

Planning Statement

43 and 43a London Street, Reading

June 2019

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Client

Rose Hill Commercial Estates Ltd

Our reference

VOC-18-40

June 2019

Executive Summary

1. This Planning Statement forms part of a suite of documents submitted to Reading Borough Council for consideration in support of the applicants' (Rose Hill Commercial Estates Ltd) proposals for re-development of land at 43 and 43a London Street, Reading.
2. This application comprises refurbishment and part re-build of the London Street façade, coupled with demolition of an existing structure to the rear of the frontage and its replacement with new build which extends along the southern boundary of the site to provide 21no. residential units, 48 sqm of community uses and associated landscaping and parking.
3. The design development process has been underpinned by pre-application engagement with Council Officers, Members, the Design Review Panel and local interest groups. The resultant proposals have therefore sought to incorporate comments, as appropriate.
4. Development of the site as proposed will generate very significant townscape and visual improvements, alongside a host of economic, environmental and social benefits. These include:
 - The application proposals will result in the redevelopment of a brownfield site, which is not environmentally sensitive, as determined by the various technical reports supporting the application and will thus achieve an efficient use of land.
 - The introduction of significant on-site planting will help provide visual and environmental uplift to the site and surrounding area, in turn helping to mitigate existing air quality issues.
 - A reduction in car parking spaces on site, helping to reduce reliance on the motor car with a consequent improvement in air quality.
 - During the construction phase a number of construction jobs will be sustained directly, with additional jobs being sustained or created through expenditure in the supply chain.
 - The future occupiers of the completed homes will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in London Street and the nearby Town Centre.
 - Other related economic benefits include CIL contributions, the extent of which is set out in the S106 Heads of Terms, as well as the award of new homes bonus payments to the Council.
 - The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock.

- The scheme provides visual uplift that will improve the outlook of nearest residential neighbours, whilst providing a missing portion of the urban grain, allowing an appropriate building typology to emerge that gifts better security, privacy and an area for solace and reflection.
 - The provision of 1, 2 and 3 bedroom dwellings will help to address an identified requirement over the local plan period, as well as provide much-needed 'windfall' accommodation to help meet the current shortfall in housing units identified in the emerging Local Plan.
 - The proposed new build along the southern boundary will help to transform an area that has recognised problems with drug abuse and anti-social behaviour into a more welcoming location that features better natural surveillance and which introduces significant landscaping to improve visual appearance and environmental credentials.
5. The development fully accords with local, regional and national planning policy, as set out in following sections, and it is therefore respectfully requested that planning permission is granted.

1. Introduction

- 1.1 This Planning Statement forms part of a suite of documents submitted to Reading Borough Council for consideration in support of the applicants' (Rose Hill Commercial Estates Ltd) proposals for re-development of land at 43 and 43a London Street, Reading.
- 1.2 This application comprises refurbishment and part re-build of the London Street façade, coupled with demolition of an existing structure to the rear of the frontage and its replacement with new build which extends along the southern boundary of the site to provide 21no. residential units, 48 sqm of community floorspace and associated landscaping and parking.
- 1.3 This statement has been prepared by Vocalism on behalf of Rose Hill Commercial Estates Ltd and sets out detail of the full planning application for the:
- 1.4 *'Part-demolition of existing London Street facade and internal works to building alongside demolition of two storey building to rear to enable residential-led mixed-use development comprising 48 sqm community use (Class D1) and 21no residential units (2 x studio, 7 x 1 bed, 9 x 2 two bed and 3 x 3 bed units) together with associated services enclosures, parking and landscaping'.*

Supporting Documentation

- 1.5 The Planning Statement is submitted as part of the planning application documentation, as set out below, for the proposed development. In addition to this Statement, the planning application documentation comprises:
- Completed Full Planning Application Forms, with Certificates of Ownership;
 - Completed CIL Forms;
 - Planning Application Drawings, including Site Location Plan, Site Plans, Floor Plans, Elevation Drawings, Section Drawings and Accommodation Schedule (references are provided in full within the application forms);
 - Design and Access Statement
 - Archaeological Report
 - Air Quality Assessment
 - Phase 1 Environmental Risk Assessment
 - Heritage Statement
 - Transport Statement
 - Energy Statement

- Sustainability Statement and BREEAM Predictive Assessments
- Environmental Noise and Impact Assessment
- Statement of Community Involvement (within Planning Statement)
- Utilities Assessment
- Landscape Scheme (set out within DAS and Planning Drawings)
- Daylight & Sunlight Assessment
- Viability Report
- Planning Obligations Statement – Draft S106 Heads of Terms

Structure of the Report

1.6 The purpose of the Statement is to provide further detail of the proposed scheme, and to assess its merits against the development plan and other relevant material considerations. The Planning Statement is structured as follows:

- Section 2 provides the context for the development through a description of the application site, the surrounding area and its planning history;
- Section 3 provides details of the proposed development for which planning permission is sought;
- Section 4 summarises the pre-application consultation process that has been undertaken throughout the preparation of the emerging proposals;
- Section 5 sets out the relevant planning policies against which the proposals will be assessed, including consideration of the development plan and relevant material considerations;
- Section 6 assesses the current development proposals in the context of the development plan and relevant material considerations;
- Section 7 provides a summary of the approach to Affordable Housing; and
- Section 8 provides an overall summary and conclusion to the report.

2. Site Context

Site Location & Description

- 2.1 The Site is located at 43 and 43a London Street, the latter address comprising a two storey building located to the rear of the main frontage. The remaining land subject to the application is currently laid out as hardstanding and used for car parking.
- 2.2 The site is bounded by residential units to the south, forming London Court and will in time be located adjacent to the recently consented 'Studios' scheme, which is being built out on East Street. To the north, land comprises retail uses, primarily that associated with the 'RISC' café, whilst to the west, buildings comprise residential and mixed retail and commercial uses on London Street.
- 2.3 The application site is located within an Area for Architectural Potential, on an identified cycle route, within the Reading Central Area, but outside of the tall buildings, central and office cores and within the Market Place/London Street Conservation Area as defined by the Local Plan proposals map, October 2012. The Eldon Square Conservation Area is located immediately to the south-east of the site. The whole of the Reading Central Area is designated as an Air Quality Management Area (AQMA).

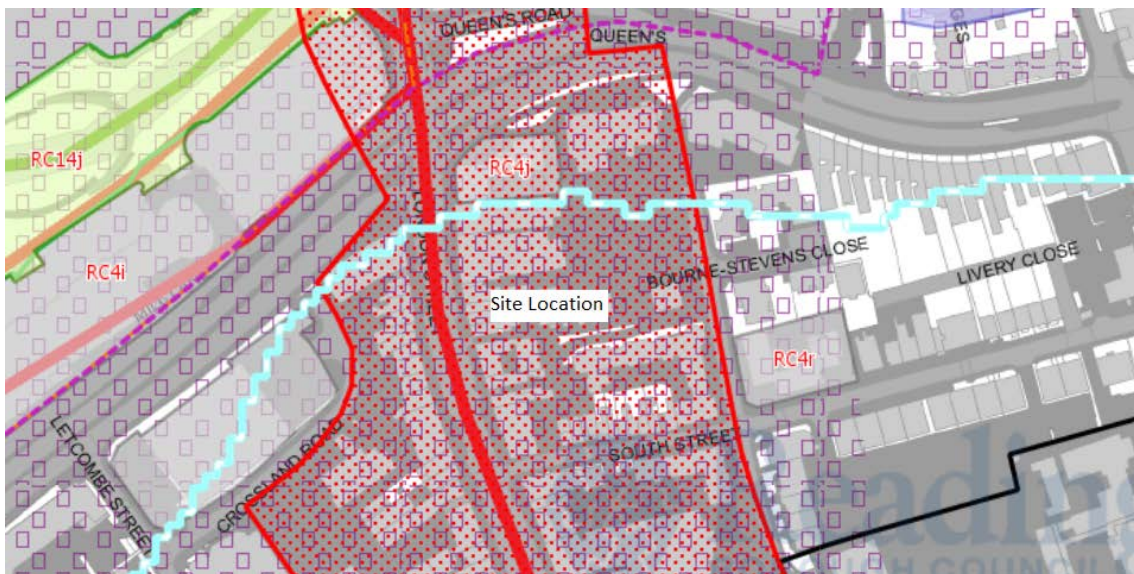


Figure 1 – Local Plan Proposals Map, October 2012 extract

- 2.4 Vehicular access to the site is via East Street Side which runs along the east of the site. The application site can be directly accessed by pedestrians from either East Street or London Street.
- 2.5 The application site is ideally located adjoining Reading Central Core and is therefore highly sustainable in terms of access to shops, leisure, community services and public transport. It is 200m from the primary shopping core and 500m from the office core.
- 2.6 The site is 800m from Reading Station which provides direct rail links to London, the South West, Wales and the Midlands. Also, many of Reading's main bus routes,

including direct links to Heathrow Airport, go via the station. Within the local area, various bus routes are also accessible on London Street and Kings Road, approximately 400m from the site, providing significant public transport connectivity.

3. Planning History and established use of 43 and 43a London Street

3.1 There is no documented online planning history pertaining to the site, although the Council's pre-application response highlighted a 1985 permission for the change of use of the rear flat roof extension from a dental surgery to offices.

3.2 Further to research on the use of buildings to underpin our approach, we consider that the 1985 permission was implemented on the following grounds:

- The 2016 lease for the Place of Worship, which pertains to 43a London Street clearly states on page 4 that that existing use was for Class B1 (Offices). A copy of this lease for 43a London Street is reproduced as Appendix 1. As the use of a place of worship is Class D1 and no permission was sought for this use during the period of occupation by Covenant Restoration Chapel International, the established use of 43a London Street is as an office. The Covenant Restoration Chapel International will vacate 43a London Street by the end of July 2019.
- Prior to the most recent use of 43a London Street, the property was let from April 2014 to June 2018 to a company called Mavenir Systems Limited, a telecommunications business. In section 11b of this lease, which forms Appendix 2, it is stated that the permitted use of this space only being for office/storage. It would appear that this company left this space early, as the place of worship took occupation in 2016, again with use as offices.
- Research to establish business rates and use according to the Valuation Office Agency (VOA) highlights clear separation of use between 43 and 43a London Street, with the former described as 'Surgery and Premises' and the latter as 'Offices and Premises'. The VOA records confirm that this arrangement has been in place since at least 2003, which is the first record for 43a London Street.
- The business rates records for 43 London Street also clearly establish that the dental surgery had its own office space within the building. Of the 130 sqm available to the surgery, only 59 sqm was utilised for surgery use, the remainder being as offices, staff facilities and storage space.
- The business rates records for 43a London Street highlight use on both ground and first floor of this building as offices.

3.3 On the basis of the above, it is confirmed that 43 and 43a were separate entities, with the former identifiable as Class D1 use and the latter benefitting from Class B1 use.

3.4 Copies of the VOA and Business Rates records form Appendix 3 to this submission. An electronic link is also provided for easy access to the Business Rates detail - <https://www.tax.service.gov.uk/business-rates-find/list-valuations?searchBy=Postcode&postCodeQuery=RG1+4PS&streetQuery=&townQuery=&primaryCriteria=ADDRESS&number=&street=&town=&postCode=&billingAuthority=&baRef=&specialCategoryCode=&descriptionCode=&from=&to=&startPage=2&listYear=2017#search-results>

4. Pre-Application Consultation

Introduction

- 4.1 Reading Borough Council (the Council) has an adopted Statement of Community Involvement (SCI) in place which was adopted in March 2014. The SCI sets out how the Council will involve the community in both the preparation of the borough's Local Plan, as well as in planning applications.
- 4.2 The SCI encourages developers/ applicants to undertake pre-application consultation with the Council prior to the submission of an application for all types of development proposals, in order to provide for relevant community aspirations, local planning policy and address all other relevant considerations.
- 4.3 Further, whilst there is no statutory requirement for applicants to undertake their own public consultations as part of the planning application process, the Council encourages applicants to undertake some form of public engagement with the local community prior to the submission of an application. The SCI notes that this is especially important on applications which are sensitive or of a significant scale.
- 4.4 The scheme proposals do not meet the criteria to be considered sensitive or of a significant scale, but nevertheless, in accordance with the guidance set out in the SCI, pre-application discussions and consultations have been undertaken with the Council, the public and other stakeholders throughout the preparation of the current development proposals. A summary of these discussions and the feedback that has been received regarding the proposed development is set out below and is provided in detail in the Consultation Statement which supports this application.

Discussions with Reading Borough Council and Local Interest Groups

- 4.5 The proposals have been considered via two formal pre-application processes in 2018 and 2019. The first, ref: 180670/PREAPP, cited a number of concerns regarding the scheme relating to scale and massing and consequent impact on amenity and heritage assets, as well as providing detail on the measures that would need to be undertaken to determine whether change of use of 43 and 43a London Street would be acceptable (at this time, the established use of both buildings was not fully known).
- 4.6 To respond to the 2018 pre-application comments, a number of changes to the scheme were made:
- Reduction in the number of units proposed from 24 to 21
 - An improved, close to policy-compliant mix of flats was proposed
 - More consideration was given to security and surveillance within Sims Court and to the rear of the site

- Improvements to existing refuse provisions for all users of Sims Court, including no.41 and the RISC cafe were proposed
 - Car parking was rationalised to allow more amenity space to come forward
 - The proposed layout and massing were significantly altered to provide an approach considered to be more reflective of the site's historic layout as a 'mews-style' development that is more in keeping with the local urban grain and vernacular
 - Significant efforts were made to consider how to enhance existing heritage assets and to consider potential development impacts to ensure that the setting of properties on London Street was appropriately protected
- 4.7 Consequently, a further pre-application submission was made to the Council in February 2019 and a formal meeting was held on 28th March 2019 to consider the proposals.
- 4.8 In tandem with the submission and formal discussions with Officers, a presentation was provided to the Reading Design Review Panel on 14th March 2019 and a joint meeting was held with the Reading Civic Society, Conservation Area Advisory Committee and Councillor Rose Williams was held on 5th April 2019.
- 4.9 The proposals were generally well received, with the principle of development being supported overall, but to meet with comments made regarding the approach to the London Street frontage, use of the ground floor at 43 London Street and to better tie in massing with that in the locality, further scheme revisions were made, these forming the basis of the Council's formal pre-application response, which is set out at [Appendix 4](#).

Response to Pre-Application Consultation

- 4.10 The feedback and comments from the Council, other stakeholders and local residents received during the pre-application consultation process have been taken into account throughout the preparation of the development proposals enclosed as part of this application. In particular, the pre-application process has resulted in the following changes being made to the proposed scheme:
- Changes to London Street facade to incorporate sash windows at first and second floor
 - New rendered surrounds set within the brick façade onto London Street;
 - New shopfront with entrance and reinstatement of a commercial unit at ground floor at 43 London Street;
 - Reduction in height of the mews buildings to tie into the eaves of London Court properties;
 - Opening up of the courtyard by the rear of London Court to allow in light and to provide outlook;

- Further improvements to facades to incorporate brick frontages to chamfered bay windows;
- Reduction in ramp levels by setting down the bin store area;
- Further greening/landscaping throughout the scheme;
- Incorporation of PVs to south-facing roofs adjacent to London Court;
- Addition of a further storey to the rear (eastern) building to tie in with the enhanced Studios scheme

4.11 This has been an ongoing process, which in turn has enabled a robust scheme evolution to the current form now proposed. All consultees approached during the pre-application phase have been notified of the final proposals and it is anticipated that discussions will continue with interested parties during the post-submission phase.

5. Proposed Development

Description of Development

- 5.1 The description of the proposed development at 43 and 43a London Street is:

‘Part-demolition of existing London Street facade and internal works to building alongside demolition of two storey building to rear to enable residential-led mixed-use development comprising 48 sqm community use (Class D1) and 21no residential units (2 x studio, 7 x 1 bed, 9 x 2 two bed and 3 x 3 bed units) together with associated services enclosures, parking and landscaping’.

Amount and Mix of Housing

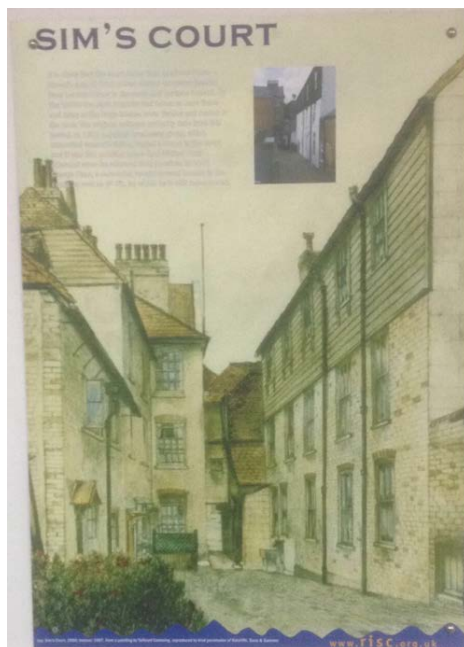
- 5.2 The proposed development, as set out in the planning drawings supporting this application, seeks to provide up to 21 one to three bed residential units.
- 5.3 A breakdown of the accommodation is shown in the table below.

Tenure	Unit Type	Number of units	%
Market Sale	Studio	2	9.5
	1 bedroom 2 person	7	33.3
	2 bedroom 3 person	9	42.9
	3 bedroom 5 person	3	14.3
Total		21	100

Massing and scale

- 5.4 The proposed development is for 21 dwellings on a site area of 0.075ha. Built form has been subject to significant negotiation which has culminated in significant changes being made to the scheme, as set out in paragraphs 4.2. and 4.4 above. In respect of this application, the scheme essentially comprises four main elements:
- Changes to the London Street façade to provide a refurbished ground floor 48 sqm commercial/community unit (Class B1/D1) with three residential units above (2 x studio; 1 x 1 bed unit)
 - Demolition of 43a London Street and its replacement with a building providing a communal refuse/recycling store, a cycle store and six residential units (2 x 1 bed, 3 x 2 bed and 1 x 3 bed units)
 - Provision of a landscaped courtyard, alongside significant greening of the site and its perimeter to enhance biodiversity and ecology

- A new building of between 3 – 5 storeys located in the south-eastern corner of the site providing twelve residential units (4 x 1 bed, 6 x 2 bed and 2 x 3 bed units)
- 5.5 In addition to these elements it is proposed to provide PV panels on the central, southern-facing aspect of the new roofscape adjacent to London Court as well as green/brown roofs at the east and western extents of the site in order to meet energy and sustainability requirements.
- 5.6 In consideration of the new build proposed, Section 3 of the DAS highlights the approach to massing and scale, which has been heavily informed by the location, orientation and height of surrounding built form, in particular, the Studios scheme to the east and properties on London Street and at London Court.
- 5.7 The resultant proposals have enabled creation of three distinct, yet fully co-ordinated aspects to built form, which wrap themselves around the southern boundary of the property to create a mews-style development that is historically-relevant and which complements and uplifts surrounding properties, whilst generating significant improvements in localised air quality and environment.
- 5.8 In this context, we have sought to provide 3 storey accommodation, which presents a modern reflection of historic mews buildings which once occupied this location. The images below highlight this point, which we have referenced in terms of design and layout to enable an appropriate footprint and built form, whilst seeking to respect the privacy and amenity of neighbouring buildings.



- 5.9 Through pre-application consultation, measures have also been taken to improve the current ad-hoc approach to refuse provision and collection. In this manner, the new refuse and recycling store at ground level will formalise arrangements not only for 43 and 43a London Street, but also for 41 London Street and the RISC café. It is

considered that this represents a substantial improvement in environmental health terms.

- 5.10 The proposals have been developed to ensure that existing residential amenity is appropriately protected. Page 9 of the DAS ably demonstrates this point, highlighting how use of chamfered windows has been used to ensure no direct overlooking. In addition, built form opposite the RISC café has been set back in comparison to the 2018 scheme and that in-situ to ensure that the current scenario is not worsened in terms of daylight and sunlight and that with greening and additional of natural surveillance the overall attraction and use of what was an unwelcoming alleyway to the rear of the site has been notably improved.

Private Amenity and Open Space

- 5.11 The scheme proposes policy-compliant private space in order to enhance the setting of the development site and surrounding area and to provide meaningful and usable local amenity spaces.
- 5.12 The proposed development will provide a mix of private amenity spaces in the form of terraces, a courtyard and projecting and inset balconies.
- 5.13 As set out further in the DAS and the upper ground floor layout, ref: LSR012 P1, there are proposals to provide a private communal courtyard for residents totalling approximately 50 sqm. The courtyard will provide wider visual uplift to adjacent properties on London Court, which currently have outlook onto the existing car park, which is of limited visual merit.
- 5.14 The courtyard will be gated and feature fob access to ensure that the security and amenity of ground floor flats in London Court and the adjacent new buildings is protected.

Access and Parking

- 5.15 Vehicular access to the site is via East Street which runs to the east of the site beyond the new Studios scheme. This remains unchanged up from the current access to the entrance to the parking and courtyard area.
- 5.16 Bin storage has been located close to the London Street frontage in line with the servicing requirements for the site. It is anticipated that vehicle loading/delivery will take place from London Road, where there is a loading bay in close proximity to the site entrance in line with current arrangements. However, space to enable vehicle loading/delivery is also available within the scheme in line to supplement this. Further detail on the site servicing and delivery strategy is set out in Section 4.6. of the Transport Statement.
- 5.17 As set out in the upper ground floor layout, ref: LSR012 P1, it is proposed to provide 2 car parking spaces, which are identified for disabled users. In addition, as shown on the ground floor layout plan ref: LSR011 P1, 15 cycle spaces within a secure, covered location are proposed for the scheme.

6. Planning Policy

Introduction

- 6.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, development control decisions must be made in accordance with the adopted development plan, unless material considerations indicate otherwise. This section sets out the relevant planning policies of the development plan and supplementary planning policy documents to be considered in the determination of this application.

Key Policy Documents

- 6.2 The current, relevant adopted Development Plan consists of the Reading Borough Core Strategy (2008 amended in 2015), the Sites and Detailed Policies Document (2012 amended in 2015) and the Reading Centre Area Action Plan (RCAAP) (2009).
- 6.3 At a national level, the National Planning Policy Framework as first adopted in March 2012 and subsequently amended in 2018 and 2019, is a material consideration in the determination of the application.

National Planning Policy Framework

- 6.4 National planning policy is set out in the National Planning Policy Framework (NPPF), the most recent version of this document being updated on 19 February 2019. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 6.5 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 6.6 The National Planning Policy Guidance was published in March 2014 and updated in July 2018 and sits alongside the NPPF. The NPPG adds further context to the NPPF and should both be read together.
- 6.7 The NPPF sets out key policies on delivering sustainable development, which include:
- Chapter 5 (Delivering a Sufficient Supply of Homes) notes the Government's objective to significantly boost the supply of homes. It goes on to emphasise the importance of a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

- Chapter 6 (Building a Strong, Competitive Economy) notes that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, in many occasions this being related to ensuring that there is an adequate and appropriate supply of homes for workers within the economic catchment area.
 - Chapter 8 (Promoting Healthy and Safe Communities) sets out the importance of access to high quality open spaces and ensuring spaces are safe and accessible, so that crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion.
 - Chapter 9 (Promoting Sustainable Transport) requires transport policies to be balanced in favour of sustainable transport modes with the appropriate Transport Assessment or Transport Statement provided. Decisions must take account of whether the opportunities for sustainable transport modes have been taken up, depending on the nature and location of development and whether improvements can cost effectively limit the significant impacts of the development.
 - Chapter 11 (Making Effective Use of Land) notes 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.
 - Chapter 12 (Achieving Well Designed Places) states that the creation of high quality buildings and place is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps makes development acceptable to communities.
 - Chapter 15 (Conserving and Enhancing the Natural Environment) places great emphasis on enhancing and protecting the natural environment; minimising impacts on biodiversity and providing net gains in biodiversity where possible and preventing new development from contributing or being put at unacceptable risk from soil, air, water and noise pollution by remediating and mitigating where appropriate. This policy encourages the effective reuse of brownfield land provided that it is not of high environmental value.
- 6.8 Following on from Prime Minister Theresa May's wide ranging and lengthy speech to support the launch of the consultation phase in March 2018, this underlining the importance the Government places on seeking to resolve the housing crisis, weight should be given to the thrust of national policy when determining this application.
- 6.9 As the Prime Minister said: *'The picture we see today is the result of many failures by many people over many years. Fixing it won't happen overnight. But the size of the challenge is matched only by the strength of my ambition to tackle it.'*
- 6.10 To meet the challenge set to improve housing delivery to reach the 300,000 homes per year target, unsurprisingly the draft NPPF has a strong focus on housing. Chapter 5,

and in particular paragraphs 60-81, deal with the goal of 'delivering a sufficient supply of homes', of which paragraph 69 is most pertinent. To summarise:

'69. Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;...*

6.11 In a similar manner, paragraphs 122 and 123 seek to support development that makes efficient use of land and where there is an existing or anticipated shortage of land for meeting identified housing needs, to ensure that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

6.12 Further, paragraph 126 encourages the efficient use of land and buildings within a context of ensuring that good placemaking principles are upheld.

Core Strategy (2008 amended in Jan 2015)

6.13 The Core Strategy sets out the Council's adopted planning strategy for the Borough. It sets out how planning and development will achieve the Reading 2020 Vision for the town. It provides a framework for how Reading can grow in a sustainable way in the future. The Core Strategy is clear that the Council will continue to support the development of Central Reading as the leading regional centre in the Thames Valley. The following Core Strategy policies are considered relevant to this proposal and are referred to later within this statement:

- **Policy CS1 (Sustainable Construction and Design)** - indicates that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- **Policy CS2 (Waste Minimisation)** - notes that development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.

- **Policy CS3 (Social Inclusion and Diversity)** – advises that development should demonstrate measures to enhance social inclusion in terms of access to housing, employment, services, community facilities, leisure, health, education, and other services and facilities
- **Policy CS4 (Accessibility and the Intensity of Development)** - states that the scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service.
- **Policy CS5 (Inclusive Access)** - denotes that all buildings should be located, sited and designed to provide suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.
- **Policy CS6 (Settlement Boundary)** - states that development will be permitted inside the settlement boundary as defined on the Proposals Map.
- **Policy CS7 (Design and the Public Realm)** - indicates 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.
- **Policy CS9 (Infrastructure, Services, Resources and Amenities)** - confirms that proposals for development shall make provision for appropriate infrastructure, either directly or through off-site contributions.
- **Policy CS14 (Provision of Housing)** - sets out that provision will be made for the completion of an average of at least 477 dwellings for the period 2001-2006, 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026. Identified sources of supply include previously developed land and windfall sites.
- **Policy CS15 (Location, Accessibility, Density and Housing Mix)** - states that proposals for residential development shall achieve an appropriate density and provide an appropriate mix of housing types, sizes and tenures.
- **Policy CS16 (Affordable Housing)** – requires all developments of 15 dwellings and above to provide 30% of the total number of dwellings in the form of affordable housing to meet the needs of the area, as defined in a housing needs assessment, unless accompanied by Viability Statement to identify why it is not commercially possible to meet this level of provision.
- **Policy CS20 (Implementation of the Reading Transport Strategy)** - denotes that proposed developments shall further the provision of a balanced transport network, as outlined in the Reading Transport Strategy.

- **Policy CS22 (Transport Assessments)** - indicates that development proposals shall ensure an adequate level of accessibility and safety by all modes of transport, particularly by public transport, walking and cycling.
- **Policy CS23 (Sustainable Travel and Travel Plans)** – identifies 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.
- **Policy CS24 (Car / Cycle Parking)** - states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- **Policy CS29 (Open Space)** - sets out that development proposals shall make provision for appropriate amenity space.
- **Policy CS30 (Access to Open Space)** – advises that new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/ or facilitate the creation or linking of safe off-road routes to parks.
- **Policy CS31 (Additional and Existing Community Facilities)** stipulates that the redevelopment of existing community facilities will not be permitted unless it can clearly be demonstrated that there is no longer a need to retain the facility.
- **Policy CS33 (Protection and Enhancement of the Historic Environment)** states that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced.
- **Policy CS34 (Pollution and Water Resources)** – states that development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution; where it would preserve or ideally enhance ground and surface water quality; and where existing water resources, sewerage and wastewater treatment infrastructure are adequate to support the proposed development.
- **Policy CS35 (Flooding)** - states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, nor shall development be allowed to increase the risk of flooding elsewhere.
- **Policy CS36 (Biodiversity and Ecology)** – confirms that proposals for development shall assess, retain and protect ecological interests, and demonstrate that impacts on biodiversity can be minimised and/or appropriately mitigated.
- **Policy CS38 (Trees, Hedges and Woodlands)** - states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal.

Reading Central Area Action Plan (RCAAP) (adopted Jan 2009)

6.14 The Reading Central Area Action Plan (RCAAP) is made up of a number of different elements, which together form a comprehensive basis for managing change in the Central Area up to 2026. The RCAAP policies: which are considered relevant to the proposal and are referred to later within this statement include:

- **Policy RC5 (Design in the Centre)** – provides guidance to identify the need to integrate built form and layout with the surrounding urban grain and identify means to engage and enhance the public realm.
- **Policy RC6 (Definition of the Centre)** – identifies an urban hierarchy within which development is directed.
- **Policy RC9 (Living in the Centre)** – 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.
- **Policy RC14 (Public Realm)** – identifies important areas of public open space to be protected from development.

Sites & Detailed Policies Document (2012 amended in Jan 2015)

6.15 The Sites and Detailed Policies Document (SADPD) (2012 amended in 2015) includes further Borough-wide policies as well as identifying sites for development outside of the Reading Central Area. The Policies which are considered relevant to the proposal and are referred to later within this statement include:

- **Policy SD1 (Presumption in Favour of Sustainable Development)** - states that a positive approach to considering development proposals in accordance with the presumption in favour of sustainable development, as required by the NPPF.
- **Policy DM1 (Adaption to Climate Change)** – requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.
- **Policy DM2 (Decentralised Energy)** – advises that in meeting the most up to date Ecohomes (including Code for Sustainable Homes for new build residential) (now superseded by Part L Building Regulations), or BREEAM standard developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source, including CHP
- **Policy DM4 (Safeguarding Amenity)** - confirms that development shall not cause significant detrimental impacts to the living environment of existing or new residential properties.

- **Policy DM10 (Private and Communal Outdoor Space)** - states that dwellings will be provided with functional private or communal open space, in a manner that does not give rise to detrimental amenity impacts. Houses will be provided with private outdoor space, whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.
- **Policy DM12 (Access, Traffic and Highway Related Matters)** - states that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.
- **Policy DM16 (Provision of Open Space)** – indicates that publicly accessible open space shall be as laid out in the most up-to-date Open Spaces Strategy.
- **Policy DM18 (Tree Planting)** – states that new development shall make provision for tree planting within the application site, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.
- **Policy DM19 (Air Quality)** - states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.

Supplementary Planning Documents (SPD)

- 6.16 The following SPD are also relevant in the assessment of the application:
- 6.17 **Sustainable Design and Construction SPD (2011)** - Provides practical advice on the forms of sustainable design and construction, as well as waste minimisation.
- 6.18 **Affordable Housing SPD (2013)** - This SPD provides a framework for determining the quantum, size, type, form and content of affordable housing that will be sought. Appendix 4 sets out a typology for the calculation of financial contributions/commuted sums in lieu of on-site provision. It states that any financial contribution should be broadly equivalent to the contribution that would have been made to provide the housing on-site.
- 6.19 **Planning Obligations Under S106 SPD (2015)** - This document denotes where contributions towards the provision of infrastructure shall be sought via CIL or through S106 Agreements.

The Emerging Local Plan

- 6.20 The Council is currently working on producing a new Local Plan which will replace the current Development Plan (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document) with a new plan setting out how Reading will develop up to 2036.

- 6.21 The Submission Draft Local Plan was submitted to the Secretary of State in March 2018 and was subject to Examination in Public in October of the same year. The Council is due to debate the Inspector's Proposed Minor Modifications in June, following which further consultation will take place ahead of expected adoption in autumn/winter 2019.
- 6.22 In view of the stage of its preparation, it is considered that the new emerging Local Plan can be given some weight in the determination of planning applications.
- 6.23 The emerging Local Plan has been considered in the development of proposals and it is considered that the following policies are relevant to the determination of this application:
- **Policy CC2 (Sustainable Construction and Design)**
 - **Policy CC3 (Adaption to Climate Change)**
 - **Policy CC5 (Waste Minimisation)**
 - **Policy CC6 (Accessibility and the Intensity of Development)**
 - **Policy CC7 (Design and the Public Realm)**
 - **Policy CR2 (Design in Central Reading)**
 - **Policy EN14 (Trees, Hedges and Woodlands)**
 - **Policy EN15 (Air Quality)**
 - **Policy EN18 (Flooding and Sustainable Drainage Systems)**
 - **Policy H1 (Provision of Housing)**
 - **Policy H2 (Density and Mix)**
 - **Policy H3 (Affordable Housing)**
 - **Policy H10 (Private and Communal Outdoor Space)**
 - **Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)**
- 6.24 Critically, the emerging Local Plan identifies that delivering the level of housing currently envisaged by Policy H1, which specifies that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036, will mean that there is a shortfall of 230 dwellings when considered against Reading's need. More consideration of current need is set out in the following section.
- 6.25 Further detail on relevant emerging policies, as well as those within the current Development Plan and supporting SPD, is set out within a Planning Policy Matrix, which has been used by the Project Team to inform decision-making throughout the design development process. A copy of this document is reproduced as Appendix 5.

Overview of Housing Need in the Borough

- 6.26 Produced on behalf of the Berkshire Local Planning Authorities in 2016, the Strategic Housing Market Assessment (SHMA) sets out an objective assessment of housing needs across the Housing Market Areas (HMAs) included within the study area. The analysis at SHMA Table 139¹ identifies an objectively assessed need (OAN), within the Reading Borough, for 699 homes per annum between 2013 and 2036, which still represents a higher need than is currently planned for in the existing Local Plan² and that initially determined as necessary within Policy H1 of the emerging Local Plan³.
- 6.27 The recent publication of the National Planning Policy Framework (NPPF) which advises a standard methodology to determine Objectively Assessed Need (OAN) potentially reduces this figure to 611 homes per year, but nevertheless the Council has a challenge to find sufficient supply to meet forward requirements and has sought to meet a higher figure of 689 homes per annum as set out within the latest iteration of the Local Plan.
- 6.28 The SHMA also provides guidance on the form of housing required within the HMA. In this manner, at Table 101⁴ is indicated that, within the Western Berkshire HMA, 38% of the additional market housing required between 2013 and 2036, will be 1 and 2 bedroom dwellings.
- 6.29 Breaking this down to the local scale, Tables 107 and 108⁵ set out that (across the same period) 4,119 additional 1 and 2 bedroom market dwellings and 2,619 additional 1 and 2 bedroom market dwellings will be required within Reading Borough. This equates to 39.9% and 76.3% of the total number of market and affordable dwellings needed respectively.
- 6.30 Taking the above into account, our analysis of the proposals in light of policy and housing need factors is set out in detail within the following section.

¹ Berkshire (including South Bucks) Strategic Housing Market Assessment Final Report (February 2016), p. 269.

² Core Strategy, Policy CS14: 521 dwellings per annum, 2016 - 2016

³ Submission Draft Local Plan (March 2018), Policy H1: 671 dwellings per annum

⁴ Ibid (February 2016), p. 289.

⁵ Ibid (February 2016), p. 295/296.

7. Planning Assessment

Introduction

7.1 This section of the Planning Statement sets out an assessment of the application proposals against the main planning policy and any other material considerations which are relevant to the determination of this planning application. The relevant Development Plan Documents for the District currently comprise of:

- Core Strategy (2008 amended in 2015);
- Sites and Detailed Policies Document (2012 amended in 2015); and
- Reading Centre Area Action Plan (RCAAP) (2009).

7.2 Further documents which are relevant to this site and proposed development include:

- Affordable Housing SPD, July 2013
- Revised Parking Standards and Design SPD, October 2011
- Sustainable Design and Construction SPD, July 2011
- The Emerging Local Plan, Submission Version, March 2018

Weight to be given to Planning Policy Documents and Guidance

7.3 Whilst the NPPF does not form a statutory part of the Development Plan, this document sets out the Government's planning policies and future direction for England, as well as how these are expected to be applied. It is therefore expected that both documents should be afforded weight as a material consideration in the determination of this application.

7.4 The preceding review of the planning policy context also confirms the timing of the Adopted Core Strategy as a pre-NPPF Local Plan. Accordingly, the policies of this document can only be afforded weight to the extent to which they comply with over-arching Governmental guidance.

7.5 The other substantive Development Plan Document comprises the Sites and Detailed Policies Document. Adopted in 2012 (and prepared in the context of the NPPF), this part of the Plan carries relatively more weight. A number of other SPD's form part of the local policy framework and are considered to carry varying degrees of weight.

7.6 Significant weight can also be attributed to the Berkshire SHMA (as it represents the most up-to-date OAN figure and which should include the March 2018 OAN Sensitivity Testing), whilst some weight can be attributed to the emerging Local Plan given that it is at Main Modifications stage.

7.7 In addition, the aforementioned assessment of the planning policy context serves to identify a number of dimensions to be considered as part of the overall planning

balance. In terms of principle, the redevelopment of previously development sites (in sustainable locations) is promoted at both national and local levels. Similarly, the provision of new homes that meet identified local needs is a clearly stated policy ambition.

- 7.8 In respect of other considerations, both national and local planning policies require that developments shall achieve a high standard of design, which responds to the character of the local area. The policy context further confirms that development proposals shall not result in severe highways impacts or be detrimental to road safety.
- 7.9 A number of broader considerations, relating to air quality and land contamination are identified through the assessment of planning policies described above. These factors are analysed in relation to the application proposals and are considered alongside an overall evaluation of the environmental, economic and social benefits of the proposals, as set out below.

Achieving Sustainable Development

- 7.10 The NPPF (at Paragraph 8) sets out three dimensions to sustainable development; an economic role, a social role and an environmental role. It confirms that these roles should not be undertaken in isolation, as they are mutually dependent. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 7.11 The attributes of the proposed development are set out below in the context of the three dimensions of sustainable development;

Environmental Benefits

- 7.12 The application proposals will result in the redevelopment of a brownfield site, which is not environmentally sensitive, as determined by the various technical reports supporting the application and will thus achieve an efficient use of land.
- 7.13 The application site is situated within the settlement boundary and is in a highly sustainable location. A wide range of retail and other facilities are located in the vicinity of the site and a bus stop, serving a strategic bus route, is located in the immediate locale.
- 7.14 The accessibility of the site ensures the rail network, as well as services, employment and leisure opportunities found in Reading Town Centre are easily reachable via excellent public transport, footpath and cycleway links. Section 2 of the Transport Statement assesses this point further.
- 7.15 The introduction of significant on-site planting will help provide visual and environmental uplift to the site and surrounding area, in turn helping to mitigate potential air quality, which will work towards the rigorous standards the Council is seeking to apply further to its recent climate change emergency announcement. More detail in this regard is set out within Section 6 of the Air Quality Assessment.
- 7.16 The approach to landscaping seeks to increase local biodiversity and accordingly, significant thought has been given to green spaces throughout the site. As set out in

Section 5 of the DAS and drawing number LSR016 P1, a number of green/brown roofs support that proposed in the central courtyard space and forming boundary treatments across the site.

Economic Benefits

- 7.17 During the construction phase a number of FTE construction jobs will be sustained directly⁶, with additional jobs being sustained or created through expenditure in the supply chain. It is also relevant that the predominance of jobs sustained during the construction phase will be filled by people living in Reading area and wider region⁷. Best endeavours to directly employ a localised labour force, as well as a number of local sub-contractors will ensure that a greater proportion of salaries and expenditure arising from the construction phase is retained in the local economy in line with the Council's Economic policy. Commitment to provision of an Employment and Skills Plan is made within the S106 Heads of Terms in this regard.
- 7.18 Economic benefits also continue during the post-construction phase. The proposed development will result in the redevelopment of a brownfield site to provide new dwellings. The future occupiers of the completed homes will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in London Street and the Town Centre. Other related benefits include CIL contributions, the extent of which is set out in the S106 Heads of Terms, as well as the award of new homes bonus payments to the Council.

Social Benefits

- 7.19 The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock.
- 7.20 The DAS identifies the commitment to high quality living in terms of layout, amenity, outdoor space and materiality and it is considered that the scheme provides visual uplift that will improve the outlook of nearest residential neighbours, whilst providing a missing portion of the urban grain, allowing a mews typology to emerge that gifts better security, privacy and an area for solace and reflection to those residents abutting the central courtyard space.
- 7.21 Meeting Reading's housing need is also a clear priority for the Borough, as evidenced by the SHMA findings. In this respect, the provision of a policy-compliant mix of 1, 2 and 3 bedroom dwellings will help to address an identified requirement over the local plan period, as well as provide much-needed 'windfall' accommodation to help meet the current shortfall in housing units identified in the emerging Local Plan.
- 7.22 The applicant is committed to providing high-quality accommodation and has demonstrated a desire to work with the Council throughout the pre-application period. In this regard, the proposed new build along the southern boundary will help transform an area that has recognised problems with drug abuse and anti-social behaviour into a

⁶ Based on research presented on the report '*The Labour Needs of Extra Housing Output: Can the House building Industry Cope?*' (HBF, 2005).

⁷ Based on a relatively high degree of self-containment in the local construction labour market (see ONS (2011) Census 2011 – 'Location of usual residence and place of work')

more welcoming location that features better natural surveillance and which introduces significant landscaping to improve visual appearance and environmental credentials.

The Principle of Development

- 7.23 The NPPF adopts a clear pro-growth stance and introduces a presumption in favour of sustainable development. It identifies that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local place the country needs.
- 7.24 In considering the relevant sections of the NPPF, it is noted that the Framework promotes the redevelopment of brownfield land and supports the efficient use of land. The NPPF also seeks to '*boost significantly the supply of housing*' and deliver a wide range of homes, of different types and tenures.
- 7.25 Policy SD1 states that the Council will take a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the NPPF. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 7.26 The 'Key Principles' of the RCAAP promote the Central Area as a place to live in, work in, study in, and visit. The RCAAP identifies housing as a main land use in the Central Area, in which the application site is located, and states that the centre of Reading is becoming ever more important as a residential location, not just the inner areas surrounding the core, but increasingly the commercial and shopping core itself.
- 7.27 In consideration of Policy RC9 of the RCAAP, the scheme promotes an appropriate mix of different sized units within the development which also closely meet the requirements of the SHMA 2016 (as updated, March 2018), which will help to meet Policy CS14 objectives, as well as the shortfall identified in the emerging Local Plan.
- 7.28 Core Strategy Policy CS14 (approved in 2008) currently states that provision will be made for the completion of an average of at least 477 dwellings for the period 2001-2006, 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026. These housing targets are currently under review in line with paragraph 117 of the NPPF which requires local planning authorities to meet the full objectively assessed housing need (OAN) within their area, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 7.29 The NPPF and the Planning Practice Guidance (PPG) state that local authorities should plan to identify enough land to provide for the full OAN to be met. It is clear from the evidence base to inform the emerging Local Plan, that the Council is struggling to provide enough sites to accommodate the level of housing need stated in the 2016 SHMA and its updated. Within this, there is identified significant need for 1 and 2 bedroom units, which the proposed development will help satisfy.
- 7.30 The proposed development is considered to be acceptable in terms of the principle of development and therefore the proposed redevelopment of the site for housing use is

acceptable and complies with the provisions of policy RC9 and contributes significantly towards the achievement of the housing targets within Policy CS14.

The Application Site

- 7.31 The site is located within the settlement boundary and is in a highly sustainable location, which benefits from excellent access to services, amenities and public transport. In the immediate locale are a number of local shops and convenience retailers.
- 7.32 Employment opportunities and additional services are available within Reading Town Centre, and are easily accessible, as are other employment areas that are commutable by rail and bus. Indeed, a two-way strategic bus route runs on London Street, with this thoroughfare also providing pedestrian and cycle links to a number of key locations in the town centre and suburbs. The proposals are therefore consistent with Core Strategy Policy CS6 and CS4.
- 7.33 The site is previously developed and Core Strategy Policy CS14 envisages that the redevelopment of such land will facilitate the delivery of residential developments and contribute to the supply of new dwellings.

Design, Scale and Massing

- 7.34 The Central Area of Reading is in a period of transformation, typified by the emergence of high-quality commercial signature buildings such as The Blade, Forbury Place, Chatham Place, Clarendon House and Kings Point changing the skyline and creating a more urban character within the Reading Central Area. The proposals seek to continue this step-change in design approach, whilst respecting heritage assets and neighbouring buildings.
- 7.35 The approach to design has been iterative: borne out of significant discussion with planning officers, members, local interest groups and the DRP, which has helped mould the final scheme, the detail of which is set out in Section 4 of this statement.
- 7.36 The proposal to introduce 21 new homes of a policy-compliant mix, responds well to the character of the local area and the properties in the immediate vicinity. The proposals follow existing building and roof lines where appropriate and provide height where it is appropriate to do so in design terms, particularly where the site adjoins the new Studios scheme. Overall, the layout is consistent with the existing pattern of development on London Street, adjacent to London Court and that emerging to the east, as well as the Central Reading Area in general
- 7.37 Section 3 of the DAS evidences the rationale to the morphology of the scheme proposals in this regard, reflecting the Project Team's strong desire to:
- Complete the urban block with a well-defined group of buildings holding the edge of the site
 - Enable a high-quality approach to materiality, taking influences from the existing urban grain

- Provide a design and layout that enables an appropriate mews typology, following historic built form on site to enable residential development to come forward in an acceptable manner
 - Implement high sustainability credentials, through the provision of green/brown roofs and PV panels and significant lower-level greening of the site to allow the local air quality environment to be considerably improved
 - Respect neighbouring amenity in terms of heritage, outlook, daylight and sunlight, noise, air quality and highways impact.
- 7.38 As part of this process, scheme designs have been tested to consider potential impact on amenity, relating findings to policy and legislative criteria, as well as identifying required mitigation, as appropriate and our findings in this regard are set out below.
- 7.39 The proposed development also makes effective use of an under-utilised area of hard standing and accordingly, it is considered that the application proposals meet the requirements of Policy RC13 of the RCAAP, Policy CS15 of the Core Strategy and achieve a high quality of design as required by the NPPF.

Historic Impact

- 7.40 A Heritage Statement and corresponding Heritage Assessment is submitted in support of the planning application, which assesses the significance of identified heritage assets and the impact, if any, that the proposed development would have upon their significance and setting in line with Policy CS33.
- 7.41 In line with pre-application advice from Council Planning and Heritage Officers, some importance and weight has been given to the significance of local heritage assets, albeit this being reduced in terms of views from the east in context of the recent Studios scheme consents.
- 7.42 The Heritage Assessment undertaken, which forms part of the supporting package submitted with this application, finds that the proposed scheme will reinstate built form and the urban grain in Sim's Court where it has been lost and that the proposals are a well-designed and sensitive response to its constrained site which will make efficient use of the site to ensure its optimum viable use, while acknowledging and respecting the heritage significance of its surroundings.
- 7.43 Further, the Heritage Assessment notes that the proposals will provide significant public and heritage benefits by considerably enhancing the site, the setting of listed and locally listed buildings and the conservation area while providing needed housing in central Reading.
- 7.44 The conclusion of the Heritage Assessment is that the proposed scheme at 43 & 43A London Street site will preserve the setting of listed buildings and preserve and enhance the character and appearance of the Market Place/London Street Conservation Area. The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is contended that the proposed

scheme is consistent with the urban design and heritage policies of the National Planning Policy Framework and Reading's Local Plan.

- 7.45 Taking the above into consideration, it is affirmed that the proposals comply with the requirements of Policy CS33 of the Core Strategy and Policy DM4 of the SADPD.

Residential Amenity

- 7.46 Policy DM4 of the SADPD states that development will not cause a significant detrimental impact to the living environment of existing or new residential properties. This next section sets out how the amenity of both new and existing residents will be maintained and protected as a result of the development proposals.

Amenity Space and Landscaping

- 7.47 The proposed landscape strategy for 43 and 43a London Street seeks to provide a green edge to the site through significant edge planting through Sims Court and adjacent to the eastern site boundary
- 7.48 It also proposes the creation of an inner courtyard garden of c. 50 sqm area that provides additional gated amenity space for residents over and above that provided through inset, projecting balconies and terraces. Total amenity space provision taking into consideration balconies, terraces and courtyard spaces is c.314 sqm.
- 7.49 The courtyard area seeks to create an oasis of calm that provides a core to the development and a break between buildings to allow views and light to the rear elements of London Court. It is noted that these properties are located hard to the boundary with the application site and that with current views over a car park, the windows have either been covered or feature blinds to protect against unwanted snooping. As such, the courtyard will enable an element of aspect to these properties.
- 7.50 In addition to the landscaping provided at ground level, green and brown roof areas, the total area of which is 140sqm are provided at roof level in order to provide increased biodiversity and rainwater retention.
- 7.51 The approach to providing a series of landscaped spaces within the development will improve neighbouring outlook into what is currently a hardstanding, car-dominated environment which visually links to large, object buildings of low visual merit beyond on Queens Road. As such, the approach to high-quality landscaping and materiality, as set out in detail within Section 5 of the DAS is considered to be a strong element of the scheme and is contended to provide improvement over that required by Policy DM10 of the SADPD.

Privacy and Overlooking

- 7.52 The proposed development has been designed to avoid significant detrimental harm to the living environment of both existing residents in the locality and the occupants of the new apartments in line with Policy DM4 of the SADPD.
- 7.53 As set out in Section 3 of the DAS, which considers the design evolution of the scheme and, in particular, approach to layout and massing, the scheme has been subject to review and comment by the Reading DRP, local interest groups, Council Officers,

following which more detailed proposals have been subject to testing in terms of air quality, noise and daylight and sunlight have been undertaken and their results used to finalise the design.

- 7.54 The design process has given significant regard towards the need to minimise adverse impacts in terms of privacy, overlooking, visual dominance, and overbearing effects, which has led to a mews typology emerging to help maximise separation between old and new elements, alongside use of chamfered windows to ensure no direct overlooking.
- 7.55 It is notable that adjacent uses are not residential in nature, save for the London Court properties, which feature a small number of windows looking onto the current car park area and the response to which is covered above. As such, there are no substantive habitable elements against which to assess the proposals. Nevertheless, the approach to design and layout undertaken enables development to come forward in a manner considered to be consistent with Policy DM4.

Daylight and Sunlight

- 7.56 Policy DM4 states that proposals should ensure adequate levels of daylighting and sunlighting are able to reach buildings and spaces within the development and avoid significant negative impacts on existing residential properties.
- 7.57 The proposed development has been subject to a detailed assessment of daylight and sunlight impacts, considering BRE 2011 guidance to first set parameters within which proposed built form can emerge to ensure external impacts are within accepted guidelines, prior to reviewing internal amenity for new residents.
- 7.58 The assessment concludes that the range of detailed analyses undertaken are considered to demonstrate no material effects to daylight and sunlight amenity enjoyed by occupants of properties neighbouring the proposed development. As a result, the proposals are not considered to give rise to unacceptable, adverse impact on daylight and sunlight amenity are therefore considered fully compliant with Policy DM4 of the SADPD.

Air Quality

- 7.59 Policy DM19 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated.
- 7.60 With regard to Air Quality, the applicant has commissioned an Air Quality Assessment to consider the suitability of the site for residential development. The Assessment concludes that the predicted concentrations of PM10 in all modelled years are below the relevant objectives. Predicted concentrations at all the modelled receptors fall within APEC Category A, which states that there are “no air quality [PM10] grounds for refusal, however, mitigation of any emissions should be considered”.
- 7.61 Taking the above results into account, it is not considered that air quality represents a material consideration to the development proposals and that the development fully complies with NPPF and Development Plan principles.

Land Contamination

- 7.62 Given the nature of the end use, the applicant has commissioned an Environmental Risk Assessment to determine the nature and where possible the extent of contaminants potentially present at the site; to establish the presence of significant pollutant linkages; and to assess whether the site is safe and suitable for the proposed development or can be made so by remedial action.
- 7.63 The assessment concludes that the risks identified are not considered significant and based on a recent site inspection it is unlikely gross contamination exists at the site. Hence, it is the opinion that potential contaminative risks can be addressed and resolved in a reasonable simple technical and commercial manner.
- 7.64 Notwithstanding the above; in order to further evaluate the risk that the site may present, a suitable ground investigation will need to be completed prior to commencement of development should consent be granted. In this regard, the assessment recommends this comprises at least eight intrusive borehole/trial pit locations, where at least three locations should be converted to ground gas and water monitoring wells. Appropriate soil and groundwater sampling and chemical testing should be completed to determine contaminative profiles. Additionally, a suitable program of ground gas and vapour monitoring with risk assessment should be completed.

Noise and Vibration

- 7.65 An environmental noise survey at the proposed site was undertaken in order to review the existing incident noise levels at the proposed residential development.
- 7.66 The assessment of the suitability of the proposed residential extensions for their intended use was undertaken in full accordance with the aims and requirements within the National Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). The NPPF is a material consideration for planning applications when the local plan does not align closely with its aims.
- 7.67 The assessment has demonstrated that based on the surrounding noise climate, the provision of conventional external building fabric elements (albeit with a higher sound reduction performance compared to the minimum required to satisfy the Building Regulations) will satisfy the aims of national policy on noise and there is no evidence to show that the site cannot comply with the provisions of the local plan.
- 7.68 The assessment has demonstrated that the noise climate at private amenity areas at the vast majority of the site will not give rise to significant adverse effects on health and quality of life (since the SOAEL will not be exceeded). The slight exceedance of the proposed SOAEL at amenity areas overlooking London Street may be justified based on the reasoning in BS8233:2014.

Parking and Highways

- 7.69 It is noted that the application proposes to provide 2 off-street car parking spaces associated with the new build proposals, which have been laid out in order to meet disabled parking standards.

- 7.70 Current policy within the Council's adopted Parking Standards SPD advises that proposals for flatted residential development shall provide between 0.5 to 1 spaces per dwelling, plus visitor spaces (based on zone 1 standards, see table below).
- 7.71 The SPD states that should a developer require fewer spaces, there would be need to be a demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result. In this regard, inclusion within the Council 'Core Area' and proximity to a range of car parking for visitors and good transport links provides rationale to proceed with lower parking provision.

	Residential Parking Provision			
	Zone 1	Zone 2	Zone 3	Zone 4
Residential				
C3 Retirement Home with Warden (spaces per individual units)	0.5 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff
C3 Dwelling Flat 1-2 bed	0.5	1	1.5	1.5
C3 Dwelling Flat 3+ bed	1	1.5	2	2
C3 Dwelling House 1 bed	0.5	1	1	1
C3 Dwelling House 2 bed	1	1	1.5	2
C3 Dwelling House 3 bed	1	2	2	2
C3 Dwelling House 4+ bed	2	2	2	3
Visitor Parking	0	1 space per 10 dwellings (Flats only)	1 space per 4 dwellings (Flats only)	1 space per 4 dwellings (Flats only)

- 7.72 It is notable that the SPD was adopted in 2011 and therefore pre-dates the NPPF, which at Paragraph 32, clarifies that '*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*'. Furthermore, Paragraph 39 which addresses the matter of local parking standards states that;

'Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.'

- 7.73 As a result of the above, the weight which can be afforded to the Parking Standards SPD must necessarily be lessened, as they can only be considered to be partially compliant with the NPPF. The proposals must therefore be considered on their merits, with it only being appropriate to impose parking standards (in full) should the LPA provide clear evidence and a compelling justification for such. Similarly, in the context of NPPF Paragraph 109, development proposals 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

- 7.74 Paragraph 110 of the NPPF reinforces the scheme approach highlighting that proposals give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
- 7.75 In evaluating the nature of the proposals, it is clear that there are many sound planning reasons to depart from the standards set out in the Parking Standards SPD. First, there are several examples of car-free development or low provision within the central area, Second, some provision is proposed, particularly to cover disabled provision and a servicing and delivery strategy has been produced, as set out in Section 4.6 of the Transport Statement, which helps explain proposals to accommodate other traffic movements likely be generated by activity associated with the residential-led mixed-use development.
- 7.76 The proposals equally would not be materially significant in respect of highways impacts and would not result in severe adverse effects on road safety or the free flow of traffic. As a starting point, it is noted that the 2011 census (for the middle super output area; Reading 011), confirms that just over 45 percent of households in Katesgrove Ward, in which 43 and 43a London Street are located, are without a car and that a further 45 percent have access to one car only.
- 7.77 The Transport Statement makes the case for low car parking provision in consideration of the previous use of the site as a car park and identifies that there will be a negligible change in trip generation associated with the proposals.
- 7.78 It is further contended that the location of the site lends itself to sustainable travel and the reduced level of car parking is justified by the excellent local transport links and nearby amenities within walking distance. There are a number of excellent, well maintained pedestrian and cycle links available to the residents of the site, as highlighted in both the DAS and Transport Statement.
- 7.79 As noted above in paragraph 2.3, it is recognised that the site falls within an Air Quality Management Area. In this regard, Policy DM19 indicates that where a development would introduce a 'sensitive use', appropriate mitigation measures shall be incorporated, such that air quality issues are not exacerbated. The supporting text to this policy notes that '*other mitigation measures may also include travel plans, restrictions in car access or parking*'. In this respect, a lower level of existing parking provision (for a site which is extremely well served by public transport), serves to further a key policy objective in the Development Plan.
- 7.80 In consideration of the above, the proposals therefore comply with Policy CS24, which states that car parking standards will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport and the NPPF.

Flood Risk and Drainage

- 7.81 Policy CS35 states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, where development would reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding.
- 7.82 The Environment Agency Flood Zone mapping identifies the site as being within Flood Zone 1 (1 in 1000 chance of flooding each year).
- 7.83 As the site is in Flood Zone 1, no further assessment is required in this regard.
- 7.84 As the site currently comprises hardstanding, the approach to surface water runoff will, if possible, incorporate an element of disposal via infiltration and/or discharge to the Thames Water surface water sewer network (as is understood to currently be the case). It is also notable that the provision of green/brown roofs will also increase water retention capacity on-site, providing an element of attenuation.
- 7.85 Taking this into consideration, the proposals fully comply with the requirements of Policies CS1 and CS35.

Housing Mix

- 7.86 Policy RC9 requires all proposals for residential development within the Central Area to contribute towards a mix of different sized units within the development. It states that as a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1 bed, 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.
- 7.87 The proposed housing mix is set out in the table below.

Unit Type	Number of units	%
Studio	2	9.5
1 bedroom	7	33.3
2 bedroom	9	42.9
3 bedroom	3	14.3
Total	21	100

- 7.88 It is considered that an appropriate mix of units is provided, which better accords with the dual requirements of the SHMA (as updated) and the need to provide significantly more housing units than envisaged within the current Development Plan. It is noted that the RCAAP, which sets the mix criteria for the central area, pre-dates the NPPF and should only be given limited weight in decision-making.
- 7.89 It is further considered that the lack of car parking proposed makes the site less attractive for larger families, who may expect some form of provision to meet demands specific to this style of living. The site instead predominantly seeks to provide accommodation for new starters or downsizers. The location close to the town centre

makes the scheme proposals attractive to both groups and the development of a calm, reflective courtyard area is in part reflective of the applicant's desire to provide meaningful accommodation for an older age group that in turn could release larger buildings back into the market, this providing more meaningful family-scale accommodation, where it is better matched to play space, education and other required infrastructure elsewhere in the Borough.

Affordable Housing

- 7.90 Policy CS16 requires that schemes of 5 units or over provide a minimum of 30% affordable units within a scheme, with the tenure as specified in the most up to date Housing Needs Assessment.
- 7.91 Supporting text to policy highlights that *'In all cases where proposals fall short of the policy targets 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'*.
- 7.92 The consequent open-book appraisal has highlighted a negative net residual value, meaning that the proposals as they stand cannot provide affordable housing either on-site or as an in-lieu contribution.
- 7.93 More detail to support our proposals is set out in the Viability Statement supporting this application.

Protection of existing Community Facilities

- 7.94 As set out in Section 3, above, it has been clearly demonstrated that the established use of 43a London Street is as offices (Class B1). As such, there is no loss of an existing community facility associated with this element of the proposals and it would therefore be possible to seek prior approval to convert these premises to residential and in essence establish the principle of the residential use being sought to replace this building.
- 7.95 With respect to 43 London Road, the established use is as a self-contained dental surgery (Class D1). The proposals therefore seek to retain an element of this use, at ground floor level, to provide 48 sqm of fully refurbished D1 floorspace set within an enhanced frontage, and improved sole use refuse and recycling facilities to the rear of the unit, considered likely to create more interest in the premises and therefore potential use.
- 7.96 Taking the above into account, it is considered that the proposals strike the right balance in terms of re-providing more usable community floorspace, albeit at a lesser level, within a unit that has stood empty for over three years, alongside enhancements to the London Road façade, improvements to formalise refuse and recycling provision for a number of properties and provision of much-needed, high-quality built form that will offer improved surveillance, environmental benefit and accommodation to meet a number of locally-identified needs. Accordingly, it is contended that the proposals comply with Policy CS31.

Sustainability and Energy

Approach to Energy Reduction/BREEAM

- 7.97 The proposed development is committed to comply with the current Building Regulations Approved Document Part L1A.
- 7.98 It is common practice to assess the effect of carbon dioxide emissions by using the following hierarchy:
- Be Lean – Use Energy Efficient measures to reduce energy use. This includes passive measures such as orientation, levels of insulation, ventilation strategies, and heating systems efficiencies and controls.
 - Be Clean – Source energy from the greenest sources. This could be to use CHP, or to link into an existing district heating system
 - Be Green – Use on-site renewable energy to reduce energy and carbon emissions. The results show that when not using any renewables or de-centralised energy production the building will be compliant with building regulations.
- 7.99 The strategy proposed follows this three-step 'Energy Hierarchy' and meets all policies as outlined in Section 3 of the Energy Report.
- 7.100 Taking this approach, the refurbished building at 43 London Street is expected to reduce CO2 emissions by 47.78% over the existing building baseline, whilst the new-build to the rear, which will replace 43a London Street and occupy the current car park area will achieve an overall reduction in carbon emissions over the Part L1a 2013 baseline of 23.72% therefore complying with Policy CS1 on CO2 reductions.
- 7.101 To minimise energy consumption by the development and to assist in achieving a Building Regulation Part L 2013 compliant development, the following design measures are recommended in the Energy Report:
- Building fabric construction U-values significantly improved compared with standard Building Regulations U-values in the new-build portion;
 - Upgrade to fabric performance in refurbished portion where appropriate;
 - In the new-build portion, reduced Air Permeability, lower than standard Buildings Regulations;
 - Upgrade to heating systems in the refurbished portion of the development;
 - On-site efficient energy generation through the use of a Photovoltaic (PV) array on the uppermost roof for the new-build portion;
 - HVAC system controls ensure installed equipment will be operating efficiently and to include automatic monitoring and targeting with alarms for out of range values;
 - High efficiency LED lighting utilizing low-energy control systems such as occupancy sensing.

- 7.102 Policy CS1 also requires new refurbishment projects to achieve a BREEAM Very Good rating. Therefore, this is relevant to the proposed commercial unit and the converted residential units within the existing building fronting London Street.
- 7.103 The results of the BREEAM review demonstrate that the minimum requirements for a BREEAM Very Good rating for each assessment could be met and confirms that the commercial refurbishment could achieve a score of 59.18%, and the residential refurbishment could achieve a score of 59.51%, providing a suitable buffer over the 55% required for a BREEAM Very Good rating.
- 7.104 The applicant has a strong desire to provide a highly sustainable building, which is evidenced in the conclusions of the Energy and Sustainability Statements, which identify that the proposed scheme will achieve substantial reduction in CO2 emissions and therefore comply with adopted policy.

Sustainability Considerations

- 7.105 Opportunities to incorporate sustainable development features will be explored from an early design stage to provide flexibility to the design team, compensate for any design constraints, and improve the development's ongoing sustainability performance. This will include the key topic areas outlined below:

Minimising Water Use

- 7.106 The proposed dwellings will include, where appropriate, the following features for minimisation of water use:
- Water efficient Dual flush WCs
 - Showers with efficient flow rates
 - Garden spaces and incidental landscaping that will not require permanent irrigation systems or to be irrigated using treated rainwater

Construction Materials and Techniques

- 7.107 Sustainable waste behaviour will be encouraged and facilitated through the following measures during and construction:
- Construction waste will be segregated and recycled where viable
 - Materials specified for low environmental impact where possible including:
 - o Purchasing timber and timber products from legal sustainable sources, using external certification e.g. FSC as verification evidence
 - o Materials will be specified to achieve an 'A/A+' rating as defined by the Green Guide to Specification
 - o Durability measures being in place across the proposed development whenever possible

- o The use of Products with either no formaldehyde or low VCC (meeting the European standards) containing materials
- o The use of thermal insulation which has a low embodied environmental impact relative to its thermal properties.
- o The use of local materials (wherever possible)
- o Re use of materials
- o Good energy efficiency e.g. best practice U-value shall be used for the building fabric.

8. Conclusions

- 8.1 This planning statement has been prepared by Vocalism on behalf of Rose Hill Commercial Estates Ltd in support of a planning application for the:

'Part-demolition of existing London Street facade and internal works to building alongside demolition of two storey building to rear to enable residential-led mixed-use development comprising 48 sqm community use (Class D1) and 21no residential units (2 x studio, 7 x 1 bed, 9 x 2 two bed and 3 x 3 bed units) together with associated services enclosures, parking and landscaping'.

- 8.2 This Planning Statement sets out the site context, explains the pre-application consultation process, and assesses the development proposals against government guidance, and regional and local planning policies.
- 8.3 Furthermore, in preparing this application and its proposals all relevant planning policy requirements together with specific issues identified by officers during pre-application consultations have been taken into account.
- 8.4 As a result, the development fully accords with local, regional and national planning policy and it is therefore respectfully requested that planning permission is granted.

Appendix 1: Place of Worship - Lease

Appendix 2: Mavenir Systems Ltd - Lease

Appendix 3: VOA and Business Rates Records

Appendix 4: RBC Pre-application response, 190364

Appendix 5: Planning Policy Matrix

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