

North Street

Planning Statement
October 2019

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Comment Issue

This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Introduction

1.1. Project Brief

LDA Design have been commissioned by Reading Borough Council to prepare a full planning application for land on the corner of North Street and Weldale Street at grid reference: 470904 (eastings), 173664 (northings) (referred to in this document as ‘the site’) in Reading, Berkshire. The planning application is for a residential development of 41 affordable dwellings (Class C3) comprising 19no. 1 bed, 21no. 2 bed and 1no. 3 bed units, and vehicular, cycle and pedestrian access, parking and hard and soft landscaping.

Reading Borough Council has held a long-standing commitment to ensuring a supply of affordable housing to meet local housing needs. The Council has retained its housing stock and currently owns circa 7,000 homes and as part of its commitment to increasing the new affordable housing supply, Reading Borough Council is developing its own programme of new build housing.

Reading Borough Council considers that the site at North Street provides an opportunity to develop quality homes for the residents of Reading.

1.2. Structure of Document

This Planning Statement provides a thorough assessment of the relevant issues under the following headings:

- 1) Introduction
- 2) Site Context
- 3) The proposals
- 4) Planning policy and guidance
- 5) Planning assessment
- 6) Conclusion

The Planning Statement is informed by, and should be read in conjunction with, the following additional documents:

- The planning application form, notices and certificates
- Design and Access Statement (DAS)
- Preliminary Ecological Appraisal
- Tree Survey
- Air Quality Assessment
- Noise and Vibration Assessment
- Phase 1 Ground Risk and Remediation Study
- Utilities Statement
- Transport Statement

1.3. Approach to planning application

A full detailed planning application has been prepared to secure the development of the site for affordable housing. A pre-application meeting with RBC planning Officers was held on 18th August 2017 to discuss the scheme. Further meetings were held on the 15th March and 14th June 2018. A final pre-application meeting was organised on the 8th May 2019. The scheme was presented to the Design Review Panel on the 4th July. These meetings and subsequent correspondence have helped to inform the scope and content of information required to support the planning application. Design advice provided during these meetings is discussed in the Design and Access Statement.

The approach to pre-application public consultation has been discussed with local Cllrs and informed by the consultation approach and the (limited) public feedback received for the extant planning permission for the site. Given the site benefits from outline planning consent for 47 affordable flats, it was agreed with local members that a formal pre-application consultation event would not be required, and that the notification process and statutory consultation period would be appropriate to allow members of the public to comment on the application proposals.

2.0 Site Context

2.1. Site location

The site occupies a 0.23ha plot of previously developed land located in central Reading (see drawing 7916_PL_101). The site lies within the administrative area of Reading Borough Council. The site is currently vacant but was previously occupied by the Citivas Academy; which included a temporary modular building on the site and a small area of hardstanding for car parking, which is accessed off North Street. The site perimeter is enclosed by fencing and gates. This use was permitted under application reference 141626/REG3, which controls the temporary nature of the use (see 2.3 Planning History).

The surrounding area is characterised by a mix of uses typical for a centrally located urban site. Reading Ambulance Station is located directly north of the site, the area to the east is largely occupied by commercial uses, with an A1 supermarket and associated car parking to the south east. The areas to the west and south are largely residential, characterised by 3 storey buildings of flats.

The site is generally flat and is set down slightly from Weldale Street. There are a small number of existing trees along the site's southern border, lining Weldale Street.

2.2. Site ownership

The site is owned by Reading Borough Council, who are also the applicant.

2.3. Planning History

The site was the subject of an application that was approved on 7th January 2015 for development of a, 'new temporary school of modular construction, single storey and flat roofed. New fencing and gates to site perimeter. New hardstanding for car and cycle parking, and pupil hard play' (application ref: 141626, alternative ref: 141626/REG3). The Committee Report clarified that the application was to use the site for a temporary primary school housed in a modular building composed of several buildings, whilst the permanent site for the primary school at Hodsoll Road was being constructed. The development has been implemented on the site.

Condition 2 attached to the 141626 permission specifies that, 'the siting of the single storey modular school shall cease on or before the expiration of two years following the first siting of the buildings hereby permitted, and the land returned to its former condition. For the avoidance of doubt, within one month of the siting of the buildings, formal written notification of the date of the siting shall have been submitted to the Planning Manager'. The reason given for the imposition of this condition is 'as the development is not suitable for permanent retention'.

Prior to the temporary use of the site for the school, the site was used as a social services facility for a number of years. Permission 880059 was approved in February 1989 for 'Extension to form enhanced services for families.' The Committee Report for application 141626 reports that the Council's Valuation Section confirmed that the social services family welfare building was demolished, and the site cleared in March 2007.

There are two extant outline planning permissions (181652/OUT & 181653/OUT) for a residential development on the site, both approved on 5th December 2018. Both of the

proposed developments comprise of 47 apartments of one, two and three bedroom units, with one permission providing 30% affordable housing and the other 100% affordable housing.

The two extant permissions were submitted in accordance with the s106 planning obligations on Lochailort, the then owner/developer of the Thames Quarter scheme (permission 162166/FUL to provide 315 dwellings on the former Cooper Reading BMW site, Kings Meadow Road). Given permission 162166/FUL contains no on-site affordable provision the Section 106 agreement requires the submission of these applications in order to ascertain the value of the site and prove its capacity/suitability as a 'surrogate' affordable housing scheme.

The officer report for permissions 181652/OUT & 181653/OUT notes that 'In reality, neither of these schemes is likely to be built out, but an approval would allow the developer to discharge their requirements and for the site to be transferred to a Registered Provider who will design and build a suitable scheme, to meet the housing needs of the Borough.'

3.0 The proposals

3.1. Scheme description

Full details of the scheme are set out in the DAS. The key features of the layout are as follows:

The proposed development seeks to achieve planning approval for the development of 41 affordable residential apartments. The accommodation schedule below sets out the exact provision, in summary the proposal is to comprise:

- 19 no. 1 Bedroom Apartments
- 21 no. 2 Bedroom Apartments
- 1 no. 3 Bedroom Apartment
- 9 parking spaces

The proposed development will consist of two separate apartment blocks, with the taller 4.5 storey block facing North Street and the shorter 'T' shape block facing Weldale Street being generally 3.5 storey steeping down to 2.5 storey adjacent Burford Court.

Each block contains a facilities store conveniently located next to the entrance areas to each block. There are two public green spaces for the prospective residents to enjoy. The primary space is enclosed by the apartments on three sides and bounded by proposed trees on the northern edge. The secondary space bounds the Western edge of the site adjacent to Burford Court. The majority of the apartments are dual-aspect providing maximum daylight.

The 'U' shape of the scheme encourages a sense of community and a safe enclosure for children to play under supervision. Front doors are intentionally on the street-facing facades to activate the streetscene. Hedgerows act as defensible space offering the ground floor residents some privacy from passers-by.

Access to the communal open-space is provided via the core of the 3.5 storey block. Access to the main garden space, in particular, is encouraged through the brick archway that joins the two blocks. The positioning of the balconies was determined by orientation, solar shading and aspect out on to the courtyards. Where possible, inset balconies are used to offer solar shading to South-facing units.

4.0 Planning Policy and Guidance

The following policy review assesses how this proposed scheme performs against national and local planning policy objectives and the Development Plan.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires an application to be determined in accordance with the provisions of the Development Plan unless material considerations indicate to the contrary.

Material considerations include, amongst other matters, the National Planning Policy Framework (NPPF) 2019, the National Planning Practice Guidance, and other policy documents, the views of the statutory consultees and the views of the public.

This statement will highlight the most relevant policy and seeks to deliver a coherent argument that demonstrates the proposed scheme's compliance with various policy documents.

4.1. The Development Plan

The Development Plan for Reading comprises the following policy documents:

- Core Strategy (adopted January 2008 with Alteration Adopted 27th January 2015)
- Reading Central Area Action Plan (adopted January 2009)
- Sites and Detailed Policies Document (Adopted October 2012 (altered January 2015))

The relevant policies of the Development Plan documents are outlined below.

4.1.1. Reading Core Strategy

The Core Strategy sets out Reading Borough Council (RBC)'s overall planning strategy. It was originally adopted in 2008 and subsequently altered to update Policy CS16 following RBC's review of their affordable housing policies, in conjunction with introducing the Community Infrastructure Levy. The alterations were adopted on 27th January 2015.

The Core Strategy's Spatial Strategy envisages that development in the centre of Reading will typically be medium to high density, accessible mixed use schemes, incorporating housing and public spaces of an excellent and sustainable standard of design, that will improve the quality of life of those who live, work in or visit Reading. Private parking space will be limited, due to the proximity, frequency and choice of public transport options.

The policies that are relevant for the purposes of this application are outlined below:

Policy CS1 (Sustainable Construction and Design) proposals for new development 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) requires development to 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 promoting layouts and designs that provide adequate space to facilitate waste storage, refuse, recycling and composting.

Policy CS3 (Social Inclusion and Diversity) requires major developments to 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) requires development to be at a scale, density and intensity related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.

Policy CS5 (Inclusive Access) requires all buildings to 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 CS7 (Design and the Public Realm) expects development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Development will be assessed to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness; create safe and accessible environments; address the needs of all in society; are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping. Policy CS7 further requires that applications be supported by a Design and Access Statement that deal with these matters.

Policy CS9 (Infrastructure, Services, Resources and Amenities) will not permit proposals for development unless the Local Planning Authority (LPA) is satisfied that infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided or re-provided at the appropriate time. Planning obligations will be required to secure the enhancement of additional physical and social infrastructure, services, resources, amenities or other assets.

Policy CS14 (Provision of Housing) specifies that provision will be made for the completion of an average of at least 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026. The supporting text to Policy CS14 outlines that locations for residential development should follow the principles that:

- Major development should be located in areas of high accessibility;
- Development should be directed to areas in most need of regeneration;
- Development must have access to efficient and effective public transport.

Policy CS15 (Location, Accessibility, Density and Housing Mix) seeks to provide an appropriate density and mix of residential development within the Borough. This will be informed by:

- An assessment of the characteristics, including the mix of uses of the area in which it is located;
- Its current and future level of accessibility by walking, cycling and public transport, as defined in Policy CS4;
- The need to achieve high quality design in accordance with Policy CS7; and
- The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

Development should provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures, and include an appropriate proportion of units

designed to the Lifetime Homes standard. Policy CS15 outlines acceptable net densities dependent on the location of development. For 'Urban' areas (defined as 'areas that are generally denser, than more suburban area and comprise a mix of residential and employment areas') a density of 40-75 dwellings per ha. is considered acceptable.

Policy CS16 (Affordable Housing) states that all developments of 15 dwellings and above will provide 30% of the total number of dwellings in the form of affordable housing to meet the needs of the area. The Council will seek an appropriate tenure mix of affordable housing to include affordable rented, intermediate rent and shared ownership affordable units. Priority needs identified in the Core Strategy (needs at 2014) are for family sized housing, specialist accommodation for vulnerable people and extra care housing. The Council will regularly monitor and review the need for, and delivery of, affordable housing.

Policy CS22 (Transport Assessments) planning permission will not be granted unless development proposals make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with an agreed transport assessment submitted as part of the application.

Policy CS23 (Sustainable Travel and Travel Plans) requires major development proposals to make a commitment to implement measures to promote and improve sustainable transport facilities and through agreed travel plans, safe routes to schools, safe routes to parks and similar measures.

Policy CS24 (Car/ Cycle Parking) applies maximum car parking standards and cycle parking requirements in relation to the accessibility of locations to sustainable transport facilities.

Policy CS29 (Provision of Open Space) requires all new developments to make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space. On sites of less than 50 dwellings or in area not identified as deficient in the provision of open space, new open space provision/improvements/enhancements will be sought through appropriate contributions.

Policy CS32 (Impacts on Community Facilities) stipulates that where development would have an adverse impact in terms of increasing the need for additional community facilities, or the extension or upgrading of existing facilities, mitigation measures should be provided in line with the scale of the impact.

Policy CS33 (Protection and Enhancement of the Historic Environment), 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) will only permit development 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. Proposals for development that are sensitive to the effects of air, noise or light pollution only be permitted in areas where they will not be

subject to high level of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.

Policy CS36 (Biodiversity and Geology), development should retain, protect and incorporate features of biodiversity or geological interest found within the application site into their schemes.

Policy CS38 (Trees, Hedges and Woodlands) seeks to protect individual trees, groups of trees, hedges and woodlands from damage or removal, and extend the Borough's vegetation cover.

4.1.2. Sites and Detailed Policies Document (October 2012)

Policy SD1: Presumption in Favour of Sustainable Development takes a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the NPPF.

Policy DM1: Adaptation to Climate Change requires developments to demonstrate how they have been designed to incorporate measures to adapt to climate change, and lists the measure that should be incorporated into development. These include orientating buildings to maximise natural heating and ventilation; using trees and landscaping to provide shading; and minimising the impact of surface water runoff from the development in the design of the drainage system.

Policy DM3: Infrastructure Planning requires proposals to make appropriate provision for infrastructure, services, resources and amenities through planning obligations and/or the Community Infrastructure Levy as relevant.

Policy DM4: Safeguarding Amenity ensures that development will not cause a significant detrimental impact to the living environment of existing or new residential properties in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell; or
- Crime and safety.

Policy DM4 recognises that the position of habitable rooms, windows and outdoor living spaces will be particularly important. It states that a back to back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.

Policy DM5 (housing mix) identifies that on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will

ensure that over 50% of dwellings will be of 3 bedrooms or more, and the majority of dwellings will be in the form of houses rather than flats, having regard to all other material considerations.

Policy DM10: Private and Communal Outdoor Space requires dwellings to be provided with functional private or communal open space that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens. The design of outdoor areas will respect the size and character of other similar spaces in the vicinity.

Policy DM12: Access, Traffic and Highway-Related Matters will give consideration to the effect on safety, congestion and the environment in the determination of proposals involving a new or altered access onto the transport network. Development will only be permitted where: the proposed access complies with the accepted standards of the transport authority; the development would not have a detrimental impact on the functioning of the network or to the safety of users of the transport network.

Policy DM16: Provision of Open Space states that the amount and type of publically accessible open space to be provided will be as laid out in the most up to date Open Spaces Strategy. The most up to date strategy is the Reading Open Spaces Strategy (RBC, March 2007). The provision of open space should satisfy the most urgent need in terms of type of open space to be provided in a location. The Policy details requirements for the delivery of open space in terms of its usability, accessibility, and aesthetic, wildlife and recreational value.

Policy DM18: Tree Planting requires new development to make provision for tree planting within the application site, or off-site where appropriate, in order to improve tree coverage, enhance the area's character and appearance, provide for biodiversity, and contribute to measures to reduce carbon.

Policy DM19: Air Quality requires development to have regard to the need to improve air quality and reduce effects of poor air quality. The Policy also requires that where a development that introduces sensitive uses (such as residential) into an Air Quality Management Area, detrimental effects on that use will be mitigated. The Policy Map shows that the site lies within an Air Quality Management Area.

4.1.3. Reading Central Area Action Plan (AAP)

The AAP establishes a planning framework for Central Area of Reading and contains both site allocation policies as well as a set of general Central Area policies guiding guide development in the centre.

The site is allocated within the AAP under Policy RC4b for residential development in the region of 25 – 40 dwellings. The AAP does not include any further policy requirements in terms of design principles. It is included as one of a number of 'opportunity sites', the development of which can help contribute to meeting the vision for Reading and its centre. Sites were allocated on the basis that they met one of four criteria, which included making a significant contribution to meeting the Borough's housing need. The AAP clarifies that where dwelling figures have been provided these are intended as a guide.

Policy RC9: Living in the Centre, proposals for residential development will be assessed against criteria listed in the Policy. This includes the contribution of housing to a mix of different size units within the development, measured by the number of bedrooms provided within individual units. The Policy stipulates that ideally a mixture of one, two and three bedroom units would be provided. A guide is given that in developments of 15 dwellings or more, a maximum of 40% 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. The Policy requires residential developments in the centre to contribute towards affordable housing in line with Core Strategy Policy CS16 and states that in the central area, an over-concentration of affordable renting for single persons will be avoided.

In addition, Policy PC9 requires proposals for new residential development within the central area to demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated.

4.2. Material Considerations

4.2.1. National Planning Policy Framework (NPPF) (June 2019)

The revised NPPF was published on 19th June 2019 and replaces the previous National Planning Policy Framework published in March 2012. The NPPF sets out the Government's planning policies for England and states how they are to be applied.

The core theme of the NPPF is a presumption in favour of sustainable development, which should inform every planning decision. As per paragraph 11, in terms of decision taking for local planning authorities this means:

- Approving development proposals that accord with an up to date development plan without delay; and
- Where there are no relevant development plan policies or the policies that are most important for determining the application are out-of-date, granting permission unless:
- The application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in this framework as a whole.

Paragraph 47 clarifies that local planning authorities may give weight to relevant policies in emerging development plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The NPPF sets out a number of policies that are particularly relevant to this application. These are set out below.

Paragraph 8 outlines the roles that planning should play in respect of each element of sustainable development. The social role of the planning system is outlined as, ‘supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations’.

Chapter 11 outlines the policies in relation to making effective use of land. Paragraph 117 clarifies that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 118(c) outlines that planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’. Paragraph 118(d) requires planning to ‘promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively’.

Paragraph 59 states that to support the Government’s objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land 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.

The NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) (Annexe 2).

Paragraph 92 outlines that in order to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments.

4.2.2. Submission Draft Reading Borough Local Plan (March 2018)

The Draft Local Plan was submitted to the Secretary of State on 29th March 2018. The independent inspector identified a number of modifications that need to be made to the Draft Local Plan submission in order for it to be considered sound. Once adopted the new Local Plan will replace all existing development plans in Reading. In line with NPPF paragraph 48, weight may be given to relevant policies in emerging plans, according to the stage of its preparation, the extent to which they are unresolved objections and the degree of consistency of policies in the emerging plan to the NPPF policies.

The submission draft Local Plan contains general, cross-cutting development management policies that are applicable to the whole of Reading, along with site-specific policies and allocations. A number of the new draft policies are broadly similar to existing, adopted policies of the Core Strategy or Site and Detailed Policies. Notable differences in approach are outlined below:

Policy H1 (Provision of Housing) updates Core Strategy Policy CS14 and the District’s housing requirement figure. Draft Policy H1 outlines that Reading Borough will make provision for at least an additional 15,847 homes in the Borough over the new plan period of 2013 – 2036 (averaging 689 homes per year). This is a notably higher annual housing

requirement compared to that required by Policy CS14 (572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026).

Policy H2 (Density and Mix) updates Core Strategy Policy CS15 and provides higher indicative density ranges for residential development, with 60-120 dwellings per hectare given as an indicative density range where appropriate.

Main modifications to policy H2 clarifies that 'Residential development capacity figures within the site allocation policies are often based on these densities, but the capacity of each site will likewise depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.'

Figure 4.6 in the Draft Reading Local Plan (May 2017) presents estimated size of accommodation type required in Reading. The breakdown for affordable housing is given as follows:

	1 bed	2 bed	3 bed	4+ bed
Affordable	43.4%	32.9%	21.6%	2.1%

This shows that for affordable units the demand is for 1 and 2 bed units.

Policy CR14b Former Reading Family Centre, North Street allocates the site for residential development it notes that development should:

- Address air quality impacts on residential use; and
- Take account of potential archaeological significance.

4.3. Supplementary Planning Documents

4.3.1. Affordable Housing Supplementary Planning Document (July 2013)

The Affordable Housing Supplementary Planning Document (SPD) is intended to provide users of the planning service in Reading with an appropriate framework for determining the size, type, form and content of affordable housing that will be sought in considering whether planning applications for development accord with various local planning policies that form part of the development plan for the Borough. The guidance contained in the SPD is largely geared towards schemes for which there is a proportion of affordable housing, as opposed to schemes such as the Proposed Development which proposes only affordable housing.

Section 3.0 confirms that 'various assessments over the years have pointed to a very high level of need for affordable housing in the borough'.

The SPD advises that in order to meet identified priority needs for affordable housing, new developments providing affordable housing in compliance with policies CS16 and DM6 shall include a range and mix of types and sizes of affordable housing (as appropriate depending on site size). It is further stated that there is a need for a mix of 1, 2, 3 and 4 bedrooms and some even larger accommodation in the provision of affordable housing. Within this range, larger 3 and 4-bedroom family accommodation is a significant priority.

The SPD identifies that Reading has the following priority affordable housing needs:

- Disabled persons units + other specialist properties such as properties with a bedroom and bathroom downstairs for those families coping with a disabled adult in the house;
- Large, affordable, 4 bed & above houses;
- Disabled adapted housing, especially to meet needs of disabled children;
- 1 bed flats in blocks of not more than 6 for vulnerable singles;
- Pepper potted small flats on section 106 sites;
- Shared ownership is an option for Learning Difficulty clients and physically disabled people;
- Bungalows with flexible use e.g. flat for carers;
- Elderly person accommodation including (extra) care homes and sheltered accommodation.

It is confirmed that other needs and priorities will from time to time be detailed and changed through the Council's Housing Strategy.

4.3.2. Community Infrastructure Levy (January 2015)

RBC have an adopted Community Infrastructure Levy (CIL) charging schedule which sets the borough wide CIL rate for residential development at £120 per m². As a 100% affordable housing scheme, it has been agreed with the Local Authority that the scheme will be exempt from CIL charges, in line with the regulations.

4.3.3. Planning Obligations under Section 106 SPD (April 2015)

The SPD sets out the Council's approach towards seeking planning obligations, alongside the introduction of the Council's Community Infrastructure Levy (CIL) Charging Schedule.

4.3.4. Revised Parking Standards and Design SPD (October 2011)

The Revised Parking Standards and Design SPD provides guidance on the level of parking provision required for new developments. It explains that a zonal scheme is applied to determine parking standards. The site is within 'Zone 2 Primary Core Area', which is described as follows:

'Typically this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone. Much of this area is within acceptable walking distance (400m) of either the main railway station, or Reading West railway station. Walking and cycling in this area tends to be encouraged through the provision of wide and safe footways, with some dedicated or shared cycle ways. The areas within Zone 2 also typically have smaller local centres, providing day-to-day access to retail and some commercial facilities. Future growth in these areas is likely to be more mixed than in the core area, with larger amounts of residential than commercial space'.

4.3.5. Sustainable Design and Construction SPD (July 2011)

The SPD aims to promote high standards of Sustainable Design and Construction, providing detail on how to comply with development plan policies set out in the Core Strategy. It aims to assist applicants in ensuring that relevant information is submitted at

the appropriate stage of an application to comply with the requirements of Reading's sustainability policies and national guidance.

5.0 Planning assessment

5.1. The principle of the development

RBC have confirmed that the principle of residential development at this site is considered acceptable. Furthermore, extant permissions 181652/OUT and 181653/OUT for 47 units confirms the acceptability of residential development on this site.

The site is allocated for residential use in the Central Reading Area Action Plan (an allocation which is also being carried over into the Draft new Local Plan). The allocation indicates that the site could accommodate between 25 – 40 dwellings. This demonstrates that RBC accept that the site is suitable for residential development.

Furthermore, the location of the site accords with the principles outlined in the supporting text to Core Strategy Policy CS14 in being in an area of high accessibility and having access to efficient and effective public transport. Given its central location the site is well served by a range of facilities and services. The site is within walking distance of the town centre, with schools, sports facilities, supermarkets and shops within 500m (just over 6 minutes walking distance) of the site. The site is under a kilometre from Reading Station, providing access to mainline rail services and a direct link to both London Paddington and Oxford. The proposed development represents an efficient and sustainable use of previously developed land.

The development of the site is therefore considered to be in conformity with the principles of Core Strategy Policy CS14 and the Reading Central AAP.

5.2. Affordable Housing Provision

As outlined in the supporting text to Policy CS16 and in the Affordable Housing SPD, RBC have identified a significant need for affordable housing provision and views this as a high priority. The Berkshire SHMA (February 2016) also emphasised the critical need for affordable housing within Reading suggesting there is a need for 406 new affordable homes per year, which represents the majority of the overall housing required. The new Local Plan recognises that the consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. The scheme proposes 41 affordable homes of a range of sizes that will provide a significant contribution to the overall affordable housing supply in the Borough. The scheme comprises a mix of unit sizes, providing 19no. 1 bed apartments, 21no. 2 bed apartments and 1 3 bed apartment.

Core Strategy Policy CS16 specifies that in determining application the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. Priority needs in terms of affordable housing are set out in CS16 as well as in the SPD (as set out in Chapter 4).

Reading continues to experience a shortage of all types of housing, and affordable accommodation is particularly in demand. With thousands of people on the Housing Register and an increasing number of families presenting as homeless there is a clear requirement for both houses and flats, of all sizes, at affordable rent levels. However, further analysis indicates that the sized property most required are 2 bed units. Requests

for this sized property make up 40% of the housing register (bands A-E) and is the property size in most demand when you compare the number of families in need of that sized property and the number of units of that size let per year. Therefore, the mix of units proposed for the site directly helps to mitigate this demand.

The Draft Reading Borough Local Plan (Submitted on 29th March 2018) draws on the Strategic Housing Market Assessment (SHMA) (published February 2016) to inform the latest policy direction in terms of housing mix (Policy H2: Density and Mix).

Figure 4.6 in the Draft Reading Local Plan (May 2017) presents estimated size of accommodation type required in Reading. The breakdown for affordable housing is given as follows:

	1 bed	2 bed	3 bed	4+ bed
Affordable	43.4%	32.9%	21.6%	2.1%

This shows that for affordable units the demand is for 1 and 2 bed units. The supporting text (para. 4.4.9) states ‘In terms of a policy requirement, it is not possible to introduce a blanket requirement across the whole Borough. A very substantial amount Reading’s housing need will need to be met in the town centre due to the availability of sites, and delivery of a substantial amount of family housing on these sites will not be achievable’.

As noted in Figure 4.6 above, units at 1 and 2 bedrooms represent 76.3% of the demand for affordable homes in Reading.

The provision of 41 new affordable housing units therefore complies with the principle of delivering affordable housing in line with the current evidence of identified needs, as required by Policy CS16.

5.3. High quality design

The Proposed Development has been designed to ensure that it responds sensitively to the existing context, is accessible, sustainable, and attractive. The DAS that supports this application provides detail on the design principles that have informed the Proposed Development.

5.3.1. Housing Mix and Density

Policy CS15 requires an appropriate density and mix of residential development to be provided. The justification for the proposed housing mix is provided in section 5.2 above.

Policy CS15 gives an appropriate density range of between 40 – 75 dwellings per hectare (dph) in ‘Urban’ areas. The density of the Proposed Development delivers a density of 178dph. However, as demonstrated in the DAS, the layout has been well organised in order to deliver this density whilst still delivering high quality amenity space.

The housing mix delivered on this site differs from that specified in Policy DM5. However, the mix has been developed in consultation with RBC’s housing team. As noted in 5.2 above, the identified need is for 1 and 2 bedroom units which is what the development has been designed to deliver.

5.3.2. Responding to Local Character

The Development Plan requires development to ensure that it responds positively to its local context and create or reinforce local character and distinctiveness. The DAS provides an analysis of the local character of the area in which the site is located. It is proposed that the most appropriate way in which to achieve the aim of ensuring there is an appropriate relationship with the sites existing context is to focus on a set of good design principles. The scheme aims to respond to its context through its scale, orientation and use of materials.

The scale of the development aims to act as an effective transition between predominantly taller development of the city centre to the east and the predominantly low rise residential development to the west. The taller block on North Street addresses the city centre scale and provides a taller feature to the focal corner, whilst the lower block reflects the 3 storey residential development opposite, stepping down to 2.5 storeys as a transition to Burford Court. Front doors are orientated towards the street in order to create active frontages.

The immediate local built environment has no prevailing character, with a mix of ‘styles’ and materials that reflect their time. Therefore, the overall approach to design and aesthetic or ‘look’ of the proposed building is a contemporary one, providing a building which is of its time. The appearance does reflect the local and wider context of Reading using red brick as the main material. However, accent materials, balconies and the massing reflect the function of the building and create its own identity that relates to its immediate site and context.

The layout of the Proposed Development has been designed to help safeguard the amenity of surrounding residents, as required by Policy DM4.

5.3.3. Sustainable Design

The proposed development provides the opportunity to address climate change through a wide range of measures. These cover a range of scales, from the overall layout down to building construction. Sustainable design principles are proposed to be incorporated into the proposed development to ensure that it adequately takes account of the effects of climate change, through building construction and site layout.

The proposed development has been designed to be energy efficient and environmentally sustainable, the key aspects of this sustainable approach to design are described below.

The primary strategy in reducing energy consumption within the proposal is the ‘Fabric First’ approach. Providing a well insulated building envelope with a high level of airtightness. The use of Mechanical Ventilation with Heat Recovery (MVHR) will reduce the energy needed to heat the homes through heat recovery. This type of centralised system will allow the building to be air-tight whilst still having adequate ventilation, providing a healthy internal environment.

Having reduced the energy demand as much as possible through the design of the building envelope and the use of low carbon technologies, the residual energy demand will be partly provided by the generation of renewable energy. Renewable Energy generation will be provided by the installation of a photo voltaic (PV) or combined PV and solar thermal panel array on the West facing roofs.

In order to reduce water usage, low flush toilets will be used throughout the development. Surface water from the site will discharge to the local SW system, being limited to 2l/s. Surface water attenuation will be provided, the maximum calculated size for this storage would be 64m³. This can be provided within the red line boundary of the site, outside of adoptable roads and structures. Please refer to WSPs' reports for further information.

No negative impacts are envisaged on any designated sites in relation to the proposed scheme. Existing trees along Weldale Street to the south will be removed and replaced with new specimens. The existing site has low biodiversity value, replacing hard surface parking with new trees and planting will increase the biodiversity of the site.

5.3.4. Open and Green Space and Trees

The proposed development includes provision of a communal garden. This green space provides an amenity space and opportunity for informal play for local residents and enhances the setting for the dwellings overlooking the space. These dwellings will ensure the creation of a well-defined space with good levels of surveillance to enhance the feeling of security.

A tree survey has been completed and is include in the application documents submitted.

5.3.5. Parking provision

Car parking provision within the proposed development has been provided in line with advice from RBC following formal pre-application consultation and the maximum standards as set out by Reading Borough Council in Reading Borough Local Development Framework - Revised Parking Standards and Design - Supplementary Planning Document - Final - Adopted 31st October 2011. The site is within 'Zone 2 Primary Core Area'.

The proposed development includes 9 parking spaces, this is lower than the typical standard set out in the Parking Standards SPD. However, the SPD states that should a developer require fewer spaces than are set out here then there would need to be demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result.'

Given the site's close proximity to the centre of Reading, and its easy access to public transport connections and the facilities within the town centre, it is considered that the site is located in a sustainable location. Therefore, a reduction in the residential parking provision [i.e. 9 spaces] is appropriate and will not lead to onstreet parking being detrimental to road safety. This position is supported by the local Highways Authority as detailed in the Transport Statement which accompanies this application.

5.3.6. Waste Storage

The Proposed Development includes adequate provision of waste storage as required by Policy CS2. Communal bin storage for waste and recycling is provided in a convenient location within the apartment buildings, which are also in convenient locations for collection.

In light of all the above, it is considered that, in respect of delivering high quality design the Proposed Development is compliant with: Core Strategy Policies CS1, CS2, CS7, CS24,

CS29 and CS38 as well as the following policies from the Sites and Detailed Policies Document: DM1, DM4, DM10, DM16, DM18.

5.4. Transport

The proposed development will be accessed via Weldale Street and north Street, vehicular access is provided via horizontal parking along Weldale Street which also accommodates a footway to facilitate pedestrian access to the site and adjoining network. As indicated on the masterplan, a further pedestrian and cycle access will be provided on the eastern edge of the Site, connecting from North Street.

A transport statement has been prepared to accompany the development proposals; summary of the transport statement conclusions is presented below:

- The proposals comply with national and local policy objectives, in that they provide appropriate car and cycle parking provision, and are sustainable from a transport and highways perspective;
- The site achieves good accessibility by non-car modes of travel including on foot, by bicycle, and by public transport;
- There are no common patterns or trends in accidents on the local highway network over the last five-year period;
- The site is well connected in terms of its proximity to local facilities and amenities;
- The proposed vehicle access arrangements are appropriate to meet the needs of the development and would not result in any detriment to the operation of the local highway network;
- The proposed level of parking is appropriate to serve the proposals;
- The proposals would not result in a significant uplift in vehicle trips, and as such would not negatively impact on the operation of the local highway network;
- The effect of the proposed development, in terms of non-car mode travel, is anticipated to be insignificant on the local sustainable transport network; and
- The proposals will not impact on local highway safety.
- The proposals will not generate significant new trips and as such would not impact on the operation of the local highway network.

5.5. Flood risk and drainage

A drainage strategy statement has been prepared to accompany the planning application. In summary: There are no watercourses within the vicinity of the site. The Environment Agency's (EA) Flood Maps for Planning (Rivers and Seas) indicate that the site is wholly located within Flood Zone 1, which means that it has less than a 0.1% Annual Exceedance Probability (AEP) of fluvial flooding. An area of Flood Zone 2 is located approximately 25m north of the site, although the elevation extent of this zone 2 area is lower than the minimum elevation of the site. Therefore, the risk of fluvial flooding, including an allowance for climate change is considered to be low.

The Environment Agency flood risk from surface water mapping shows that the site is at a very low risk of surface water flooding.

Due to the presence of an existing manhole soakaway onsite and the underlaying chalk bedrock with possible superficial deposits of Clay, Silt, Sand and Gravels, infiltration is considered to be possible at this site.

Therefore, infiltration drainage should be considered as the preference for surface water drainage subject to soakaway testing. Should infiltration drainage not be appropriate, it is proposed to discharge surface water to the Thames Water surface water sewer in North Street.

Surface Water runoff would be limited to 2.5 l/s. The volume required to attenuate surface water discharge to 2.5 l/s in the 1 in 100 year storm event with 40% allowance for climate change, would be approximately 75m³. This will be accommodated in geo-cellular storage and flow limited by a 76mm diameter vortex flow control.

Foul water drainage would be connected to the existing Thames Water infrastructure in North Street.

5.6. Ecology and Biodiversity

A Preliminary Ecological Report (PEA) is submitted with the application. This provides information on the ecological resources present or potentially present at the Site. The PEA concludes that there will be no anticipated impacts upon any designated sites.

The survey found that the dominant habitat on Site was hardstanding/bare ground. A large area of semi-improved grassland was also present on Site along with a line of six trees along the southern boundary and a thin line of scattered scrub along the northern boundary.

Five of the six trees on the Site were assessed as having low potential to support roosting bats; the sixth was assessed as having negligible potential. In addition, the Site sits within a wider landscape which has suitable habitat for foraging and commuting bats.

Given five trees within the Site were assessed as having low potential to support roosting bats, it is recommended that necessary tree removal is subject to precautionary mitigation measures including a pre-works inspection. If the pre-works inspection confirms the presence of a bat roost, or re-categorises the risk of the tree supporting a bat roost, further survey and/or licensing would be required prior to the felling works proceeding.

The trees and scrub were found to have potential to support common species of nesting bird, with a disused nest being observed in one of the trees. Therefore, vegetation removal should be carried out outside of the nesting bird season (March – September inclusive). If this is not possible then a nesting bird check would need to be carried out no earlier than 24 hours prior to the commencement of works.

Enhancements for the site are recommended in line with planning policy including installation of bat and bird boxes, native landscape and grassland planting and good horticultural practice.

5.7. Air Quality

An Air Quality Assessment has been undertaken and is submitted as part of the application. The Air Quality Assessment identifies that based on a review of local air quality data for the area in which the Application Site is located future residents will not be exposed to poor air quality, and that no operational phase mitigation measures are required specifically for air quality. The construction phase of the development will be limited in duration given the size and nature of the development proposals. Following the application of good construction practices and appropriate mitigation measures on site, any potential dust impacts will be mitigated so that the residual effects will be negligible.

5.8. Noise

A noise assessment has been prepared to determine the suitability of the site for residential development. The site is considered suitable for residential use subject to provision of appropriate building envelope sound insulation, it is anticipated that detailed specifications and requirements can be addressed via a condition to any planning permission granted for the scheme.

5.1.5. The impact of the proposed scheme on existing Noise Sensitive Receptors from the proposed development has been considered. This shows that no adverse impacts are predicted to occur from the proposed development.

5.9. Sustainable communities

Given its central location, the site is in an intrinsically sustainable location being close to existing services and amenities, and close to public transport. The site benefits from good access to a number of facilities and amenities which are within walking distance of the site and accessible via safe footpaths and road crossings. The site is within walking distance of the town centre, with schools, sports facilities, supermarkets and shops within 500m (just over 6 minutes walking distance) of the site.

The nature of the Proposed Development in delivering a quantum of affordable housing fulfils social sustainability objectives by providing the supply of housing required to meet the needs of present and future generations, thereby enhancing access to suitable housing.

In light of the above it is considered that the Proposed Development is compliant with Core Strategy Policies CS3, CS4, CS5, CS9 and Sites and Detailed Policies Document Policy DM3.

5.10. Ground Risk and Remediation

A phase 1 contaminated land assessment has been undertaken. The assessment indicates that Very Low to Moderate risks have been identified to end users, and very low to low risks have been identified to controlled waters. The potential contaminants, if identified, are likely to be of low solubility and hence, mobility and the form of development is likely to function to reduce potential future infiltration. Based on the available information, widespread groundwater contamination is unlikely to be present beneath the site.

It is recommended that an intrusive ground investigation is conducted in order to better understand ground conditions, locate any contamination that may be present on site, and establish any geotechnical constraints to construction.

6.0 Conclusions

The proposed development will deliver considerable benefit in respect of affordable housing provision and is supported through national guidance and specific local policies. The site is located in a sustainable location, close to public transport and local amenities, and is allocated for residential development. The principle of development is this location is established via the approval of applications 181652/OUT & 181653/OUT.

The scheme will deliver:

- Provision of 41 new affordable dwellings, including a range of house types and sizes;
- Provision of an attractive and safe communal garden;
- Provides legible internal layout and fits well into the street hierarchy to ensure easy movement in and around the proposed development;
- Integration of sustainable urban drainage systems; and
- Reflection of the local vernacular in terms of materials selection to ensure that the proposed development respects and reinforces the local built character.

As identified in this statement and the other supporting information, the development is considered to be a wholly appropriate for the site and its context, which has been justified in accordance with the planning policy requirements.

In conclusion, it has been demonstrated that the proposals have been informed by, and are developed in accordance with, national, regional and local planning policies. The overriding social, economic and environmental impacts of the scheme are positive, and where, potential impacts have been identified, suitable mitigation measures have been deployed to either remove or minimise the significance of potential effects. The proposal acceptability in planning policy terms provides a clear route for consenting the scheme in line with the normal development management process.