

Planning Statement

Wensley Road:

New Build & Estate Improvements Phase 1

Wensley Road, Reading RG1

On behalf of Reading Borough Council



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1.0 Introduction

- 1.1 This Planning Statement provides supporting analysis and commentary for the planning application submitted by HTA Design LLP on behalf of Reading Borough Council for the development of 46 dwellings on land at Wensley Road, Reading.
- 1.2 The description of the planning application is:
- Demolition of 29 garages, and development of 46 new dwelling units, including the provision of affordable homes, provided in a mixture of houses and apartments (1 bed/ 2 bed / 3 bed / 4 bed), in blocks of up to 2.5 and 4 storeys, and the provision of bicycle parking spaces, car parking spaces and public realm works.*
- 1.3 The scheme has been designed by HTA Design LLP. .
- 1.4 The submitted application forms the first phase of works to the housing estate at Wensley Road. The proposal will increase the housing supply in Reading Borough through the provision of 46 new homes thereby meeting a key objective for the Borough. The adopted Local Plan makes provision for at least 15,847 new homes (an average 689 homes per annum). The proposal includes improvements to the public realm, including to the children's play space and soft landscaping, which will be of benefit to existing residents.
- 1.5 A second phase is planned which includes changes to the exterior of the tower blocks to improve the thermal performance and visual appearance of the tower, the provision bike stores, and bin storage which will address the issues that have been raised during residents' consultation in relation to refuse and pest control. This will form a second planning application.
- 1.6 The scheme has been subject to a number of positive scoping meetings and Pre-Application discussions with Reading Borough Council Officers which has informed the development of the proposal. These took place in July 2019, September 2019, October 2019 and November 2019. Further details of the Pre-Application discussions are set out in Section 3 of this Planning Statement.
- 1.7 The scheme has also been presented to residents at consultation events: August 2019; September 2019, and October 2019. A newsletter providing final details of the proposal has been sent to the residents in January 2020. The Statement of Community Involvement which is submitted as part of this



application sets out further details on the community consultation events and the response to the proposal that are a result of the consultation.

1.8 The key planning considerations relevant to the redevelopment of this site include:

- (i) the acceptability of residential development on the site, including the provision of affordable housing;
- (ii) the provision of high quality new dwellings;
- (iii) the acceptability of the proposed density of the development in planning policy terms for the location;
- (iv) how the design of the proposal will ensure that amenity of other residential dwellings on Wensley Road is maintained;
- (v) landscaping and communal amenity improvements;
- (vi) how the car parking provision is acceptable in the location; and,
- (vii) the sustainability of the proposal.

1.9 The planning statement which is divided into the following sections:

- Section 2.0 - Site and Surroundings;
- Section 3.0 - Proposed Development;
- Section 4.0 - Planning Policy Considerations;
- Section 5.0 - Planning Assessment of the Proposal;
- Section 6.0 - Design and Layout Considerations
- Section 7.0 - Site Assessment; and
- Section 8.0 - Summary and Conclusions.

2.0 Site and Surroundings

Site and Location

- 2.1 The proposal site is located within the loop at the western end of Wensley Road, within the Coley Park Estate. The site is characterised by three residential tower blocks of 15 storeys each. Adjoining the proposal site to the west of the tower blocks are residential dwellings also located within the loop road. Residential dwellings are also situated to the north and east of the proposal site. These are primarily two storey terraces and semi-detached houses. To the south of Wensley Road is Fobney Meadow, a nature reserve.
- 2.2 The towers are set within open grassed amenity spaces with perimeter fencing. Mature trees are planted along the southern and northern fringes of the site, with a denser planting of mature trees in the centre and south-central area of the site. A children's play space is located in the centre of the site, which caters for 5 –11 year olds. It is accessed via pedestrian footpaths.
- 2.3 Car parking for the tower blocks is located in 3 parking courts, which are accessed directly from the Wensley Road loop. Each tower block is served by a parking court, which extend into the site, and act as boundaries to the centrally located amenity and play space. There is currently no vehicular access through the site.

Figure 2.1 Extract from Google Maps: site location





The Surrounding Area

- 2.4 The proposal site at Wensley Road is well located with regard to parks, play spaces and community amenity facilities. To the north of the proposal site is Courage Park, an open grassed parkland which is accessed via pedestrian routes from North Lodge Mews which leads off Wensley Road.
- 2.5 Further east of the site are the Coley Park Allotments, the Coley Park Community Centre and St Mary & All Saints CofE Primary School. Southcote Primary School is located to the west of the site, beyond the railway line. Accessibility to the school is via footbridge over the railway line.
- 2.6 The wider Coley Park Estate lies to the south west of the centre of Reading, within an approximately 30 minute walk from the town centre. To the east of the site is the A33 which links to the M4 which runs to the south of Reading. The M4 links Reading to London in the east and Bristol in the west.

Public Transport Provision and Accessibility

- 2.7 The bus route Number 11 Bronze connects the site to Reading town centre, with services that are approximately every 20 minutes.
- 2.8 The nearest bus stops are located on Wensley Road, adjacent to the site. There are also bus stops located on Berkeley Avenue which provide additional bus services; these are set out in detail in the Transport Statement which is submitted as part of this application.
- 2.9 The site is located approximately 2.7km south-west of Reading train station, which connects Reading to London and Newbury, and 2.5km south of Reading West train station which connects Reading to Newbury and Basingstoke.

3.0 Proposed Development

- 3.1 This section provides a description of the proposed development and the consultation that has been undertaken with Reading Borough Council officers. A detailed description of the design of the proposal and the relationship with the existing surrounding properties is set out in the Design & Access Statement prepared by HTA Architects which accompanies this application.
- 3.2 The scheme proposes the construction of 46 dwellings, provided in terraced houses and flats. A total of 28 houses and 18 flats are provided in three blocks.
- 3.3 Block A comprises a total of 7 houses: a terrace of 5No 3B5P dwellings to the north, and two 4B7P detached homes to the south.
- 3.4 Block B comprises a total of 25 dwellings: a terrace of 7No 3B5P dwellings located to the north, and a flatted block of a total of 18 dwellings to the south. Within the flatted block there are 8No 2B4P dwellings; 6No 1B2P dwellings, and 4No wheelchair units (2No 1B1P dwellings, and 2No 2B3P dwellings).
- 3.5 Block C comprises two terraces of 7No dwellings each, all of which are 3B6P dwellings. The table below summaries the dwellings provided in the scheme.

Figure 3.1 Proposed dwellings

Unit size	Block A	Block B	Block C	Total
1B1PF	0	2 (WCH)	0	2
1B2PF	0	6	0	6
2B3PF	0	2 (WCH)	0	2
2B4PF	0	8	0	8
3B6PH	5	7	14	26
4B7PH	2	0	0	2
TOTAL	7	25	14	46

- 3.6 Below is an extract from the submitted Proposed Site Plan (Drawing RBC-WLR-HTA-A_XX_00_DR_0100_Wensley Road_Proposed Plan-Rev D) which shows the proposed site layout:

Figure 3.2 Proposed Site Plan extract



- 3.7 To the south of the dwellings, improvements to the children's play area are proposed. Car parking rearrangement and landscaping improvements are proposed for the northern and central part of the proposal site, and the perimeter of the site.

Consultation on Proposals

Pre-application Consultation

- 3.8 Pre-application consultation has been undertaken with officers at Reading Borough Council who are supportive of the proposal. Below are summaries of the discussions that have been undertaken.

- July 2019 scoping meeting: general layout and siting of blocks were discussed, and the need to ensure there is coherence between the proposed development and the existing development on the site. Routes through the site were discussed and supported.
- September 2019 scoping meeting: further discussion relating to the siting and orientation of the proposed blocks in relation to the existing development on the site; support for the proposed houses; consideration of appearance to create a sense of identity.
- October 2019 Pre-Application meeting: discussion of layout and massing, density and mix, external appearance, car parking provision, east-west route through the site, and improvements to the existing towers with regard to cycle and refuse storage.
- November 2019: Pre Application meeting: extent of the Phase 1 and Phase 2 works; trees and landscaping; changes to the layout of Wensley Road roadway to enable the bus stop to be located in the site; pedestrian route the site; car parking, cycle parking and electric charging points; internal layout comments; daylight / sunlight / overshadowing; Design Review Panel feedback; zero carbon requirement; crime prevention; replacement of garage storage spaces; density / open space calculations within the redline boundary.

Design Review Panel

- 3.9 In November, the scheme was presented to the Design Review Panel. The review was positive, and a number of comments were made which related to the site layout and pedestrian access; the landscaping of the proposed bus route and reconfigured open space; and detailed design relating to the animation of side elevations, an increase in the width of dormers on the terraced housing, and the need for refinement of the flatted block.



3.10 In addition, the panel questioned whether any other sustainability benefits could be included which would ensure the scheme reaches the required zero carbon standards.

3.11 Further details on the DRP and the design response are provided in the Design & Access Statement.

Consultation with Residents

- August 2019
- September 2019
- October 2019

3.12 Further details relating to the consultation with residents are set out in the Statement of Community Involvement.

4.0 Planning Policy Considerations

- 4.1 This section provides a list of the planning policies and guidance documents of relevance to the consideration of the planning applications.

National Planning Policy

- 4.2 The revised National Planning Policy Framework (NPPF) was published by the Government on 25 July 2018 and sets out the overarching national policy framework for planning. The NPPF identifies the economic, environmental and social dimensions of sustainable development (paragraph 8). It has subsequently been revised in February 2019.
- 4.3 The NPPF also applies a 'presumption in favour of sustainable development' (Para 11) whereby Local Planning Authorities should plan positively to meet the development needs of an area and planning decisions must take account of the proposals accordance with the development plan. Or where the plan is out of date or silent then proposals should be granted where benefits outweigh adverse impacts and the proposals have been assessed against the policies of the NPPF as a whole.
- 4.4 The following NPPF principles are considered particularly relevant to the Application Scheme:
- Delivering a sufficient supply of homes
 - Decision making;
 - Making effective use of land;
 - Promoting sustainable transport;
 - Achieving well-designed places;
 - Meeting the challenge of climate change and flooding;
 - Conserving and enhancing the natural environment
- 4.5 Paragraph 59 confirms the Government's objective of significantly boosting the supply of homes. Planning policies and decisions should promote and support the development of under-utilised land and buildings as well as 'support opportunities to use the airspace above existing residential and commercial premises for new homes'. In particular, they should support 'upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene', is well-designed, and 'can maintain safe access and egress for occupiers'.

- 4.6 Paragraph 39 highlights the importance of early engagement to support 'better coordination between public and private resources and improved outcomes for the community'. Paragraph 128 goes on to emphasise the importance of "early engagement with the local planning authority and local community about the design and style of emerging schemes" to ensure that proposals reconcile differing interests and meet local expectations.
- 4.7 The government's commitment to achieving a well-designed place is set out in section 12. The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve (paragraph 124). This requires the evolution of development proposals to consider quality (paragraph 128). New development should protect against a range of impacts arising from climate change, through suitable adaptation measures, such as increasing green infrastructure, can help to reduce greenhouse gas emissions (paragraph 150), and avoid development on the most vulnerable locations with the lowest flood risk (paragraph 163).
- 4.8 Well-designed places also require the active management of growth in a local area. Local authorities are encouraged to support proposals, which prioritise the creation of places which are safe, secure and attractive and minimise the scope for conflicts between pedestrians, cyclists and vehicles, while also responding to local character and design standards (Paragraph 110). Proposals should only be prevented on highways grounds if unacceptable impacts on highway safety, or the residual cumulative impacts on the road network are considered to be severe.
- 4.9 The National Planning Practice Guidance (NPPG) documents were published from March 2014 and used in July 2018 to reflect the revised NPPF (2018), providing contextual support for the Framework. The following NPPG documents are considered relevant to the Application Scheme:
- Air Quality (2014);
 - Climate Change (2014);
 - Community Infrastructure Levy (2018);
 - Consultation and pre-decision matters (2014);
 - Design (2014);
 - Making an application (2014);
 - Open space, sports and recreation facilities (2014);
 - Planning Obligations (2016);
 - Viability (2014).



Local Planning Policy

Reading Borough Council

- 4.10 The Development Plan for Reading Borough Council comprises adopted Local Plan and Proposals Map (November 2019) which covers the period up to 2036.
- 4.11 Other policy documents include: the Community Infrastructure Levy Charging Schedule (January 2015); Annual Monitoring Report 2018.

Supplementary Planning Documents

- 4.12 Supplementary planning documents include: Affordable Housing SPD (July 2013); Revised Parking Standards and Design SPD (October 2011); Planning Obligations under S106 (April 2015), and Sustainable Design and Construction SPD (July 2011).

Community Infrastructure Levy (CIL)

- 4.13 The Community Infrastructure Levy (CIL) is a source of funding from developments, whose aim is to assist in supporting local infrastructure delivery in order to ensure future housing and employment growth envisaged in its Local Plan can be accommodated sustainably.
- 4.14 The Reading Borough Council charging schedule was adopted in 2015. The charge for residential development is £120 / sqm across the Borough.
- 4.15 All relevant CIL forms have been completed and accompany this planning application.

5.0

Planning Assessment of the Proposal

Key Planning Considerations

5.1

This section and the following section of the Planning Statement assesses the key planning considerations for the proposed development, which are as follows:

- (i) the acceptability of residential development on the site, including the provision of affordable housing;
- (ii) the proposed density of the development;
- (iii) the preservation of residential amenity of neighbouring properties, in terms of the scale, bulk, massing and layout of the proposed dwellings;
- (iv) the car parking provision;
- (v) the proposed landscaping and open space strategy;
- (vi) the sustainability of the proposal.

Planning Designations

5.2

The extract of the Proposals Map below shows that the majority of the site does not have any designations. The most north-western corner is located within in an Air Quality Management Area, and a cycle route runs along Wensley Road to the north. To the south of the site is an area designated as a Major Landscape Feature which is also covered by the Area of Archaeological Potential designation. There are green links to the east and west of the proposal site.

Figure 5.1 Extract from Reading Borough Council Proposals Map





- 5.3 In order to assess the acceptability of the proposed redevelopment of the site to provide 46 new affordable dwellings (C3 use class), it is necessary to first have regard to housing need in Reading and relevant national, regional and local plan policies in relation to housing need in Reading.
- 5.4 The importance of providing high quality housing is a key part of Reading's vision for the plan period to 2036 as set out in the adopted local plan (November 2019). Policy H1 Provision of Housing of the local plan states that provision will be made for at least an additional 15,847 homes, averaging 689 homes per annum, during the period 2013 to 2036.
- 5.5 The policy goes on to state that there is a shortfall of 230 dwellings that cannot be provided within Reading Borough itself. Therefore, there is a need to ensure that developments, such as the one proposed at the Wensley Road site are brought forward, to ensure that the shortfall does not increase.
- 5.6 The Annual Monitoring Report 2018-2019 notes that housing delivering in the last five years has been strong, and the last four of which have seen housing delivery over the objectively assessed need identified in the SHMA. Completions in 2018-19 were the highest since 2005 (paragraph 8.3).
- 5.7 The AMR 2018-2019 notes that Reading has a housing land supply (Use Class C3) of 5.56 years against the Local Plan housing targets.

Affordable Housing Statement

5.8 It is a key objective for Reading Borough Council to deliver more housing especially affordable homes.

5.9 Policy H5 Affordable Housing states that:

Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading

- *On sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing;*
- *on sites of 5 – 9 dwellings, a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided will be as affordable housing elsewhere in the Borough; and*
- *On sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.*

For sites of 10 or more dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

In all cases, 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

In determining residential applications the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development.

Priority needs are currently for housing with two or more bedrooms that can house families. The Council will regularly monitor and review the need for, and delivery of, affordable housing.

The following types of residential development will be except from the requirement to provide affordable housing:

- *Replacement of a single dwelling with another single dwelling; and*
- *Conversion of a dwelling to self-contained flats where there is no new floorspace.*

Affordable housing requirement

- 5.10 The SHMA 2016 for Berkshire identifies that there is a total need of 970 affordable homes per annum for Reading; taking into account the supply from existing stock (564) there is a net need of 406 affordable homes per annum.
- 5.11 In terms of the dwelling size, the SHMA 2016 estimates the need for different sizes of affordable homes based on analysis of demographic trends. For the period 2013 to 2036, approximately 75% of the need is for one and two bed homes across the area covered by the SHMA, and for Reading Borough itself.
- 5.12 The requirement for affordable homes for Reading Borough is set out below:

Figure 5.2 Extract of table 108 Estimated size of accommodation required by number of bedrooms (2013 to 2036) – Affordable Sector

Local authority		1 bed	2 bed	3 bed	4+ bed	Total
Reading	No.	1,490	1,129	741	72	3,433
	%	43.4%	32.9%	21.6%	2.1%	100.0%

Affordable housing completions

- 5.13 With regard to affordable housing completions, the AMR 2018 – 2019 states that a total (gross) of 158 affordable homes were completed. It is noted there has been a significant increase in the affordable housing completions in 2018 – 2019, as compared to 2017 – 2018 (66 affordable homes); 2017 – 2017 (60 affordable homes); and 2015 – 2016 (52 affordable homes). The AMR notes that the delivery of affordable homes is likely to increase as there are 149 affordable dwellings under construction, but the total likely provision will fall well below the requirement for 406 affordable homes per annum (paragraph 8.15).

Affordable housing offer

- 5.14 The application proposes 46 new homes, all of which will be affordable. The accommodation schedule is set out below. The largest proportion of homes will be 3 bedroom (57%), with smaller proportions of 1 bedroom (17 %) and two bedroom (21% homes).

Figure 5.3 Proposed affordable housing

Unit size	Bed space per unit type	Habitable rooms per unit type	Total units	Total bed spaces	Total habitable rooms	mix
1B1P	1	1	2	2	2	4%
1B2P	2	2	6	12	12	13%
2B3P	3	3	2	6	6	4%
2B4P	4	3	8	32	24	17%
3B6P	6	5	26	156	130	57%
4B7P	7	6	2	14	12	4%

Conclusion

- 5.15 The application proposes 46 new homes, all of which will be affordable and will contribute to the affordable housing need of 406 dwellings per annum.
- 5.16 Although this proposal does not meet the indicated housing mix requirement for affordable homes as set out in the SHMA 2016, a number of schemes in Reading have recently been granted planning permission for 1 and 2 bedroom homes (affordable and market housing) and therefore there is a need for affordable family homes which will be provided through this scheme.

Principle of residential development

- 5.17 There is a clear housing need in Reading. Planning policy at a local and a national level also encourages the efficient use of land to boost the supply of housing and meet housing need.
- 5.18 The adopted local plan sets out the intention that Central Reading will be the focus of much of the development, and some new development will be located in South Reading.
- 5.19 The adopted plan recognises that there is scope for small scale regeneration of suburban areas through renewal and reconfiguration. The proposal site is located on the Coley Park Estate, and Policy H14 supports redevelopment within the suburban context, in which the Wensley Road site is located. The aims of the policy to:
- improve the local built environment;

- improve and modernise the housing stock; and
- deliver additional homes.

5.20 If a development satisfies these aims, the policy goes on to say that it would generally be supported, provided that:

- Any loss of undeveloped land brings qualitative improvements to open and green space, and benefits to the community as whole;
- Buildings and features that make a positive contribution to the character of the area are retained;
- there would adequate community facilities to serve the resulting community; and
- there would not be unacceptable impact on the highway network as a result of loss of parking areas or garages.

5.21 Paragraph 4.4.104 states that 'the principle of [small scale regeneration] is generally to be welcome, and the policy aims to provide support to such proposals where they do not result in unacceptable impacts on the existing area.'

5.22 The proposed new dwellings, all of which will be affordable, will increase the housing stock in Reading Borough Council with high quality homes built to modern housing standards.

5.23 The new housing will be located on land in the northern part of the site boundary. The area that will be developed by residential development is currently used for garages, open space and hard standing. It is also proposed to improve the landscaping and amenity spaces, as well as the children's play spaces, which are located in the centre of the site.

5.24 The proposed terraced blocks will create a street edge along the northern side of the Wensley Road loop. Consideration has been given to the siting and location of these dwellings in relation to the existing dwellings, so that amenity is preserved for existing residents. The proposed flatted block will front on to the improved communal amenity space at the heart of the Estate, creating opportunities for overlooking and passive surveillance of this new open space.

5.25 As the following sections show, the proposal will bring benefits to the existing Estate through landscaping and enhancements to the public realm and amenity space, and the provision of additional housing, all of which will be affordable.

- 5.26 Consideration to car parking spaces and other transport related matters is given in Section 7.0. The proposed landscaping and open space strategy will also be considered in Section 7.0 of this planning statement.

Housing Mix

- 5.27 Adopted Policy H2 Density and Mix states that the appropriate density of residential development will be informed by the character and mix of uses in the area in which it is located, including the housing mix. With regard to housing mix, the policy goes on to state:

'Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.'

Figure 5.4 Estimated size of accommodation type required in Reading (source: SHMA 2016)

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	10.38%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
Overall	18.6%	30.5%	36.5%	14.4%

- 5.28 The proposed mix: for the scheme is set out in table below, all units are affordable:

Figure 5.5 Proposed dwelling mix

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Number of units	8	10	26	2
Percentage	17%	23%	56%	4%

- 5.29 With respect to Policy H2, this exceeds the minimum of 50% of dwellings that are 3 bedrooms or more.

6.0 Design and Layout Considerations

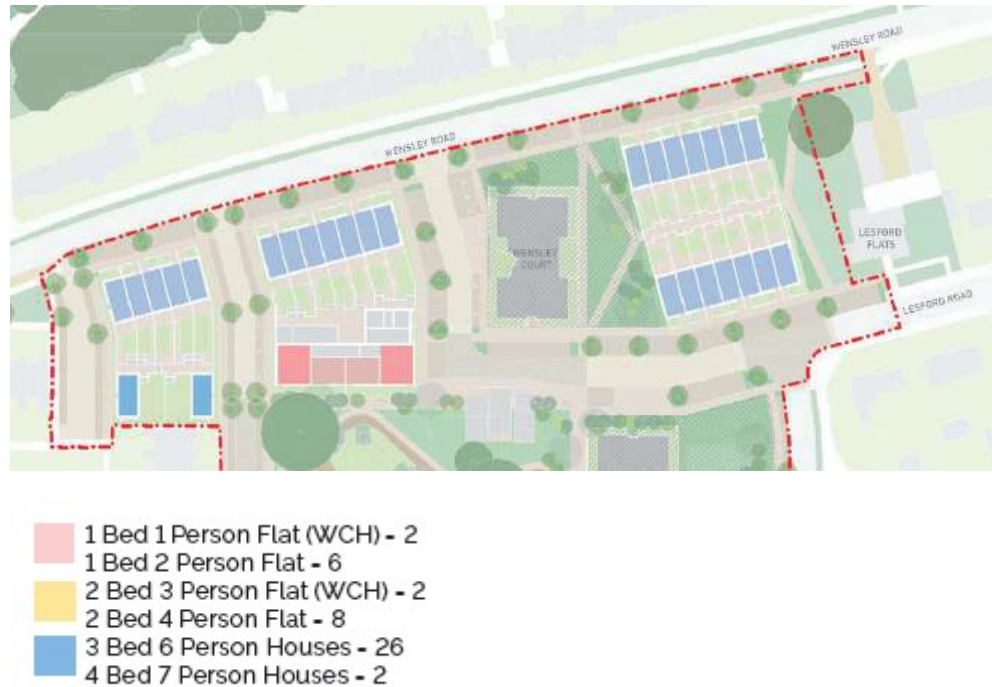
Design & Layout

- 6.1 The NPPF (2018) is clear in its recognition of the importance of good design, which is considered to be a key aspect of sustainable development (paragraph 124). The NPPF goes on to state at paragraph 127 that planning policies should ensure that developments will function well and add to the overall quality of the area for 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; establish or maintain a strong sense of place; optimising the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible, and which promote health and wellbeing.
- 6.2 Adopted Local Plan Policy CC7 Design and the Public Realm sets out the criteria against which the borough will assess the quality of design. The policy 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. These include:
- layout,
 - landscape,
 - density and mix,
 - scale and architectural details and
 - Architectural detail and materials.
- 6.3 The policy states that the scheme will be assessed to ensure that the development makes a positive contribution to urban design objectives including character, quality of the public realm, ease of movement and permeability and legibility.
- 6.4 The policy goes on to state that the developments will also be assessed to ensure that they:
- respond positively to their local context,
 - create safe and accessible environments,
 - address the needs of all in society, and

- are visually attractive as a result of high-quality built forms and spaces.

- 6.5 The policy requires that application for major development, or other relevant developments, should be accompanied for a design and access statement that deals with all the matters set out in the policy.
- 6.6 The proposed site layout concentrates development of new dwellings in the north of the proposal site which is bound by Wensley Road which forms a loop around the site. The proposal seeks to bring improvements and regeneration benefits to the site as a whole, focusing on place-making and integration with the wider urban context, rather than only providing an uplift in housing.
- 6.7 The large public amenity greenspace in the centre of the site has been the focus of the proposal, and the layout of the housing and car parking has been considered in order to maximise this open space. Improvements to the permeability through the site has been a key consideration in the layout, and therefore an east-west route through the site will be created through extension of Lesford Road to the east of the site, and the continuation of this route as pedestrian access. This east-west route also improves the connectivity of the site with the wider area, which is characterised by a green link to the east, and the pedestrian underpass under the railway which connects the Estate to the Southcote area of Reading to the east of the railway line. Wensley Road is currently a loop; Wensley Road will be stopped up to the north of Lesford Road, diverting the road through the site.
- 6.8 The three existing tower blocks on the proposal site will remain. The proposal will provide 46 new dwellings, including 26 three bedroom terraced houses, two detached four bedroom homes, and a single apartment building of 18 flats. The dwellings are designed as three coherent blocks: Block A has a block of four terraced houses, and two detached dwellings; Block B has a block of seven terraced houses, and a block of 18 flats; Block C has two blocks of seven terraced houses.

Figure 6.1 Proposed site layout (extract from DAS)



Scale, Bulk & Massing

- 6.9 The two and a half storey terraced dwellings, with the upper floor set back, are proposed along the northern edge of Wensley Road, creating a built edge along this part of the road with front doors on the street. Block C has two blocks of terraced housing. The proposed detached dwellings, which form part of Block A, are also two and a half storeys in height. The proposed height of the houses has been informed by the existing terraced houses which are two storeys, creating continuity in the built form and massing.
- 6.10 The flatted block which forms part of Block B is proposed as part four / part three storeys in height. The south facing element of the block is four storeys, facing on to the open space in the centre of the site; the proposed height steps down to three storeys on the eastern elevation providing a transition between the proposed new houses, and the existing tower blocks.

Building appearance and architectural style

- 6.11 The architectural style of the proposed terraces takes its cue from the existing terraced and semi-detached dwellings in the wider Coley Park Estate and Reading. Many of the brick terraces in Reading have the same repeated proportions, with different brick details and colours to create unique identities for different streets.

- 6.12 The proposal includes three typologies: terraced houses, detached houses and the apartment building. Consistency is created through materials, details and proportions, defining a character for the new buildings which harmonises with the existing dwellings on the Estate. A consistent facing brick is proposed for all of the main elevations, with a secondary brick colour for the detail element. Additional elements, including windows, rainwater products, canopies, coping and canopies, have been proposed to complement and allow the brick material to be read as the primary material on the elevations.

Density

- 6.13 Adopted Policy H2 Density and Mix states that the appropriate residential density is informed by:
- the character and mix in the area that it is located, including important landscape or townscape areas;
 - current and future levels of accessibility;
 - the need to achieve high quality design;
 - the need to maximise efficiency of land use;
 - need to minimise environmental impacts.
- 6.14 Appropriate densities in the adopted policy have increased in all locations as compared to the previous Core Strategy, reflecting the drive for sustainable development and an increase in housing need.
- 6.15 Indicative densities are provided in the Local Plan in figure 4.5:
- in the town centre: above 100 dwellings per hectare;
 - urban location: 60 – 120 dwellings per hectare
 - suburban locations: 30 – 60 dwellings per hectare
- 6.16 The policy notes that the criteria which informs density may not be appropriate, 'the capacity of each site will depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation'. The policy goes on to state that net density of below 30dph is not acceptable.
- 6.17 The Local Plan states at paragraph 4.4.7 that 'it is important that efficient use is made of land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, in particular the character of the surrounding areas and any other

particular sensitivities. Each site has its own particular characteristics, and it is not appropriate to set down exact densities in this policy’.

- 6.18 The proposal site can be considered to be in an urban location. As defined by the redline boundary, the site has an area of 2.36ha. There are currently 267 dwellings on the site; the proposed number of new homes is 46, bringing the total number of homes up to 313.
- 6.19 Therefore, the existing density is 113 units per hectare; the proposed density is 132 units per hectare.
- 6.20 Although the proposals would take the density beyond the urban density range (60 – 120 dwellings per hectare), this is considered appropriate for the site, and it is considered acceptable in light of the identified housing need in Reading for the plan period under the newly adopted local plan. Furthermore, there is emphasis in the local plan for sustainable development, which is achieved through higher densities.

Quality of accommodation and safeguarding amenity

- 6.21 The adopted plan states that housing standards serve an important role in ensuring resident health and well-being (paragraph 4.4.40). Therefore, Policy H5 Standards for New Housing states that new build housing should be built to the following standards:
- (a) floorspaces must comply with nationally described space standards;*
 - (b) all new buildings will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations;*
 - (c) all major new-build residential development should achieve zero carbon homes;*
 - (d) all new build housing will achieve a minimum 19% improvement in the dwelling emission rate over the target emission rate, as defined in 2013 Building Regulations;*
 - (e) all new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3);*
 - (f) on developments of 20 or more new build dwellings, at least 5% of dwellings will be for wheelchair users dwellings in line with M4(3) of the Building Regulations.*

- 6.22 It is noted in the adopted plan that new development does not reduce the quality of environment for others and ensure that development creates a quality living environment for future residents. Adopted Policy CC8 Safeguarding Amenity addresses these issues. It states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential property in terms of:
- Privacy and overlooking;
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of development;
 - Harm to outlook;
 - Noise and disturbance;
 - Artificial lighting;
 - Vibration;
 - Dust and fumes;
 - Smell;
 - Crime and safety;
 - Wind, where the proposals involve new development of more than 8 storeys.
- 6.23 The policy goes on to state:
- The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without detrimental effect on privacy.*
- Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to restrict such changes.*
- 6.24 In the remainder of this section, the Planning Statement sets out details relating to proposed unit sizes; distancing, outlook and privacy; and daylight, sunlight and overshadowing.

Proposed Unit Sizes

6.25 Policy H5 Standards for New Housing requires that dwellings must meet nationally described space standards. These standards will be met; and the table below sets out the proposed floorspace for the new dwellings:

Figure 6.1 Proposed unit sizes

Unit size	Type	Number of storeys	Nationally described space standards (sqm)	Floorspace sqm (GIA)
1B1P (WCH)	T1	1	39	50.1
1B2P	T1	1	50	50.1
2B3P (WCH)	T1	1	61	72.9
2B4P	T1	1	70	72.9
3B6P	T1	2.5	108	109.2
	T2	2.5	108	109.7
4B7P	T1	2.5	121	121.5

Distancing, Outlook and Privacy

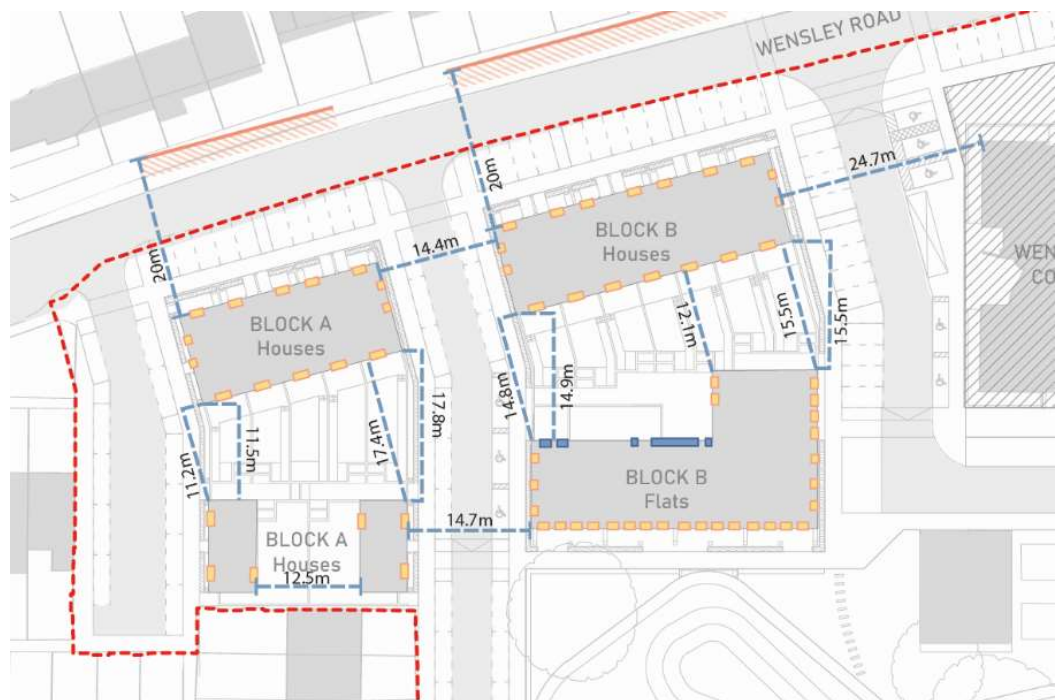
6.26 Policy CC8 which is concerned with safeguarding amenity, requires a back to back distance of 20 metres to be achieved; however the policy states that appropriate circumstances on individual sites may enable dwellings to be closer without detrimental effect on privacy. As it is demonstrated below, the required distance of 20m is not achieved in a number of locations due to the constraints of the site. The proposed mitigation measures are discussed where this distance cannot be achieved to ensure that overlooking is reduced and privacy is maintained for the existing residents.

Block A

6.27 The proposed back to back distance between the northern terraced dwellings and the detached dwellings to the rear is less than 20m; the distances range from 17.8m to 11.5m. The mitigation measures are as follows: non-parallel building alignment to reduce the opportunities for overlooking, and north-west and south-east facing windows to terrace houses and east and west facing windows on the detached houses.

- 6.28 The proposed detached dwelling houses are at a distance of 12.5m from each other. Staggered windows are proposed, to reduce overlooking.
- 6.29 The terraced housing in Block A is located at a distance of 14.4m from the terraced housing in Block B., and the detached houses in Block A are located 14.7m from the flatted block in Block B. Staggered windows are proposed to reduce overlooking.

Figure 6.2 Distances between existing and proposed dwellings: Blocks A and B



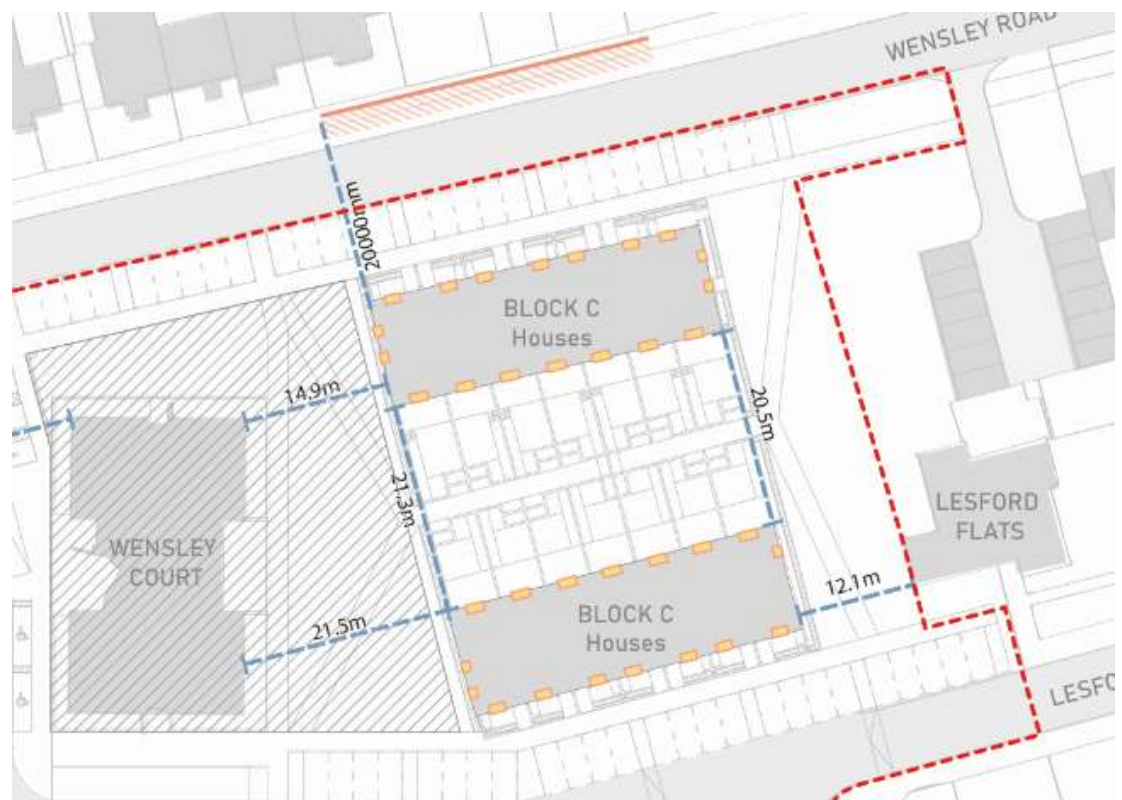
Block B

- 6.30 The proposed back to back distances between the proposed terraced dwellings and the flatted block to the rear are less than 20m: the distances range from 15.5m to 12.1m.
- 6.31 In order to address the issue of overlooking the same approach is taken as with Block A: non-parallel building alignment; and obscured and high level windows on the apartment building north elevation. All of the primary windows and balconies of the apartment building are located on the south, east and west facing elevations. It is proposed that windows on the northern elevation have obscured glazing to prevent overlooking between the apartment building and terraced housing to the north.
- 6.32 The terraced housing in Block B is located at a distance of 24.7m from the Wensley Court tower block which complies with Policy CC8.

Block C

- 6.33 The two blocks of proposed terraced housing are at a distance of 21.3m to 20.5m which meets policy requirements. In terms of existing neighbouring residential dwellings, to the west Wensley Court lies between 14.9m and 21.5m distance from the proposed new terraces; and to the east Lesford Flats are 12.1m from the southern terraced housing block. It is proposed to offset window positions to avoid overlooking.
- 6.34 The diagram below shows the distances between the proposed and existing dwellings in relation to Block C.

Figure 6.3 Distances between existing and proposed dwellings: Block C



Accessibility

- 6.35 Policy H5 Standards for New Housing requires for schemes of 20 or more units, the provision of at least 5% of dwellings to be accessible for wheelchair users in line with M4(3) of the Building Regulations.
- 6.36 The application proposes a total of 46 homes, and four of these will be wheelchair accessible homes: 2 x 1B1P, and 2 x 2B3P. Therefore, 8.6% of the proposed dwellings are wheelchair accessible, which meets and exceeds the policy requirement.

Daylight / Sunlight / Overshadowing

- 6.37 Policy CC8 Safeguarding Amenity is also concerned with access to sunlight and daylight.
- 6.38 The adopted local plan refers to the 'BRE Site Layout Planning for Daylight and Sunlight: A guide to good practice' in ensuring that new development adjacent to residential properties is not of adverse bulk and do not block out sunlight and daylight to habitable rooms and outdoor living spaces. An assessment of daylight, sunlight and overshadowing has been undertaken by HTA Sustainable Futures.

Daylight Assessment

- 6.39 A daylight assessment of the impact on existing properties has been undertaken. All properties achieve a Vertical Sky Component of at least 27% which is the minimum targets suggested by the BRE guidelines.
- 6.40 In terms of the proposed development, the houses achieve and exceed the BRE criteria for both the Average Daylight Factor and No-Sky Line tests. For the proposed flats, all the rooms achieve the minimum targets set for the NSL. Most of the rooms exceed the targets for the ADF. For those rooms which fall below the recommendations, the presence of balconies above the main window of the rooms causes this result. An additional analysis of the living rooms which fail, through the exclusion of the kitchen area, demonstrates that sufficient daylight in the living rooms is achieved. It should also be noted that the balconies reduce solar gains and provide shading in the summer months.

Sunlight Assessment

- 6.41 Existing properties have been assessed; only windows facing within 90 degrees of due south need to be assessed in accordance with BRE guidance. Overall, the sunlight analysis of the impact on surrounding properties is found to be negligible.
- 6.42 For the proposed development, the main requirement for sunlight in dwellings is in the living rooms; where possible these should have at least one window that faces 90 degrees of due south. It is recognised by BRE guidance that not all living areas will achieve compliance due to orientation, and therefore BRE guidance applies to mainly south-facing living rooms. A total of 49 windows were assessed. For all the houses, the windows achieve the minimum sunlight requirements in winter and throughout the year. For the flats, all the windows achieve good sunlight availability in winter conditions. There are some windows which are situated below balconies which blocks the solar gain.

Overshadowing

- 6.43 The overshadowing analysis shows that the proposed buildings do not overshadow the surrounding existing properties.
- 6.44 External amenity spaces have been assessed for sunlight levels. On 21st March, the communal spaces achieve and exceed the minimum criteria for sunlight provision, and a similar result is achieved for south-facing private gardens. North-facing private gardens achieve lower values of sunlight, due to the orientation of these spaces. On 21st June the spaces achieve at least two hours of sun in at least 50% of their area.

Conclusion

- 6.45 Overall it can be concluded that the proposed development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. Therefore it complies with Policy CC8 in relation to those criteria discussed in this section.

7.0 Site Assessment

Amenity Space: Private and Communal

7.1 Adopted policy DM10 Private and Communal Outdoor Space states:

Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and / or roof gardens.

7.2 The policy goes on to state:

7.3 *The design of outdoor areas will respect the size and character of other similar spaces in the vicinity, clearly identified whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.*

7.4 The adopted plan states at paragraph 4.4.86:

In determining the appropriate level of private and communal open space for the new development, the constraints of the site and the extent of deprivation of public open space within the proposed scheme will be taken into consideration (paragraph 4.4.86).

The adopted plan notes the minimum provisions for private and communal outdoor space for each type of accommodation, which can be used as a guide:

Houses: useable private outdoor space should be no less than the gross floor area of the dwelling to which it relates (measured externally and including garage space)

Flats outside central Reading: 1-2 bedrooms, 25 sqm private amenity space;
3 or more bedrooms: 40 sqm private amenity space.

7.5 The table below provides the private amenity space provision for the new dwellings:

Figure 7.1 Proposed amenity space

Unit number	Type	Amenity space provision (sq m) minimum
1B1P	T1	13.9
1B2P	T1	13.9
2B3P	T1	13.9
2B4P	T1	13.9
3B6P	T1	44.6
	T2	64.3
4B7P	T1	73.7

- 7.6 The proposed new family homes will be provided private amenity space in the form of gardens which meets and exceeds the GIA of the ground floor of each dwelling.
- 7.7 The proposed new flats are each provided with 13.9 sqm of private amenity space. This level of provision has been guided by the constraints of the area available for development. The flatted block fronts on to the high quality public amenity space, which is easily accessible, and provides additional amenity space for the residents in the flats. The application proposes improvements to the public amenity space which is discussed in the following sections.

Landscape Strategy

- 7.8 A Landscape Proposal has been provided by HTA Landscape and it is submitted as part of this application. The overall strategy seeks to:
- Promote good access from Wensley Road to existing green and active travel networks;
 - Enhance nature at Wensley Road through a nature recovery network and connected green corridors;
 - Make Wensley Road a great place to live for families with safe connections from homes to greenspaces;
 - Create a fun and stimulating natural play space with activities for all ages.

Open Space

- 7.9 The proposal includes an area of open space within which the existing tower blocks is located; according to policy it is not designated. Within the immediate area is Coley Park to the east, Courage Park to the north, and to the south is Fobney Meadows. The adopted Local Plan notes that 'access to high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities' (paragraph 4.2.27).
- 7.10 There are three key policies in the plan which can be considered in relation to the submitted application which are set out below.
- 7.11 Policy EN7 protects the identified local green spaces and public open spaces. Courage Park to the north of the site is identified as a public open space (EN7Wg). Policy seeks to ensure that these local green spaces and public open spaces are not lost through development, and their quality is not eroded through insensitive adjacent development, or their use and enjoyment by the public is not jeopardised.
- 7.12 Policy EN8 states there is a presumption in favour of retaining undesignated open space: development should not result in the loss of or jeopardise the use and enjoyment of these spaces. Development may be permitted if a replacement open space can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided at sufficient level to outweigh the loss of the open space.
- 7.13 Policy EN9 states that new development is required to make provision for the open space need of the development. On sites less than 50 dwellings, or in areas not identified as deficient in the provision of open space, new open space provision, improvement or enhancements will be sought through appropriate contributions. New open space should:
- Be in useable parcels of land and not be fragmented;
 - Be safely and easily accessible and not severed by any physical barrier, including a road;
 - Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm;
 - Create a safe environment, appropriately considering lighting and layout to reduce the fear of crime;
 - Provide some informal landscaping for aesthetic, wildlife and recreational purposes; and
 - Link into the Green Network where possible.

- 7.14 The adopted plan notes that the amount and / or quality of open space in the Borough should increase over the plan period due to the growing population.

Establishing whether there is a deficit of open space in the area

- 7.15 Policy ENg states that sites proposing less than 50 dwellings or in areas which do not have a deficit of open space, are required to provide new open space, improvements or enhancements.
- 7.16 Details on the provision of open space in Reading Borough can be found in the Open Spaces Strategy 2007, and the subsequent Strategy Update 2018.
- 7.17 The 2007 Strategy identifies the existing open space on the Estate as having 'restricted' access for the public.
- 7.18 In terms of accessibility, the Open Space Strategy and Strategy Update have analysed the areas of Reading with permanent residents in relation to 400m and 600m distance from an identified open space. The analysis shows that the proposal site is located within the 400m and 600m buffer of recreational open space.
- 7.19 Overall, the Strategy Update notes that between 2001 and 2011, the population of Reading Borough grew 8.8%, which was higher than the national rate of 7% (paragraph 4.1), and that in the last ten years there has been a small increase in the amount of recreational open space.
- 7.20 The Strategy Update concludes that in the last ten years there has been a small increase in the amount of recreational open space, and access to open space has slightly increased with a slightly greater proportion of Reading falling within a 400m buffer of recreational open space.
- 7.21 Therefore, the proposal site is not located in an area which has an open space deficit, and overall within the Borough the accessibility has improved. However the proposed scheme seeks to reconfigure the existing open space, and Policy ENg sets out requirement for the new open space. These criteria are discussed in relation to the proposed scheme in the subsequent sections.

Impact of the proposal on the existing open space provision

- 7.22 The open space on the proposal site is undesignated. Policy EN8 states there is a presumption in favour of retaining undesignated open space. Development may be permitted if a replacement is provided, that is accessible, or if improvements are made to recreational facilities that are at a sufficient level to outweigh the loss of the open space.

7.23 The proposal seeks to provide new housing, in the form of three new blocks located in the northern portion of the site. The current land use is undesignated open space, garages and car parking.

7.24 The table below shows the existing and the proposed open space.

Figure 7.2 Existing and proposed open space

Typology	Existing (sq m)	Proposed (sq m)
Public greenspace	11.275	4.378
Non accessible / underused greenspace	2.039	-
Communal private greenspace	-	3.211
Private back gardens	-	1.832
Paths	3.071	3.463
Roads / parking	5.409	6.919
Built footprint	1.892	3.883

7.25 The table shows that, due to the increase in the built footprint by approximately 2,000 sqm (from 1,892 sqm to 3,883 sqm) there is a decrease in the amount of public greenspace on the proposal site by just under 7,000 sqm (from 11,275sqm to 4,378sqm).

7.26 Although there is reduction in public greenspace, there is an increase in other forms of greenspace which are not currently provided on the site: communal private greenspace has been provided: 3,211 sqm; and private back gardens are provided for the new dwellings: 1,832sqm.

7.27 Therefore, overall a total of 9,421 sqm of greenspace will be provided on the site, which represents a reduction of greenspace by some 1,854sqm, which is approximate to the increase in built footprint.

Improving access to open space in the local area and new open space provision

7.28 Policy protects existing open space, and seeks to ensure that its quality is not negatively impacted. Policy also states that open space which replaces open space that is lost due to development is accessible and outweighs the loss, and any new open space that is provided is accessible, safe and provides some informal landscaping and links to the Green Network where possible.

- 7.29 Through the improvement of the quality of open space, the provision of greenspaces for communal and private use, as well as a range of design interventions which will attract a wider range of users, accessibility to greenspace will be improved.
- 7.30 The measures proposed in the landscape masterplan successfully address the requirements for new open space as set out in Policy ENG:
- the centrally located open space is easily accessible for existing and new residents;
 - the shared surface streets facilitate accessibility to the open space;
 - provision of 5-11 year old's play area, under 5's play area, seating area (including a memorial bench), outdoor gym and perimeter exercise trail provides a range of activities for different age groups;
 - new street trees and native woodland buffer will bring biodiversity and environmental benefits;
 - new lighting in the public realm will improve safety;
 - the provision of private rear gardens for the new dwellings will provide access to playable space for young children and amenity space for all the family;
 - linkages to the existing green network and wider area will be provided.

Arboricultural Impact Assessment and Method Statement and Proposed Tree Planting

- 7.31 Adopted Policy EN14 require trees, hedges and woodlands to be protected from damage or removal where they are of importance. The policy requires new development to make provision for tree retention and planting, particularly on the street frontage, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. There is also a requirement that the trees are adequately maintained.
- 7.32 A Tree Survey, and Arboricultural Impact Assessment and Method Statement have been undertaken by ACD Environmental. These documents form part of the submission. The proposed layout, and its impact on the trees has been developed through consultation with residents and the officers at Reading Borough Council.

7.33

The proposed development will:

- Retain all the Category A trees;
- Large areas of existing hard surfacing currently within the RPA of higher category trees will be removed and returned to soft landscaping;
- The large high category Turkey Oaks within the interior of the site will be retained and their growing environment improved;
- Three trees (T87, T90, T93) will be removed due to declining health; this removal is part of council works, and is not a result of the planning proposal;
- There will be no construction within RPAs of retained trees.

7.34

The table below shows the number of trees that will be removed as a direct result of the current design:

Figure 7.3 Trees to be removed as a direct consequence of development

BS Category	Number of individual trees	Number of groups	Number of trees within groups
U	10	0	0
A	0	0	0
B	22	2	40
C	34	11	169

7.35

The submitted Arboricultural Impact Assessment and Method Statement also provides consideration on the following issues: on trees that require to be pruned; protection for retained trees; shade and future pressure to prune; protecting trees to ensure that infrastructure trenches near to services do not cause damage; alterations to levels close to trees must be carried out in a sensitive manner; and all plot boundaries are to be designed, positioned and installed to avoid damage to retained trees.

7.36

A total of 184 new trees will be planted.

7.37

A tree planting strategy is set out in the Design & Access Statement. In summary:

- New street tree planting species will be selected to reflect the street hierarchy;

- Large monocultures to be avoided, creating species diversity;
- Include native fruiting and flowering species;
- New native woodland buffer planting at the perimeter of the site;
- New large species and locations for these trees identified to maintain the character of the central space which is currently planted with mature Turkey oaks.

7.38 Further details are set out in the Design & Access Statement.

Preliminary Ecological Assessment

7.39 An Ecological Impact Assessment by ECOSA forms a part of the application submission and a final report will be submitted following the remaining surveys of trees that have been identified as having moderate potential for bat roosting.

7.40 In summary:

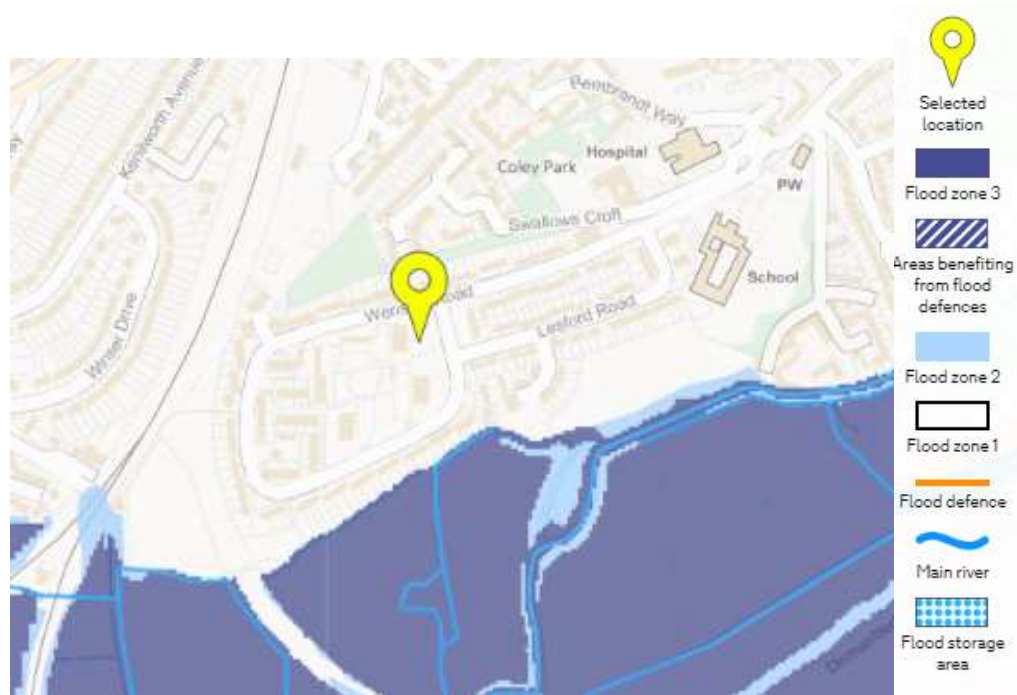
- Holy Brook LWS and the River Kennet and Avon Canal LWS lie 300 metres and 600 metres south of the site respectively. These designated sites will not be impacted by the proposals.
- The habitats of relatively greatest importance on the site are the mature scattered trees. The site offers suitability for invertebrates, tree roosting bats, foraging and commuting bats and nesting birds and there is a risk that these features could be impacted by the proposals in the absence of suitable mitigation;
- Mitigation recommended includes the implementation of a CEMP during site preparation and clearance. The CEMP would include detail such as the use of tree protection barriers and sensitive timings of vegetation removal ecological supervision for certain aspects of works;
- Trees assessed as having low suitability for roosting bats will require removal under ecological supervision. Further surveys are being carried out during January 2020 of trees with moderate bat roosting suitability. Further recommendations for mitigation in relation to these trees may be required upon completion of the survey. None of the buildings on site (the flats have not been included in the assessment) have bat roosting suitability;

- Mature trees should be retained where possible. Where tree removal is unavoidable, dead wood should be retained on site to create habitat for invertebrates.
- There are opportunities for site enhancement through the provision of suitable native species planting (with appropriate ongoing management), provision of bat and bird boxes and the creation of habitat for invertebrates. A site-specific EMEP is recommended and this would provide details of mitigation, compensation and enhancement;
- Given the impacts identified and the mitigation, compensation and enhancement measures proposed, it is considered that the proposals accord with all relevant local and national planning policy;
- If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 18 months of the date of the most recent relevant survey.

Flood risk and sustainable urban drainage assessment

- 7.41 The NPPF requires a Flood Risk Assessment for proposals of 1 hectare or greater in Flood Zone 1; this criteria applies to the proposal. Therefore, an FRA has been undertaken for the proposal by WFBA, and it is submitted as part of the application. The findings are summarised below.
- 7.42 According to the Environment Agency maps, the site is located in Zone 1. The diagram below shows the flood risk zone for the site

Figure 7.4 Flood Risk Map



- 7.43 The site is regarded as having less than 1 in 1000 annual probability of fluvial flooding. The site is located approximately 110m from flood zones 2 and 3, and therefore fluvial flooding is not considered to be a risk.
- 7.44 The site is not considered to be at risk from tidal flooding as it is located approximately 75km inland from the nearest coastal water.
- 7.45 In terms of surface water flooding, according to the Environment Agency website, the proposed site is at low risk although there are some areas around existing garages to the west and surrounding roads which are rated at medium and high risk of surface water flooding. The figure below shows the surface water flood risk for the site.

Figure 7.5 Surface Water Flood Risk map



7.46 It is considered that the site is not at risk from groundwater flooding.

Sustainable Urban Drainage Strategy

7.47 The site is located Flood Zone 1. A SUDs report has been prepared by WFBA and it is submitted as part of the application. The objective of the proposed SUDs is:

- to ensure development does not increase potential flooding; there is the opportunity;
- to reduce the potential for flooding off site, if the opportunity arises;
- to ensure that surface water flooding is managed so that there is an acceptable level of protection for new and existing developments downstream of the site.

7.48 The design of the surface water drainage strategy is guided by the Flood and Water Management Act 2010, RBC SFRA, the NPPF and the relevant chapters of PPG25: Development and Flood Risk. The guidance seeks to ensure that the method of discharge of surface water does not increase flood risk elsewhere.

7.49 As there is no ground investigation data currently available for the site to provide detail on infiltration rate, consideration must be given to discharging surface water into a watercourse. The site is currently developed as open space and residential development. It is proposed that the surface water system for the new development can connect to the existing surface water

network, which discharges into the Holy Brook, running near the southern boundary of the site.

7.50 The outfall rate has yet to be agreed with Reading Borough Council. An outfall rate of 10.1 l/s is proposed; the calculations used to arrive at this figure are provided in the SUDs report.

Summary

- The FRA demonstrates that the site will not increase the risk of flooding elsewhere.
- The surface water strategy proposes to use permeable paving as the attenuation structure.
- Attenuated surface water will be discharged at a combination of greenfield and a reduction of brownfield rate, of 10.1 l/s.
- This outfall rate will be restricted to this rate for all storm events up to and including a 1 in 100 year storm event, plus 40% climate change allowance.
- Separate foul and surface water networks will be utilised by the development.

Microclimate Assessment

7.51 Policy CC8 Safeguarding Amenity seeks to ensure that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of 11 criteria, including wind.

7.52 A pedestrian wind comfort analysis assessment of the proposed development has been undertaken to establish the wind comfort of the proposed scheme.

7.53 In summary:

- Private gardens and building entrances achieve conditions suitable for expected activities, and there are no significant issues regarding wind microclimate.
- Some areas of the rest of the site achieve conditions suitable for other types of activity such as 'strolling' and 'business walking'. 'Unsafe' conditions may develop.

- However, higher velocities are not caused by the proposed buildings, which will help to break down wind flows and reduce the negative effects generated by the three existing tower blocks.

Mitigation measures are not considered necessary as the proposed blocks do not worsen the situation. Measures to improve the microclimate conditions have been described to suggest solutions which might be considered in the future.

Transport

7.54 Policy TR1 Achieving the Transport Strategy states:

Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local plan actions.

Planning permission will not be granted for major development proposals unless there is a commitment to implement measure to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures.

All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.

7.55 In accordance with Policy TR1 which seeks to promote and improve means of sustainable transport, provision is made for cycle parking, and improving accessibility to public transport. Consideration is also given to car parking provision in accordance with policy requirements. These issues are discussed further in the following sections.

Car parking and bicycle parking

7.56 Adopted Policy TR5 Car and Cycle Parking and Electric Vehicle Charging

Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Development should make the following provision for electric vehicle charging points:

All new houses with dedicated off-street parking should provide charging points;

Within communal car parks for residential or non-residential development of at least 10 spaces, 10% of spaces should provide an active charging point.

7.57 Revised Parking Standards and Design SPD (October 2011) sets out the maximum car parking standards and cycle parking requirements. The eastern part of Wensley Road and Lesford Road are located in Zone 2 which is defined as 'areas directly surrounding the core area, well served by public transport'.

7.58 Car parking requirements for Zone 2:

- 1-2 bed flat, 1 and 2 bed house: 1 space
- 3+ bed flat: 1.5 spaces
- 3 and 4+ bed house: 2 spaces
- Visitor spaces: 1 space per 10 dwellings (flats only)

7.59 The SPD notes that should a developer require fewer spaces than are set out here, then there would need to be demonstration to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result.

7.60 The western part of Wensley Road is located in Zone 3: Secondary Core Area. This zone is defined as covering a variety of land uses within 400m walk of high frequency bus services, and has different car parking requirements:

- 1 bed house: 1 space
- 1 – 2 bed flat, and 2 bed house: 1.5 spaces
- 3+ bed flat, 3 and 4+ bed house: 2 spaces
- Visitor spaces: 1 space per 4 dwellings (flats only)

Existing and proposed car parking on the site

7.61 A Transport Statement undertaken by WYG is provided as part of the planning application submission. A parking survey has been undertaken in the daytime and night-time in November 2019 to determine the existing use of the car parking spaces. This is summarised in the table below:

Figure 7.6 Summary of parking survey, November 2019

	Capacity	Occupied	Free spaces	Parking stress
21 st November 2019 Time: 13.00				
	192	115	77	60%
27 th November 2019 Time: 00.30				
	192	187	5	97%

7.62

The existing car parking ratio has been calculated and following discussions with the Highways Officer, a car parking ratio has been agreed that is appropriate for the site and the car level ownership. Census 2011 data for the Reading 013B output area which covers an area around the western end of Wesley Road shows that car ownership is 0.82 vehicles per dwelling.

Figure 7.7 Car parking space provision

	Existing	Proposed	Total
Number of dwellings	267	46	313
Car parking spaces	192	38	230
Car parking ratio	0.72	0.82	

Car parking strategy key points:

- The proposed layout provides spaces of 2.4m x 4.8m, with an aisle width of at least 6m to facilitate manoeuvring. This is an improvement on the existing parking courtyards which provide smaller car parking spaces, and aisle widths of around 4.5m. Therefore, the proposed parking layout provides a significant betterment for users of the existing car parks.

- Wheelchair accessible bays will be provided in close proximity to the wheelchair accessible dwellings. The number of spaces exceed the policy requirements.
- Groups of 4 parking bays with electric charging points are located in 8 locations through the site so that they are accessible to all existing and new residents. The provision exceeds the policy requirements.

Cycle parking

7.63 Cycle parking requirements in Reading are the same for all zones:

- One and two bed flats require 0.5 cycle parking spaces;
- 3 or more bed flats, and 1 bed houses require 1 cycle space;
- houses of 2, 3 and 4 or more beds require 2 cycle spaces.
- Motorcycle parking requirements: this must be 2% of the maximum total car parking provision, on developments of 10 or more units.

7.64 Adequate cycle storage in accordance with policy is provided for each of the blocks. For the houses, cycle storage is accessed from the pedestrian mews at the rear of the blocks: each house will have a store for two bikes. For the flatted block, a communal cycle storage is provided to accommodate one cycle space per flat with double stacked cycle racks, accessed from the secondary entrance.

Alteration to Wensley Road

7.65 Wensley Road currently forms a loop which encircles the existing tower and area of proposed residential development. The proposed submission includes an alteration to Wensley Road running to the north from Lesford Road, which currently accommodates a bus lay-by and stop. The road will be diverted through the site, and the bus stop relocated to this new section of road.

7.66 Policy TR3 Access, Traffic and Highway Related Matters states that in considering applications which make new or altered access to highways, development will only be permitted where:

- (i) *Accesses and works the highway comply with the adopted standards of Transport Authority;*
- (ii) *The development would not have a material detrimental impact on the functioning of the transport network;*

- (iii) *The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*
- (iv) *The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and*
- (v) *For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.*

7.67 The policy also states:

Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the free flow of traffic on the network or the safe use of the road.

7.68 The figure below shows the area of the road that will be stopped up, extracted from the Transport Statement.

Figure 7.8 Diversion of Wensley Road



7.69 The 11 Bonze buys route will be diverted along the new road alignment. Swept path analysis has been undertaken, and the details are included in the Transport Statement. It is demonstrated that the 11 Bronze route can safely negotiate the new route and access the new bus stop. Permission for

the stopping up order and diversion will be sought separately to this planning application.

Refuse and recycling

- 7.70 Terraced and detached housing: each house will be provided with an enclosure to accommodate 1 x 240 litre general waste bin, and 1 x 240 litre recycling bin.
- 7.71 The wheelchair accessible ground floor flats will also be provided with an enclosure for 1 x 240 litre general waste bin, and 1 x 240 litre recycling bin.
- 7.72 The other dwelling units in the flatted block will be provided shared refused and recycling store, which will accommodate 2 x 1100 litre general waste bins, and 2 x 110 litre recycling bins. This exceeds the Reading Borough Council requirements for weekly collection.
- 7.73 Further details are set out in the Design and Access Statement.

Archaeology

- 7.74 An Historic Environment Assessment has been undertaken by Compass Archaeology which is submitted as part of this planning application.
- 7.75 In summary:
- it is considered that there is a medium potential for prehistoric remains,
 - there is a low potential for Saxon archaeological remains as the site lay between three settlements which are thought to have existed in the Saxon period.
 - there is considered to be medium potential for encountering medieval and post-medieval remains during the groundworks for the proposed development.
- 7.76 Due to the medium potential for encountering prehistoric, medieval and post-medieval finds and features, and in light of the total loss of any potential archaeological remains through the foundations of the new buildings, some form of archaeological mitigation may be required. It is suggested that this mitigation could take the form of an appropriately worded condition attached to an approved planning consent, rather than any pre-determined action.

Sustainability and Zero Carbon

7.77 Reading Borough Council declared a Climate Emergency in 2019, and are committed to working towards achieving carbon neutral Reading by 2030. Policies in the newly adopted Local Plan reflect this support for sustainable development:

- Policy CC1 Presumption in favour of Sustainable Development states that a positive approach will be taken to considering development which reflects this presumption.
- Policy CC2 Sustainable Construction and Design states that proposals will be acceptable where the design of buildings and site layouts use energy, water, minerals and materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. In relation to residential development, the policy requires that the proposal should include recycling greywater and rainwater harvesting where systems are energy and cost effective.
- Policy CC3 Adaption to Climate Change states that all developments must demonstrate how they have been designed to incorporate measures to adapt to climate change, which include: orientation of new buildings to maximise opportunities for natural heating and ventilation and reducing exposure to wind and other elements; demonstrate how buildings are maximised resistance and resilience to climate change; use of trees and other planting where appropriate as part of a landscape scheme; minimise impact of surface water runoff from the development in the design of the drainage system.

7.78 In addition, specifically in relation to housing, Policy H5 Standards for New Housing requires at part (c) that all major new-build residential development should achieve zero carbon homes.

Energy Strategy

7.79 An energy strategy for the scheme has been prepared Hoare Lee and it is submitted as part of this application. A three-step approach has been taken to reducing the carbon dioxide emissions:

- Be Lean: reduce the building's energy requirements by incorporating passive design measures and reduce the building's energy consumption through the use of energy efficient mechanical and electrical engineering systems.

- Be Clean: reduce the building's carbon dioxide emissions by supplying energy more efficiently.
- Be Green: reduce the building's carbon dioxide emissions through the use of renewable technologies.

7.80 Through the use of fabric first measures, and high efficiency systems (Be Lean), the proposed development can achieve a 40% reduction in regulated carbon emissions when compared to SAP 10 baseline building.

7.81 It has been established that it is not possible to connect to a nearby District Heating Network as there is not one within close proximity of the site. A site-wide heat network in the form of a Combined Heat and Power has been considered but it is likely to offer a 'negative benefit' within the next five years due to expected proposed changes to Part L, and therefore it has not be explored as part of the energy strategy.

7.82 Therefore at the Be Clean stage, the carbon dioxide emissions remain the same as at the Be Lean stage, 40% below the baseline scheme.

7.83 Through a review of renewable technologies (Be Green) it is established that solar photovoltaic cells (PVs) and Air Source Heat Pumps (ASHP) are appropriate technologies for this development and they will be adopted into the site. With the inclusion of PV arrays and the ASHP, the estimated reduction in regulated carbon dioxide emissions is approximately 60% below the energy efficient (Be Lean) scheme and 100% below the Part L 2013 baseline scheme. This represents an annual saving of approximately 72 tonnes of CO₂.

7.84 The scheme is considered to address the key elements of the Reading Local Plan on energy, and it will be make positive contribution to reducing the Borough's CO₂ emissions.

Sustainability

7.85 A Sustainability Statement has been prepared by HTA Design LLP and submitted as part of this application.

7.86 In summary, the key elements of the proposed development which address resource efficiency and environmental protection:

- The proposed new homes will be built to high sustainable standards, and secure good daylighting, use of high quality materials and a healthy indoor environment;
- It is estimated that the proposed development will save 100% of carbon emissions compared to the Part L 2013 baseline by: using

passive design measures, supplying energy efficiently; using renewable energy systems.

- The site has access to existing green and active travel networks, and a nature recovering network and connections to green corridors will enhance nature on the proposal site. Improvements will be made to a natural play space for children, providing activities for all ages.
- The site is well located to access sustainable modes of travel;
- There will be enhanced landscape and biodiversity value, linking to the surrounding biodiverse rich landscape and the expanded green network;
- The effective use of resources will be optimised and the impact on the existing environment across construction and operation processes are kept to a minimum. Noise, waste, water consumption and air pollution are addressed; responses are incorporated into the design and management framework.

7.87

Therefore, the proposal will provide new homes at higher sustainable standards and ensure a healthy indoor environment, create a saving of 100% of carbon emissions compared to the predicted baseline; provide opportunities for more sustainable modes of transport, through the prioritisation of walking and cycling; enhance the external landscape and biodiversity values; optimise resources used and minimise their impact on the existing environment across all construction and operation stages.

8.0 Summary and Conclusions

- 8.1 Section 1 sets out the key planning considerations relevant to the redevelopment of this site include:
- i. the acceptability of residential development on the site, including the provision of affordable housing;
 - ii. the provision of high quality new dwellings;
 - iii. the acceptability of the proposed density of the development in planning policy terms for the location;
 - iv. how the design of the proposal will ensure that amenity of other residential dwellings on Wensley Road is maintained;
 - v. landscaping and communal amenity improvements;
 - vi. how the car parking provision is acceptable in the location;
 - vii. The sustainability of the proposal.
- 8.2 There is a clear housing need in Reading, and residential development on the site is appropriate. The site is currently developed with three tower blocks providing 267 units, and it is set within the wider Coley Estate which is predominately housing, with some community uses. The site is easily accessible to the town centre which in itself supports residential development. The area within the redline boundary which will be developed for the new homes is currently open space and garages. Policy supports the delivery of new homes, and seeks to ensure that if there is loss of undeveloped land the new development bring qualitative improvements, and any loss of garages does not result in unacceptable impacts on the highway network. As this Planning Statement, and supporting documents, demonstrates, there will be improvements made to the open space and public realm and the loss of garages will not have a negative impact.
- 8.3 The proposed development of 46 new dwellings, provided in houses and flats, will all be affordable. There is a clear need for affordable housing in Reading, and the development will provide much needed new housing for the residents of the city. The dwellings will be high quality, built to meet nationally described space standards, and provided with private amenity space.
- 8.4 There are currently 267 dwellings on the site; the existing density of the proposal site is 113 units per hectare. With an increase of 46 new units, taking

the total number of units to 313 dwellings, the density will increase to 132 dwellings per hectare. The proposed new density of the development is considered to be acceptable: although the proposal would take the density beyond the urban density range set out in the adopted Local Plan, the need for new housing supports this higher density. Sustainable design is a key driver of the adopted Local Plan, which is achieved through higher densities.

- 8.5 Consideration has been given to the amenity of existing residents through the detailed design of the new dwellings. Policy CC8 sets out the criteria that must be addressed in safeguarding amenity for existing residents, and new residents, to ensure that a quality living environment is achieved. The Planning Statement has demonstrated that privacy and overlooking issues, where the policy required distance cannot be achieved between dwellings, will be addressed through the design. In terms of daylight and sunlight, acceptable levels are achieved for existing and new dwellings. A microclimate study has been undertaken in relation to wind, and it is concluded that although there are some areas of the site which have areas where 'unsafe' conditions may develop, higher wind velocities are not created by the new dwellings, and therefore mitigation measures are not required.
- 8.6 A comprehensive landscape strategy is proposed which will bring benefits to the existing and new residents. The rationalisation of car parking spaces, and the provision of a central open space at the heart of the development site creates a new focus for this part of the Coley Estate. The loss of open space is accounted for by the increase in built footprint on the proposal site. Although there is a reduction in open space that is publicly accessible, the provision of new play equipment and spaces for children, new planting including new trees, seating and shared surface streets improves the overall quality of open space and the public realm, which mitigates the loss.
- 8.7 Car parking spaces for the new development are provided at a ratio that has been agreed with Reading Borough Council, that reflects census data on car ownership levels. The findings of the car parking survey allow for the provision of the required level of car parking spaces for the existing residents. The loss of garages will not cause a negative impact on the highways network. The stopping up of Wensley Road allows for the rerouting of the bus route into the heart of the site, making it more accessible to existing and new residents, and therefore encouraging the use of more sustainable transport methods.
- 8.8 Reading Borough Council has declared a Climate Emergency in 2019, and are committed to working towards carbon neutral Reading by 2030. Through the use of fabric first measures, and the use of renewable technologies, it is estimated that a reduction of carbon dioxide emissions is

100% below the Park L 2013 baseline, representing an annual saving of approximately 72 tonnes of CO₂.

- 8.9 Therefore, the planning proposal for 46 high quality new homes and associated amenity space and landscape improvements meets policy requirements and brings benefits to the resident of Reading, and we request that this planning application is granted permission.