

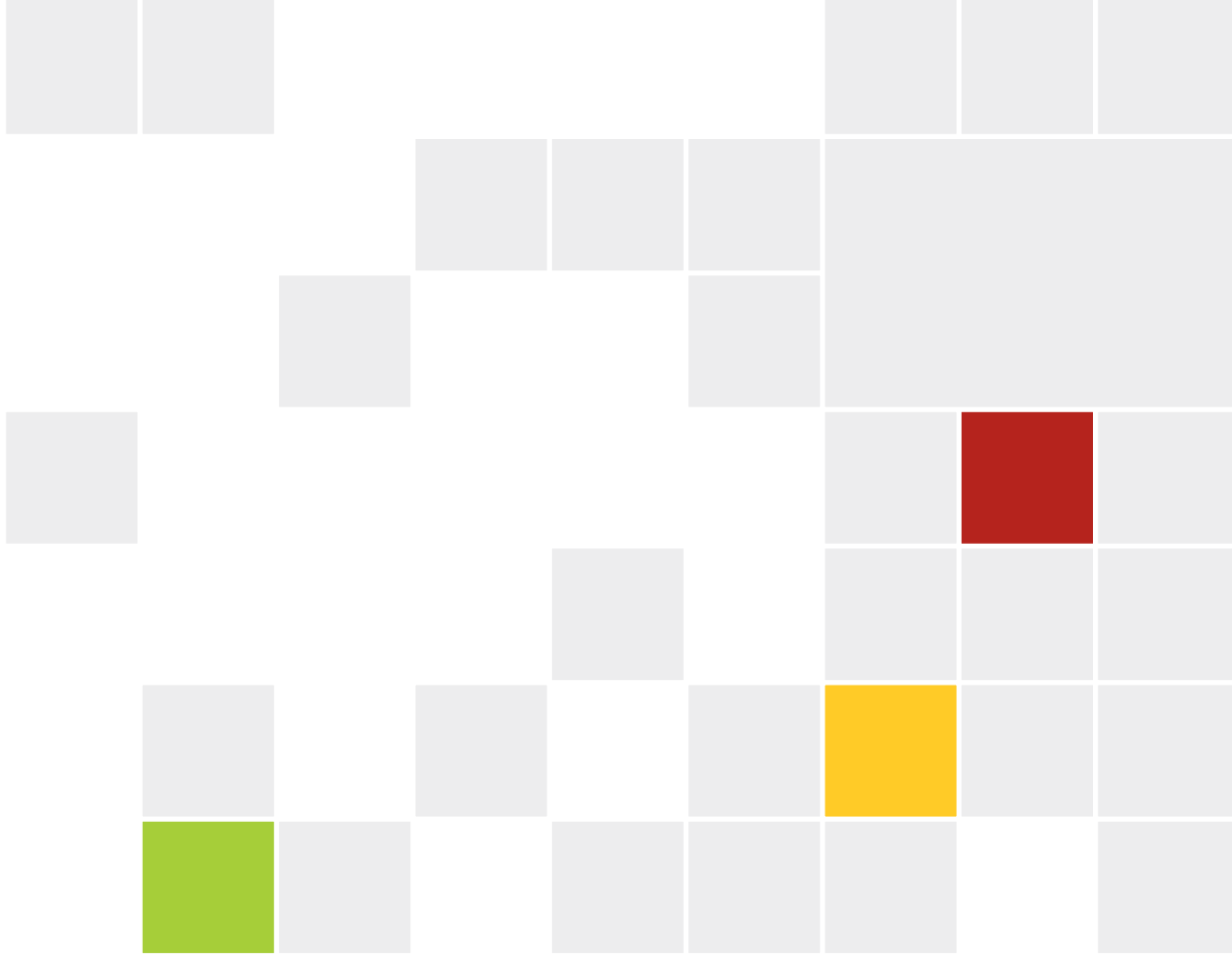
Gas Holder Site, Reading

Planning Statement

April 2019

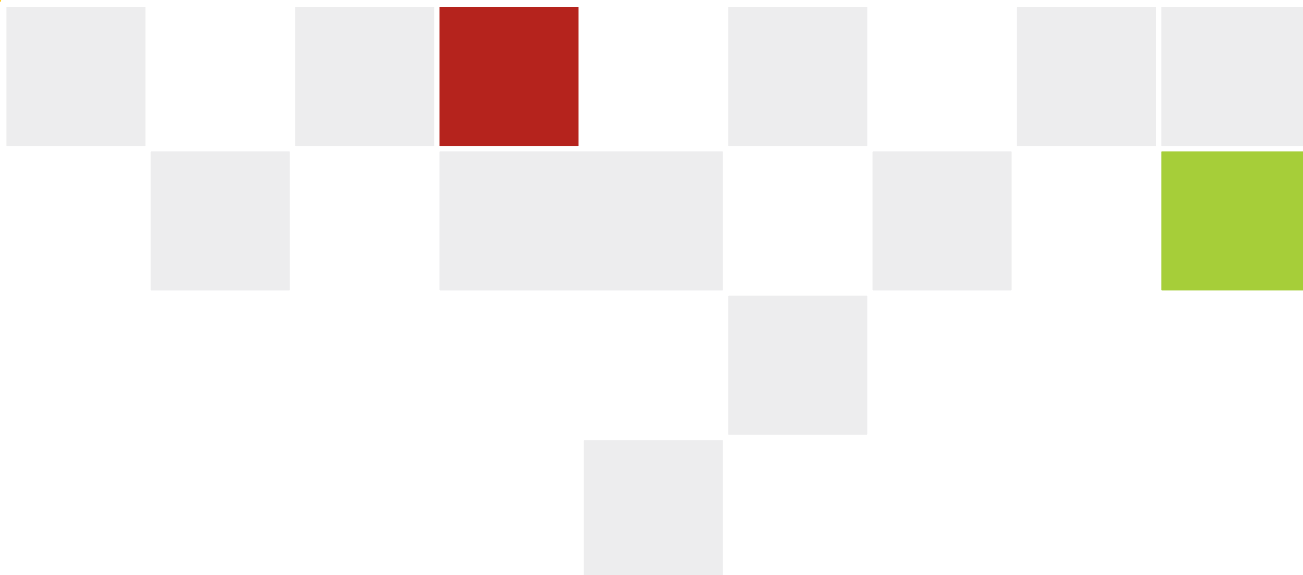
A photograph of a modern residential courtyard. In the background, there are multi-story brick buildings with large windows. The courtyard features green lawns, stone walls, and several people walking or sitting. The overall atmosphere is bright and open.

Boyer



Gas Holder Site, Reading

Planning Statement



Boyer

Report Control

Project:	Gas Holder Site at Alexander Turner Close Reading
Client:	Danescroft (Kenavon Drive Project Management) LLP
Reference:	17.1003
File Origin:	http://lucas/sites/boyer/wokingham/2017/17.1003/4 Boyer Planning/4.02 Reports/2018 Planning Statement/180905 Planning Statement - Final.docx
Primary Author	Michelle Thomson/Alice Davidson
Checked By:	Karen Charles

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	10/04/2019	Draft v1	KC
2	11/04/2019	V2	KC
3	12/04/2019	Final	KC

TABLE OF CONTENTS

1. Introduction	2
2. Site and Surrounding Area	5
3. Proposed Development	8
4. Planning Policy Context	13
5. Consideration of Planning Issues	23
6. Summary and Conclusion	40

APPENDICES

Appendix 1 – Drawing Register

1. INTRODUCTION

- 1.1 This Planning Statement is submitted on behalf of Danescroft (Kenavon Drive Project Management) LLP ('Danescroft') in support of a full planning application relating to the redevelopment of the 'Gas Holder' site ('the site').
- 1.2 The site, situated at the end of Alexander Turner Close and accessed via Robert Parker Road, is allocated for residential development and forms the far eastern corner of the 'East Side Major Opportunity Area' (MOA) in the Reading Central Area Action Plan (2009) and the submission version of the emerging Reading Borough Local Plan (2018).
- 1.3 The site is owned and operated by SGN, and the majority of the site is occupied by the Gas Holder structure itself. Following years of investment in upgrading gas networks and technology infrastructure, gas is now more efficiently stored in underground pipework and Gas Holders are no longer needed. It is not sustainable for SGN to keep redundant Gas Holders in a safe and visually acceptable condition long-term. SGN is therefore committed to dismantling 50% of its Gas Holders by 2021 and to redeveloping the land they sit on for uses that are more beneficial to the local community, such as housing.
- 1.4 The Gas Holder was decommissioned a number of years ago and the hazardous substances consent for the Gas Holder was revoked in 2012. There is no prospect of the Gas Holder being brought back into use as part of the network in the future or its adaptation for alternative uses. The Gas Holder occupies the majority of the site and the existing buildings and hardstanding remain in use as a depot for SGN, where vehicles and materials are stored. The site is fully operational and will remain so unless a viable planning permission for an alternative use is achieved.

Description of Development

- 1.5 The planning application seeks full planning permission for a new residential development and area of public realm with associated works following the planned removal of the existing Gas Holder and the demolition of all other existing buildings on the site.
- 1.6 The description of development, as set out on the application form, is as follows:

"Demolition of existing buildings and Gas Holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units (Class C3) with associated access, car parking, landscaping and open space."

Accompanying Documentation

- 1.7 The appended drawing register (**Appendix 1**) sets out the drawings that accompany the planning application:
- 1.8 Table 1 below sets out the other documents and reports that are submitted in support of the planning application, in accordance with the Council's local validation requirements:

Table 1 – Documents and reports submitted in support of the application

Document	Prepared by
Daylight and Sunlight within the Proposed Dwellings	Anstey Horne
Geotechnical & Structural Engineering Planning Design Report	Atkins
Application Form	Boyer
CIL Form	Boyer
Covering Letter	Boyer
Planning Statement	Boyer
Statement of Community Involvement	Boyer
Energy Statement	Briary Energy
Design and Access Statement	Collado Collins
Landscape Statement	Farrer Huxley
Heritage, Townscape, Visual Impact Assessment	Montagu Evans
Arboricultural Impact Assessment	Greenspace Ecological Solutions
Bat Emergence Survey	Greenspace Ecological Solutions
Preliminary Ecological Appraisal	Greenspace Ecological Solutions
Air Quality Assessment	Stuart Michael Associates Limited
Construction Environmental Management Plan	Stuart Michael Associates Limited
Flood Risk Assessment and Drainage Statement	Stuart Michael Associates Limited
Framework Travel Plan	Stuart Michaels Associates Limited
Noise Assessment	Stuart Michaels Associates Limited
Transport Assessment	Stuart Michaels Associates Limited
Affordable Housing Statement	Turner Morum LLP
Archaeological Desk-Based Assessment	Wessex Archaeology
Geo-Environmental Site Assessment	WSP

Structure of the Planning Statement

1.9 This Planning Statement is structured as follows:

- **Section 2** sets out the background context leading up to the submission of the planning application, including the pre-application process and community engagement;
- **Section 3** provides a description of the site and its surroundings, the current use of the site and relevant background information and planning history;
- **Section 4** provides a description of the proposed development;
- **Section 5** provides an overview of national and local planning policy and guidance which is relevant to the determination of the planning application;
- **Section 6** provides an assessment of the proposed development against the identified planning policy framework; and
- **Section 7** provides a summary of the application and conclusion.

2. SITE AND SURROUNDING AREA

- 2.1 The site measures 0.71 hectares and is broadly triangular in shape. It is bounded by the River Kennet to the south and the east, railway lines to the north which sits on a 3.5 meter high embankment, and residential development to the west. This includes the Kennet Walk development and the more recent development along Robert Parker Road and Alexander Turner Close built by Bellway Homes.
- 2.2 The site itself is occupied by the existing 33 metre high Gas Holder, some ancillary buildings, a water tower and an area of hardstanding. The north and south boundaries of the site benefit from existing vegetation, predominately in the form of trees, although the majority of these are situated beyond the application boundary for the site.
- 2.3 The site formerly comprised one small part of the wider Reading gasworks which previously extended to the west of the site and was first established in 1880. The site has considerable ground contamination due to its historical use.
- 2.4 The remaining Gas Holder on the site, known as GH4, was built in 1916 by C. & W. Walker Limited. It replaced an earlier Gas Holder that had been on the site since the late-19th century. The design of the Gas Holder comprises a narrow lattice box-section standard. It is identified as a 'Type 37' in the categories identified as part of the study of Gas Holders commissioned by English Heritage (now Historic England) in 2000, and it is a late example of its type. Compared to listed examples, GH4 is neither technologically innovative nor decoratively detailed, and has a functional and utilitarian appearance.
- 2.5 In the mid-20th century the production of gas shifted towards intake from the North Sea and Gas Holders became increasingly obsolete. The investment and upgrading of infrastructure means that gas is now stored more efficiently in underground pipework. The majority of the holders at the Reading gasworks were dismantled and GH4 was decommissioned in March 2008. The hazardous substances consent for the Gas Holder was revoked at the end of 2012 and the consultation zones previously associated with the hazardous substances consent around the Gas Holder subsequently removed.
- 2.6 The site is currently owned and operated by SGN, however the Gas Holder has been taken out of service and so is no longer in use. The Gas Holder occupies the majority of the site and the existing buildings and hardstanding remain in use as a depot for SGN, where vehicles and materials are stored.
- 2.7 The site is in a sustainable location just over 1 km east of Reading town centre on the junction where the railway lines towards London Waterloo and London Paddington meet the mouth of the River Kennet. The site is within a 20 minute walk from Reading Station, and is serviced by the numbers 42 and 42a bus service which operates 400m from the site, along Kenavon Drive. The Gas Holder is also a 10 minute walk to Tesco Extra supermarket which is accessible via a pedestrian tunnel under the adjacent railway line. There is also a pedestrian footbridge crossing the River Kennet adjacent to the site, which provides access to New Town.

- 2.8 The site benefits from close proximity to a number of social and community facilities. New Town Primary School (Grade II Listed) is situated a 2 minute walk over the river Kennet footbridge and a day care nursery school, 'Dingley' is located 100m along Kennet Walk from the site. In addition to Tesco Extra, the nearest local district centre is Cemetery Junction which is 1km from the Gas Holder site. Palmer Park is situated 1.5km from the site and benefits from a public library, Athletics club, two playgrounds and a multiple other community facilities.
- 2.9 As well as the Grade II Listed New Town Primary School building, which is situated to the south of the site on the opposite side of the river, the railway bridge to the north-east of the Site is also Grade II listed. These and other local heritage assets are given full consideration in the Heritage, Townscape and Visual Impact Assessment (HTVIA) which accompanies this application. The site does not lie within a Conservation Area.
- 2.10 Part of the site falls within the Reading Air Quality Management Area (AQMA) due to its proximity to the railway line where it passes through the built-up area. The site also falls within Flood Zone 2.
- 2.11 The site forms the far eastern corner of the East Side MOA which has been allocated for development as a new community at the eastern fringes of the centre since the Reading Central Area Action Plan (RCAAP) was adopted in 2009 (Policy RC3). The Gas Holder is the last phase of development which is allocated in this plan.
- 2.12 In terms of accessing the site, the only access is via Robert Parker Road and Alexander Turner Close which have been developed as part of the Bellway Scheme and are currently utilised by SGN as access the depot.
- 2.13 There have been no formal planning applications of relevance on the site in the past, although the following notable developments have been approved elsewhere in the East Side MOA:
- **42 Kenavon Drive (RCAAP Site RC3e)** - 192 dwellings have recently been completed by Bellway on land immediately to the west of the application site, formerly known as 42 Kenavon Drive (RCAAP Site RC3e). This was originally granted planning permission under application ref. 131280 in 2013 with buildings ranging in height from 3 to 8 storeys;
 - **Former Homebase and Toys R Us Site (RCAAP Site 3c)** – Planning permission was granted in October 2018 on the former Homebase and Toys R Us site at the junction of Forbury Road and Kenavon Drive for the erection of buildings ranging between 2 and 11 storeys, providing 765 homes (Class C3), 5 commercial units (1x flexible Class A1-A4, B1 or D1-D2, 1x flexible D1 or D2, 1x flexible Class A1- A5, 1x flexible Class A3 or A4, 1x flexible A1-A5 or D1-D2

uses), various works to the public realm including a new riverside square, landscaping, accesses, parking and associated works (ref. 170509); and

- **2 and 3 Forbury Place, Forbury Road (RCAAP Site RC3a)** - Two new eight storey office buildings have recently been constructed following planning permission in 2013 (ref. 121826).

3. PROPOSED DEVELOPMENT

3.1 The application seeks full planning approval for:

“Demolition of existing buildings and Gas Holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units (Class C3) with associated access, car parking, landscaping and open space.”

3.2 The proposals comprise:

- The demolition of existing buildings on the site and the Gas Holder structure;
- 130 apartments comprising a mix of 48 x 1 bedroom apartments, 74 x 2 bedroom apartments and 8 x 3 bedroom apartments;
- Buildings at 5 storeys (Building A), 9 storeys (Building B) and 3 storeys (Building C) with a 2 storey enclosed car park;
- A mix of tenures including market and affordable housing;
- Vehicular and pedestrian/cycle access off Alexander Turner Close;
- High quality hard and soft landscaping and public realm;
- Public Art;
- 127 car parking spaces;
- Secure indoor cycle storage with 74 cycle spaces;
- Refuse and recycling storage; and
- Open space including a community garden, a nature corner and a viewing platform.

Mix and Layout

3.3 The proposed housing mix is as follows:

- 48 x 1 bedroom apartments;
- 74 x 2 bedroom apartments; and
- 8 x 3 bedroom apartments.

3.4 The proposed development is formed of three distinct buildings; a five storey apartment building (Building A) set back from the river edge but benefiting from views of the River Kennet, a taller nine storey building on the northern boundary with a covered multi-level car park (Building B), and a small scale building (Building C) forming an extension to the existing homes along Alexander Turner Close. Each dwelling has access to private amenity space, either in the form of a terrace, garden or balcony.

Building A

3.5 Building A comprises 38 market apartments (including 3 wheelchair accessible homes) and is 5 storeys high. There are 13 x 1 bedroom apartments, 20 x 2 bedroom apartments and 5 x 3 bedroom apartments. Each ground floor apartment has a garden or terrace, allowing a direct relationship with the open space along the river frontage. The building incorporates a refuse store for residents of these apartments.

Building B

- 3.6 Building B comprises 82 market apartments (including 4 wheelchair accessible homes) and is 9 storeys high. There are 35 x 1 bedroom apartments, 45 x 2 bedroom apartments and 2 x 2 bedroom apartments (of which there are 3 x 2 bedroom duplexes and 2 x 3 bedroom duplexes). The building is split into two elements in order to break up the bulk and massing of the building form. The ground floor homes are duplexes and face onto the open space. 114 car parking spaces are provided within the building including accessible and electric charging spaces. The building also incorporates refuse and recycling storage alongside plant rooms to service the building. The proposed car parking is situated within a two storey covered element.

Building C

- 3.7 Building C comprises 10 homes provided across 3 storeys. There are 2 large apartments (1 x 2 bedroom and 1 x 3 bedroom) at ground floor level, as well as the entrance to the cycle store for the development. Across the first and second floors there are 8 x 2 bedroom apartments.

Design

- 3.8 The design rationale for the proposals are to create a high quality development that carefully responds to the local context. The development reduces in height to the west where the site abuts the existing terraced houses and rises to the east to mark the gateway into Reading.
- 3.9 The three buildings reflect the surrounding townscape, with pitched roofs and their use of brick. All three buildings use red brick, with detailing and accents in grey and white brick. Dark grey is used for windows and other features such as balustrades. Red, and grey Herringbone brick detailing provides further elevational interest. The industrial character of the site and surrounding area has influenced the proposed design.
- 3.10 Building A relates to the river frontage and the access road. Building B relates to the open space and the railway line and Building C relates to the access road and the existing development to the west of the site.
- 3.11 Building B comprises of two sections which appear as one block in plan form, but are separated to reduce the appearance of the bulk and mass in elevation.

Access and Parking

- 3.12 The site is accessed from Alexander Turner Close. Footways and lines of trees are located on both sides of the access road. Car parking, including disabled parking sits between the footway and the access road outside Building C. A network of pedestrian routes run through the development site.

- 3.13 13 car parking spaces are provided on-street outside Building C (this includes 3 wheelchair accessible spaces). The remaining 114 car parking spaces are located within Building B, including accessible spaces and electric charging vehicle points.
- 3.14 All car parking is unallocated, for visitors and residents of the proposed development.
- 3.15 Secure cycle storage for the development is provided on the ground floor of Building C with 74 cycle parking spaces available.
- 3.16 A refuse store will be located at the eastern entrance to the multi-story car park in Block B, as well as at both the northern and southern boundaries of the access road. Each refuse store will serve each of the three blocks. Swept path analysis has been undertaken for a refuse vehicles entering and existing the site. The turning head to the east of the site will allow the refuse vehicle to turn and reverse up to the refuse store at the entrance to the multi-storey car park before moving back to first gear, can also access the other bin stores and exit the site.

Open Space

- 3.17 The proposals include a public community garden, located between Buildings A and B and the river frontage. This area comprises 520m² and includes 2 x 50m² LAPs. It provides space for informal play, planting and sheltered seating by the river. It leads onto a viewing platform that projects out into the river and provides informal seating areas.
- 3.18 The river frontage includes measures to enhance the biodiversity and ecological value of this area. Public access is informal here rather than marked out by pathways.
- 3.19 The nature corner is a sunken area to the east of Building B, which provides an ecologically diverse area of approximately 160m². Managed public access is provided by steps down to this area from the community garden and frontage of Building B.
- 3.20 The historic aspects of the site also provide an opportunity for public art and sculpture to be incorporated into the areas of open space with the industrial heritage of the site also captured through the palette of materials across the development.

Pre-Application advice

- 3.21 The proposed development is a result of an extensive pre-application engagement process, including structured and regular dialogue with Reading Borough Council (RBC) and various statutory consultees. The pre-application discussions with RBC took place under a Planning Performance Agreement and included the following pre-application meetings and events in advance of this submission:
- 29 March 2018 – Initial pre-application scoping meeting with RBC;
 - 4 June 2018 – Pre-application meeting with RBC;
 - 28 June 2018 – Pre-application meeting with Design South East;
 - 9 July 2018 – Public Exhibition 1;
 - 25 July 2018 – Pre-application meeting with RBC;

- 18 October 2018 – Pre-application meeting with RBC;
 - 7 November 2018 – Pre-application meeting with RBC;
 - 24 and 25 January 2019 – Public Exhibition 2; and
 - 29 January 2019 - Pre-application meeting with RBC.
- 3.22 In addition to the pre-application meetings above, separate meetings and discussions were also undertaken with the Environment Agency (17 October 2018 and 14 November 2018) (covering landscape, ecology and contamination) local ward members and Councillors (27 September and 21 January 2019) including Councillor Tony Page, Councillor Karen Rowland and Councillors Mohammed Ayub.
- 3.23 On 28 June 2018, at an early stage of the design process, the preliminary scheme was presented and reviewed by Design South East. The panel comprised an expert team of architects, urban designers and landscape architects. A full site visit was conducted by the panel ahead of the review and the panel's written comments were received on 16 July 2018.
- 3.24 The panel agreed that the existing site has some highly positive qualities and has the potential for a successful housing development. The panel welcomed the approach to analysis and modelling of initial options for the site's redevelopment but considered that an optimum solution had yet to be identified at that point in time. The panel recommended exploring additional options that further consider the widely varying conditions to the north and south of the site. The panel raised no concerns about the density and height of the proposal but recommended giving further consideration as to how the better distribute accommodation throughout the site to create a greater sense of place.
- 3.25 Holding the design review at an early stage enabled Design South East's recommendations to be fully explored as part of the emerging design process and the feedback received has been integral to the development of the final proposals, as detailed within the accompanying Design and Access Statement prepared by Collado Collins.
- 3.26 Community engagement has also been central to the evolution of the proposed development. An initial public exhibition was held on 9 July 2018 at the Kennet Walk Community Centre, close to the application site. The exhibition was held at an early stage of the design process to inform people about the initial sketch proposals considered for the site and to provide further details of the preferred sketch before progressing the detailed design further.
- 3.27 A second public exhibition was held on 24 and 25 January 2019, at the same venue as the first exhibition. The exhibition was held at a later stage of the design process to explain the work which had been undertaken to date and to show how the scheme had progressed since the previous exhibition.
- 3.28 Feedback from the exhibitions were largely positive, with general support for the redevelopment of the site. Whilst there was some nostalgia for the gas holder itself, the majority of respondents accepted that it would need to be removed to facilitate development and that a scheme that incorporated the Gas Holder structure would not be appropriate

and/or viable. Concerns primarily related to the potential increase in traffic and provision of sufficient parking to ensure there would be no overflow onto surrounding roads.

- 3.29 Full details on the community engagement process, the responses received and how the proposals have evolved in response to the feedback received can be found within the accompanying Statement of Community Involvement.

4. PLANNING POLICY CONTEXT

- 4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, to the extent that development plan policies are material to an application for planning permission, the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
- 4.2 The development plan for Reading Borough Council (RBC) currently comprises:
- Core Strategy (2008, altered 2015);
 - Reading Central Area Action Plan (2009); and
 - Sites and Detailed Policies Document (2012, altered 2015).
- 4.3 The following adopted Supplementary Planning Documents (SPDs) are also of relevance:
- Affordable Housing SPD (2013);
 - Employment, Skills and Training SPD (2013);
 - Revised Parking Standards and Design SPD (2011);
 - Revised SPD on Planning Obligations under Section 106 (2015);
 - Sustainable Design and Construction SPD (2011); and
 - Kenavon Drive Urban Design Concept Statement SPD (2004).
- 4.4 The National Planning Policy Framework (NPPF) is also a material consideration in the determination of the planning application.
- 4.5 RBC is in the process of producing a new Local Plan which was submitted to the Secretary of State on 29 March 2018. The Examination in public took place between 25 September 2018 and 5 October 2018 to determine whether the Local Plan and Proposals Map are sound, legally compliant and fulfil the duty to co-operate. Pending the outcome of the examination, RBC anticipates that the new Local Plan will be adopted in Summer 2019. Having been through examination, the emerging policies will carry some weight in the decision making process.

National Planning Policy

National Planning Policy Framework (2019)

- 4.6 The National Planning Policy Framework provides the overarching planning policy framework against which all local plans and neighbourhood plans should be prepared and against which all planning applications are determined.
- 4.7 Paragraph 8 of the NPPF establishes that “*achieving sustainable development means that the planning system has three overarching objectives*”. These objectives give rise to the need for the planning system to perform a number of roles:

- *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *a social objective – to support 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; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy” (p.5).”*

4.8 As detailed in Paragraph 10, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 sets out how the presumption in favour will apply to plan-making and decision-taking, and states that development that accords with an up-to-date development plan should be approved *“without delay”* (p.6).

4.9 With regard to delivering a wide choice of high quality homes, Paragraph 59 requires local planning authorities to *“support the Government’s objective of significantly boosting the supply of homes”* (p.17).

4.10 Section 12 attaches great importance to the design of the built environment. In particular, Paragraph 127 states that planning policies and decisions should aim to ensure that developments:

- *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to 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 quality of life or community cohesion and resilience” (pp.38-39).*

4.11 The Government encourages the use of previously developed land where suitable opportunities exist. Paragraph 118 states that planning policies and decisions should, *inter alia*:

- *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...”*

4.12 The Government also strongly encourages local planning authorities to approach decision taking in a positive way to foster the delivery of sustainable development, and Paragraph 38 states that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible” (p. 13).

Planning Practice Guidance (PPG)

4.13 The Planning Practice Guidance (PPG) sets out guidance on a wide range of topics relevant to this planning application including: before submitting an application; climate change; consultation and pre-decision matters; design; determining a planning application; flexible options for planning permissions; natural environment; open space, sports and recreation facilities, public rights of way and local green space; planning obligations; renewable and low carbon energy; and travel plans, transport assessments and statements in decision-taking.

Local Planning Policy

4.14 As indicated above, adopted local planning policy is currently set out within the Core Strategy (2008, altered 2015), Reading Central Area Action Plan (2009); and Sites and Detailed Policies Document (2012, altered 2015). Local planning policies and Supplementary Planning Documents (SPDs) which are considered of relevance to the determination of the application are set out below:

Core Strategy:

- Policy CS1: Sustainable Design and Construction
- Policy CS2: Waste Minimisation
- Policy CS3: Social Inclusion and Diversity
- Policy CS4: Accessibility and the Intensity of Development
- Policy CS5: Inclusive Access
- Policy CS6: Settlement Boundary
- Policy CS7: Design and the Public Realm
- Policy CS9: Infrastructure, Services, Resources and Amenities
- Policy CS14: Provision of Housing
- Policy CS15: Location, Accessibility, Density and Housing Mix
- Policy CS16: Affordable Housing
- Policy CS20: Implementation of the Reading Transport Strategy
- Policy CS22: Transport Assessments
- Policy CS23: Sustainable Travel and Travel Plans
- Policy CS24: Car / Cycle Parking
- Policy CS29: Provision of Open Space
- Policy CS30: Access to Open Space
- Policy CS33: Protection and Enhancement of the Historic Environment
- Policy CS34: Pollution and Water Resources
- Policy CS35: Flooding
- Policy CS36: Biodiversity and Geology
- Policy CS38: Trees, Hedges and Woodlands

Reading Central Area Action Plan:

- Policy RC3: Development in the East Side Major Opportunity Area
- Policy RC5: Design in the Centre
- Policy RC9: Living in the Centre
- Policy RC13: Tall Buildings
- Policy RC14: Public Realm

Sites and Detailed Policies Document:

- Policy SD1: Presumption in Favour of Sustainable Development
- Policy DM1: Adaptation to Climate Change
- Policy DM2: Decentralised Energy
- Policy DM3: Infrastructure Planning
- Policy DM4: Safeguarding Amenity
- Policy DM5: Housing Mix
- Policy DM6: Affordable Housing
- Policy DM10: Private and Communal Outdoor Space
- Policy DM12: Access, Highway and Traffic-Related Matters
- Policy DM16: Provision of Open Space

- Policy DM17: Green Network
- Policy DM18: Tree Planting
- Policy DM19: Air Quality
- Policy DM20: Hazardous Installations
- Policy SA11: Settlement Boundary

Submission Draft Emerging Reading Borough Local Plan (2018)

- 4.15 RBC is undertaking a review of their policies in their emerging Local Plan. Consultation of a Pre-Submission Draft Local Plan took place between the 30 November 2017 and 26 January 2018. After this consultation period, the Council submitted the Local Plan to the Secretary of State on 29 March 2018.
- 4.16 The Council envisage adopting the emerging Local Plan in summer 2019. This will supersede all existing documents containing the main planning policies including the Core Strategy, the SDPD and the Reading Central AAP.
- 4.17 Due to the stage of progression of the emerging Local Plan, it will be worth noting relevant policies in relation to the site, although they do not carry full weight in planning decisions at the current time.
- 4.18 Policy CC1 – Presumption in Favour of Sustainable Development: This policy states that a positive approach will be taken when considering development proposals, in compliance with national policy
- 4.19 Policy CC2 – Sustainable Design and Construction: Proposals should ensure that the design of buildings and site layouts use energy, water, minerals, materials and other natural resources efficiently by meeting several requirements
- 4.20 Policy CC4 – Decentralised Energy: Any development of more than 20 dwellings shall consider the inclusion of a CHP plant, or other form of decentralised energy provision within the site.
- 4.21 Policy CC5 - Waste Minimisation and Storage: Developments should demonstrate measures to minimise the generation of waste on the construction, use and life of buildings and promote more sustainable approaches to waste management. Layouts and design should provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.
- 4.22 Policy CC6 – Accessibility and the Intensity of Development: This policy states that any new development must be at a scale, density and intensity appropriate to the level of accessibility to defined districts and local centres

- 4.23 Policy CC7 – Design and the Public Realm: The Policy states that all development must be of a high design quality and that new development should make a positive contribution to the Council's urban design objectives. The Policy states that development will need to respond positively to the local context and create or reinforce local character and distinctiveness and be visually attractive as a result of high quality built form and spaces
- 4.24 Policy CC8 – Safeguarding Amenity: states that the design of a scheme for existing and new residential properties should have regard to the following key areas:
- Privacy and overlooking,
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of a development; and
 - Artificial lighting.
- 4.25 Policy CC9 – Securing Infrastructure: Proposals for development will not be permitted unless infrastructure, services, resources, amenities to other assets lost or impacted as a result of the development will be provided through direct provision or financial contributions.
- 4.26 Policy EN1 – Protection and Enhancement of the Historic Environment: Historic features, including their setting will be protected and where possible enhanced.
- 4.27 Policy EN9 – Provision of Open Space: All new development should make provision for appropriate open space based on the needs of the development. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought.
- 4.28 Policy EN10 – Access to Open Space: New development should make provision for, or contribute to, improvements to road and crossings to improve access to green space.
- 4.29 Policy EN11 – Waterspaces: Where development is in the vicinity of watercourses, it will provide appropriate buildings which enhance the relationship with the watercourse and make positive contributions to the distinct character and amenity of the watercourses. It should be set at least 10 metres back from the watercourse wherever practical.
- 4.30 Policy EN12 – Biodiversity and the Green Network: Permission will not be granted for development that negatively affects the sites within identified interest or fragments the overall green network. Development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.
- 4.31 Policy EN14 – Trees, Hedges and Woodland: New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations.
- 4.32 Policy EN15 – Air Quality: Development should have regard to the need to improve air quality and reduce the effects of poor air quality. Mitigation measures for a development in an Air Quality Management Area will need to be detailed in any planning application.

- 4.33 Policy EN16 – Pollution and Water Resources: Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use.
- 4.34 Policy EN18 – Flooding and Sustainable Drainage Systems: Where possible, development should be designed to reduce flood risk, both on and off site. All major development must incorporate SuDS as appropriate. All new developments in areas of flood risk should give priority to SuDS.
- 4.35 Policy H1 – Provision of Housing: Provision will be made for at least an additional 15,433 homes in Reading Borough for the period 2013 – 2036.
- 4.36 Policy H2 – Density and Mix: The indicative density range for an urban area is 60-120dph. Net densities of below 30 dph will not be acceptable.
- 4.37 Policy H3 – Affordable Housing: All developments of 10 dwellings and above should identify 30% of the total number of dwellings as affordable housing.
- 4.38 Policy H5 – Standards for New Housing: New build housing should be built to the standards prescribed in the full wording of the policy. This includes complying with the nationally described space standards, designing to achieve zero carbon homes, and ensuring all housing is accessible and adaptable in line with M4(2) of the Building Regulations.
- 4.39 Policy H10 – Private and Communal Outdoor Space: This Policy requires dwellings to be provided with functional private or communal open space. Houses will be provided with private outdoor space whereas flats may be provide with communal outdoor space, balconies and/or roof gardens.
- 4.40 Policy TR1 – Achieving the Transport Strategy: Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan.
- 4.41 Policy TR4 – Cycle Routes and Facilities: Developments will be expected to make full use of opportunities to improve for cyclists to, from and within the development and to integrate cycling through the provision of new facilities.
- 4.42 Policy TR5 – Car and Cycle Parking and Electric Vehicle Charging: Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities. For communal car parks for residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.
- 4.43 Policy OU2 - Hazardous Installations: Development in the vicinity of hazardous sites or pipelines will not be permitted unless it has been satisfactorily demonstrated that the hazardous substances would not pose adverse health and safety risks to the surrounding population and environment.
- 4.44 Policy CR2 - Design in Central Reading: Applications for development within Central Reading should demonstrate that they comply with the relevant design attributes.

- 4.45 Policy CR3 – Public Realm in Central Reading: Proposals for new development will need to make a positive contribution towards the quality of the public realm of the central area.
- 4.46 Policy CR6 – Living in Central Reading: All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. They will also need to demonstrate how the issue of potential noise disturbance from neighbouring land uses have been mitigated.
- 4.47 Policy CR10 – Tall Buildings: In Reading, tall buildings are defined as 12 storeys of residential or above. Tall buildings will only be appropriate within the ‘areas of potential for tall buildings’ as defined on the Proposals Map.
- 4.48 Policy CR13 – East Side Major Opportunity Area: The vision for this area will be a new community at the eastern fringes of the centre lending a more urban character to the area, and helping to frame the historic east of the central core.

Site Promotion and Site Allocations

- 4.49 The site has been promoted for a number of years by SGN and, more recently, by Danescroft on SGN’s behalf.
- 4.50 As highlighted above, the site is allocated for development in the Reading Central Area Action Plan (RCAAP) under Policy RC3f (Gas Holder). This is a sub-area within the wider East Side Major Opportunity Area, as designated under Policy RC3 (Development in the East Side Major Opportunity Area). The vision for the area is as follows:
- “The east side area will be a new community at the eastern fringes of the centre, lending a more urban character to the area, and helping to frame the historic east of the central core.”*
- 4.51 Policy RC3 is structured with general points applicable to all sub-areas, then some individual guidance for each sub-area. The more general points that are particularly relevant specify that development should:
- *“Provide a more defined urban environment than currently exists, of a medium to high density;*
 - *Contribute towards the provision of a new residential community at the eastern fringes of the central area;*
 - *Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;*
 - *Preserve the historic features in the area and enhance their setting where possible;*
 - *Provide additional areas of open space where possible, particularly in the centre of the new community;*
 - *Maintain, improve and create new access along the River Kennet.”*

- 4.52 The specific allocation for the ‘Gas Holder’ site (Policy RC3f) states that:

“This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading.”

- 4.53 The vision for the East Side MOA remains unchanged in the emerging new Local Plan (draft Policy CS13), with the general points detailed at Paragraph 5.16 above repeated and added to, in particular a new reference to:

- *“Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth”*

- 4.54 The emerging site-specific allocation for the ‘Gas Holder’ site (draft Policy CR13d) repeats and builds on the existing allocation:

“CR13d, Gas Holder:

This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river will be sought. Development should be set back at least ten metres from the top of the bank of the river and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.”

- 4.55 The submission version of the Local Plan specifies the site size as 0.71 ha and includes an indicative potential of 46-70 dwellings. Paragraph 5.4.23 of supporting text clarifies the number of dwellings are, to an even greater extent than other areas, an indication only and that development capacity can vary significantly on high density town centre sites.
- 4.56 SGN and Danescroft strongly support the continued allocation of the East Side MOA and specifically the Gas Holder site. Representations were submitted to the Examination of the Local Plan supporting an increase in the indicative site capacity to better reflect the site’s potential and the emerging development proposals for the site and also recommending a number of minor amendments to the wording of draft Policy CR13 and CR13d in the interests of soundness.

Kenavon Drive Urban Design Concept Statement

- 4.57 The Kenavon Drive Urban Design Concept Statement (KDUDCS) was adopted in 2004. Whilst it provides some basis for consideration of the development of the site and how this fits in with wider developments in the East Side MOA, the document itself is now somewhat out-of-date given that it pre-dates the 2009 RCAAP. Since the KDUDCS and RCAAP were adopted, development has also been completed at Forbury Place and 42 Kenavon Drive, and there is a resolution to grant planning permission at the former Homebase / Toys R Us site, which render some elements of the KDUDCS out of date. It is however, a material consideration in decision making.
- 4.58 The KDUDCS specifies six key design principles for the future development of the area:

- Allowing for permeability and movement;
- Designing a quality public realm;
- Achieving diversity and legibility;
- Continuity of frontage;
- Sustainable design; and
- Appropriate use of height and scale.

4.59 A number of specific references are made to the 'Gas Holder' site, including:

- Page 6 notes that there are long range views of the Gas Holder from Caversham to the north and the university area to the south;
- Page 8 notes that social housing has been positioned at the end of the Kennet Walk development adjacent to the Gas Holder within poor quality open space;
- Page 8 refers to the previous HSE exclusion zones associated with the Gas Holder, however these were subsequently removed following the decommissioning of the Gas Holder and prior to development of the 42 Kenavon Drive site, so are no longer applicable;
- Page 11 notes that, if the Gas Holder is redeveloped, *"there may be scope for a landmark building on this corner site overlooking the river. The Gas Holder, as an industrial structure of varying height should not be considered to set a precedent for the height of future structures in this area."*; and
- Page 11 also states that *"High visibility from the railway affords the study area the potential role of a 'gateway' into Reading, and as such the development of the area should act as a 'design ambassador' for the Town."*

5. CONSIDERATION OF PLANNING ISSUES

5.1 The main planning issues are considered to be:

- Principle of development and land use considerations, including housing density / mix and provision of affordable housing;
- Demolition, layout, height & massing, appearance, design and effect on heritage assets;
- Open space / public realm, trees, landscaping and ecology;
- Quality of accommodation for future occupiers;
- Amenity for nearby occupiers;
- Transport;
- Sustainability, energy, SuDS and flooding;
- Other matters; and
- Planning obligations and CIL.

Principle of development and land use considerations, including housing density / mix and provision of affordable housing

5.2 The site is located within the designated East Side Major Opportunity Area (MOA) within the RCAAP, which has been carried forward into the submission version of the emerging Local Plan. The vision for the East Side MOA is to *“be a new community at the eastern fringes of the centre, lending a more urban character to the area, and helping to frame the historic east of the central core.”*

5.3 Policy RC3 continues by stating that development in the East Side MOA will:

- *“Provide a more defined urban environment than currently exists, of a medium to high density;*
- *Contribute towards the provision of a new residential community at the eastern fringes of the central area;*
- *Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;*
- *Safeguard land which is needed for mass rapid transit routes and stops;*
- *Preserve the historic features in the area and enhance their setting where possible;*
- *Provide additional areas of open space where possible, particularly in the centre of the new community;*
- *Maintain, improve and create new access along the River Kennet.”*

5.4 The proposed development will meet all of these overarching objectives in full, as demonstrated in the table below.

Policy RC3	Requirement	Compliance
i)	Provide a more defined urban environment than currently exists, of a medium to high density;	Compliant – the proposed development provides definition to the northern boundary of the site through built form. The river frontage is defined by an apartment block and by landscaping, softening the public realm and linking the public open space with the heart of the site. The proposed density is reasonably high, however, there is no upper density limit set by the local policies and the proposed density is acceptable in this urban environment.
ii)	In sub-areas RC3c, RC3d, RC3e and RC3f, contribute towards the provision of a new residential community at the eastern fringes of the central area;	Compliant – The proposed development will provide a new residential community. A range of 1, 2 and 3 bedroom apartments and duplexes are proposed, including shared ownership and affordable rented homes. Wheelchair accessible units are also proposed.
iii)	Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;	Compliant – the proposals are fully accessible to pedestrians and cyclists and provides secure cycle storage. The proposals provide access to the river frontage and will contribute towards future improvements to connectivity across the River Kennett to the south.
iv)	Safeguard land which is needed for mass rapid transit routes and stops;	Compliant – the proposals do not prevent any future mass rapid transit proposals.
v)	Preserve the historic features in the area and enhance their setting where possible;	Compliant – the design of the proposed apartment blocks and the public realm reflect the industrial history of the area. The landscaping and public realm, as well as high quality architecture will enhance the appearance of the area significantly.

vi)	Provide additional areas of open space where possible, particularly in the centre of the new community;	Compliant – A community garden is proposed in the centre of the site, connecting all apartment blocks with communal amenity space and play areas. To the north east of the site, the nature corner provides a further area of open space. These areas are both publically accessible and also link up to the river frontage which provides informal access and seating.
vii)	Maintain, improve and create new access along the River Kennet.	Compliant – the proposals enhance the river frontage, through improved access to the river via footpaths and also a viewing platform jetting out into the river. There is informal access along the entire river frontage of the site.
RC3f, GAS HOLDER:	This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading.	Compliant – the proposed development will provide a new residential community and a landmark building for this gateway into Reading. The character of the area will be significantly enhanced due to the proposed landscaping works along the river frontage, the provision of open space, play areas and new homes. The materiality and design details reflect the industrial heritage of the area and connect into the existing townscape.

5.5 More specifically, the application site is designated under sub-area RC3f ('Gas Holder), of which Policy RC3 states that:

“This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading.”

5.6 Again, as this Planning Statement will demonstrate, the proposed development is considered to comply with the specific sub-area designation.

5.7 The allocation of the East Side MOA follows on from the Kenavon Drive Urban Design Concept Statement (KDUDCS) (2004). The site is recognised as part of an important strategic area for redevelopment within Reading. The purpose of the KDUDCS is to provide a broad vision and urban design framework for the area, to guide future redevelopment proposals. The document sets out the following long-term redevelopment objectives:

- *“Create a unified sense of place for an area that is currently detached and isolated;*
- *Reduce the isolation of the area by creating new links to adjoining areas;*
- *Provide high quality design in accordance with the principles set out in “By Design”;*
- *Provide a balance between built form that makes an appropriate statement, responding to views into the study area from the railway line and further afield;*
- *Provide mixed use development;*
- *Provide lively and animated street frontages;*
- *Integrate the existing development at Kennet Walk as part of the urban fabric created by new development; and*
- *Create a high quality public realm with appropriate open space and landscaping.”*

5.8 The proposed development will meet all of these objectives as demonstrated in the table below.

Policy RC3	Requirement	Compliance
Objective 1	Create a unified sense of place for an area that is currently detached and isolated	Compliant – the proposed development will provide a landmark building for this gateway location. It will give a sense of scale and purpose to the under-utilised site and significantly improve the visual appearance.
Objective 2	Reduce the isolation of the area by creating new links to adjoining areas	Compliant – the proposals will link through to Alexander Turner Close. On exiting the site pedestrians can access Kennet Walk and the pedestrian footbridge over the river. Pedestrians, cyclists and vehicles can also travel to the town centre from the site.
Objective 3	Provide high quality design in accordance with the principles set out in “By Design”	Compliant – high quality design, materiality and architectural detailing are at the heart of the proposals, as set out in more detail in the DAS.
Objective 4	Provide a balance between built form that makes an appropriate statement, responding to views into the study area from the railway line and further afield	Compliant – the proposals provide a landmark gateway building. The proposed apartment blocks will provide a visual focus from the railway line and further afield, reminiscent of the industrial heritage of the site, in a contemporary form.

Objective 5	Provide mixed use development	Compliant – the proposals comprise residential development in a range of sizes and tenures. Publically accessible open space and play areas are also proposed. The proposed development is well connected with local facilities in the surrounding area.
Objective 6	Provide lively and animated street frontages	Compliant – the proposals activate frontages into the public areas, including the community garden, the river frontage and the main street. External amenity space for each apartment in the form of ground floor terraces or balconies ensures activity and animated facades.
Objective 7	Integrate the existing development at Kennet Walk as part of the urban fabric created by new development	Compliant – the proposals respect the form of the Kennet Walk development. The scale of the development at this end of the site steps down and landscaping provides a buffer. The site access leads straight onto Kennet Walk, providing an important link. There are also active frontages looking out towards Kennet Walk.
Objective 8	Create a high quality public realm with appropriate open space and landscaping	Compliant – the proposals are centred around the public realm. The main street is a tree lined shared surface area which leads onto the community garden, the nature corner and the river frontage. The apartments all benefit from outdoor private amenity space, providing an active frontage to the public realm.
Key Principle 1	Allowing for Permeability and Movement	Compliant – the proposals encourage pedestrian permeability through the site, via a network of landscaped areas and pathways. The site access opens out onto Alexander Turner Close, providing permeability into the Bellway scheme and Kennet Walk, as well as onto the pedestrian footbridge across the river.

Key Principle 2	Designing a Quality Public Realm	Compliant - the proposals are centred around the public realm. The main street is a tree lined shared surface area which leads onto the community garden, the nature corner and the river frontage. The apartments all benefit from outdoor private amenity space, providing an active frontage to the public realm.
Key Principle 3	Achieving Diversity and Legibility	Compliant – the proposals provide a landmark building for this part of Reading, drawing pedestrians and cyclists into the town centre. Both private and communal amenity spaces are provided for each apartment, as required by the principle 3.
Key Principle 4	Continuity of Frontage	Compliant – A strong edge is proposed along the northern boundary of the site. The southern edge, along the river frontage provides a continuous landscaped frontage. Active frontages are proposed onto all public areas to allow natural surveillance.
Key Principle 5	Sustainable Design	Compliant – the proposals have evolved, taking due consideration of potential sustainable design methods and energy efficiency options. The proposed utilises a fabric first approach to sustainable construction and also utilises Pv cells for energy generation.
Key Principle 6	Appropriate use of Height and Scale	Compliant – the proposals use height and scale to provide a landmark building at this gateway location for Reading. As a result of pre-application discussions, the height of the tallest building (Block B) has reduced. The scale of the buildings step down towards the more sensitive site edges with the river and existing residential development.

5.9 The KDUDCS divides the study area into three distinct character areas. The application site lies at the far eastern end of the MOA, adjacent to Character Area 3. In regard to this character area the guidance notes that:

“The existing private and social housing at the eastern end of the study area is poorly integrated into its surroundings due to fencing, neglected areas of open space and parking arrangements. This area could continue as a blend of residential and commercial uses or transfer to a wholly residential development. The visually dominant Gas holder should be considered as part of emerging proposals.

Viable social interaction, especially with regards to affordable units and the development of ‘Tenure Blind’ layouts will be a key consideration for residential development in this area.”

- 5.10 Emerging Policy CR13 for the East Side Major Opportunity Area seeks a new community at the eastern fringes of the centre lending a more urban character to the area, and helping to frame the historic east of the central core.
- 5.11 The KDUDCS further defines and explains the following key design principles for the area:
- 1. Allowing for Permeability and Movement;
 - 2. Designing a Quality Public Realm;
 - 3. Achieving Diversity and Legibility;
 - 4. Continuity of Frontage;
 - 5. Sustainable Design; and
 - 6. Appropriate use of Height and Scale.
- 5.12 In terms of land use, the principle of the redevelopment of the site for residential use is therefore strongly supported in adopted and emerging policy. As well as aligning with the sub-area, MOA and KDUDCS objectives, the proposal is also consistent with the broad objectives of Policy CS14 and the NPPF, which support the provision of new housing to meet local needs. The provision of 130 homes would make a substantial contribution to meeting the Borough’s housing needs.
- 5.13 Although the proposal exceeds the indicative capacity suggested within draft Policy CR13d of the emerging Local Plan, supporting Paragraph 5.4.23 is clear that the number of dwellings indicated for the remaining sub-areas of the East Side MOA are, to an even greater extent than other areas, an indication only.
- 5.14 In terms of density, Policy CS4 states that the scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. The proposal represents a density of 183 dwellings per hectare (130 units / 0.71 hectare site). Although a relatively high density development, there is no prescribed upper limit set out in local policy for sites within the Reading Central Area.
- 5.15 Furthermore, Policy CS15 specifies an indicative density of above 70 dwellings per hectare in town centre locations, with factors such as site characteristics, accessibility and need to achieve high quality design / minimise environmental impacts informing the density. The sustainable location of the site, together with the quality of the design on previously developed land which maximises the potential of the site to be a river gateway to Reading, justify a higher density development on this site.

- 5.16 In terms of housing mix, Policy RC9 sets out expectations for residential development in the Reading Central Area, including setting a maximum of 40% of homes to be one-bed and a minimum of 5% three-bed or more. The proposal complies with this Policy by providing 48 x 1 bed (37%), 74 x 2 bed (57%) and 8 x 3-bed (6).
- 5.17 In terms of affordable housing, Policy CS3 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 CS16 seeks 30% affordable housing on sites of 15 or more dwellings.
- 5.18 10 affordable apartments are proposed, located within Building C. These comprise 9 x 2 bedroom 4 person apartments and 1 x 3 bedroom 5 person apartment. Of these, 5 apartments are shared ownership and 5 are affordable rent. The proposed level of affordable housing complies with the requirements of Policy CS16 and emerging Policy H3, as the maximum level of affordable housing that can viably be achieved on the site is proposed. Further details are provided within the accompanying Affordable Housing Statement that is submitted as part of this application.

Demolition, layout, height & massing, appearance, design and effect on heritage assets

- 5.19 To facilitate the redevelopment of the site it is proposed to dismantle the existing Gas Holder structure and demolish all existing buildings on the site.
- 5.20 The existing Gas Holder is a late example of its type and is neither technologically innovative nor decoratively detailed. Following the removal of the hazardous substances licence in 2009, the Gas Holder is now redundant. It has no current use or function and lies permanently in its resting state.
- 5.21 Whilst the structure itself has limited architectural or engineering interest, owing to its age and local value the accompanying HTVIA assesses the Gas Holder as a non-designated heritage asset according to the definition set out in the NPPF. As such, under Paragraph 197 of the NPPF, the proposed demolition of a non-designated heritage asset is a material consideration in the determination of the planning application.
- 5.22 The concept of a non-designated heritage asset was introduced by the NPPF to recognise buildings, sites, places, areas or landscapes that have a degree of significance and merit consideration in planning decisions. This category of heritage asset is wide-reaching and necessarily broad to capture the range and types of heritage that could, and ought, to be considered within the planning process. As such, buildings and structures that narrowly fail to meet the criteria for national designation are captured alongside those that have social value but very little architectural interest.
- 5.23 As detailed within the accompanying HTVIA, Montagu Evans advise that GH4 lies towards the lower end of that spectrum. That assessment is based on the Gas Holder's lack of technical innovation, age in the context of the historical development of Gas Holders and the lack of architectural interest.

- 5.24 Furthermore, RBC is invited to have regard to the weight afforded to the interests of a non-designated heritage asset. Where designated heritage assets are concerned, the statutory provisions of the 1990 Act are engaged alongside the overarching duty imposed by Section 38(6) of the Planning and Compulsory Act 2004. By contrast, non-designated heritage assets receive no statutory protection and Schedule 2, Part 11 of the Town and Country Planning (General Permitted Development) (England) Order 2015 extends permitted development rights for the demolition of such assets, subject to prior notification procedures. This is also a material consideration for the purposes of the determination of the planning application.
- 5.25 Consistent with that position, the NPPF states only that *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”* (Paragraph 197).
- 5.26 Accepting the conclusions above and the need, as set out in planning policy and guidance, to identify significance and consider change in a balanced and proportionate manner, the removal of the existing Gas Holder should therefore be acceptable in principle.
- 5.27 Turning to design and layout, Policy CS7 states that development must be of high quality design that maintains and enhances the character and appearance of the area of Reading in which it is located, and gives guidance on how that is to be judged.
- 5.28 Policy RC5 builds on relevant Core Strategy policies and sets out further expectations for design in the Reading Central Area. It expects development to reflect the historic grid structure, provide quality public spaces, use high quality details and materials that respect the form and quality of nearby areas, and contribute to the diversity of the central area.
- 5.29 Policy RC14 requires proposals for new development to make a positive contribution towards the quality of the public realm of the central area. Proposals will be assessed against the following criteria:
- *“All proposals on sites of more than 1 hectare within the central area boundary will need to provide new public open space or civic squares integrated with surrounding development. Smaller developments will contribute towards improvements to the public realm;*
 - *Imaginative uses of open space and the public realm, which contribute to the offer of the centre, will be encouraged, and new open spaces should be of a size and shape to be flexible enough to accommodate such uses. The provision of water features, trees (including street trees) and other planting, as well as hard landscaping, to create high-quality spaces, will be encouraged;*
 - *Development proposals adjacent to or in close proximity to waterways will retain and not impede existing continuous public access to and along the waterways, and will provide legible continuous public access to and along the waterways where this does not currently exist;*

- *The design of developments adjacent to a waterway, including the refurbishment of existing buildings, will be required to enhance the appearance of the waterways and to provide active elevations facing the waterways. Development that turns its back on the waterways and results in blank or mundane elevations facing the waterways will not be permitted.”*

- 5.30 The proposals comprise 3 distinct buildings which respect the existing neighbouring development by stepping down in height towards it and also stepping down towards the river frontage. The materiality is a key aspect of the proposals. The proposed red brick with white and grey brick detailing as well as the use of herringbone brick sections, reflect the history and the former industrial uses of the area, whilst creating a contemporary landmark building for the town centre, in accordance with Policy RC5 and emerging Policy CC7.
- 5.31 Public realm is an important part of the proposals, with a community garden at the heart of the development, linking the centre of the site with the river frontage. A nature corner in the north east part of the site provides a sunken contemplative space which reflects the heritage of the area. The proposals therefore fully accord with Policy RC14 and emerging Policy CC7.
- 5.32 In terms of height, Policy RC13 and emerging Policy CR10 specifies that tall buildings are defined as 10 storeys of commercial floorspace or over 12 storeys of residential (equating to 36 metres tall). Tall buildings will only be appropriate within ‘areas of potential for tall buildings’. The site does not fall within any of the three defined areas. The tallest building is 9 storeys, lower than the existing Gas Holder, and so does not fall under the definition of a ‘tall building’ under local planning policy.
- 5.33 Policy CS33 seeks to ensure that planning permission will only be granted without an adverse impact on historic assets on their settings.
- 5.34 The submitted HTVIA demonstrates that the proposals would deliver benefits to the wider townscape by improving access to and integrating the site within the local area. The scheme will also provide a more effective and successful boundary to the river, providing a landmark building that will draw people to this location. Further land use benefits will also include the provision of additional housing, a proportion to be affordable housing, and the provision of sustainable and environmentally efficient new buildings and improved accessibility.
- 5.35 There are also opportunities to provide heritage benefits, by reflecting the gas heritage through landscape design, sculpture or recording. The proposed high quality design, and palette of local materials would help to anchor the development within the area. The proposals therefore fully accord with Policy CS33 as there would be no adverse impact on heritage assets, and there is even an opportunity to provide benefits.

Open space / public realm, trees, landscaping and ecology

- 5.36 Policy CS29 requires all new development 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. In areas with relatively poor access to open space facilities, Policy CS30 stipulates that new development

should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/ or facilitate the creation or linking of safe off-road routes to parks. Policy DM16 sets out a number of design criteria for new open space and specifies that the provision of open space shall satisfy the most urgent need in terms of the type of open space to be provided in a particular location having regard to the size of the site and shall be subject to considerations of particular site specific deficiencies.

- 5.37 The site abuts the River Kennet, which is also an identified green network. Policy DM17 seeks to protect Reading's existing Green Network, and for the enhancement and extension of that network.
- 5.38 Policy CS36 requires development to retain, protect and incorporate features of biodiversity or geological interest found within the application site into their schemes. Policy CS38 states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal, and the Borough's vegetation cover will be extended. Policy DM18 requires new development to make provision for tree planting within the application site, or off-site in appropriate situations.
- 5.39 A Preliminary Ecological Appraisal was undertaken by Greenspace Ecological Solutions whereby the site's potential to support protected species and habitats has been assessed.
- 5.40 Bat Emergence Surveys were undertaken and found that the existing site was identified as having a low – negligible potential for bats. A phase 2 bat emergence survey was conducted as a precautionary measure only. No bat roosts were recorded. The existing vegetation on the northern and southern boundaries of the site provide foraging and commuting habitats for bats. Biodiversity improvements are therefore, proposed as part of the scheme, including bat boxes, to serve commuting bats.
- 5.41 The proposed development is considered unlikely to result in a negative impact to any designated sites, ancient woodland or priority habitats. There will be a positive impact to ecology and biodiversity as a result of the proposed enhancements and landscaping.
- 5.42 Suitable nesting habitat for breeding birds is present on the site in the form of trees, scrub and buildings. Works in these areas will therefore, be undertaken outside the core breeding period for birds. It is also noted that peregrine falcons currently utilise the site for nesting, and alternative peregrine nest ledges will be provided during construction and on the final structure.
- 5.43 There are no immediate issues regarding other protected species on the site and no further surveys are required in this instance.
- 5.44 Mitigation measures are set out in the accompanying ecological assessments, in compliance with Policy CS36.
- 5.45 An Arboricultural Impact Assessment and Tree Protection Plan has been prepared by Greenspace Ecological Solutions. This document presents the results of the survey,

including a Tree Survey Schedule, an Arboricultural Implications Assessment, and an Arboricultural Method Statement. A Tree Protection Plan has also been produced.

- 5.46 The results of the survey indicate that the trees within the survey area vary considerably in terms of quality and contribution to the amenity value within the local area. A total of four groups of trees will be removed to facilitate the proposals. The trees to be removed are Category C trees, which are considered to be of low amenity value in the context of the wider area.
- 5.47 The development of the site provides an opportunity to plant new trees as part of a landscape scheme which will increase the age range and species diversity of the trees in the local area. The proposals include the planting of new trees and landscaping for the areas of open space and the enhanced river frontage, in accordance with Policies DM18 and CS36 and emerging Policy EN14. Through the specified tree protection measures, it will be possible to minimise the impact of the proposed development on the retained trees, as required by Policy CS38.
- 5.48 Overall, there are no overriding arboricultural constraints which would affect the proposals, subject to the protection measures and construction methodologies specified within the arboricultural report being implemented.
- 5.49 In accordance with Policy DM10 which specifies that dwellings should be provided with functional private (in the case of houses) or communal (in the case of flats) open space, the proposed apartments all benefit from private amenity space, in the form of private terraces, gardens or balconies. Furthermore, the future residents and wider local community will also benefit from publically accessible communal outdoor open space, in the form of the Community Garden, the Nature Corner, the Riverfront and the Viewing Platform.
- 5.50 The play strategy for the site has been developed in order to provide opportunities for play that complement the surrounding play offer and provide a range of natural and informal play possibilities for the whole family to explore. This is considered to provide a more appropriate response to the context of the site and the surrounding area rather than more formalised fenced equipment areas with traditional static equipment.

Transport

- 5.51 Policy CS20 states that planning permission will not be granted unless the proposed development contributes appropriately to the provision of a balanced transport network as outlined in the Reading Transport Strategy.
- 5.52 Policy CS22 requires development proposals to 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. For major development proposals, Policy CS23 also requires a commitment to implement measures to promote and improve sustainable transport facilities. Policy DM12 covers highway safety and effects on congestion.

- 5.53 Policy CS24 applies maximum car parking standards and cycle parking requirements in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. The Revised Parking Standards and Design SPD (2011) provides guidance on the levels of parking required.
- 5.54 The site is sustainably located, 1.5km from the railway station and within 2km of several facilities, amenities and employment opportunities. Several bus stops are located within 400m – 700m of the site, and are served by high frequency bus services. The proposals would contribute towards aims to increase the use of sustainable modes of transport, due to the accessible and sustainable location, in accordance with Policies CS20, CS22 and CS23 and emerging Policies TR1, TR4 and TR5.
- 5.55 The proposed development would not have an adverse impact on the local highway network, as demonstrated by the submitted Transport Assessment.
- 5.56 The proposals include 127 car parking spaces, which are unallocated, for visitors and residents. This represents significantly more parking on the site than if the Zone 1 parking standard had been applied. The proposals do provide a minor shortfall in car parking provision against the Zone 2 parking standards, however, given the accessible location of this site there are ample alternatives to travelling by car, which justify this reduction. Further consideration of this matter is provided in the Transport Assessment, which accompanies this submission.
- 5.57 74 cycle parking spaces are provided, within a secure cycle storage area. This equates to 0.52 spaces per dwelling, which therefore accord with and exceed the Revised Parking Standards and Design SPD as well as Policy CS24 and emerging Policies TR4 and TR5.

Sustainability, energy, SuDS and flooding

- 5.58 Policy CS1 states that development proposals 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.
- 5.59 Policy CS2 states that development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management.
- 5.60 Policy DM1 seeks measures to make new development resilient to climate change, covering matters such as orientation, trees and landscaping and surface water drainage. Policy DM2 requires demonstration of consideration of inclusion of decentralised energy measures, including CHP (Combined Heat & Power). Central Reading is identified as having particular potential.
- 5.61 Policy CS35 states that development within areas identified at high risk of flooding will not be permitted where development would reduce flood plain capacity, impede the flow or floodwater, or increase the risks to life and property arising from flooding.

- 5.62 The proposals are located within Flood Zone 2. However, the land is being raised to remove the risk from flooding as part of the proposals. Safe access would be maintained for all rainfall events up to and including the 1 in 100 year + 35% climate change event and would not create an unacceptable increase in flood risk elsewhere, in accordance with Policy CS35 and emerging Policy EN18.
- 5.63 Due to the depth of the made ground and the high water levels, infiltration methods of disposal of surface water run-off will not be feasible. Surface water run-off will therefore be discharged into the watercourse. The proposed development will lead to an overall decrease in impermeable area across the site, providing a betterment to the existing situation. Attenuation storage will be provided using porous paving, with geocellular crates underneath.
- 5.64 An Energy Statement has been prepared by Briary Energy which demonstrates that the developer will meet the Building Regulations reduction in emissions across all dwellings relative to a 2013 Part L1A Building Regulations baseline, and will be achieved through the use of improved energy efficiency measures such as improved thermal fabric efficiency, air tightness and effective heating controls, as well as the use of Pv. In accordance with Policy DM2 and emerging Policy CC4, the use of decentralised energy has been considered within the submitted Energy Statement. However, decentralised systems are not proposed. This is because the costs of CHP for installation and running would result in the use of more energy due to the proposals being separated into 3 buildings.
- 5.65 The findings show that the combination of energy demand reduction measures and solar photovoltaic panels will deliver minimum total carbon savings of 20.24%, and energy demand reduction would be 14.98%. This represents over 20% improvement over a Part L 2013 compliant development with at least a 14% energy demand reduction using a fabric first and a solar Pv solution. The proposals are therefore in accordance with Policy DM1 and emerging Policy CC2.
- 5.66 A daylight and sunlight assessment was also undertaken by Anstey Horne which demonstrates that the layout of the proposed development follows the BRE guidelines and will provide very good daylight and sunlight conditions within the proposed accommodation, in accordance with Policy CS1 and emerging Policy CC8.

Other matters

Contamination and Pollution

- 5.67 Policy CS34 permits development only 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.

- 5.68 A Geo-Environmental Assessment has been carried out by WSP to intrusively investigate the site and its associated constraints, specifically the ground, ground gas and groundwater conditions of the site.
- 5.69 The overall risk to the identified receptors (future residents, groundwater, surface water, neighbouring residents, buried concrete, underground services) is generally considered to be moderate to high.
- 5.70 The scope of the investigation has provided a suitable level of information to develop an understanding of the constraints, which need to be addressed in order to redevelop the site however, a supplementary ground investigation is currently being undertaken in order to assess the level of remediation required at the site.
- 5.71 Mitigation measures are likely to include source removal, capping in areas of soft landscaping, soil and groundwater treatment and gas and vapour protection.
- 5.72 A noise assessment has been undertaken by Stuart Michael Associates which considers the constraints on the proposed development, as well as any impacts as a result of construction.
- 5.73 From the results of the noise level surveys and the computer modelling it is evident that primarily as a result of the proximity to the railway lines, during the daytime and night time, noise levels within development site are above recommended levels of 55 dB and 45 dB respectively and a commensurate level of mitigation will be required. These mitigation measures have been outlined in the submitted Noise Assessment.
- 5.74 Based on the results of the noise assessment, it is concluded that with appropriate mitigation, internal and external noise levels meet the national and local standards and are acceptable for future residents of the proposed development.
- 5.75 Policy DM19 states that where a development introduces sensitive uses such as residential into an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measure should be detailed in any planning application.
- 5.76 An Air Quality Assessment has been prepared by Stuart Michael Associates which demonstrates the impact on sensitive receptors as a result of development generated traffic. In addition, it sets out the constraints on the development from the existing and future emissions from the rail and road traffic, as well as the likely impacts from the construction of the development.
- 5.77 The assessment concludes that the proposed development is acceptable from an air quality perspective, in accordance with Policy DM19 and emerging Policy EN15.
- 5.78 Mitigating the pollutant at source is not practicable, however where the use of Mechanical Ventilation and Heat Recovery (MVHR) is proposed the air inlets will have to be at sufficient height to provide “clean” air to the apartments.
- 5.79 Passive ventilation will be provided from the car park, which will provide fresh natural air flow.

- 5.80 Within the public amenity area concentrations are below the NAQO level, therefore no mitigation is proposed.
- 5.81 Based on the worst-case results of the AQA, it has been concluded that with the appropriate mitigation, air quality concentrations are acceptable for future residents of the proposed development. Moreover, the impact of development on local sensitive receptors is predicted to be negligible during the construction phase.
- 5.82 Therefore, in terms of the planning application, the proposed Gas Holder Site development is acceptable from an air quality perspective.

Archaeology

- 5.83 The site falls within an 'Area of Archaeological Potential', as defined on the Proposals Map. Policy CS33 protects historic features and areas of historic importance and seeks their enhancement where appropriate. This includes sites and features of archaeological importance.
- 5.84 An Archaeological Desk-Based Assessment has been undertaken by Wessex Archaeology. The study assessed the known and potential heritage resource within the site and the surrounding area, and assessed the likely impacts of the development proposals.
- 5.85 The assessment established that due to the previous use of the site as part of a gas works, contaminated made ground is present within the site and contamination was also identified within the underlying ground. As a result, substantial remediation groundworks will be required which would involve removal of a significant depth of deposits across the site and importation of remediated soils and inset materials. Groundworks associated with the proposed development are then likely to be restricted to within these remediated deposits.
- 5.86 Overall, the potential for archaeological remains which would be impacted by the development is considered to be low to negligible. Archaeological monitoring on the adjacent site when developed did not observe any archaeological or natural deposits due to remediation works and shallow depth of groundworks. As the situation on the current site is comparable, it follows that there are unlikely to be any archaeological or natural deposits.

Planning obligations and CIL

- 5.87 Policy CS9 does not permit development 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 by the development will be provided or re-provided at the appropriate time. Pursuant to this, Policy DM3 requires development proposals to make appropriate provision for relevant infrastructure, services, resources and amenities. Such provision will be secured through planning obligations and/or the Community Infrastructure Levy as appropriate.

- 5.88 RBC adopted their Community Infrastructure Levy (CIL) in April 2015. All residential development across the Borough which is liable to pay CIL is required to pay £120 per sq m of chargeable floorspace. The chargeable floorspace within the proposed development is 13,104.20 sq m. This would result in a CIL payment of approximately £1.5 million (before indexation).
- 5.89 In addition, to the CIL payment identified above the applicant will also enter into a S106 Legal Agreement with RBC to secure the proposed affordable housing for the development.
- 5.90 The combination of CIL and S106 contributions will therefore ensure that RBC are able to deliver sufficient community facilities and services in light of the proposed development, in accordance with Policy CS9.

6. SUMMARY AND CONCLUSION

- 6.1 This Planning Statement accompanies a full planning application submitted on behalf of SGN Commercial Services Ltd as advised by Danescroft (Kenavon Drive Project Management) LLP for the redevelopment of the existing 'Gas Holder' site at Alexander Turner Close, Reading.
- 6.2 The application seeks full planning permission for the demolition of the existing buildings and Gas Holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 (48 x 1-bedroom, 74 x 2-bedroom and 8 x 3-bedroom) homes (Class C3) with associated access, car parking, landscaping and open space.
- 6.3 The proposals have been arrived at through detailed consideration of the planning policy context and through pre-application consultations with statutory and other consultees, stakeholders and the local community.
- 6.4 The application should be determined favourably in the context of the current planning policy framework. The Applicant and its consultant team will be pleased to continue to engage with the Council and stakeholders during the determination of the application.
- 6.5 This Planning Statement should be read alongside the other supporting documents which have been submitted as part of the full application.
- 6.6 The proposed development is in accordance with the development plan and should therefore be approved without delay.

APPENDIX 1 – DRAWING REGISTER

London W1W 6DW

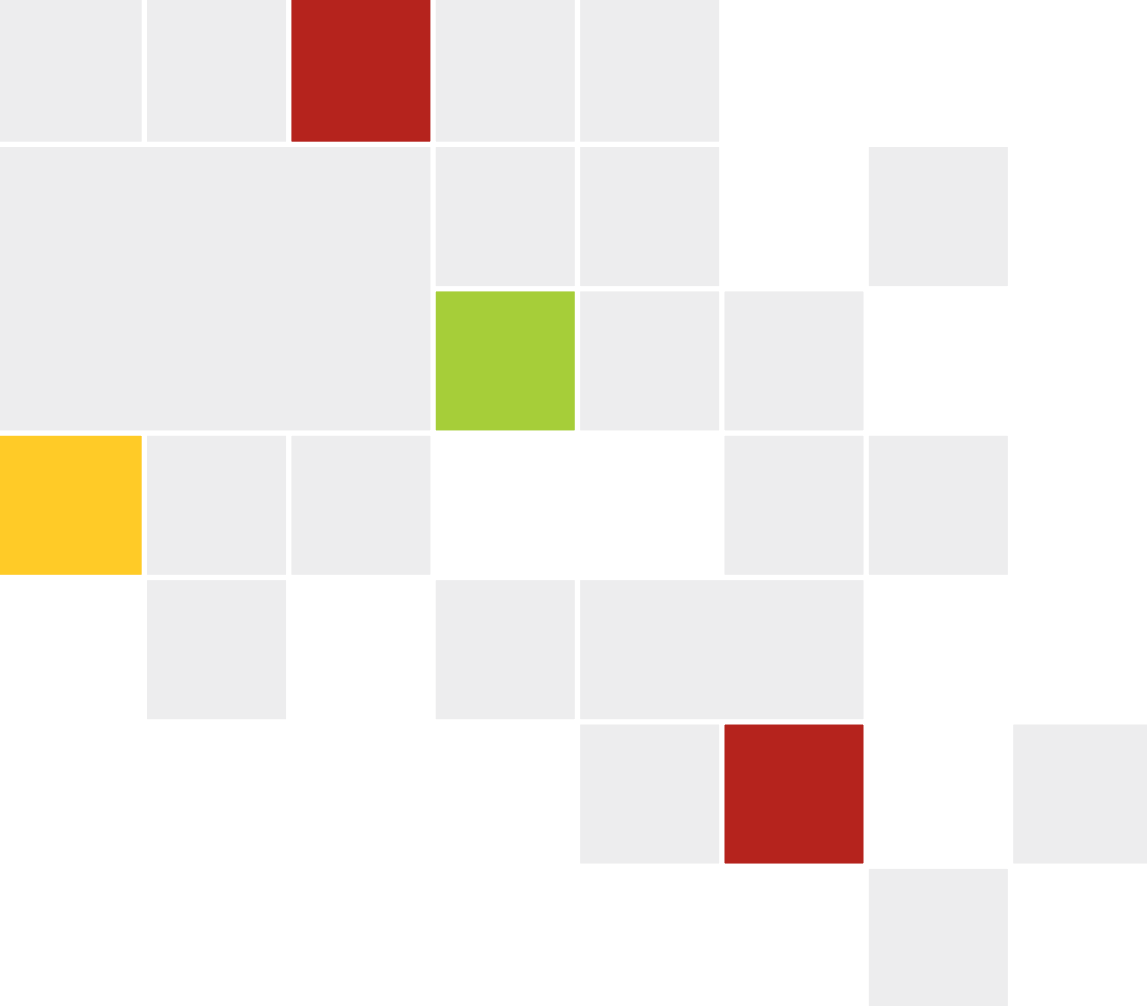
E: info@colladocollins.com

Project Title: **SGN Reading**

Drawing Group: Planning Drawings

We enclose copies of the drawings listed below:

Drawing title	Scale	Dwg Size	Dwg No.	Issue/Revision													
Site Location Plan	1:1250	A3	P0-001	P													
Existing Site Plan	1:500	A1	E0-010	P													
Proposed Site Plan	1:500	A1	P0-010	P													
Proposed Plan - Ground Floor	1:250	A1	P0-100	P													
Proposed Plan - First Floor	1:250	A1	P0-101	P													
Proposed Plan - Second Floor	1:250	A1	P0-102	P													
Proposed Plan - Third Floor	1:250	A1	P0-103	P													
Proposed Plan - Fourth Floor	1:250	A1	P0-104	P													
Proposed Plan - Fifth to Eight Floor	1:250	A1	P0-105	P													
Proposed Plan - Roof	1:250	A1	P0-109	P													
Proposed Plan - Block A - Ground Floor	1:100	A1	P1-100	P													
Proposed Plan - Block A - First to Fourth Floor	1:100	A1	P1-101	P													
Proposed Plan - Block B - Ground Floor	1:100	A1	P1-200	P													
Proposed Plan - Block B - First Floor	1:100	A1	P1-201	P													
Proposed Plan - Block B - Second to Third Floor	1:100	A1	P1-202	P													
Proposed Plan - Block B - Fourth to Eighth Floor	1:100	A1	P1-204	P													
Proposed Plan - Block C Plans	1:100	A1	P1-300	P													
Proposed Sections	1:250	A1	P2-201	P													
Proposed Context Elevations - Block A (1)	1:250	A1	P3-011	P													
Proposed Context Elevations - Block A (2)	1:250	A1	P3-012	P													
Proposed Context Elevations - Block B (1)	1:250	A1	P3-013	P													
Proposed Context Elevations - Block B (2)	1:250	A1	P3-014	P													
Proposed Context Elevations - Block C	1:250	A1	P3-015	P													
Proposed Elevations - Block A - South and East	1:100	A1	P3-101	P													
Proposed Elevations - Block A - North and West	1:100	A1	P3-102	P													
Proposed Elevations - Block B - South	1:100	A1	P3-201	P													
Proposed Elevations - Block B - North	1:100	A1	P3-202	P													
Proposed Elevations - Block B - East and West	1:100	A1	P3-203	P													
Proposed Elevations - Block C	1:100	A1	P3-301	P													
		Day Month Year	01														
			04														
			19														
Distribution / Number of copies N=negative X=issue sheet only F=fax D=disk E=Email																	
Client	1.01			e													
Tenant	1.08																
Letting Agent	1.09																
Solicitor	1.11																
QS	2.03			e													
Structural Engineer	2.04			e													
M&E Engineer	2.05			e													
Highways Consultant	2.06			e													
Planning Consultant	2.07			e													
Conservation/Heritage Consultant	2.09			e													
Fire Engineer	2.19			e													
Purpose of issue: A-Approval, B-Billing,C-Construction, I-Information, T-tender				A													
Collado Collins Partners LLP Registered Office: 17-19 Foley Street, London W1W 6DW Registered No. OC309485																	



Boyer

Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk