

Planning and Affordable Housing Statement

LAND TO R/O 173-177 KINGS ROAD
READING, RG1 4EX



DAVIS
PLANNING LTD

Chartered Town Planners

19 Woodlands Avenue | Wokingham | Berkshire | RG41 3HL

t – 01189 787972

e – mail@davis-planning.com

Contents

Introduction

- 1 The Site and Surroundings
- 2 Planning History
- 3 Relevant Planning Policies
- 4 The Proposal (including Affordable Housing Statement)
- 5 Summary & Conclusions

Introduction

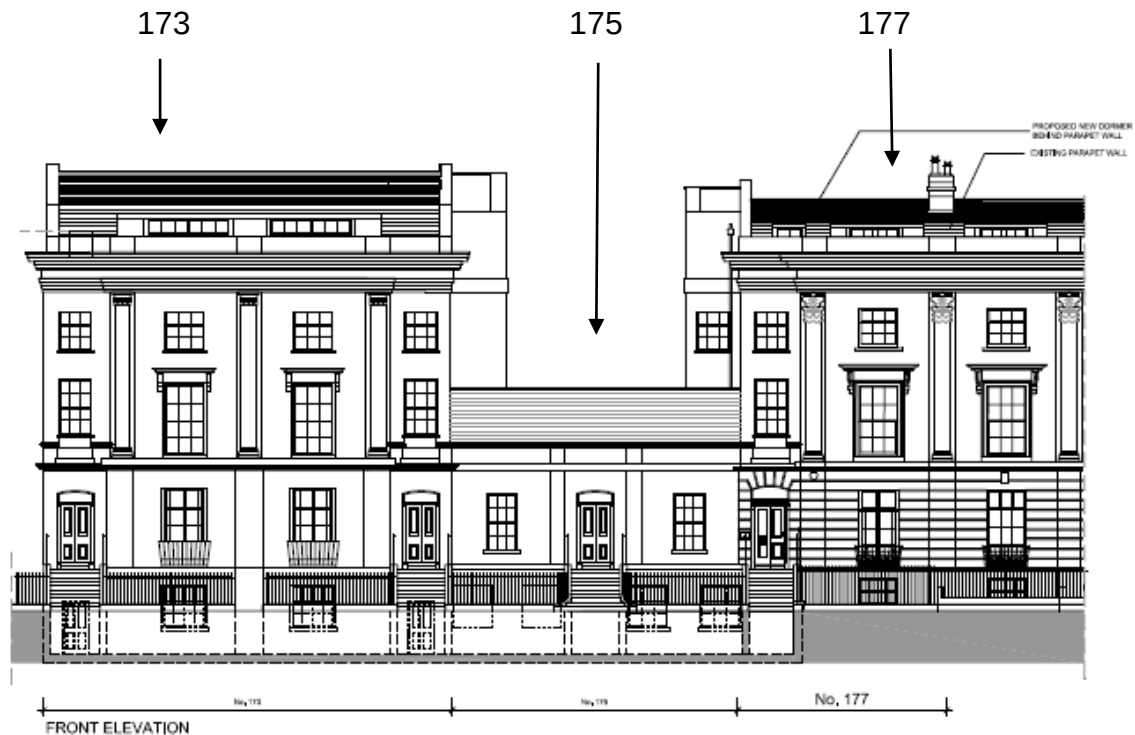
This statement is submitted in support of a planning application by Fitzwilliam Trustees No.1 Ltd c/o Christina Meyer, for the erection of a new building over three floors comprising of 6No. flats (6no. two bed).

The application is accompanied by the following reports:

- i) Planning Statement – Davis Planning Ltd
- ii) Heritage Statement – Heritage Collective
- iii) Sustainability Statement – see Design and Access Statement
- iv) Affordable Housing Statement – Davis Planning Ltd
- v) Tree Survey and AIA – Keen Consultants
- vi) Design and Access Statement – Jon Spires Architects
- vii) Air Quality Assessment - Aether

1 The Site and Surroundings

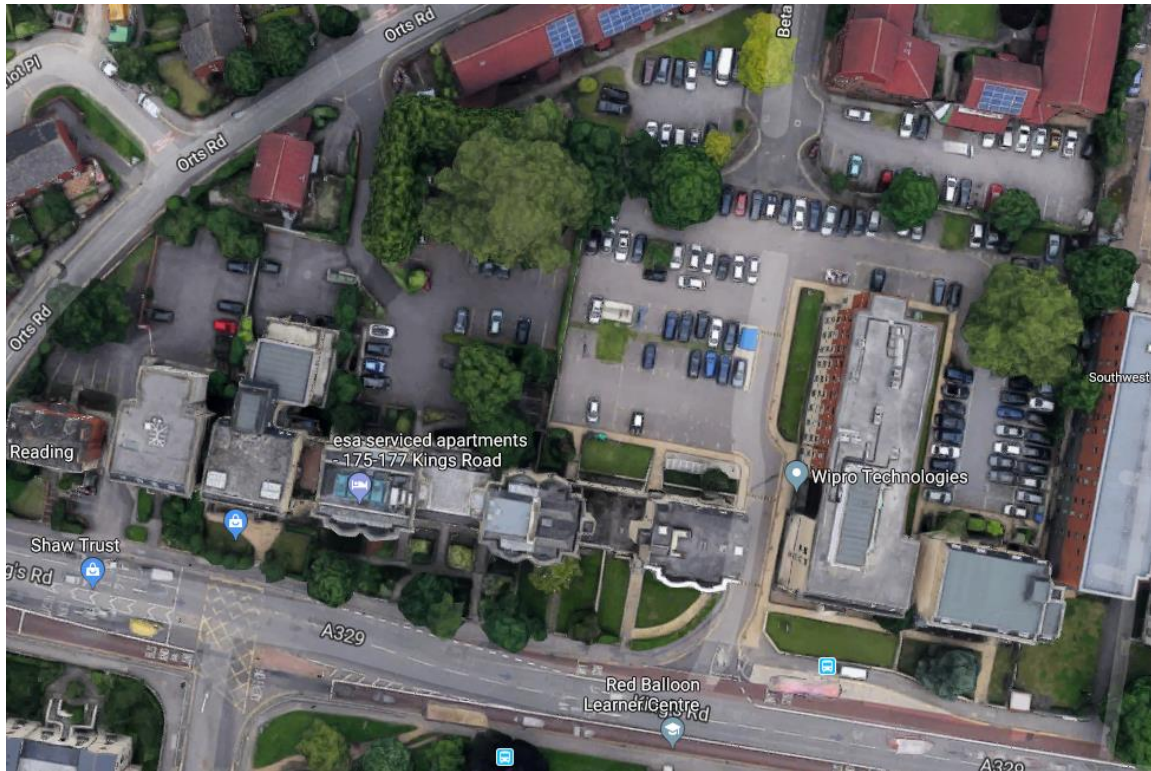
The application site is located to the north of a row of Grade II* listed buildings fronting on Kings Road (Nos.173-177) dating from 1832. The site forms part of a large communal area of hardstanding which serves the parking requirements of the frontage properties which have recently undergone refurbishment and a change of use from B1(a) offices to residential apartments (151116/FUL and 160749/FUL). The buildings are constructed from Bath Stone with slate roofs. The buildings are relatively high with prominent side additions restricting views to the rear carpark. No.173 is five storeys in height with a lower ground floor and roof level; no.175 is lower and forms a link between Nos.173 and 177. Like No.173, No.177 is also three storeys in height (again with a lower ground floor level and roof level accommodation) – see front elevation below



The parking area is accessed from Orts Road immediately to the north of the application site. The site contains a large Plan Tree which is protected under TPO 95/06. The impact on this tree is discussed within the Tree Survey and report produced by Keen Consultants. The site also falls within the Eldon Square Conservation Area which is centred to the south of the A4 and a Air Quality Management Area (see Air Quality Assessment). The Conservation Area Appraisal refers to the important vistas along Kings Road towards them.

The site lies a short distance to the east to the east of the town centre. The site falls with Zone 2 within the Parking Standard SPD which is acknowledged as the

second most accessible location after the Central Core Area. The SPD states that most of these areas are within walking distance of either main railway station or Reading West railway station and generally well served by public transport. This site is within the inner part of this zone so is particularly accessible to the town centre which is only a short distance to the west.



This revised proposal is submitted to overcome the earlier concerns raised by the Council in respect to a proposal submitted in 2018 for 9 flats over 5 floors (180795). The removal of two of these floors and 3 flats from the scheme (i.e. this revised proposal is for a standalone three storey building) provides for clear benefits including reductions in scale and height and a more subservient relationship to the host properties fronting onto Kings Road.

The Heritage Assessment and Design and Access Statement both confirm that the reduced scheme will be far less prominent in any views from Kings Road with any potential views being limited to oblique views from distance or small elements of the building from the opposite side of Kings Road.

2 Planning History

The planning history of the site is relatively long and complex and broadly split between Nos.173-175 and No.177 Kings Road. The recent history of each of these is set out below:

Nos.173-175 Kings Road

151116 – Change of use from office (Class B1a) to 13 residential units (Class C3) and associated works. Approved 30.10.2015.

160775 & 160776 – Change of use from office (Class B1a) to 15 (4x1, 10x2 and 1x3 bed) residential units (Class C3) and associated works, including fenestration alterations.

No.177 Kings Road

160749/FUL & 160750/LBC – Change of use from office (Class B1a) to 6 residential units (Class C3) including 2no. studios, 3no. two bedroom and 1no. one bedroom flat plus new front dormer and associated works.

Land to the rear of 173-175 & 177 Kings Road

180795 – Erection of a five storey building to provide 9 residential units, parking, landscaping and associated works. Refused 13.12.2018 on the following grounds:

- By reason of mass, height and location the building would harm the setting of the listed buildings;
- By reason of the detailed design the proposal would not be of a sufficiently high quality to maintain and enhance the character and appearance of the area;
- By reason of the proposals height, mass and location it would be visually dominating and overbearing creating a lack of outlook for the lower ground floor to No.177 Kings Road;
- By reason of the proposed footprint, internal layout and proximity to a protected mature Plane tree, it would cause unacceptable pressure for pruning and an unsustainable relationship;
- Failure to demonstrate adequate vehicular parking, cycle parking and waste storage facilities;
- Lack of an acceptable contribution towards affordable housing provision.

3 Relevant Planning Policies

Government Guidance

National Planning Policy Framework (2019) - The Revised NPPF sets out the Government's planning policies and how these should be applied. It confirms that applications should be determined in accordance with the development plan unless material considerations indicate otherwise (paragraph 2). The NPPF must be taken into account in the preparation of the development plan and is a material consideration in planning decisions. Paragraph 212 of the NPPF confirms that the policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication.

Paragraph 7 of the revised NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states that in achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These are an economic objective, a social objective and an environmental objective. Paragraph 10 states that '*So that sustainable development is pursued in a positive way, at the heart of the framework is a **presumption in favour of sustainable development** (paragraph 11).*

The presumption in favour of sustainable development does not change the status of the development plan as the starting point for decision making.

Chapter 4 states that in determining applications, local planning authorities may give weight to relevant policies in emerging plans according to:

- *The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- *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;*
- *The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given);*

Chapter 11 is concerned with making effective use of land. Paragraph 117 states that planning policies and decision 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. Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- The importance of securing well-designed, attractive and healthy places.

Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important 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.

Chapter 12 is concerned with achieving well designed places. It states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and helps to make development acceptable to communities.

Paragraph 127 states that planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities;
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 16 is concerned with conserving and enhancing the historic environment. Paragraph 184 confirms that these assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 192 states that in determining applications, LPA's should take account of:

- The desirability of sustain and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Reading Borough Local Development Framework Core Strategy 2008 (Altered 2015)

The following policies are considered relevant:

Policy CS1 – Sustainable Construction and Design. Requires the design and site layouts to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

Policy CS4 – Accessibility and the Intensity of Development. States that the scale and density of development within the Borough will be located to its level of accessibility by walking, cycling and public transport to a range of services and facilities.

Policy CS7- Design and the Public Realm. Requires all development to be of high quality that maintains and enhances the character and appearance of the area of reading within which it is located. The following components of development will be assessed: Layout, urban structure & urban grain; landscape; density and mix; scale, height and massing; and architectural detail and materials.

Policy CS9 - Infrastructure, Services, Resources and Amenities. States that proposals will not be permitted unless the local planning authority is satisfied that infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary will be provided.

Policy CS15 – Location, Accessibility, Density and Housing Mix. States that density and mix will be determined by location. Developments should provide an

appropriate range of housing types and tenures in accordance with the findings of a housing market assessment. Net densities below 30dph will not be acceptable. Indicative density ranges are as follows:

Town Centre: Above 70dph

Urban: 40-75dph

Accessible suburban: 35-55dph

Less accessible suburban: 30-50dph

Policy CS33 – Protection and Enhancement of the Historic Environment. Confirms 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. These includes listed buildings, conservations areas and other features of local or national designation. Planning permission will only be granted where development has no adverse impact on historic assets or their setting

Sites and Detailed Policies Document 2012 (Altered 2015)

Policy SD1 Presumption in Favour of Sustainable Development – States that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained with the NPPF.

Policy DM3 – Infrastructure Planning. Requires that proposals for development make appropriate provision for infrastructure, services, resources and amenities. Such provision to be secured through planning obligations or the Community Infrastructure Levy.

Policy DM4 – Safeguarding Amenity. States 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; noise and disturbance; artificial lighting; vibration; dust and fumes, smell, crime and safety. The position of habitable rooms, windows and outdoor living spaces will be particularly important.

Policy DM6 – Affordable Housing. States that on sites of less than 15 dwellings, the following proportions of affordable housing provision will be provided:

- On sites of 5-9 dwellings - 20% provision

Policy DM10 – Private and Communal Outdoor Space States that 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 similar spaces in the vicinity, clearly identify whether they are private or communal spaces, ensure

that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing and overshadowing.

Policy DM12 – Access, Traffic and Highway Related Matters. States that consideration will be given to the effect on safety, congestion and the environment.

Reading Central Area Action Plan (2009)

Policy RC5 – Design in the Centre. Sets out a series of requirements for design in new developments within the central area. These include:

- Respect for the existing grid pattern structure of the central area;
- Appropriately designed public spaces and other public realm;
- High quality architectural details and materials;
- Contribution towards the diversity of the central area and capability of adaption over time.

Policy RC9 – Living in the Centre. This policy is concerned with new residential development in the central area. It states that developments will be assessed against the following criteria:

- Contribution towards a mix of different size units, measured by the number of bedrooms. Ideally this should be a mixture of 1, 2 and 3 bedroom units. More specific guidance is applied to developments of 15 dwellings or more;
- Noise disturbance from neighbouring land uses and other sources should be considered and where necessary mitigated;
- Contribution towards affordable housing in line with Policy CS16;
- Where a need for additional community facilities is required, mitigation measures will be required;

Submission Draft Reading Borough Local Plan

The emerging plan will eventually replace the current development plan and was submitted to the Secretary of State for Communities and Local Government on 29th March 2018, marking the beginning of the examination in public process. Public hearings took place between 25th September and 5th October 2018.

Policy CC1 - Presumption in Favour of Sustainable Development. States that a positive approach to considering development proposals will be taken that

reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. 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.

The policy continues by stating that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless material considerations indicate otherwise.

Policy CC7 – Design and the public realm. States that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form include: layout; landscape; density and mix; scale (height and massing); and architectural details and materials. These will be assessed to ensure that the development makes a positive contribution to the following urban design objectives:

- Character;
- Continuity and enclosure;
- Quality of the public realm and provision of green infrastructure and landscaping;
- Ease of movement and permeability;
- Legibility;
- Adaptability;
- Diversity.

Development will be assessed to ensure that they, amongst other matters:

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- 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 EN1 - Protection and Enhancement of the Historic Environment. States that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include Listed Buildings; Conservation Areas; Scheduled Monuments; Historic parks and gardens; and other features with local or national significance. All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement

Policy EN4 – Locally important heritage asset. States that development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the assets significance.

Policy H2 – Density and mix. States that the appropriate density of residential development will be informed by:

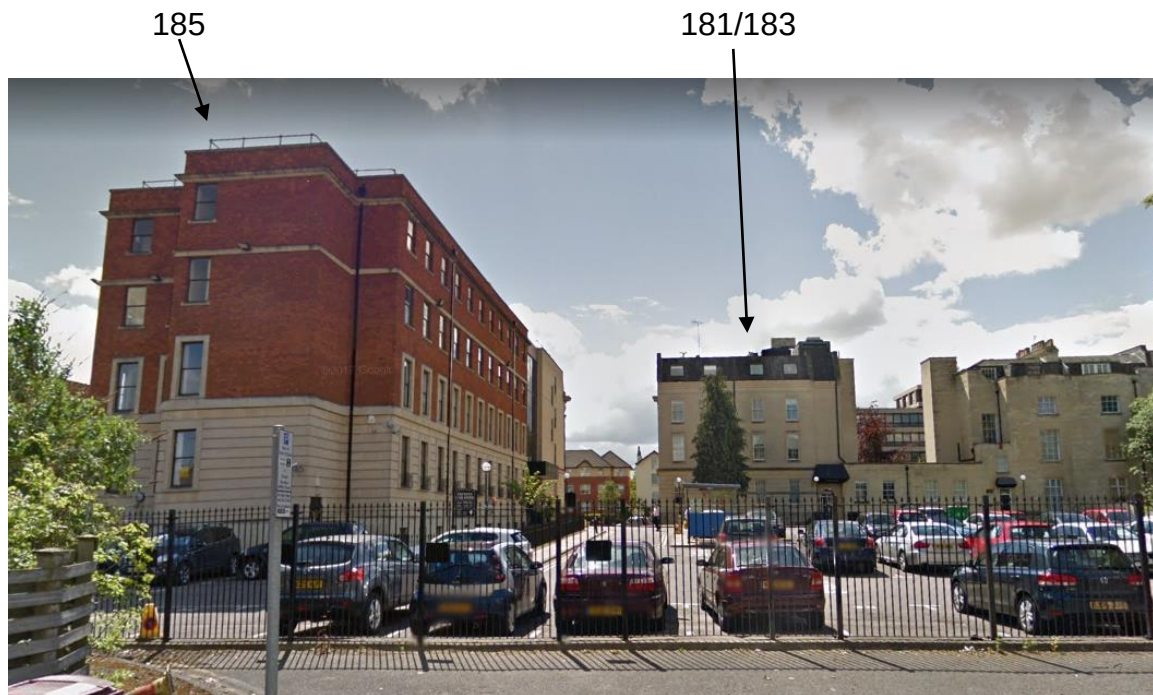
- The character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;
- Its current and future level of accessibility by walking, cycling and public transport;
- The need to achieve high quality design;
- The need to maximise the efficiency of land use; and
- The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

4 The Proposal

The proposal is for the erection of a building comprising of 6No. flats.

Principle of Development

The site of 0.14hectares (0.35acres) is in a highly sustainable location, being only a short distance away from Reading town centre, the main Railway Station and a range of shops, services and local facilities. It is located within the urban area of Reading, in a location which is free from environmental constraints (e.g. outside of Flood Zones 2 and 3). Whilst the host buildings are statutorily listed and also within the Eldon Square Conservation Area, this does not rule out redevelopment to the rear of the site in principle subject to meeting development plan policies and national planning policy advice. The site itself currently represents an underused resource and an inefficient parking layout. The surrounding area is already characterised by development forms at significant depth in the form of some very large rearward projections. This includes 185 Kings Road (see photograph below).



The NPPF sets out a presumption in favour of sustainable development and paragraph 7 identifies that there are three dimensions to sustainable development comprising (i) economic, (ii) social and (iii) environmental. The proposal meets with all of these roles, as follows:

i) An economic objective:

The proposed development provides a number of material benefits to the local economy:

- It provides 6 no. flats assisting to meet defined housing needs and the national requirement to demonstrate and maintain a 5 year housing land supply;
- It would result in local employment opportunities in the construction industry. For every new home built, up to two jobs are created for a year (as set out in the Government Housing Strategy for England (2011));
- It will provides contributions to the Council in the form of the New Homes Bonus that can be spent on local infrastructure enhancements;
- The new residents occupying the development will help to sustain key services in the area.

ii) A social objective

Wider benefits to the wider community include:

- Providing high-quality residential accommodation which represents a high standard of design that enhances the character of the area;
- Increases opportunities for home ownership;
- Increase the number of residents in the locality to support local community facilities.

iii) An environmental objective

The scheme provides a number of benefits to the wider environment such as:

- The site is sustainable located within central Reading, with public transport links and services located in close proximity;
- The scheme responds positively to local context, respecting the character and appearance of the area and the setting of the Listed Buildings to the south;
- Secures a landscaping scheme, to the benefit of the site and the surrounding area. The Tree Report demonstrates that the protected London Plane can be retained.

By meeting the economic, social and environmental goals the proposed development accords with the sustainable development principles contained within the NPPF and the proposal is considered to be acceptable in principle. The scale and density of the development meets the objectives of Policies CS4 and CS15. The indicative density range set out with Policy CS15 advocates a density range of 40-75 dph for an urban situation. This proposal achieves a density of 42dph which is at the lower end of this range reflecting the sensitive nature of the site and its heritage constraints.

Impact on the street scene and local character (see also the Design and Access Statement)

The context of the application site and the surrounding area has been carefully analysed and fully taken into account in designing the application proposal. In particular, the design of the proposal is informed by the local context which includes development at depth such as to the east at no.185.

The proposed building has had regard to the scale and proportions of the existing frontage buildings on the site. It has been designed to be read as a subservient detached building behind the main façade stretching along Kings Road. As set out within the Heritage Assessment, English Heritage had previously considered the obscuring of the rear elevation to be harmful. The reduction in scale to a three storey development substantially reduces this impact as well as largely eliminating any noticeable views from Kings Road. Its physical detachment from the rear elevation will ensure that its built form will be read differently to these properties and as a result its external appearance is unlikely to compete with the elaborate design of the listed properties.

As stated above, the setting of the listed terrace from the rear has already been affected through the creation of the large tarmacked car park. The properties former gardens have long since disappeared. The rear elevation of the terrace has also been the subject of substantial changes as well as the overall negative affect to the setting from the creation of the parking area. Whilst the new building will be slightly higher than the link between the terrace, the new building will only start to come into view over the ridge of the link building some 110m away from the application site. Therefore, in summary, the proposal would not undermine the architectural significance of the terrace or remove its historical connection. Policy CS33 has been met as the areas historic importance and the setting of the listed building has been preserved. The preservation of the setting of the listed buildings means that the earlier refusal reason no.1 has been met.

Impact on neighbouring dwellings

The siting of the proposed building has taken into account the siting of the adjacent buildings and window positions and ensures that no loss of amenity will occur as a result of loss of light or outlook. Care has been taken in positioning windows within the proposed building, with no habitable room windows proposed on the flank elevations directly facing the existing listed terrace.

The previous Daylight and Sunlight Report identified that there would only be one isolated exception to meeting target criteria for the vertical sky component (VSC) to primary windows. However, this was still considered to be close to the target criteria and not considered to be material. The removal of two floors of accommodation deals with the marginal issues previously raised as well as the refusal reason on amenity grounds raised by the Council for the earlier 9 unit scheme. This concerned the dominating and overbearing impact to the outlook of the adjacent lower ground floor to no.177 Kings Road and this will be substantially improved as a result of the removal of the two floors. No other amenity issues were raised by the Council.

Policy DM4 is therefore met as there would be no significant detrimental impact to the living environment of existing properties. The earlier refusal reason no.3 has therefore been overcome.

Housing Mix

The proposal provides for 6 x 2-bed flats. The proposed mix is considered appropriate in this highly sustainable location. Policy RC9 of the Reading Central Area Action Plan does not lay down a minimum target for three bedroom units. As the site is located within the central area and is for fewer than 10 dwellings, the requirements of Policy DM5 (housing mix) to provide a minimum 50% 3 bedroom units are not applicable to this development.

Affordable Housing Statement

Policy DM6 (Affordable Housing) states that on sites of between 5-9 units, affordable housing should be provided at a ratio of 20% provision. The application is not in conflict with the NPPF/NPPG which state that contributions should not be sought on sites of greater than 10 units or 1,000sq.m. This application is therefore below the Government threshold contained within the NPPG. The applicant will be providing an affordable housing viability report to establish whether it is viable to make provision to deal with previous refusal reason no.6.

Trees

The earlier decision for 9 units concluded that the proximity of the new building to the Plane tree would cause unacceptable pressure for pruning and an unsustainable relationship. Whilst the footprint and siting of the revised proposal is broadly identical in terms of its relationship to the protected tree, the reduction in building height will substantially reduce future pressure on the tree and its branches thereby meeting previous reason for refusal no.4.

The application is also accompanied by a Tree Survey which address these issues in detail. The tree survey confirms that the protected London Plane can be protected and retained within the proposed layout without harm or future pressure for removal/lopping of branches.

Access and Parking

The proposal reconfigures the existing layout to the rear of Nos.173-177 making better use of the space and as a result providing a total of 34 no. spaces for the existing and proposed apartments. The existing apartments and the proposed apartments provide for the following total mix of dwelling sizes:

Studios and 1 bed flats – 6 flats

Two bed flats – 16 flats

Three bed flats – 3 flats

The total requirement when assessed against the Council's Revised Parking Standards and Design SPD (2011) is for a provision of 27 spaces with Zone 2 locations. The layout indicates that there will be 34 spaces which complies with the adopted parking standards (Zone 2) and this level of parking provision is considered appropriate given the sustainable location of the site, being only a short walk from Reading Station and close to a range of bus services.

The revised submission also indicates the location of cycle parking and waste storage facilities thereby dealing with reason for refusal 5.

5 Summary and Conclusions

The planning application provides for the redevelopment of the site to provide 6No. new flats. The proposal meets in full the Council's adopted policies and should be supported for the following reasons:

- The application submission is for a three storey detached building behind the existing main faced of the listed terrace. The proposal is the second submission on this site following the refusal of a five storey building containing 9no. flats. This much reduced scheme is submitted to deal with all of the earlier refusal reasons issued under ref.180795.
- The proposal makes the optimum use of a site in a sustainable location well related to key facilities and railway and bus services and as such receives strong support from national and local policy (NPPF and Policies CS4 and CS15). The existing car park which overprovides for the apartments represents a poor and inefficient use of land within an accessible location. This is a much reduced scheme following the submission and refusal of a 5 storey building in the same location earlier this year (9 flats). This proposal removes two full floors of accommodation and 3 of the flats.
- The proposal is designed to reflect the scale, proportions and spacing of existing development within this location and regard has been given to the design process including the evaluation of the site and surrounding area. The local area is characterised by development at depth behind the street frontage either in the form of extensions to existing Listed Buildings (i.e. no.185) or buildings designed with a significant degree of depth such as No.191. The existing Listed frontage properties are already in use as residential apartments. The reduction in height limits any external views from Kings Road and maintains more of the existing limited external views of the much altered rear elevation. The proposal meets Policy CS33 and chapter 16 of the NPPF.
- The proposal provides for 6no. two bed dwellings which is not in conflict with Policies RC9 or DM5 (housing mix).
- The siting and height of the building has taken into account the positioning of adjacent dwellings and ensures that the proposal would not result in any loss of amenity to occupants of adjoining properties along the Kings Road frontage by way of being either visually dominating or overbearing to the outlook. Policy DM4 is therefore met.
- The proposal provides for a form of development that is in keeping with the character and appearance of the surrounding area in terms of its size, scale, layout, height and design. Hardstanding is restricted to areas that are already characterised by open parking. The large London Plan tree which is protected is retained and incorporated into the scheme. This is

demonstrated through a tree survey and AIA. The reduction in height since the earlier submission will reduce future pressure for pruning.

- The site is accessible to public transport modes and provides for adequate car parking, waste storage and secure cycle storage within the proposed layout in accordance with the requirements for a Zone 2 site (Revised Parking Standards and Design SPD, 2011).
- There are no air quality management issues arising from the redevelopment of this site.