proposed mix of residential units should be considered to be acceptable.
- 4.41 With reference to RBC's affordable housing policy, a financial appraisal has been undertaken of the proposed development. This affordable housing viability appraisal, whilst containing commercially sensitive financial details, will be made available for scrutiny by RBC's officers.

Transport and Servicing

- 4.42 LP Policy CC6 sets out that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest development taking place in the most accessible locations.
- 4.43 LP Policy TR1 requires that all proposed development to contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan. The Policy notes that planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport.

- 4.44 LP Policy TR3 states that in determining proposals involving the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where it would not have a material detrimental impact on the functioning of the transport network.
- 4.45 LP Policy TR4 sets out 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.
- 4.46 LP Policy TR5 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. Further details in relation to parking are set out within RBC's Revised Parking Standards and Design SPD.
- 4.47 The NPPF highlights that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 103).
- 4.48 Paragraph 108 of the NPPF notes that in assessing applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users; and
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree
- 4.49 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Paragraph 109). Within this context, as set out in Paragraph 110, applications for development should:
- a) give priority first to pedestrian and cycle movements;
 - b) address the needs of people with disabilities and reduced mobility;
 - c) create places that are safe, secure and attractive;
 - d) allow for the efficient delivery of goods, and access by service and emergency
 - e) vehicles; and
 - f) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

- 4.50 Paragraph 111 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport assessment so that likely impacts of the proposal can be assessed.

Assessment

- 4.51 The application is supported by a Transport Note (TN) which carefully examines the highways impact of the proposal.
- 4.52 The site is located within close proximity to public transport facilities (including Reading Railway Station and the local bus network) and within the Central Area of Reading where future residents will have access to job opportunities, shops and leisure facilities.
- 4.53 The TN references local car parking standards and concludes that the provision and retention of 8 car parking spaces (including 2 disabled spaces) is appropriate due to the site's accessible location. It is further considered that the existence of on-street parking restrictions surrounding the site would limit the prospect of overspill.
- 4.54 Notwithstanding the above, it is proposed that the applicant would enter into a legal agreement with RBC to ensure that future residents (other than blue badge holders) will not be eligible to apply for residents' parking permits.
- 4.55 The applicant is committed to marketing the development as car-lite to future residents. Parking spaces would be allocated to interested residents with first priority given to disabled users and then to residents of the larger, 2 bedroom units.
- 4.56 RBC's adopted standards require the provision of a minimum of 22 cycle spaces for the development. However, given the development's car-lite nature and to encourage a modal shift from the private car to more sustainable transport options, it is proposed to provide a total of 44 spaces. These are to be accommodated within in 2 secure locations at ground floor and can be accessed from the rear.
- 4.57 As explained within the TN, the existing apart-hotel is serviced by private refuse collection company and it is proposed that similar arrangements will continue to serve the residential development on weekly or bi-weekly basis. The height restrictions within the undercroft to the rear, require the use of smaller refuse collection vehicles than are typically used by RBC's contractors. It is confirmed that refuse store would include bins for general waste and recyclables.

- 4.58 The TN notes that the type of deliveries anticipated to be associated with the proposed residential use (including groceries, parcel and mail deliveries) already occur in connection with the existing serviced apartments.
- 4.59 The TN includes trip generation analysis of existing and proposed use. This concludes that the development proposal is considered to result in a negligible impact on the local highway network, public transport network, and local walking and cycling infrastructure. The proposed development is anticipated to marginally reduce the number of trips during the AM peak hour, PM peak hour and daily, so it can therefore be concluded that the development would not result in a severe residual impact in accordance with the NPPF and the Local Plan.

Sustainability and Climate Change

- 4.60 LP Policy CC2 promotes the incorporation of sustainable design and construction principles including measures that reduce energy and water consumption.
- 4.61 LP Policy CC3 requires all development proposals to demonstrate how they have been designed to incorporate measures to adapt to climate change. These measures include maximising the opportunities for both natural heating and ventilation as well as resistance and measures such as solar shading and green and brown roofs.
- 4.62 LP Policy CC4 states that any development of more than 20 dwellings should 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. In addition, where there is existing decentralised energy provision present within the vicinity of an application site, further developments of 10 dwellings will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.
- 4.63 LP Policy CC5 notes that proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings. Adequate provision should also be made for the storage of recyclables.
- 4.64 LP Policy H5 requires new all new build housing development to achieve water efficiency and carbon emission savings.
- 4.65 RBC's Sustainable Design and Construction SPD sets out further guidance including in relation to energy efficiency, water management and reduction, waste reduction and decentralised energy.

- 4.66 In noting that the purpose of the planning system is to ensure sustainable development, the NPPF highlights the importance of using natural resources prudently, minimising waste and pollution, and mitigating climate change including moving to a low carbon economy.
- 4.67 Paragraph 150 of the NPPF states that “new development should be planned in ways that: avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and can help to reduce greenhouse gas emissions, such as through its location, orientation and design...”
- 4.68 In determining planning applications, local planning authorities should expect new development to comply with any Development Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (Paragraph 153 of the NPPF).

Assessment

- 4.69 The development which comprises of the change of use only and only minimal changes to the layout of the units is inherently sustainable in that it minimises the potential for construction waste.
- 4.70 An energy strategy (as set out in the Energy and Sustainability Statement) has been developed by the design team following the Energy Hierarchy of Lean, Clean and Green in order to achieve carbon emissions below Part L of the Building Regulations compliant levels. This is to be achieved using a communal heating strategy.
- 4.71 It is noted that there are currently no proposals for a heat network nearby the site. Therefore, at present, connection to a district heating system is not considered to be feasible. However, as set out in the Statement, the retention of a communal ‘wet’ system would allow the proposed development to connect to a new district heating network in the future. It has further been determined that the use CHP is not suitable for a scheme of this size as the proposed residential units do not have sufficient space or heating and hot water demand for a CHP system to run efficiently.
- 4.72 As part of the refurbishment of the property, it is highlighted that a comprehensive resource management plan will be implemented to follow the principles of the waste hierarchy. Targets will be set in relation to volume of construction waste and diversion from landfill.

- 4.73 In addition, water fittings will be installed with restricted flow rates to meet the target water consumption of 110 litres per head per day.
- 4.74 It is therefore considered to meet the sustainability objectives of the Development Plan by following the energy hierarchy and through measure to reduce resource consumption.

Pollution including Contamination

- 4.75 LP Policy CC8 seeks to safeguard the amenity of future residents including with respect to the potential for noise and disturbance.
- 4.76 LP Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects and that proposals which would detrimentally affect air quality will not be permitted unless the effect is to be mitigated.
- 4.77 LP Policy EN16 sets out that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution. Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution. Similarly, 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.
- 4.78 LP Policy CR6 states that proposals for new residential development within the central area will be required to demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated.
- 4.79 Paragraph 170 of the NPPF sets out that planning decisions should contribute to and enhance the natural and local environment including by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. The remediation of contaminated land is also sought.
- 4.80 Paragraph 178 states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

- 4.81 Paragraph 180 requires planning decisions to ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Assessment

- 4.82 No groundwork is proposed as part of the application and accordingly, the development is not expected to give rise to a contamination impacts that would affect future residents.
- 4.83 Although site is within central Reading, it is not located within an Air Quality Management Area and accordingly, an air quality assessment is not required to support the change of use.
- 4.84 The application is supported by an Environmental Noise Survey and Acoustic Design Statement. This proposes appropriate target internal noise levels and concludes that these are achievable using conventional mitigation measures and subject to their inclusion, the site is suitable for residential development.
- 4.85 It is therefore considered that there are no grounds for refusing the application on the account of pollution impacts upon future residents.

Drainage and Flood Risk

- 4.86 LP Policy EN18 and Paragraph 155 of the NPPF seek to direct development away from areas at highest risk of flooding. Local Planning authorities should also ensure that flood risk is not increased elsewhere (Paragraph 163). Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Assessment

- 4.87 The site is located within Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- 4.88 As illustrated on the EA's maps, the risk of surface water flooding is also low.
- 4.89 As the proposal does not entail operational development or an intensification of use, it is not expected to give rise to increase discharge or run-off. On the basis of the limited nature of the development (comprising solely of a change of use), there would be no scope to incorporate sustainable drainage systems.

- 4.90 Therefore, it is considered that the proposed development accords with the relevant drainage and flood risk policies of the Development Plan.

Planning Obligations

- 4.91 LP Policy CC9 seeks to ensure that infrastructure made necessary by the development is direct provision or financial contributions.
- 4.92 LP Policy EN9 states that all new development should make provision for appropriate open space based on the needs of the development. It is noted that this can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities.
- 4.93 LP Policy TR1 notes that all development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling.
- 4.94 RBC's has also published a Planning Obligations under S106 SPD which provides further detailed guidance.
- 4.95 The NPPF sets out that "planning obligations should only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development." (Paragraph 56)

Assessment

- 4.96 It is confirmed that the applicant would be willing to enter into a S106 agreement to secure financial and non-financial obligations providing they meet the tests as set out within the NPPF.

5.0 Conclusion

- 5.1 This Statement together with the other application documents demonstrates that the proposed development is in accordance with the Development Plan and is supported by material considerations including the NPPF.
- 5.2 The site is located outside the Reading Central Core and the loss of visitor accommodation in this location does not conflict with Local Plan.
- 5.3 The proposed provision of 44 flats of a mix of sizes is considered entirely appropriate given the site's sustainable location and is consistent with policies for the Central Area of Reading.
- 5.4 The flats will make a contribution towards RBC's housing requirements and effectively utilise previously development land in an accessible location.
- 5.5 The proposed development is not considered to give rise to any environmental, or infrastructure concerns.
- 5.6 The proposed dwellings would provide an acceptable quality of living accommodation and comply with the Government's Technical Housing Standards.
- 5.7 The development also Incorporates sustainable design measures to ensure reduced carbon emissions by users and water consumption as well as minimising waste material.