
Alexander House, Kings Road, Reading

Planning Statement

Submitted on behalf of P.J. Alexander Estates Ltd.

January 2019

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1.0 INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by P.J. Alexander Estates Ltd to submit a planning application for the demolition of Alexander House, Kings Road, Reading (the "Site") and for the construction of a new Purpose-Built Student Accommodation ("PBSA") building.
- 1.2 The description of development for which full planning permission is sought is as follows:

"Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking and amenity space."

- 1.3 The drawings and supporting documentation that accompany this application are as follows:

Plans and Drawings

01 - Location Plan		
Location Plan	1:1250@A3	A-01-001
02 - Site Plans		
Existing Site Plan	1:500@A3	A-02-001
Existing Topographic Survey Plan	1:100@A0	A-02-002
Proposed Site Plan	1:500@A3	A-02-100
Proposed Landscape	1:200@A1	L-90-100
03 - Floor Plans		
Existing Basement & Ground Floors	1:100@A1	A-03-001
Existing First Floor & Roof Plan	1:100@A1	A-03-002
Proposed Lower Ground Floor	1:100@A1	A-03-099
Proposed Ground Floor	1:100@A1	A-03-100
Proposed First Floor	1:100@A1	A-03-101
Proposed Second Floor	1:100@A1	A-03-102
Proposed Third Floor	1:100@A1	A-03-103
Proposed Fourth Floor	1:100@A1	A-03-104
Proposed Fifth Floor	1:100@A1	A-03-105
Proposed Sixth Floor	1:100@A1	A-03-106
Proposed Seventh Floor (Plant)	1:100@A1	A-03-107
Proposed Roof Plan	1:100@A1	A-03-108
04 - Sections		
Existing Section 1	1:100@A1	A-04-001
Proposed Section AA	1:100@A1	A-04-100
Proposed Section BB	1:100@A1	A-04-101
Proposed Section CC	1:100@A1	A-04-102
Proposed Section DD	1:100@A1	A-04-103
05 - Elevations		
Existing Elevations 1 & 2	1:100@A1	A-05-001
Existing Elevations 3 & 4	1:100@A1	A-05-002
Existing Elevations 5 & 6	1:100@A1	A-05-003

Existing Contextual Elevations 7 - 9	1:100@A1	A-05-004
Proposed South Elevation	1:100@A1	A-05-100
Proposed West Elevation	1:100@A1	A-05-101
Proposed North Elevation	1:100@A1	A-05-102
Proposed East Elevation	1:100@A1	A-05-103
Proposed Street Scene - King's Road	1:200@A1	A-05-104
Proposed Street Scene - Rupert Street	1:200@A1	A-05-105
Proposed Context Elevation - North	1:200@A1	A-05-106
Proposed Context Elevation - East	1:200@A1	A-05-107
Proposed Bay Study - Main Entrance	1:50@A1	A-05-108
Proposed Bay Study - Typical	1:50@A1	A-05-109
Proposed Bay Study - Central Studios (S)	1:50@A1	A-05-110
Proposed Bay Study - Central Studios (N)	1:50@A1	A-05-111
06- Other		
External Lighting Lux Plot	1:100@A1	4479-EX-00-DR-E-200
External CCTV Layout	1:200@A1	4512-EX-00-DR-E-500

Supporting Documentation

- Cover Letter and Application form (January 2019)
- CIL Form (January 2019)
- Daylight and Sunlight Analysis, Brooke Vincent and Partners (January 2019)
- Design and Access Statement, Broadway Malyan (January 2019)
- Ecological Impact Assessment, ECOSA (January 2019)
- Energy Strategy and Sustainability Statement Report, Wilson Gray Consulting (January 2019)
- BREEAM Pre-Assessment Summary Report, Dewpoint Energy Services Ltd (January 2019)
- Flood Risk Assessment, Peter Brett Associates (January 2019)
- Heritage Assessment, Orion (November 2018)
- Air Quality Assessment, Apex Acoustics (January 2019)
- Noise Impact Assessment, Apex Acoustics (January 2019)
- Office Market Report, Campbell Gordon (November 2018)
- Residential Market Report, Haslams (January 2019)
- Statement of Community Involvement (January 2019)
- Student Management Plan, Homes for Students (January 2019)
- Student Market Report, Savills (January 2019)
- Transport Statement, Peter Brett Associates (January 2019)
- Travel Plan, Peter Brett Associates (January 2019)
- Infrastructure Report (January 2019)
- Superfast Broadband Statement, Wilson Gray Consulting (January 2019)

Structure of Planning Statement

- 1.4 Chapter 2.0 of this statement (The Application Site and Surroundings) details the physical characteristics of the Application Site and its immediate surroundings as well as the relevant planning history for the Site.
- 1.5 Chapter 3.0 (Pre-Application Advice and Community Involvement) details the engagement between the Applicants, Reading Borough Council (the "Council"), and other key stakeholders during the preparation of the application, prior to submission.
- 1.6 Chapter 4.0 (The Proposed Development) provides details of the proposed development of the site and should be read alongside the submitted supporting plans and reports.
- 1.7 Chapter 5.0 (Planning Policy Context) refers to the relevant policies in the National Planning Policy Framework (NPPF) and relevant local planning policy within the adopted development plan, plus any emerging planning policy.
- 1.8 Chapter 6.0 (Planning Appraisal) provides a response to the development plan policies (including any material emerging planning policy) and other guidance which relate to the Site and the proposed development. This chapter presents the planning balance which reviews the development's conformity with the relevant policies of the Local Plans and other material considerations which should be given weight in determining the application. A detailed specific assessment is included against the requirements of emerging Local Plan Policy H12 (student accommodation). To aid the assessment, regard will be had to any relevant recent decisions. This chapter explains why the proposed development should be approved.
- 1.9 Chapter 7.0 provides Draft Heads of Terms for the Section 106 agreement that would be required following approval of planning permission for the Proposed Development.
- 1.10 Chapter 8.0 sets out the conclusions of this Planning Statement and concludes that the proposals are consistent with the relevant policies of the Development Plan. Moreover, the chapter emphasises that proposed development represents sustainable development and should, therefore, be approved in accordance with the NPPF's presumption in favour of sustainable development.

2.0 THE APPLICATION SITE AND SURROUNDINGS

Site Context

- 2.1 Alexander House is a two-storey office building, located on the corner between Kings Road and Rupert Street. The existing building fronts onto Kings Road, with further service entrances off Rupert Street. Off-street parking and refuse bins are located to the rear of the building, accessed off Rupert Street.
- 2.2 Either side of the building there are two large residential apartment buildings. The Pinnacle is located to the immediate west, and was granted full planning permission in 2001 (reference 99/1128/FUL/PB and 992352), providing 52 flats within accommodation which reaches five, six and seven storeys in height. The Pinnacle replaced a former 1960s constructed 6 storey office building. To the eastern side of the Site, there is the Crossway Point residential apartment development. Crossway Point received planning permission (reference 030376) in 2003 for 98 affordable units within 7 storeys of accommodation. Both buildings provide height well in excess of Alexander House and therefore present an opportunity to develop the Site using a high quality design to further enhance the visual appeal of this part of Reading.
- 2.3 Further residential flats are located to the rear at Saxon Court, a three-storey 1960s/1970s building, with further flats opposite on the opposite side (south side) of King's Road at Sovereign Court.
- 2.4 Kings Road is particularly characterised by a number of taller buildings of heights similar to that of The Pinnacle and Crossway Point to the degree that a building of similar height on the Site would not be out of character with the street scene. The character of properties along King's Road is varied and incorporates a number of modern structures of large scale (height and massing). It is noted that there are two nearby Listed Buildings, neither of which are adjacent or directly opposite. These are the Grade II Listed Gladstone Club (Listing reference 113509) on the other side of King's Road, and the Grade II Listed Wycliffe Baptist Church (Listing reference 1155966) near to the A329 King's Road / A4 London Road Junction.

- 2.5 Since the Environmental Act 1995, the local authority is required to regularly review and assess the local air quality. The Site is located within a designated Air Quality Management Area, which includes a number of the main arterial roads in and out of the centre of Reading and was designated in April 2009 (as stated within the 2017 Air Quality Annual Status Report). These are areas close to main arterial roads where the levels of nitrogen dioxide exceed air quality objectives and where levels of particulates are elevated. It is acknowledged that the Council are monitoring air quality levels along Kings Road
- 2.6 In terms of sustainable access to services and facilities, the Site is very well located. The University of Reading Whiteknights campus is a c.19-22 minute journey using a regular public bus service (which travels via Reading Town Centre), approximately 20 minutes direct walk via public footways, or less than 10 minutes by bicycle. The University of Reading London Road campus is only a 10 minute (0.5 mile) walk from the Site, whilst Reading College is almost adjacent (next door but one) to the Site involving less than a 50 metre walk to the west of the Site alongside King's Road, effectively 'next door but one' on the western side of The Pinnacle. Both the University of Reading and Reading College offer full-time further education courses, and both are accessible via sustainable modes of transport (public transport, bicycle and walking).
- 2.7 The Site is within extremely convenient and sustainable reach of a number of other services and facilities, including those at Cemetery Junction a short walk to the east, and those within Reading Town Centre to the west and surrounding areas. A wealth of sustainable onward connections are also available from Reading Train Station, providing access to London Paddington and London Waterloo and the West of England. This would significantly reduce dependence on the use of private vehicles, which would further be reduced with an appropriate parking strategy which encourages the use of sustainable transport modes.

Planning History

- 2.8 There is relevant planning history for the Site. Currently, a valid, extant planning permission exists on the Site to demolish Alexander House and construct a new residential building comprising 56 residential apartments which was granted in 2017 under reference 162057. The consented scheme would have risen to 7 storeys (plus basement level) facing King's Road, but tapered down to 4 storeys facing the flats at Saxon Court to the rear. A key difference between the Proposed Development and the existing planning permission is that the design for the consented scheme incorporated a balcony for each flat, present on each elevation. The permitted scheme incorporated new planting fronting King's Road

and attracted four objections from the adjacent 'The Pinnacle' residential building. The Council considered that the impact on amenity, however, would not be at a level which would warrant a sustained reason for refusal. In terms of scale, the Council considered the permitted development to be appropriate, responding to the local context with height comparable to adjacent buildings.

- 2.9 In terms of the Proposed Development there is de minimus deviation from what the Council have already confirmed would be acceptable in determining the extant permission (162057) in terms of scale, massing and height (and the potential impact on local character). The only significant difference is that the consented scheme related to 56 residential apartments (C3 Class Use), whereas the current proposals relate to sui generis student accommodation.
- 2.10 Finally, it is worth noting in this introductory section of the planning statement that it is noted that, at the time of submission, that the site benefits from a draft allocation within the emerging Reading Borough Local Plan under reference ER1g. Draft allocation ER1g looks to allocate the site for 26-38 C3 residential dwellings. During pre-application discussions, the Council indicated that, should the allocation remain at the time the emerging Local Plan is adopted, any alternative proposal would need to demonstrate evidence of need and to balance that need against the need for housing at that time in Reading. This Planning Statement will draw on relevant evidence to make this planning balance.

3.0 PRE-APPLICATION ADVICE AND COMMUNITY INVOLVEMENT

- 3.1 The applicant has understood the importance of engaging with key stakeholders in the planning process prior to submitting a planning application. Therefore, pre-application engagements involved the submission of a pre-application advice request to the Council and a public consultation exercise which included a public exhibition. Summary details are provided below.

Pre-Application Advice

- 3.2 In preparing proposals to submit to the Council for pre-application feedback, it was known that pre-application advice had previously been sought of the Council with regard to a potential 230-bedroom scheme towards the end of 2017 / beginning of 2018, with regard to which the Council responded with a letter dated 30th January 2018. The Council's response to that scheme was reviewed and considered. This proved useful as it provided a guide as to the Council's opinions surrounding a development for student accommodation on the site and any key design considerations.

- 3.3 The Council responded with the following key comments to the former, unrelated, pre-application submission:

- Loss of existing office use was justified on determination of the consented scheme through point-by-point assessment of Policy CS11 and provision of an office market report, and that an updated analysis would be required;
- The need to demonstrate compliance with emerging Policy H12 and the requirement for new student accommodation to be provided on or adjacent to existing further or higher education campuses unless it can be demonstrated that such sites cannot meet the need;
- The need for a Student Management Plan (SMP).

- 3.4 Matters of design:

- The scheme largely followed the footprint of the consented scheme, with some increase to sixth floor massing but concluded that it would likely be acceptable (with the caveat that elevation plans were not provided to ascertain a view on overall height, particularly in comparison to neighbouring properties);
- A high-quality design would be expected on this site, citing potential that a more contemporary scheme may be more appropriate;

- Raised concern that on those proposals Rupert Street appeared to accommodate the main entrance to the proposals despite Kings Road providing the primary frontage and with the Rupert Street ground floor frontage lacking activity;
- The quality of accommodation was questioned, compromising basement level accommodation (lack of light and outlook), large number of single aspect north rooms, no natural light / outlook for above ground floor kitchen areas, open space/landscaping quality concern.

3.5 Whilst the abovementioned former pre-application exercise is unconnected in any way with the current planning application, the applicant considered it prudent to fully consider and address the points raised through the proposed development as submitted.

3.6 The applicant submitted a pre-application advice request, dated 19th July 2018 (Appendix A), which took into account the extant consent parameters and the Council's response to the previous non-connected pre-application advice submission. The Council provided a detailed response to the July 2018 submission (Appendix B) following a pre-application meeting which took place on 13th September 2018.

3.7 The submitted pre-application proposals proposed a predominantly studio-based scheme providing 178 bedrooms across 8 storeys of accommodation (plus lower ground floor) which represented one storey more than the consented scheme. The Council's key comments can be summarised as follows;

- There would need to be an evidence-based assessment of the need for further student (sui generis) accommodation;
- In view of emerging Policy H12, conduct a sequential assessment of the availability of policy compliant sites within the Borough of Reading;
- In reference to the emerging allocation (ER1g) for the site, there would be a need to address this emerging policy designation, balancing the need for student accommodation against the need for residential housing;
- That whilst the emerging Local Plan carries limited weight until the Local Plan Inspector comments on its soundness, it would carry increasing weight as the Local Plan progresses;
- There is a need for a point-by-point assessment of Core Strategy Policy CS11 to address the loss of the existing office use and the provision of an updated office market report;
- That the extant permission on the site would provide a benchmark for the proposals;

- Any height above that of the neighbouring buildings (and the consented scheme) would need to be justified;
- The need to consider day/sunlight impact on neighbouring properties;
- The massing fronting Kings Road and towards Crossway Point appears uncontentious;
- Recommended a change to the massing fronting Rupert Street to a 2-4-6 storey stepped approach;
- Review of design and materials to ensure it contains references to local distinctiveness and relationship with nearby buildings;
- It is likely that a case can be advanced to satisfy potential impacts on nearby heritage assets;
- Importance of trees along King's Road as King's Road is designated as an 'Existing or potential treed corridor';
- A Section 106 would be required, if approved, to cover securing the Sui Generis use as student accommodation, and potential requirement for contribution towards Employment Skills and Training;
- Suggested the use of a Planning Performance Agreement (PPA) to support a collaborative approach between parties;
- The need for public / stakeholder engagement;
- Other matters of detail which should be picked up in the submission (addressed within the submitted Design and Access Statement);
- Suggested the proposals should be considered by the Reading Design Review Panel.

3.8 The above comments, including other matters of detail, will be picked up through this planning statement and supporting reports. A key change from the submitted pre-application proposals referred to above, is the removal of the 8th floor shown within the pre-application submissions with the height and massing limited to the parameters of the consented scheme. In terms of height, scale and massing, in light of the feedback response received from the Council, the proposed development would be uncontentious.

3.9 The Council's pre-application response also drew attention to the following planning applications, which have been considered in forming the current proposals:

- 172118 (40 Silver Street) – An application for student accommodation refused by the Council, and dismissed at appeal (Appeal reference 3199747);
- 150752 (Yell House) – as an example of level / nature of information required for a student accommodation scheme, particularly a Student Management Plan;
- 161205 (187-189 & 191 Kings Road) – a student accommodation scheme to increase the number of beds from 72 to 150, refused at Planning Committee;

- 170019 (East Street) – student accommodation proposals refused by the Council, later allowed at appeal;
- 172045 (St Patrick’s Hall) significant expansion of existing halls of residence, refused by the Council and currently at appeal.

3.10 In addition to the above schemes, later in this planning statement, the planning appraisal will also consider the approved student accommodation proposals at 79 Silver Street (Council reference 170685 and 180075) and the allowed appeal following the Council’s refusal for a student accommodation scheme at the Woodley Arms Public House on Waldeck Street (Council reference 171893).

Design Review Panel

3.11 Within the Council’s response to the applicant’s pre-application submission, the Council recommended that the proposals be taken to the Reading Design Review Panel for a thorough design review. This took place on the 15th November 2018. The DRP considered the proposals which had been revised to take account of the Council’s pre-application comments.

3.12 The DRP commented (Appendix C) that;

- 1) King’s Road does not have a coherent character;
- 2) The massing of the building is uncontentious and respect is given to neighbouring buildings, including Saxon Court;
- 3) “Overall the scheme is very elegant”;
- 4) “Generally we would support this scheme, it appears to be an improvement on the previously consented scheme.”

3.13 A number of design specific points were mentioned by the DRP and have been picked up in the design revisions which have followed, resulting in the submitted plans (further detail available within the Design and Access Statement (DAS)).

Community Engagement

3.14 Following the DRP, the proposed development was refined and the applicant, following the Council’s pre-application advice, elected to conduct a public consultation exercise to ascertain any local resident views. Any material considerations received would then be addressed as appropriate, and if justified and reasonable, they would result in

amendments to the proposals. The public consultation exercise has been fully documented within the Statement of Community Involvement (SCI) submitted with this application. It should be noted that the Council's views on the consultation exercise had been sought prior to the event by email.

3.15 The SCI submitted as part of this application outlines the pre-application public consultation activity undertaken by the applicant, which was conducted in line with Reading Borough Council's Statement of Community Involvement (2014), the National Planning Policy Framework (2018) and the Localism Act (2011) to ensure that local people are at the heart of the planning system.

3.16 A Public Exhibition was held on 12th December 2018 (2.00pm until 7.00pm) at Reading College. A total of 2,545 local residential properties and business addresses received the invitation to attend. Additionally, a consultation website was published at www.ahplans.co.uk, allowing local people who could not attend to view the proposals after the consultation event and submit feedback using an online form. Those attending the exhibition in person were offered printed feedback forms. Given the consultation period covered the Christmas and New Year holiday, an extended period of time was provided for any respondents to send in their comments, concluding on 4th January, 2019.

3.17 A total of nine A1 boards were on display with detailed information about:

- The site
- Need for student accommodation
- Student accommodation proposals
- Proposed building layout
- Design and materials
- Transport and highways
- Landscape and ecology
- Working with the local community

3.18 Verbal feedback from the Public Exhibition was largely positive with a number of attendees acknowledging that there is an unmet demand for student accommodation in Reading and that professionally-managed student developments are needed. Several people also commented positively on the design of the building.

- 3.19 Where concerns were raised verbally, they mainly centred around parking in the surrounding area and the enforceability of parking restrictions which seek to prevent students from bringing cars and prevents parking within a designated zone.
- 3.20 A total of 15 people attended the exhibition, including Park Ward Councillor and Planning Committee Member, Cllr Josh Williams. Six people provided feedback on the proposals. Such a low response rate is symptomatic of the proportionally low level of concern surrounding the proposals for a new student accommodation development at Alexander House amongst local residents.
- 3.21 Full details of the responses received and the information that was made available to the public are available to review within the SCI.

4.0 THE PROPOSED DEVELOPMENT

- 4.1 This planning application seeks full planning permission for the following development, henceforth referred to as the "Proposed Development":

"Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking and amenity space."

- 4.2 The building would include a number of facilities for the beneficial use of future student occupiers, located in the lower ground floor. These facilities would include a laundry room, bookable space / dining area, TV lounge, cinema room, games room and gym. Thirty-eight bicycle storage spaces would also be located at this level.
- 4.3 The main entrance and frontage to the building would front King's Road at ground floor level, with a communal study room and reception area. Within the building, arranged into clusters, there will be between 21 and 32 rooms on each floor. On the sixth floor (seventh storey) there would be a smaller number of around 15 rooms, 2 of which would have disabled access. All floors are accessible by lift, whilst there are two internal stair columns.
- 4.4 The Council's Revised Parking Standards and Design SPD (2011) designates the Site as being within a Zone 2 parking area (Primary Core Area with walking distances up to 2km from the Town Centre, within walking distance of a railway station and well served by public transport). Zone 2 parking areas have lower parking requirements in reflection of the high sustainability of such locations. The Council's parking SPD sets out the Council's maximum parking standards for C2 Class Use proposals (halls of residence) of 1 space per FTE staff and no spaces for students on the basis that the sustainable nature of the location means dependence on a private car is not necessary and should be discouraged. In line with these standards, 2 parking spaces would be available for staff and 3 disabled parking spaces are proposed.
- 4.5 The Site is located in a highly accessible, sustainable location with plentiful nearby facilities and services. The sustainability of the Proposed Development is further enhanced through the inclusion of a range of internal facilities allowing students to gather, socialise and study in a well-managed and controlled environment.

- 4.6 Attention has also been given to appropriate landscaping, having regard to the Council's committee report for the consented scheme at Alexander House which stated the importance of trees along King 's Road, in that it enhances the local environment and amenity for this area of Reading. Therefore, in order to support the Council's designation of King's Road as an 'existing or potential treed corridor' as set out within the Borough Tree Strategy, tree planting is proposed along the King's Road frontage.
- 4.7 The Proposed Development would also be highly energy efficient, and as demonstrated by the BREEAM Pre-Assessment report included with this application, would be able to achieve BREEAM 'Excellent'.
- 4.8 All 182 rooms within the proposal will be 1-bed. This will consist of 151 en-suite beds (84%), 6 en-suite beds with disabled access (3%), 20 studios (11%) and 3 studios with disabled access (2%). The proposed unit schedule is listed in the table below.

Table 1 – Proposed Unit Schedule

Floor	Ensuite Beds	Ensuite Beds (DA)	Studios	Studios (DA)	Total by Floor
Basement	0	0	0	0	0
Ground Floor	15	0	5	3	23
First Floor	29	1	2	0	32
Second Floor	27	1	2	0	30
Third Floor	27	1	2	0	30
Fourth Floor	23	1	3	0	27
Fifth Floor	21	1	3	0	25
Sixth Floor	11	1	2	1	15
TOTAL	153 (94%)	6 (3%)	19 (10%)	4 (2%)	182

Massing and Building Heights

- 4.9 The Proposed Development has been carefully designed to follow the design parameters set by the consented scheme, the massing and height of which were considered appropriate by the Council in approving those proposals.

- 4.10 The consented scheme reached 7 storeys in height (ground floor plus 6 floors above), and was deemed by the Council to be acceptable, relating appropriately to its surroundings. Therefore, great care has been taken to follow heights and massing which would fall within the same acceptable parameters.
- 4.11 During pre-application discussions, the Council considered there is a need to reduce the massing demonstrated in the pre-application scheme facing Saxon Court. The amendments made to the rear facing Saxon court, as now submitted, have brought the design back within the design parameters of the consented scheme.
- 4.12 For reference, it is useful to refer to the DAS and pages 52 – 57 where a comparison exercise has been conducted between the Proposed Development and the consented scheme. Further 3D illustrative views are provided to aid in demonstrating the high-quality nature of the development and how it fits well with the scale and massing of the surrounding buildings, whilst also enhancing the architectural quality of this part of Reading.

Open Space and Landscaping

- 4.13 A mixture of soft and hard landscaping, including tall trees are proposed along the front edge of the Proposed Development facing King's Road, to reinforce the avenue of trees developing along the road (illustratively shown on p41 of the DAS). Following the Design Review Panel feedback, the front amenity area has been enhanced to increase its size and usability. This has been achieved by using a more direct approach for the proposed ramp and steps, accented with planters where appropriate. Further, to the front would also be located a lightwell which would help provide direct sunlight down into the lower ground floor amenity spaces.
- 4.14 Landscaping to Rupert Street includes a mixture of soft and hard landscaping, including raised planters.
- 4.15 During pre-application discussions the Council confirmed that they required the same high-quality approach and attention to landscaping to the rear as that shown to the front of the Proposed Development. The rear area would be used for bicycle access and egress, for limited car parking (disabled and staff parking as discussed elsewhere) and for general amenity purposes. In order to achieve this, it is proposed that the rear amenity area uses a shared surface which integrates the 5no parking bays (including 3 disabled), accented by trees, ornamental planting and seating areas.

- 4.16 It should be noted that students residing within the building would have access to highly attractive indoor communal amenity spaces. Externally, the rear of the building would also be highly attractive and useable, providing an active, efficiently well used space.
- 4.17 Bin and bicycle storage will be located at lower ground floor level and accessed from the rear external amenity area. A substation will be located to the rear of the amenity area.

Access and Movement

- 4.18 The site is in a very sustainable location within the Borough, located along main bus routes and within walking distance of local facilities and the town centre including those at Cemetery Junction, Reading Town Centre and higher / further education institutions including Reading College and the University of Reading.
- 4.19 Vehicle access to the staff parking and disabled parking spaces to the rear of the Proposed Development would utilise the existing access, though secure rear gates off Rupert Street. This would also provide access for students arriving and leaving with their bicycles; 46 bicycle spaces would be provided, exceeding the policy compliant ratio of one space per five students and one space per three staff. Kings Road is located to the front of the site, providing a key route out of Reading, joining London Road at Cemetery Junction and linking with the A3290. Kings Road is a multi-lane one-way route, providing left-in / left-out access onto and off Rupert Street.
- 4.20 Pedestrian access would remain to the front of the building off Kings Road. Details of how access would be managed are provided within both the DAS and the Student Management Plan included with this application.
- 4.21 In order to monitor movements around the building (and ensure compliance with the relevant student tenancy agreement), 7 CCTV cameras are proposed in various locations.

Flood Risk and Surface Water Drainage

- 4.22 The EA Flood Zone mapping shows the site to lie in Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) and is therefore an area at lowest risk of fluvial flooding. The NPPF states that all development classes are appropriate for Flood Zone 1 and that an Exception Test is not required.

- 4.23 In terms of surface water, the RBC SFRA confirms that there are no historical records of any surface water flood events on or in close proximity to the site. In relation to the surface water drainage options, it was found that discharge to ground was not suitable due to the small site area and high groundwater vulnerability. Therefore, it is proposed to continue to discharge to the Thames Water surface water sewer in Norwood Road.
- 4.24 The proposed surface water strategy utilises SuDS to store runoff generated by the development up to and including a 1 in 100 year + 20% allowance for climate change event restricted to a reduced rate, for all storm events, in order to prevent an adverse effect on flood risk.

Sustainable Construction

- 4.25 Greater detail on sustainable construction methods to be employed (and materials) are detailed within the appended reports, including the DAS, sustainability report, energy report and BREEAM pre-assessment. It is however worth noting that the whole development would be designed to meet a minimum BREEAM 'Excellent' rating.

Utilities Infrastructure

- 4.26 The site has shown from the Superfast Broadband Statement that it demonstrates excellent broadband availability for the future occupiers of the Proposed Development. No issues have been found with regard to other utilities, such as gas, electric and water supply.

5.0 PLANNING POLICY CONTEXT

- 5.1 This section of the Planning Statement summarises the relevant policy context for the planning application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of a planning application must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The Development Plan for the Application Site comprises:
- (i) Saved policies from the Reading Borough Local Development Framework Core Strategy (adopted 2008); and
 - (ii) Saved policies from the Reading Borough Local Development Framework Sites and Detailed Policies Document (adopted 2012).
- 5.3 The Proposed Development has also had regard to all relevant Supplementary Planning Documents (SPDs). Reading Borough Council are also in the latter stages of preparing a new Local Plan. The emerging Reading Borough Local Plan was examined in public during September 2018, with the Local Plan Inspector currently considering what modifications may be required in order for the Plan to be considered sound. There is no definitive date by which the Inspector's comments will be received, however, adoption may take place during the Spring of 2019. Accordingly, policies within the Council's submission version of the emerging Local Plan have also been taken into consideration through the evolution of the Proposed Development.

National Planning Policy

- 5.4 Relevant National Planning Guidance is found in the National Planning Policy Framework (NPPF), the revised version of which came into force on 24th July 2018. Paragraph 47 reinforces the fact that planning law requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.5 Sections of the NPPF of relevance in this instance include:
- Achieving sustainable development
 - Decision-making
 - Delivering a sufficient supply of homes
 - Promoting healthy and safe communities
 - Promoting sustainable transport

- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

5.6 It has been established in recent Reading Borough planning appeals that the emerging Local Plan carries only limited weight at this point in time. Whilst it is acknowledged that an emerging Local Plan can gain material weight the further it progresses, to date, there is nothing that has materially increased the weight of a number of its policies since the commencement of the Examination in Public (EiP). This is particularly true with regard to emerging Policy H12 which has been the subject of substantial unresolved objections by the University of Reading; the planning weight of which cannot be deemed to have increased until at least the Inspector's comments on potential modifications, and will not carry full weight until the adoption of the Local Plan. In the interest of robustness, this planning statement considers the relevant policies within the emerging Local Plan in anticipation of its adoption prior to the determination of this application.

5.7 This section will now set out the policies within the adopted Development Plan, and the emerging Local Plan, which are considered relevant to the Proposed Development.

5.8 The following policies are considered relevant, and the 'Consultant Output' column, indicates where the substance of each policy is addressed and compliance demonstrated:

Core Strategy (Adopted 2008, revised January 2015)		
Policy	Requirements	Consultant Output
CS1: SUSTAINABLE CONSTRUCTION AND DESIGN	• Minimum 50% of the provision meets BREEAM 'Excellent' standards • Maximise energy efficiency and energy conservation • Incorporate on-site generation of energy from renewable sources and energy efficient design measures to offset at least 20% predicted carbon dioxide emissions • Reduce mains water use and incorporate water conservation measures where appropriate • Incorporate SuDs	Wilson Gray Consulting - BREEAM pre-assessment; - Energy Statement; - Sustainability Statement

CS2: WASTE MINIMISATION	- Minimise the generation of waste in the construction, use and life of buildings - Provide space to facilitate waste storage, reuse, recycling and composting	Wilson Gray Consulting (Sustainability Statement) PBA - Waste Collection details
CS3: SOCIAL INCLUSION AND DIVERSITY	- Demonstrate measures to enhance social inclusion; access to housing, employment, services, community facilities, leisure, health, education and other services and facilities - Access to good quality health, education and social facilities - Public involvement planning will be encouraged	Quatro - Statement of community Involvement Broadway Malyan - DAS Homes for Students - Student Management Plan
CS4: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT	The scale and density of development will be related to its level of accessibility to the district and local centre with a good range of facilities by pedestrian routes, and to a bus stop	PBA - Transport Statement - Travel Plan
CS5: INCLUSIVE ACCESS	Ensure location, site and design provides suitable access to its facilities for all potential users, including disabled people	Broadway Malyan - DAS - Plans
CS7: DESIGN AND PUBLIC REALM	- Ensure high design quality that maintains and enhances the character and appearance of the area, including layout, landscape, density and mix, scale and architectural detail - Makes a positive contribution to the following urban design objectives: character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and diversity - Respond positively to the local context - Creates local character and distinctiveness	Broadway Malyan - DAS - Plans Brooke Vincent - Daylight/Sunlight Analysis

	- Protects and enhances the historic environment - Creates safe and accessible environment - Addresses the needs of all in society - Visually attractive - Accompanied by a Design and Access Statement	
CS9: INFRASTRUCTURE, SERVICES, RESOURCES AND AMENITIES	- Infrastructure, services, resources, amenities or other assets lost will be re-provided - Planning obligations to secure the replacement and enhancement of additional physical and social infrastructure where justified	Barton Willmore - S106 Draft Heads of Terms)
CS11: USE OF EMPLOYMENT LAND FOR ALTERNATIVE USES	- Within Core Employment Areas, the overall level of employment land should be maintained In other areas, when assessing proposals which would result in a loss of employment land the following would apply; - Is access by a choice of means of transport? - Is employment use viable? - Is there a surplus of a similar size and type of accommodation in Reading? - Would continued use of employment use be detrimental to the area? - Is the need for alternative uses stronger than the retention of employment land?	Campbell Gordon - Office Market Report Savills - Student Market Report
CS15: Location, Accessibility, Density and Housing Mix	Development density and mix is to be informed by; Area characteristics including the mix of uses, accessibility, good design, minimise environmental impacts, to inform an appropriate mix and density.	Broadway Malyan - DAS PBA - Transport Statement
CS22: TRANSPORT ASSESSMENTS	Appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport	PBA - Transport Statement

CS23: SUSTAINABLE TRAVEL AND TRAVEL PLANS	- Promote and improve sustainable transport facilities e.g. encourages walking, cycling and public transport - Agreed travel plans including safe routes to schools and park	PBA - Transport Statement
CS24: CAR/ CYCLE PARKING	Maximum car parking standard and cycle parking requirements in relation to the accessibility of locations	PBA - Transport Statement
CS33: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT	Protection of historic environment, including their settings, including; Listed Buildings, Conservation Area, other features with local or national designation	Orion Heritage - Heritage/Archaeology Statement
CS34: POLLUTION AND WATER RESOURCES	Prevent harm to the environment through air, land, noise of light pollution, preserve or enhance ground / surface water resources, sewerage and wastewater.	Apex Acoustics - Noise Assessment - Air Quality Assessment PBA - Drainage Strategy
CS36: BIODIVERSITY AND GEOLOGY	Protection of features of biodiversity or geological interest (including protected species and their habitats).	ECOSA - Ecology survey
Sites and Detailed Policies Document (October 2012 with Alteration January 2015)		
Policy	Requirements	Consultant Output
SD1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	General sustainable development principles which align with the NPPF	Barton Willmore - Planning Statement
DM1: ADAPTATION TO CLIMATE CHANGE	- Designed to incorporate measures to adapt to climate change - Maximise opportunities for natural heating and ventilation and reducing exposure to wind - Maximise resistance and resilience to climate change e.g. solar shading, thermal mass, heating and ventilation,	Wilson Gray Consulting - Energy Statement / Sustainability Statement Broadway Malyan - DAS / plans

	appropriately coloured materials • Use of trees and planting • Minimise the impact of surface water runoff	
DM2: DECENTRALISED ENERGY	• Consider securing energy for the development from a decentralised energy source including CHP to meet Ecohomes or BREEAM standards • Consider the inclusion of a CHP plant, or biomass-fuelled heating scheme, or other form of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable or feasible for this form of energy provision.	Wilson Gray Consulting - Energy Statement
DM3: INFRASTRUCTURE PLANNING	• Provision for infrastructure, services, resources and amenities through planning obligations and/or CIL	PBA - Transport Statement Barton Willmore - Draft S106 Heads of Terms
DM4: SAFEGUARDING AMENITY	• Avoid detrimental impact to the living environment including privacy, access to sunlight, visual dominance, noise and disturbance, artificial lighting, vibration, dust, smell and crime	Broadway Malyan - DAS / plans APEX - Noise / Air Quality Assessments Brooke Vincent - Daylight/Sunlight Analysis
DM10: PRIVATE AND COMMUNAL OUTDOOR SPACE	• Functional private or communal open space, that allows for suitable sitting-out areas • Designed to respect the size and character of other similar space in the vicinity, ensure they are appropriately related to main entrances, enhance safety and perception of safety	Broadway Malyan - DAS / plans

DM12: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS	- The generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment - Access and works to the highway will comply with standards of the Transport Authority - No detrimental impact on the functioning of the transport network - No detriment to the safety of users of the transport network - No encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic	PBA - Transport Statement / Travel Plan
DM18: TREE PLANTING	Provision of tree planting within or off-site in appropriate situations to maintain and enhance character, appearance, biodiversity and reduce carbon	Broadway Malyan - DAS
DM19: AIR QUALITY	- Improve air quality and reduce the effects of poor air quality - Detrimental effects within an AQMA will be mitigated - Planning obligation will secure contributions to measures to tackle poor air quality	APEX - Air Quality Assessment
Submission Draft Reading Borough Local Plan (March 2018)		
Policy	Requirements	Consultant Output
CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	General sustainability principles.	Barton Willmore - Planning Statement
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION	- The design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately; - All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible.	Wilson Gray Consulting - Sustainability Statement - Energy Statement - BREEAM Pre-Assessment

CC3: ADAPTATION TO CLIMATE CHANGE	All developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.	Wilson Gray Consulting - Sustainability Statement - Energy Statement - BREEAM Pre-Assessment
CC4: DECENTRALISED ENERGY	(Similar to Policy CS4: Decentralised Energy) - Demonstrate how consideration has been given to securing energy from a decentralised energy source, including CHP - Consider CHP or other form of decentralised energy provision unless demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. - Expectation to link to nearby CHP or district energy network where connection available.	Wilson Gray Consulting - Energy Statement
CC5: WASTE MINIMISATION AND STORAGE	- Minimise the generation of waste in construction, use and life of buildings - Promote more sustainable approaches to waste management, including the reuse and recycling of construction waste - Promoting layout and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting	PBA - Waste collection details Wilson Gray Consulting - Sustainability Statement Broadway Malyan - DAS / plans
CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT	The scale and density of development relates to level of accessibility by walking, cycling and public transport to a range of services and facilities	PBA - Transport Assessment
CC7: DESIGN AND THE PUBLIC REALM	(Similar to Policy CS7: Design and Public Realm) Ensure high design quality that maintains and enhances the character and appearance of the area, including layout, landscape, density and mix, scale and architectural detail	Brooke Vincent - Right of Light - Daylight / Sunlight Analysis Broadway Malyan

	• Makes a positive contribution to the following urban design objectives: character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and diversity • Respond positively to the local context • Creates local character and distinctiveness • Protects and enhances the historic environment • Creates safe and accessible environment • Addresses the needs of all in society • Visually attractive • Accompanied by a Design and Access Statement	- DAS / plans
CC8: SAFEGUARDING AMENITY	(Similar to Policy DM4: Safeguarding Amenity) • Avoid detrimental impact to the living environment including privacy, access to sunlight, visual dominance, noise and disturbance, artificial lighting, vibration, dust, smell and crime.	Broadway Malyan - DAS APEX - Noise / Air Quality Assessments Brooke Vincent - Daylight/Sunlight Analysis
CC9: SECURING INFRASTRUCTURE	(Similar to Policy DM3: Infrastructure Planning) • Provision for infrastructure, services, resources and amenities through planning obligations and/or CIL	PBA - Transport Statement Barton Willmore - Draft S106 Heads of Terms
EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT	• Protection and wherever possible, enhancement of historic features and their settings, Including; Listed Buildings, Conservation Area, other features with local or national designation • Accompanied by a Heritage Statement	Orion Heritage - Heritage/Archaeology Statement

EN2: AREAS OF ARCHAEOLOGICAL SIGNIFICANCE	- Consult the Historic Environment Record assessing the archaeological impacts of development proposals to be submitted before the planning application - No adverse effect on scheduled monuments and other nationally important archaeological remains unless public benefits outweigh this	Orion Heritage - Heritage/Archaeology Statement
EN4: LOCALLY IMPORTANT HERITAGE ASSETS	Conservation of architectural, archaeological or historical significance including the appearance, character and setting of locally important heritage assets.	Orion Heritage - Heritage Statement
EN9: PROVISION OF OPEN SPACE	Provision for appropriate open space based on the needs of the development.	Broadway Malyan - DAS
EN12: BIODIVERSITY AND THE GREEN NETWORK	Consideration of potential impact on biodiversity	ECOSA - Ecology surveys
EN14: TREES, HEDGES AND WOODLANDS	- New development shall make provision for tree retention and planting. - Protection for existing trees and hedgerows where they are of importance.	Broadway Malyan - DAS
EN15: AIR QUALITY	(Similar to Policy DM19:Air Quality) - Improve air quality and reduce the effects of poor air quality - Detrimental effects within an AQMA will be mitigated - Planning obligation will secure contributions to measures to tackle poor air quality where justified	APEX - Air Quality Assessment
EN16: POLLUTION AND WATER RESOURCES	- No damage to the environment and sensitive receptors through land, noise or light pollution - No deterioration of ground and surface water quality - Water resources, sewerage and wastewater treatment infrastructure will support the development	APEX - Air Quality / Noise Assessment Wilson Gray Consulting - Drainage details

EM3: LOSS OF EMPLOYMENT LAND	When assessing proposals which would result in a loss of employment land in this area; • Is access by a choice of means of transport? • Is employment use viable? • Is there a surplus of a similar size and type of accommodation in Reading? • Would continued use of employment use be detrimental to the area? • Is the need for alternative uses stronger than the retention of employment land? • Would there be a piecemeal loss of employment land where there is potential for a more comprehensive scheme	Campbell Gordon - Office Market Report Savills - Student Market Report
H2: DENSITY AND MIX	Density and mix will be informed by that of the surrounding area, levels of accessibility, need to achieve high quality design, maximisation of land use, minimising environmental impacts.	Barton Willmore - Planning Statement
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE	(Similar to Policy DM10: Private and Communal Outdoor Space) • Functional private or communal open space, that allows for suitable sitting-out areas • Designed to respect the size and character of other similar space in the vicinity, ensure they are appropriately related to main entrances, enhance safety and perception of safety	Broadway Malyan - DAS / plans
H12: STUDENT ACCOMMODATION	• Student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation • Clearly demonstrate how the proposal meet a need that cannot be met on other sites	Savills - Student Market Report Barton Willmore - Student Accommodation Assessment

TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS	(Similar to Policy DM12: Access, Traffic and Highway- Related Matters) • The generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment • Access and works to the highway will comply with standards of the Transport Authority • No detrimental impact on the functioning of the transport network • No detriment to the safety of users of the transport network • No generation of the regular movement of HGV on unsuitable roads • No encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic	PBA - Transport Statement
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING	• Provide car parking and cycle parking appropriate to the accessibility of locations to sustainable transport facilities, particularly public transport	PBA - Transport Statement Broadway Malvan - DAS / plans
ER1: SITES FOR DEVELOPMENT IN EAST READING	• Policy ER1g identified Alexander House as allocation for redevelopment of offices for residential. Development should; • Site size: 0.16 ha with potential capacity for 26-38 dwellings	Barton Willmore - Planning Statement Savills - Student Market Report

5.9 The following section will provide an assessment of the proposals against the above relevant planning policies, drawing on relevant evidence within consultant produced reports as necessary. Where relevant, reference will also be made to the policies contained within the NPPF.

6.0 PLANNING APPRAISAL

- 6.1 This section will provide an assessment of how the Proposed Development performs when assessed against the requirements of current and emerging local planning policy. Where relevant, reference will be made to recent decisions made by both the Council and the Planning Inspectorate.
- 6.2 There are two core elements that this planning appraisal must address, the first being the principle for the proposed development and the second being the proposed design, scale and massing.

Principle of Development

- 6.3 A revised version of the NPPF was published in July 2018, reflecting the Government's latest planning policy position for development. The NPPF at paragraph 59 reveals the Government's objective to significantly boost the supply of homes and that it is important that;

"... a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." (emphasis added)

- 6.4 It is important to note that the above quoted extract from the NPPF (paragraph 59) refers to different groups of the population which have differing specific housing requirements and places the onus on Council's to look at delivering for such needs and for the housing market to deliver without any unnecessary delay.
- 6.5 The NPPF at paragraph 61 elaborates on the paragraph 59 extract quoted below by stating that it is in this context (i.e. of providing housing for the needs of groups with specific housing requirements) that;

"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their

homes and people wishing to commission or build their own homes.” (emphasis added)

- 6.6 It is important to note that national planning policy holds the need for student accommodation in the same regard as the need to provide for other groups of society. It would therefore be in conflict with the NPPF to not sufficiently address the need for student accommodation where such a need is evidenced.
- 6.7 In addressing the matter of evidenced need, this planning appraisal will draw on two forms of evidence;
- 1) Student Market Report (produced by Savills) on behalf of the applicant;
 - 2) Accommodation Strategy; Part 1 – gap analysis, July 2018 – 2028 (produced by Cushman & Wakefield) on behalf of the University of Reading, as submitted to the Reading Local Plan Examination in Public (EiP).
- 6.8 As discussed within the pre-application exercise between the applicant and the Council, the below represent core issues which need addressing in order to establish the principle for the development;
- 1) Demonstration of a need for further student accommodation in Reading Borough;
 - 2) Demonstration of compliance with emerging policy H12 (student accommodation);
 - 3) Evidenced justification for the loss of office floorspace within Alexander House in line with the requirements of Core Strategy Policy CS11 (use of employment land for alternative uses) and emerging Policy EM3 (loss of employment land);
 - 4) Development of a site with an emerging allocation for residential development within the emerging Local Plan under reference ER1g.
- 6.9 Each of the above will be responded to in turn, in addition to why the Site is specifically suitable for PBSA development of the type and scale proposed.

The Need for Student Accommodation

- 6.10 The Council have relied upon the Berkshire (including South Bucks) Strategic Housing Market Assessment from February 2016 during the recent Reading Borough Local Plan EiP (the “SHMA”). The SHMA used census data from 2011 for much of its data. It is interesting to note that the SHMA, in reference to house prices within Reading, noted that median prices in Reading rose by 190% over the pre-recession decade, the highest in either the Western Berkshire or Eastern Berkshire HMA areas, potentially exacerbated by the buy to

let market fuelled by student demand. In other words, the SHMA is essentially saying that housing affordability problems may have been worsened through students, unable to find suitable PBSA, driving up demand and therefore rental prices in Reading. The logical method of reducing a potential influence on rental price growth is to provide further student accommodation to reduce demand for HMO accommodation.

- 6.11 The SHMA appears to indicate that (paragraph 7.77), bucking the regional and national trend, there has been a reduction in the number of shared dwellings in both HMAs as a percentage of all households, which may be in part as a result of "a shift in student culture of shared properties towards purpose built halls of residence and landlords converting shared properties into more lucrative studio flats." In Reading the number of HMOs has continued to rise with the growth of student numbers from the University of Reading (the "University"), however, the SHMA indicates that as a proportion of all households, this figure has seen a reduction.
- 6.12 The SHMA used data regarding trends in student numbers for the University of Reading from the Higher Education Statistics Agency (HESA). As quoted within the SHMA, the HESA put student numbers at the University by the academic year of 2012/13 at 13,435, which represented a drop of around 2,500 students from a peak number in 2008/09. The SHMA indicates that the reduction up to 2012/13 was driven in the main by a decline in part-time undergraduate numbers. This corresponded with an increase in full-time student numbers, which can be seen since 2010/11; SHMA, paragraph 9.94. The growth in full-time courses at the University influenced an increase in students living in student residences by around 1,250 persons between 2001 – 2011 according to the SHMA (paragraph 9.96).
- 6.13 At paragraph 9.98 of the SHMA, the report refers to a rise in overseas students between 2001/2 and 2012/13 of some 25% (EU and non-EU). The SHMA states that non-UK students are more likely than other groups to reside in student halls. This indicates that if a growth in non-UK demand is evident (EU and/or non-EU), this would drive a need for more PBSA as this would be their preferred accommodation (as opposed to HMOs which such students may be forced into without sufficient PBSA spaces to accommodate their growth in numbers).
- 6.14 In terms of growth, the SHMA referenced that the University expected growth of around 23% (2,960 students) over the years 2015 to 2018, of which international students were expected to make up around a third of that growth. The SHMA recognised (paragraph 9.102) that international student growth would lessen the impact on the wider housing

market (as opposed to domestic growth) as students from the international market tend to seek residence in PBSA.

- 6.15 Whilst the SHMA used figures at the time from the University which showed relatively modest growth between 2015 – 2018, at paragraph 9.103 it noted that such international growth is likely to bring student numbers back to the previous record high levels seen in 2008/09 (just under 16,000). The SHMA considered that with an increased supply of PBSA coming through the pipeline (plus the quoted 5,000 University accommodation capacity at the time), based on those numbers, there would unlikely be a significant need over and above previous levels.
- 6.16 There is a need to consider the findings of the SHMA, which based its conclusions on data up to the 2012/13 academic year, against more up to date data. This is available as set out in paragraph 6.7 above.
- 6.17 The University commissioned an updated review of current and future student accommodation need. The resultant report, titled Accommodation Strategy; Part 1 – gap analysis, July 2018-2028 (the “UoR Accommodation Strategy”) was submitted by the University along with Hearing Statements for the September 2018 Local Plan EiP. The content of the UoR Accommodation Strategy was discussed at the EiP and formed the basis of a Statement of Common Ground between the University and the Council (Appendix D), which shall be discussed later in this section.
- 6.18 The UoR Accommodation Strategy demonstrated (page 12) that there has been a significant growth in students (28%) between 2007/2008 and 2016/17, with a 47% increase in non-UK students over the same period. In terms of age profiles, the University has seen a growth in younger students aged 20 or under. Whilst the UK is currently experiencing a short-term demographic dip in the number of 18 year olds within the UK population, which is projected to reach its lowest point in 2020, the demographic projections indicate this would then rise significantly to 2030, increasing the demand from UK students alongside the growth in International demand. The UoR Accommodation Strategy refers to the Higher Education Policy Institute forecasts that 300,000 – 350,000 full-time places will be required by 2030 to keep pace with demand, and if the male participation rate was to keep pace with that of females, this could rise to 500,000. The growth in University demand for student places is a reflection of this wider sector growth.
- 6.19 As referenced within the UoR Accommodation Strategy, it is apparent that the Government’s removal of Student Number Controls in 2015/16 has had a significant impact. This followed the Government’s Browne Report (2010) which looked towards

changes to the student funding system and sought to create genuine competition for students. Growth in demand for student places at the University has accelerated since 2015 as demonstrated within the UoR Accommodation Strategy at page 17.

- 6.20 International demand is expected to rise, with the UoR Accommodation Strategy (page 22) predicting this may increase further following the University's launch of a new campus in Malaysia in 2016. In agreement with the SHMA, the UoR Accommodation Strategy states that this increasing number of international students would generally prefer PBSA due to high convenience, security, facilities / services within which enable a more conducive atmosphere to study than a HMO and the ability to book online. The University's data shows that students from the EU grew by 29% between 2011/12 to 2016/17 and non-EU International students by 45%. The increase in non-UK students at the University has increased by 41% since 2011/12, over five times the national average rate of increase.
- 6.21 The SHMA by contrast with the above referenced more up-to-date information, was based on 2011 census data, HESA and University information up to 2012/13. This will not have taken account of the increasing demand from the non-UK (significantly non-EU) student market, and the removal of the student number controls in 2015/16. Since the removal of the controls, the University has benefitted from a growing market outside the South East of the UK and the non-UK market, and whilst this was not accounted for by the SHMA, it is projected to continue.
- 6.22 The applicant has commissioned a report to reinforce the demand picture. Therefore, a Student Demand in Reading report (the "Student Demand" report) has been produced by Savills and is included with this application. The Student Demand Report, using the same HESA source as the SHMA found that in 2016/17 there were 15,835 students at the University, of which 14,005 were full time. During 1998/99 to 2016/17 the overall population of students has remained relatively steady, but significantly has seen growth in full-time undergraduate students replace a fall in part-time undergraduate students.
- 6.23 The Student Demand Report also identifies that the UK's population projections show a demographic dip in university students over the next couple of years, but emphasises that this will be short lived and UK student numbers would then continue to increase. As shown within Figure 3 of the Student Demand report, the increase in the UK student population attending the University is growing at an increasing rate, as are those students from the international non-EU market. It is also anticipated within the report that any potential impact from Brexit on EU students would be mitigated by the fact that EU students (as at 2016/17) only made up 6% of the student population and the significant growth of non-EU international students shows no signs of faltering. The Student Demand report also

highlights the fact that a weaker Sterling makes the UK relatively less expensive to study in. This can only further increase International demand.

- 6.24 Against the above picture, the University anticipates, as depicted within the UoR Accommodation Strategy, that it will grow from just over 16,000 students in 2017/18 to around 21,000 students by 2028, an increase of circa 5,000 students. It should be noted that the demand figures quoted by the UoR Accommodation Strategy (page 48) are lower than the total student population as the demand figures only relate to those students who register their interest in taking up a bedspace within University Halls of Residence.
- 6.25 Using the University figures within the UoR Accommodation Strategy (page 48), it is clear there is a consistent increase in demand for PBSA rooms and a corresponding increase in the number of students to whom the University cannot offer accommodation. The University state within their evidence to the EiP that for the 2017/18 academic year the number of students who registered interest in University Halls of Residence, that could not be offered accommodation, amounted to 5,015 students (c.1,000 students who were first year students) in 2017/18, and is projected to rise to a shortfall of 6,875 student bed spaces by 2020/21. Whilst this growth to 2020/21 would cover the Brexit period, as demonstrated through the Student Demand report, non-EU International demand would be expected to mitigate the relatively small proportion of demand which originates from the EU. It is worth noting that the UoR Accommodation Strategy also predicts that the shortfall in student bed spaces against those who register interest, could rise to 12,865 by 2028/29. All these numbers are significant and if not managed properly through an increase in efficiently developed and well managed PBSA would inevitably see an increase in the HMO population.
- 6.26 The subject of the scale of student accommodation need has been discussed at length during the Reading Local Plan EiP, following which, the University and the Council reached agreement on a Statement of Common Ground ("SoCG") (Appendix D). The content of the SoCG provides some further context to how the above growth figures, and current shortfall, have been considered by both parties thus far.
- 6.27 Within the SoCG the Council mention concerns that the need for PBSA is not as clear cut and consistent as for general housing. It is argued however that the above summarised evidence, within the UoR Accommodation Strategy and the Student Demand report both clearly indicate, using the same data used by the SHMA within the HESA, that growth has both occurred consistently, at an increasing rate, and is projected to continue.

- 6.28 Within the SoCG the Council (at paragraph 6.10) state that there is no “particular reason to doubt the general scale of existing shortfall identified”. Further, in reflection of this, the Council agreed, at paragraph 6.16 of the SoCG to add to the supporting text of emerging Policy H12 (student accommodation) to include wording stating that there is a current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students who registered interest could not be housed in University Halls of Residence. Furthermore, the Council agreed to include text which accepts that groups from outside the UK (which represent the largest growth area) are particularly reliant on PBSA (including private PBSA and University Halls of Residence).
- 6.29 It should be noted that the shortfall figures for 2017/18 accepted by the Council for insertion into paragraph 4.4.96 of the emerging Local Plan represent the shortfall of University accommodation to accommodate those students who registered an interest in University Halls of Residence. There will be additional students, on top of those figures which makes up the total student population who may take up a place within PBSA if it were available. For example, there were c.16,000 registered students at the University in 2017/18; if you deduct from this figure the c.12,000 students the UoR Accommodation Strategy states had registered interest, this would leave c.4,000 who did not register interest in University accommodation. Of this c.4,000 additional student number for 2017/18, an as yet unknown number may not have registered their interest in University Halls of Residence due to considering their chance of an accommodation place to be so low that they may have decided to go directly into private PBSA, live with friends/family or to go directly into HMO accommodation. It is worth noting that the SoCG between the Council and the University records the Council’s acceptance that there is a clear relationship between an insufficient provision of PBSA and a greater number of students in private housing including HMOs, with a knock-on effect for the provision of family housing.
- 6.30 Notwithstanding any demand shortfall above the figures quoted by the University for 2017/18, the current shortfall as already stated, which has been accepted by the Council within the SoCG between the Council and the University, presents a significant challenge if the requirements of the NPPF to provide for the housing needs of specialist groups (including students) are to be met.

Emerging Policy H12 (Student Accommodation)

- 6.31 Whilst emerging Policy H12 carries limited weight at present by virtue of not being part of an adopted Local Plan, it is considered prudent to assess compliance given it may become adopted prior to the determination of the Proposed Development by the Council.
- 6.32 Emerging Policy H12 currently reads as follows (but may be subject to modification following the Local Plan Inspector's impending EiP feedback);

"H12: Student Accommodation

New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation.

There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites."

- 6.33 The above draft policy text first requires an assumption that there is a 'need'. The evidence available to the Council through the University's UoR Accommodation Strategy and the Student Demand report submitted with this application, establishes that there is a current shortfall in the region of at least 5,000 student bed spaces within Reading Borough. That number is however based on a calculation set against the University's own accommodation supply and does not account for those PBSA developments with which the University does not hold current agreements.
- 6.34 The total number of current private PBSA bed spaces total 1,770 (Appendix E). Against the total number of current (2017/18) students to whom the University was unable to offer accommodation (5,015 students), this would mean there is a shortfall of the available student accommodation within PBSAs of at least 3,245. Once consented PBSA schemes within the planning pipeline become available, a further 305 bed spaces will be added to the supply, this would still result in a shortfall of student accommodation in the region of 2,940 bed spaces. The Council will be aware that the University and UPP have submitted an appeal against the Council's refusal of application 172045 (St Patrick's Hall). If that appeal is successful, it would add a further net 654 bed spaces (see Appendix E for calculations).

- 6.35 What is notable and requires attention is that this shortfall is a **current** shortfall, which, without further PBSA in the Borough would worsen significantly over the coming years.
- 6.36 Despite this, emerging Policy H12 requires that meeting an identified need for student accommodation is approached in a sequential manner, including the identification as to whether whether the scale of need could be accommodated within a policy preferred list of locations, in the following order;
- 1) On or adjacent to existing further or higher education campuses; or
 - 2) Extension or reconfiguration of existing student accommodation.
- 6.37 An assessment of potential locations in line with the above approach is therefore provided.

Assessment of the potential capacity of the University of Reading campus locations

- 6.38 The Council will be aware that the University submitted a Campus Capacity Study (September 2018) with the University Hearing statements prior to the Local Plan EiP. Within that document, available to view on the Local Plan examination website, the University found that there is theoretical capacity, on-campus locations (or extension / redevelopment of existing University PBSA) for around 1,935 new student bedrooms and 50,609sqm of additional academic space.
- 6.39 It was noted within the SoCG, by the University, that many of the potential sites identified on the Whitenights campus are not immediately available, but would form part of the University's longer-term future planning for the campus. This is an important distinction when discussing when such development could theoretically come forward.
- 6.40 It was agreed by both the Council and the University within the SoCG that it is **unlikely** that there would be capacity for further University delivered PBSA within or adjoining the existing University campus to provide the necessary level of student accommodation.
- 6.41 The Campus Capacity Study provided an initial assessment of the potential development locations on campus, but it was noted within the SoCG that many of the potential development sites included within that study are wholly or partly in Wokingham. In conclusion, the Council considered that the Campus Capacity Study may have overestimated the potential capacity for further growth on some sites and raised concerns regarding the potential loss of sports facilities, landscape impacts and the setting of heritage assets.

- 6.42 The Council concluded that the Campus Capacity Study appeared to overestimate potential residential (i.e. PBSA) capacity at an amount in the region of 500 beds, but that there may be scope for some other sites considered within the study as suitable for academic purposes that could be rebalanced to provide residential beds. In summary therefore, it is understood that the Council considered the potential capacity identified of c.1,935 new student bedrooms on campus or University owned land seemed a reasonable assumption.
- 6.43 It should be noted that the Camus Capacity Study assessment of potential on-campus capacity (including any other University land) includes the appeal, if successful, for St Patrick's Hall. If the St Patrick's Hall appeal is dismissed it would reduce the capacity on the University's campuses to 1,281 (i.e. having deducted the 654 bedspaces net increase which the proposals would have provided). This would mean a current shortfall of 1,659 bedspaces (i.e. shortfall of 2,940 minus 1,281 potential capacity on campus, equals 1,659). If the St Patrick's Hall appeal is allowed, this would increase supply by 654 (net) meaning the shortfall in overall terms would fall to 1,005 bedspaces across all years of study (for 2017/18).
- 6.44 What should be made clear is that the shortfall figures, if 'all' available capacity is developed from the University's on-campus locations and having accounted for all private PBSA (both operational and pipeline consented schemes), would still be insufficient to meet registered demand by some 1,005 bed spaces even if the St Patricks Hall proposals are successful, and short by some 1,659 bed spaces if it is unsuccessful. It also must be reiterated that these shortfall figures only represent those students who have registered interest in University accommodation in 2017/18 and does not capture those who have already decided to seek alternative accommodation (such as private PBSA). Further such shortfall calculations appraise the overall shortfall against the overall potential capacity; it does not account for the reality that we are now a year further from those figures, with shortfall projected to grow over the next five years and beyond as demand increases, and crucially doesn't account for the event that such capacity could not be built out immediately due to operational and likely financial reasons (but would need to be covered by a phased development programme). By the time much of that identified capacity on the University campus locations can be built out, the demand for accommodation is projected to have grown significantly again.
- 6.45 It is evidentially very clear therefore that there is insufficient capacity from on-campus locations to meet the current shortfall in student accommodation (2017/18 figures) and that the gap between demand and supply is likely to grow significantly over the coming

years as identified within the UoR Accommodation Strategy and having regard to the findings of the Campus Capacity Study.

- 6.46 The next step required by emerging Policy H12 is to review the potential capacity which may arise from land adjacent to existing higher or further education campus locations.

Assessment of the potential capacity of land adjacent to higher or further education campuses

- 6.47 In order to assess the potential capacity of sites adjacent to existing higher or further education locations there is a need to review the land and property which fall within this criteria. This review has been transposed into a map, included for the Council's attention at Appendix F, and henceforth referred to as the "Adjacent Study".
- 6.48 The Council clarified during pre-application discussions that in the Council's opinion, the "adjacent" test which would be required by emerging Policy H12, if adopted in its current form, would relate to land which is immediately adjacent. Therefore, the review of land adjacent to existing campus locations has followed the Council's guidance and only provides an assessment of immediately adjacent land.
- 6.49 It is apparent from the review of adjacent land, as illustrated on the Adjacent Study map, that the predominant land use of those adjacent areas are taken up by residential properties, which would
- 6.50 Other adjacent locations which are not residential development have been considered and these are identified in blue on the Adjacent Study map. These locations are set out below;
1. Leighton Park School
- 6.51 Leighton Park School is a secondary school which also offers Sixth Form places to students, with both day schooling and boarding available. Whilst the school grounds are extensive, these consist of education facilities and sports facilities used by the school.
- 6.52 Policy OU1 of the emerging Local Plan seeks to protect existing community facilities, including schools and playing pitches, development will not be supported unless it can be clearly demonstrated that there is no longer a need to retain that facility.
- 6.53 It is therefore clear that it would be compliant with emerging Policy H12 to rule out Leighton Park School from further consideration for additional PBSA.

2. The Abbey School

- 6.54 The Abbey School is a Church of England girls school which provides Nursery and Junior School places, and secondary school places with a Sixth Form. For the same reasons as above in terms of compliance with emerging Policy OU1, whilst the location of the Abbey School would be suitable for PBSA in terms of its location adjacent to the University's London Road campus, it cannot be considered as available for development.

3. Kendrick School

- 6.55 Kendrick School is a selective girls' grammar school which became an academy in 2011. The school offers places for Years 7 to 11, plus a Sixth Form. For the same reasons as that stated for Leighton Park School and the Abbey School in terms of compliance with emerging Policy OU1, whilst the location of Kendrick School would be suitable for PBSA in terms of its location adjacent, to the north of the University's London Road campus, it cannot be considered as available for development for the purposes of this assessment against emerging Local Plan Policy H12.

4. St Josephs College (6th Form)

- 6.56 Located to the north of the University's Whiteknights campus, the St Josephs College grounds would represent a suitable location for PBSA development and in terms of being adjacent to a further or higher education campus would comply with Policy H12 of the emerging Local Plan.
- 6.57 However, for the same reasons as for the other school establishments within this assessment, St Josephs College cannot be considered an deliver option for PBSA and is discounted from further assessment.

5. Royal Berkshire Hospital

- 6.58 As stated within the emerging Local Plan at paragraph 9.1.5, the Royal Berkshire Hospital on London Road is the main hospital for residents of west and central Berkshire, employing over 4,000 staff. It is therefore a very significant facility providing health care for the wider sub-region. The hospital requires land within its grounds for the provision of additional hospital floorspace regarding which there are various applications (reference paragraph 9.3.6 of the emerging Local Plan).

- 6.59 Emerging Policy ER3 specifically relates to the hospital and states that “unless it is proposed to move to a new site, the Hospital site on Craven Road will continue to be a focus for healthcare development to meet requirements” and that any proposal to move the hospital (and develop its land) would not be supported if this would lead to a reduction in the standards of or access to care.
- 6.60 Development within the already highly developed Royal Berkshire Hospital grounds would inevitably lead to a restriction in the development of further required healthcare facilities, and with no current plans to relocate the hospital, cannot be considered available for development. Any proposal to do so, without acceptable plans for its relocation in accordance with the emerging Local Plan Policy ER3 requirements, would conflict with that policy. It is therefore appropriate, in line with the emerging Local Plan Policy H12 assessment to discount the hospital site from further consideration as a potential PBSA location.

6. Chancellor House Surgery

- 6.61 Certain facilities are required in order to support sustainable growth. The emerging Local Plan includes (paragraph 10.3.4) health provision as being an important facility to support such growth. Further, it is an objective of the emerging Local Plan (Objective 3 at paragraph 2.2.2) to support infrastructure, such as healthcare services to meet identified needs. Emerging Policy CC9 (securing infrastructure) places a high priority to the appropriate provision of health facilities. Additionally, emerging Policy OU1 seeks to prevent the redevelopment of existing community facilities (including healthcare facilities), unless there is no longer a need to retain that facility.
- 6.62 It would therefore conflict with the aforementioned policies to propose the redevelopment of the Chancellor House Surgery for PBSA accommodation and it should be discounted from further assessment. Notwithstanding these conclusions, the Chancellor House Surgery site would be of insufficient size to provide meaningful PBSA provision (which would likely be restricted to two storeys in keeping with surrounding residential properties).

7. Lakeside Residential Care Home

- 6.63 This residential care home is not identified as being available on the market for redevelopment so cannot be deemed an option for PBSA. Notwithstanding this, the emerging Local Plan at Policy H6 (accommodation for vulnerable people) states (using SHMA evidence) that there is a need for an additional 253 residential care bed spaces for

elderly people between 2013 and 2036. Given this need and the unavailability of the site for re-development, it cannot be considered an option at the present time for PBSA and is therefore discounted from further assessment.

8. Allotments

- 6.64 Emerging Local Plan Policy EN8 states that there would be a presumption in favour of the retention of undesignated open space, which would include allotments and that "development should not result in the loss of or jeopardise use and enjoyment of undesignated open space."
- 6.65 It is apparent that the allotments are very much still in use and as such, it would conflict with emerging Policy EN8 to propose PBSA in this location. It is accordingly not considered further as a suitable location for PBSA.

9. St William of York Church

- 6.66 The St William of York Church is located to the north of the University's Whiteknights campus and is an active parish church. It operates a number of local community events on a regular basis from the building, predominantly surrounding religious themes at the building.
- 6.67 The building is also currently not offered for sale, which isn't entirely surprising given its current and likely continued active use.
- 6.68 In any event, as a highly functioning community facility, there is no evidence to suggest (as required by emerging Policy OU1 for the redevelopment of any existing community facility) that there is no longer a need to retain it for its current use. It is therefore discounted from any further assessment and cannot be considered available at the present time for PBSA.

10. Petrol Station

- 6.69 This petrol station, operated by BP, is located to the north of the University's London Road campus. It has not been identified to be available for sale / redevelopment and as such cannot be considered available for PBSA. It has therefore been discounted from further assessment and does not provide opportunity for further PBSA development.

11. Reading School, Morgan Road Playing Fields

6.70 Whilst the Morgan Road Playing Fields (a Reading School sports facility with three rugby / football pitches and tennis courts) would be in an appropriate location, adjacent to the University's London Road campus, its current use as sports pitches would require any proposed development to comply with Policy OU1 (new and existing community facilities). Policy OU1 requires that the loss of sports pitches and playing fields could only be developed where;

- a) an assessment clearly shows the area to be surplus to requirements; or
- b) the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

6.71 The sports pitches currently form facilities for the use of Reading School, and there are no current indications that it is surplus to requirements. It is also not currently possible, as part of the Proposed Development, to replace those sports pitches with equivalent or better provision. Finally, PBSA on the playing fields, without replacement elsewhere, would not comply with c) above given that it would not be for alternative sports and recreation provision.

6.72 Therefore, the Morgan Road playing fields area are discounted from further assessment.

12. Rosedale Clinic (Private Health Clinic)

6.73 As discussed in relation to the Chancellor House Surgery, the Rosedale Clinic represents a facility that the Council considers to be required in order to support sustainable growth. The emerging Local Plan includes (paragraph 10.3.4) health provision as being an important facility to support such growth. Further, it is an objective of the emerging Local Plan (Objective 3 at paragraph 2.2.2) to support infrastructure, such as healthcare services to meet identified needs. Emerging Policy CC9 (securing infrastructure) places a high priority to the appropriate provision of health facilities. Additionally, emerging Policy OU1 seeks to prevent the redevelopment of existing community facilities (including healthcare facilities), unless there is no longer a need to retain that facility.

6.74 It would therefore conflict with the aforementioned policies to propose the redevelopment of the Rosedale Clinic for PBSA accommodation and it should be discounted from further assessment. Notwithstanding these conclusions, the Rosedale Clinic site would be of insufficient size to provide meaningful PBSA provision.

13. Public Open Space

- 6.75 The Emerging Local Plan Policy EN8 seeks to protect open space. Not only would it conflict with emerging Policy EN8, it would also be of insufficient size to accommodate PBSA and is located on a junction between Redlands Road and Christchurch Road making suitable access difficult. It has accordingly been discounted from further assessment and cannot be considered available for PBSA development.

14. St Johns C of E Primary School

- 6.76 This primary school is located immediately north of Reading College, a further / higher education institution. Policy OU1 of the emerging Local Plan seeks to protect existing community facilities, including schools and play pitches. In accordance with this emerging policy, redevelopment of such sites will not be supported unless it can be clearly demonstrated that there is no longer a need to retain that facility.
- 6.77 It is therefore clear that it would be compliant with emerging Policy H12 to rule out St Johns C of E primary school from further consideration for additional PBSA.

15. Religious Centre (MFM Reading Transformation Centre, UK)

- 6.78 The MFM centre is a religious organisation who occupy the building to the east of Reading College. It operates a number of religious events within the building which are open to the local community on a regular basis from the building. The building is also currently not offered for sale.
- 6.79 In any event, with being a highly functioning community facility, there is no evidence to suggest (as required by emerging Policy OU1 for the redevelopment of any existing community facility) that there is no longer a need to retain it for its current use. It is therefore discounted from any further assessment and cannot be considered available at the present time for PBSA.

16. Young People's Hall

- 6.80 This building is relatively small, located to the south eastern corner of Reading College. The building as existing occupies the majority of the site and fronts onto Kingsgate Street. On such a confined site, it would be difficult to ascertain how the necessary facilities, to

support a PBSA proposal, could be provided (i.e. parking, access and amenity space) and still retain sufficient space for a PBSA scheme.

- 6.81 As the building occupies a highly restricted site and is not currently available for sale on the market, it has been discounted from further consideration as a potential PBSA site.

17. Offices (ITS construction recruitment)

- 6.82 This building is currently occupied by a recruitment company (ITS). As it is a currently occupied, it remains viable for now as an office building, its loss would not comply with emerging Policy EM3. This is in stark contrast to Alexander House, a vacant low-quality office building which, despite a marketing campaign, has not been taken up by office tenants. Further, the ITS recruitment building site is very narrow, making any meaningful provision of student accommodation difficult (i.e. with required amenity, parking and entrance facilities). Finally, as the building is not currently available to purchase, it has therefore been discounted from further assessment for PBSA.

18. Offices (WIPRO)

- 6.83 This building is currently occupied by IT company WIPRO, who use the building as offices. The building has undergone a number of fairly recent upgrades as indicated by the relevant planning history available on the Reading Borough Council website (using site address 185 Kings Road, Reading). Such investment and the continued occupation by WIPRO indicate the building remains of sufficient quality to meet their needs and accordingly it should be retained as office floorspace in accordance with emerging Policy EM3. Further, the building is not available for sale and as such has been discounted from having potential for PBSA.

19. Retail (Newsagents)

- 6.84 This site is far too small to be considered capable of accommodating PBSA and as such has been discounted from further assessment for PBSA.

Summary of potential PBSA capacity on land adjacent to existing further or higher education campus locations

- 6.85 Having conducted a full review of potential development locations on land immediately adjacent to existing further or higher education campuses, it is apparent that there would currently be no available potential capacity. The shortfall in student accommodation would

therefore remain at the level previously identified having accounted for University PBSA and private PBSA combined.

Extension or reconfiguration of existing PBSA

- 6.86 Having established that no potential PBSA development locations have been identified on land adjacent to existing further or higher education campuses in Reading (having assessed the University of Reading and Reading College sites), emerging Policy H12 requires that the question of whether or not the extension or reconfiguration of existing PBSA within the Borough could provide sufficient capacity to meet an identified need.
- 6.87 In order to make this assessment, all current PBSA development locations have been identified, including both those that are operational and those which have planning permission but are yet to be completed. The list of sites appraised are included at Appendix E and their locations illustrated on a map at Appendix G. The map at Appendix G which illustrates the locations of existing PBSA shall from this point be referred to as the "Existing PBSA map". It should be noted that whilst the location of University student accommodation is shown on the Existing PBSA map, the potential for additional capacity of those sites and any other University land has been considered within the Campus Capacity Study and as such, to prevent double counting, are not re-appraised within this section of the emerging Policy H12 assessment.
- 6.88 The search for existing PBSA has revealed that there are currently 10 private accommodation buildings in Reading Borough, generating a total capacity of 1,770 bed spaces. There are only six sites which currently have planning permission for private PBSA, totalling an additional capacity, once constructed, of 305 bed spaces. This means a combined total of 2,075 bed spaces.
- 6.89 For the purposes of this assessment, it is not considered appropriate to appraise recent planning applications as it can be assumed that those submissions, as permitted, represent the current capacity of those sites. This assessment will however look at the 10 existing PBSA developments. This is set out in brief within the below table:

PBSA name (Existing PBSA map number)	Comments
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Crown House (1)	It is evident that this site has been built out to occupy the entire site. There would therefore be no opportunity for further extensions to increase capacity. Further, as a fairly recent building, it would be highly unlikely that it would be viable to redevelop the site for a building which provides increased student accommodation.
Kendrick Hall (2)	This is a fairly recently developed PBSA, operated by Unite, and represents a full utilisation of the site capacity. There would be no further opportunity for extension without loss of amenity space designed for the use of current resident students.
Saxon Court (3)	Whilst not as recent as others within this assessment, the Saxon Court PBSA maximises the use of the site with limited, if any, scope for extension. As the PBSA is currently occupied, it is unlikely to present a redevelopment opportunity, which is even less likely at the current point in time due to the shortfall in accommodation driving up demand.
Loddon House (4)	This is a very recent development which represents the maximum capacity at this point in time. No further capacity for extension or reconfiguration could be reasonably expected at present.
Central Studios Reading (5)	Central Studios is a recent development and represents the maximum current capacity for the site.
Queens Court (6)	This student accommodation development represents the maximum current capacity for the site.
CityBlock (7)	CityBlock (Berkshire House) is a PBSA that has been fairly recently converted from offices to student accommodation, including retail on the ground floor. There is no further capacity for expansion of this building at the present time.
New Century Place 1 (8)	Recently converted under a Prior Approval Notification (reference 161601), the current accommodation as converted represents the maximum current capacity for the site.
New Century Place 2 (9)	Recently converted by Prior Approval Notification applications (172271 and 172272). Having recently been converted and as evident from a review of the site, there is no further capacity for additional accommodation.
Kings Road (10)	Kings Road is a recent development which maximises the capacity of what is a long narrow site. There is no further capacity on this site for additional PBSA.

- 6.90 Having conducted an in-depth appraisal of each existing private PBSA development, and accepting that those which have recently gained permission (six sites totalling 305 beds) represent the full capacity of those sites, it is apparent that there is no identifiable further capacity from existing PBSA within the Borough.

Emerging Policy H12 Summary

- 6.91 This assessment has had regard to the Council's emerging Local Plan Policy H12 on the basis that it may have increased planning weight (i.e. if the Local Plan Inspector does not require modification to it), or full weight in the event that the emerging Local Plan is adopted prior to the determination of this planning application.
- 6.92 The latest data from the University finds that the University is experiencing a shortfall of 5,015 student bed spaces (correct as of the 2017/18 academic year) when taking into account those students, across all years of study, who have registered interest in University student accommodation. This shortfall is understood to not take account of the following;
- 1) Students who do not register interest in University PBSA by virtue of going straight into private PBSA, HMOs or living with friends / family;
 - 2) The capacity of the private PBSA sector where students who form part of that 5,000 shortfall figure may go (although some may go to HMOs) when the University cannot offer accommodation.
- 6.93 In order to understand true shortfall, having accounted for both the supply available from the University and private PBSA with which the University does not have an agreement, there is a need to discount from the University published shortfall, the amount of capacity provided by the private PBSA sector.
- 6.94 The summary of this assessment is set out in the below table:

Table 1: Current Shortfall Summary

Category	Number of bedspaces
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1.Total shortfall (2017/18) of student bedspaces based on the number of students who registered interest in University accommodation but could not be accommodated by University supply. It should be noted that the total shortfall stated by the University has already accounted for total University PBSA supply.	5,015
2.Total Private PBSA supply (constructed and consented pipeline)	2,075 (1,770 + 305)
3.Total Private PBSA supply plus St Patrick's Hall proposals¹ (if appeal allowed)	2,729 (2. Plus 654 net)
4.Total potential on-campus supply (St Patrick's Hall appeal dismissed)	1,281
5.Total potential on-campus supply (St Patrick's Hall appeal allowed)	1,935 (4. Plus 654 net)
6.Total potential adjacent to campus supply	0
7.Total potential extension / reconfiguration of existing PBSA supply	0
8.Shortfall Remaining (Shortfall minus Private Supply / on campus potential supply but St Patrick's Hall appeal dismissed)	1,659 (2. + 4. deducted from 1.)
9.Potential Shortfall Remaining (as above but accounting for St Patrick's Hall proposals if appeal allowed, add net of 654)	1,005 (2. + 5. Deducted from 1.)

6.95 Taking rows 8. and 9. from the above table, it is clear that there is a current shortfall based on the latest figures from the University of Reading, amounting to 1,659 without the St Patrick's Hall appeal being allowed, and 1,005 with it being allowed. These shortfall figures have had regard to all current and potential emerging Policy H12 compliant locations (i.e. on campus, adjacent to campus and extension / reconfiguration of existing PBSA). For ease of comparing supply and demand numbers, the University's assessment of potential on-campus supply has been presented as a whole number, without assuming delivery over the passage of time. In reality, it is unrealistic to assume that the University could deliver its entire on-campus supply immediately. It is more likely that it would be delivered over a number of years, to a logical development programme and reflecting available resources. By the time such identified potential on-campus supply is built out in full, the reality is that the shortfall figure, as projected by the University, will have likely increased significantly.

¹ Note: Please see Appendix E for calculations.

- 6.96 The UoR Accommodation Strategy projects that shortfall figures could increase from 5,015 in 2017/18 (actual figures), to a projected 6,875 by 2020/21 and 12,865 by 2028/29. The below table illustrates how the shortfall figures, having regard to Table 1 above, would increase should the University's projections take place;

Table 2: Projected Future Shortfall

Year	UoR Accommodation Strategy Shortfall	Resultant Shortfall taking account findings of Table 1.
2017/18	5,015 (emerging Local Plan references 5,000 within the supporting text to Policy H12)	1,659 (St Patrick's Hall appeal dismissed)
		1,005 (St Patrick's Hall appeal allowed)
2020/21	6,875 (projected)	3,519 (St Patrick's Hall appeal dismissed)
		2,865 (St Patrick's Hall appeal allowed)
2028/29	12,865 (projected)	9,509 (St Patrick's Hall appeal dismissed)
		8,855 (St Patrick's Hall appeal allowed)

- 6.97 As seen from the assessment against the criteria of emerging Policy H12 for preferred locations for student accommodation, the preferred sites within the first paragraph of that policy cannot meet the current shortfall, or that projected to 2020/21 or the projected shortfall for 2028/29 (acknowledging that long term forecasts are more difficult). The shortfall numbers are significant, even in the event that the St Patrick's Hall appeal is allowed. The second paragraph of emerging Policy H12 is therefore also satisfied and PBSA can, in compliance with emerging Policy H12 come forward in other sustainable locations, including the Application Site on King's Road.

Loss of Office Floorspace

- 6.98 The Council stated within the September 2018 pre-application advice (Appendix B) that at the time application 162057 (the consented scheme) was determined, the loss of the existing office use was justified through a combination of a point by point assessment of

policy CS11, supplemented by a market report. Policy CS11 is the adopted Core Strategy Policy, which would be replaced by emerging Policy EM3 if the emerging Local Plan is adopted in its current form. This planning statement will conduct the same exercise.

- 6.99 The Council also advised at the pre-application stage that the office market report submitted with application 162057 to demonstrate the acceptable loss of the office use at Alexander House was accepted by officers to be sufficient in accordance with the requirements of Core Strategy Policy CS11. This application includes an updated Office Market Report.

Core Strategy Policy CS11 and emerging Local Plan Policy EM3 point-by-point criteria assessment

- 6.100 Emerging Policy EM3 references Core Employment Areas, which the Site is not within, and sets out a criteria for all other areas which does apply to the Site. The criteria within Emerging Policy EM3 is the same as the current adopted criteria within Core Strategy Policy CS11.
- 6.101 In order to assess compliance with the criteria within both Core Strategy Policy CS11 and emerging Local Plan Policy EM3, it is worth referencing the updated Office Market Report, included with this application.
- 6.102 The Office Market Report, conducted by Campbell Gordon in November 2018 sought to provide an updated position on the Reading Office Market. The report found that in recent years, the low demand for grade B office space (such as Alexander House) has continued. This was reflected when Campbell Gordon conducted a letting campaign from May 2013 to June 2015, for a term up to September 2017 at a rent rate far below the prime rent figures for Reading Town Centre (i.e. £20 sq.ft rather than £33.50 sq.ft). During that time Campbell Gordon only undertook 5 viewings with none progressing. Campbell Gordon conclude that the market trends identified in that letting campaign have continued in the years following, with market data up to 2018 continuing to show that grade B buildings continue to represent only a miniscule proportion of the Reading office take up.
- 6.103 Campbell Gordon, conclude that there is little or no demand for standard leasehold office accommodation in this location, and would be highly unlikely that office tenants could be attracted either in it's current condition; refurbished; or redeveloped. In reaching that conclusion, the Office Market Report looked at other letting campaigns which similarly had failed to attract interest, with only three examples of town centre fringe offices being taken up in the past three years (UTP at Sapphire Plaza, Razoom at 83 London Street,

and Just Lamps at Advantage), all of which were let at very low rental rates and represented more attractive locations.

- 6.104 With the above information and the Office Market Report submitted with this application, it is possible to conduct an updated point by point assessment against the criteria of Core Strategy Policy CS11 and emerging Local Plan Policy EM3 as set out below;

Table 3: Core Strategy Policy CS11 and emerging Local Plan Policy EM3 point-by-point assessment

Policy Criteria	Assessment
(i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?	The site is sustainably located with good connections by road, public transport and by foot, including to the Town Centre and Reading Railway Station. However, as found by Campbell Gordon in the Office Market Report, there is little or no demand for office accommodation in this location, being in neither of the locations which see office demand (i.e. in the Town Centre or out of town very close to motorway junctions in attractive statement buildings). The location is a significant factor in why there is no demand for office stock in this location, especially for grade B stock.
(ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?	It is not viable to retain a building for which there is no demand to rent it out as an office building. The Office Market Report concludes not only is there little or no demand for office accommodation in this location, but further, even if it were refurbished or redeveloped into modern office accommodation it is highly unlikely to attract any tenants. Further, examples of other office premises which are similarly grade B and in town centre fringe locations have also struggled to attract any interest as demonstrated within the Office Market report. It is clear that it would not be

	viable to continue to retain the site with an office use.
(iii) Is there a surplus of similar size and type of accommodation in Reading?	There is a clear surplus of office accommodation in Reading. The Office Market Report provides figures up to 2018 which illustrate the percentage take up of available office accommodation. Since 2016 the take up of stock in-town has been 14%, 69% and 51%, and for out of town, 86%, 31% and 49%. Alexander House is grade B office stock, for which the figures are extremely low at 4%, 3% and 5% over the past three years, with the highest percentage since 2011 being that year at 6.2% take up (offices over 5,000 sq.ft). This clearly provides up to date evidence that not only is there is a surplus, but that there is little to no demand for Grade B office stock.
(iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?	The continued employment use of the building as offices would not be detrimental to the amenity and character of the area because the locality is characterised by a mix of uses, including residential, retail and offices. Alexander House is however an old building which is becoming tired in its appearance, and would therefore benefit not only the immediate location, but King's Road as a whole (and thereby a main exit from Reading) if it were to be redeveloped with a quality design.
(v) Is the need for alternative uses stronger than the need for the retention of employment land?	Yes. There is little or no demand for office stock in this location, reflected by the findings of the Office Market Report. Against this position there is a high demand for PBSA in Reading, but specifically in locations which are in sustainable locations and within walking distance to further / higher education campuses, public transport, and facilities and

	services such as those at Cemetery Junction and Reading Town Centre. There is a current shortfall of at least 1,659 student bedspaces as at 2017 / 18, a figure which is projected to grow to 3,519 bedspaces by 2020/21 and 9,509 bedspaces by 2028/29.
(vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?	Alexander House is located within an area characterised by a mix of uses. The redevelopment of the site for PBSA would not result in the piecemeal loss of employment land as not only does the site not form part of a larger well performing office location, but there is little to no demand for grade B office space in this location, a position which the Office Market Report states is highly unlikely to change even if the property were refurbished or redeveloped as updated office stock.

- 6.105 The above assessment against the criteria of both Core Strategy CS11 and emerging Local Plan Policy EM3 clearly demonstrates that there would be no conflict with the relevant current or emerging policy to redevelop the Site for a non-employment use. It would result in the loss of a grade B office building for which there is little or no demand, and to attempt to refurbish it or redevelop for office use purposes would be fruitless as take-up, given its fringe town centre location would be highly unlikely. Alexander House is therefore not required in order to meet any current or longer term office floorspace requirements and its loss in the face of a greater evidenced need would be a policy compliant position.

Development of the Site for PBSA in the context of a potential residential allocation (ER1g)

- 6.106 The Site is currently included as a draft allocation in the emerging Local Plan under reference ER1g for 26 – 38 dwellings. The Council, at pre-application, stated that the allocation refers to C3 residential accommodation and not student accommodation which it considers to be Sui Generis. As such, the Council consider there would, if the emerging

Local Plan is adopted with that proposed allocation retained, be a conflict with the site allocation.

6.107 There are a number of factors which need to be addressed when considering the matter of the draft allocation;

- 1) A look at the current and projected demand positions for C3 residential (having regard to the pipeline) and compare it to the current demand for PBSA; and
- 2) The potential impact the proposals could have on the C3 residential housing market and compare it to the potential impact it could have on the need for further student accommodation.

6.108 The above mentioned two areas for consideration will be discussed below:

Current demand for C3 residential compared with current demand for PBSA

6.109 The emerging Local Plan identified a need for an average of 671 homes per annum in Reading Borough over the period to be covered by the emerging Local Plan of 2013 to 2036, matching the period covered by the SHMA evidence. In terms of completions and how this matched against the need from 2013 to the latest completion figures for 2016/17, this is set out in the below table:

Table 4: New Housing Delivered 2013/14 to 2016/17

Monitoring Year	Net completions	Delivery Target	Surplus / Shortfall
2013/14	361	671	-310
2014/15	635	671	-36
2015/16	751	671	+80
2016/17	717	671	+46
Total			-220

6.110 The housing delivery figures for 2017/2018 have not yet been published in a revised annual monitoring report at the time of writing, however, it is possible to review the pipeline of residential developments coming forward and looking how the projected supply affects the overall delivery picture.

- 6.111 The applicant has commissioned Haslams (Chartered Surveyors) to review the supply of housing entering the market in the short to medium term, including those which are currently under construction and those which have recently been granted planning permission. If there are any notable draft allocations which may come forward in the medium term, these have also been highlighted by Haslams to provide a complete picture of the pipeline of housing.
- 6.112 Haslams Residential Market Supply Report (the "Residential Report") identified 13 developments currently under construction, making a total supply of 1,092 dwellings (comprising 976 flats and 116 houses) which will be entering the housing market in the short term. This is supplemented by a further 12 residential sites which benefit from planning permission, making a total of 3,157 dwellings (comprising 2,925 flats and 232 houses). Combined, this means that in the short term (1-3 years equating the normal length of Planning Permission before construction must commence) 4,249 dwellings are due to enter the Reading residential market, predominantly around the town centre as illustrated within the Residential Report. This number is well in excess of the annual requirement, of 671 dwelling per annum as identified in the emerging Local Plan to calculate housing need.
- 6.113 Having regard to the 'shortfall' since 2013 of 220 as identified within Table 4 (i.e. 4,249 minus shortfall of 220), this would mean those dwellings under construction or recently granted planning permission, would provide 4,029 dwellings in the short term. This would equate to 6 years supply of housing (i.e. $4,029 / 671$ annual housing requirement), covering housing need up to and including 2022/23.
- 6.114 Two further significant developments are currently under consideration by the Council, including Green Park Village (Phase 6A) adding 339 dwellings, and Bristol and West Arcade adding 43 dwellings. If approved, those developments would add a further 382 dwellings to the short-term housing supply pipeline, raising the total to 4,631 dwellings. That number would represent a housing supply equivalent (having deducted the shortfall since 2013, reducing the 'supply' to 4,411 dwellings) of 6.57 years supply.
- 6.115 Additional to that picture, the Residential Report identifies two draft allocations within the emerging Local Plan which would add a further 1,170 dwellings to the short to medium term housing supply, improving the picture further. This does not include any dwellings at Reading Golf Club if allocated.
- 6.116 It should be noted that this exercise relates to short to medium term housing supply in Reading and is provided to demonstrate what type of housing need is presently in greatest

need between general C3 Class residential and student accommodation. This is designed to assist the Council in making an appropriate planning balance judgement, directing development to the area of greatest present need. It is not an analysis of housing need over the emerging Local Plan period (to 2036), which finds a shortfall of 644 dwellings over the Plan period.

- 6.117 What is clear however, is that the pipeline of residential development demonstrated to be available is more than sufficient to meet housing needs over the 6 years beyond the last housing completions data from 2017/2018 as quoted within the Council's latest Annual Monitoring Report. By contrast, there is a **current** significant shortfall of student housing by at least 1,659 bedspaces, which, if the same approach to providing for student accommodation is taken (i.e. projecting what the need could be in future years), would rise to 3,519 bedspaces shortfall by 2020/21, and 9,509 bedspaces by 2028/29.
- 6.118 It should be noted again that the NPPF at paragraph 61 does not make a prioritised distinction between the importance of one housing need group over another, but clearly states that the Council should consider the needs for different groups in the community, including students. Against the above backdrop of need, it is considered that there is a robust planning argument to permit PBSA on the Site, notwithstanding the potential existence of a residential allocation.

Potential impact on housing (C3) if the Site is developed for PBSA

- 6.119 The Council have stated within the emerging Local Plan, and at the Local Plan EiP in September 2018, that the amount of general housing which may be freed up through PBSA development would not make as great a contribution to housing supply as an allocation would once built out.
- 6.120 In order to consider this assumption further, it is worth noting a few points;
1. the Council have acknowledged within a SoCG between the University and the Council, following the Local Plan EiP hearing sessions, that PBSA can free up general market housing through the movement of students away from HMOs to PBSA;
 2. the draft allocation for Alexander House (ER1g) is for 26 – 38 dwellings on the site;
 3. the Council's methodology for converting student bed spaces to residential unit numbers as set out within the Reading Housing and Economic Land Availability Assessment (November 2017), at paragraph 7.3, is four student bedrooms per single dwelling.

- 6.121 Therefore, the question arises whether there would be greater housing supply from the retention of the draft allocation (taking the higher number of 38 dwellings), or whether a greater number of dwellings could be prevented from becoming student occupied HMOs through the provision of PBSA at Alexander House. Using the Council's conversion rate methodology from student bedrooms to dwellings, the 182 bedrooms proposed would equate to c. 46 dwellings (rounded up from 45.5). Therefore, using the Council's methodology, the Proposed Development would not only provide for the greater housing need (student accommodation) in the short to medium term, but would also prevent a greater number of more general C3 housing from becoming student occupied HMOs than the Borough would 'lose' through the loss of the allocation on the Site.
- 6.122 It is therefore clear again that there is strong material planning reasoning as to why it would be compliant with the NPPF to permit student accommodation through efficient PBSA, which would free up more general residential dwellings than the allocation allows for, and would also provide much needed accommodation for the greater short to medium term housing need.

Why PBSA is required at the location of the Site

- 6.123 The discussion above which supports the principle of developing PBSA on the Site is clear and evidenced. There is a significant unmet need for student accommodation in the Borough which represents a greater short to medium term need than general housing (having regard to the short to medium term residential pipeline). There are further reasons why the Site is particularly suitable for student accommodation. These reasons will be set out below.
- 6.124 We have first established within the preceding sections of this planning statement that there is insufficient capacity to meet the scale of current student accommodation shortfall and the projected shortfall growth on the campus of existing further and higher education institutions, or through extension / reconfiguration of existing PBSA. On that basis, to look at meeting the scale of shortfall first, and secondly the projected further need, requires PBSA to come forward in other sustainable locations.
- 6.125 The Site is situated in a location which is very sustainably located considering it would be occupied by students. Students, who would reside in the Proposed Development would be prevented from bringing a car to their accommodation (through their tenancy agreements which prevent the parking of vehicles within 1km of the Site), and are not provided with parking spaces on site (the only parking spaces being staff / disabled).

Therefore, PBSA needs to be in a location from which students can satisfy day-to-day needs by other sustainable means such as walking, cycling and public transport.

- 6.126 Further, when selecting a location for PBSA, it needs to be within such sustainable commuting distance to each location students would need to reach, including primarily their place of study (which could include the University of Reading campuses at Whiteknights and London Road, but also could include Reading College), but also importantly where key services and facilities are located.
- 6.127 It is evident therefore that the Site is ideally located and satisfies all of the requirements to ensure Students are able to reside and commute sustainably. The University's Whiteknights campus is c.20 minutes' walk, a similar time by public bus, and only 10 minutes by bicycle. The University's London Road campus is only a 10-minute walk. Whilst Reading College is a smaller institution than the University of Reading, it is part of the Activate Learning group which also includes Banbury and Bicester College, Bracknell and Wokingham College and the City of Oxford College. Reading College offers a range of courses, both full time and part time and **any students which occupy the Proposed Development and study a course at Reading College would find the Site conveniently next-door-but-one**. The site is therefore ideally located to access the relevant nearby higher / further education campuses.
- 6.128 The Site is also within convenient 200 metre walking distance of the services at Cemetery Junction to the east of the Site, and Reading Town Centre only a 15-minute walk to the west. This enables students to access a wide and extensive range of facilities within a convenient walking distance and time. These beneficial accessibility factors are specific to locating the Proposed Development at the Site.
- 6.129 In addition to the convenient proximity to places of study, services and facilities, there are the specific immediate site attributes which make it particularly suitable for PBSA. First, the immediate surroundings and the length of Kings Road is characterised by generally larger structures, particularly either side in the form of The Pinnacle and Crossway Point which are a similar height to the Proposed Development. This provides the opportunity for a development of scale which makes the most efficient use of the Site, providing a credible amount of student accommodation which would not be possible in areas characterised by smaller scale development.
- 6.130 Furthermore, it is also more in keeping with adjacent neighbouring residential apartments and a generally mixed-use area to situate PBSA on this specific site than in other less densely populated areas, such as general residential streets. This is clearly apparent by

the notably low objection rate to the Proposed Development following a public exhibition and consultation exercise held in December 2018.

- 6.131 The above factors, in isolation and combination, mean that the location of the Site is particularly well suited to accommodating PBSA of the type and scale proposed.

Relevant Planning Decisions

- 6.132 There are a small number of student accommodation applications which have been determined in 2018 that, notwithstanding the evolving planning policy background with the emerging Local Plan, are worth considering. These will be set out briefly below, including a brief discussion of what relevance they bring to this application.

40 Silver Street (Council application reference 172118; Appeal reference 3199747)

- 6.133 The Council's refusal reasons for the above application were based on;

1. **Design** – bulk and height considered to represent overdevelopment;
2. **Amenity** – loss of privacy, overlooking and disturbance;
3. **Community** – over concentration of student accommodation failing to provide a mixed and balanced community;
4. **S106** – absence of a legal agreement.

- 6.134 The Council's reasons for refusal which concern design are site specific and considered in the context of a residential area that is characterised by buildings which are generally modest in scale. The site-specific considerations relevant to Silver Street are very different to King's Road, particularly the Site, which is characterised by various uses and building scales; particularly the immediate area which accommodates a number of buildings similar in scale to that proposed.

- 6.135 What was interesting in the Inspector's decision to dismiss the appeal, other than areas of agreement with the Council's site-specific assessment, was that she was not convinced that the proposals would ensure a mixed and balanced community (with reference to Core Strategy Policy CS15), or that there was sufficient evidence of a need for student accommodation in that location. The appellant had argued that there were no specific student accommodation policies which direct student accommodation to particular locations. The Inspector's decision stated that no substantive evidence had been placed before her to demonstrate a specific need for student housing in that location and

accordingly, the Inspector was not able to be certain that it would provide an appropriate density and mix. It is notable that the Inspector did not conclude it would 'not' provide an appropriate density and mix, but rather pointed to the lack of evidence, including that required to demonstrate that there would not be a resultant harmful impact on the lives of neighbouring residents.

- 6.136 It is clear that the lack of evidence submitted with the 40 Silver Street planning application and appeal that followed prevented the Inspector from being able to apply the planning balance. Further, no site-specific reasoning was provided as to why the dismissed proposals would be appropriate for the area it was to be placed and also why the site would be specifically suitable for student accommodation.
- 6.137 This Planning Statement has provided robust reasons as to why the Site is specifically suited to student accommodation (paragraphs 6.123 – 6.131) and a clear evidence on the need for student accommodation in the Borough in preceding sections. Further evidence on the specific suitability of the location has been provided within other consultant produced reports appended to this planning application, including (but not limited to) the Air Quality Assessment, Noise Assessment and DAS.
- 6.138 Further, the potential impact from the occupation of the Proposed Development by students (i.e. noise, disturbance and parking) would be comprehensively managed as set out within the submitted Student Management Plan. This would include careful management of the internal communal areas, outside amenity space and parking restrictions; and strict tenancy agreement terms.
- 6.139 In summary, the Council and appeal decisions concerning the proposals for PBSA at 40 Silver Street, cannot be compared directly to the Proposed Development on the Site, but do provide a useful context to the evidence which has been required, and duly provided, within this planning application.

79 Silver Street (Council reference numbers 170685 and 180075)

- 6.140 The Council granted planning permission for the erection of a part 3 and part 4 storey student accommodation building at 79 Silver Street (Council reference 170685) to provide 56 student studio rooms in January 2018. An application to vary the permission to introduce a larger basement, increasing the number of student studios to 61 was granted planning permission in June 2018 (Council reference 180075).

6.141 Whilst direct comparisons cannot be made between this site and the Site for the Proposed Development due to different site-specific considerations, it is useful to note that the proposals at 79 Silver Street were deemed by the Council to be appropriate in scale, design and the relationship with neighbouring properties. The contents of this application were appraised and noted in the formation of the Proposed Development for the Site, whilst appreciating that Silver Street is a residential area with buildings of a modest scale, in contrast to King's Road which includes a number of large-scale buildings, particularly adjacent to the Site.

Former Private Car Park, East Street (Council reference 170019; Appeal reference 3190317)

6.142 The Planning Inspector's comments in allowing the above planning application at East Street provides some useful, relevant guidance when considering the Proposed Development on the Site.

6.143 The Council asked the Inspector to consider, as a material consideration, the content of emerging Local Plan Policy H12 (student accommodation). Whilst this Planning Statement deems it prudent to address the content of the emerging policy, the Inspector's decision in the East Street appeal clearly stated that limited weight was given to emerging Policy H12 due to the fact there remain substantial and unresolved objections, and it is yet to be tested at examination.

6.144 In light of the Inspector's comments, it is clear that emerging Policy H12 cannot be afforded full weight until the emerging Local Plan has been adopted. Further, the policy cannot be afforded greater weight, in the light of yet unresolved objections, until the Local Plan Inspector has provided her report on the soundness of the emerging Local Plan.

6.145 It was also noted within the East Street appeal that the Council had raised concerns over potential noise and anti-social behaviour, but that the Inspector considered that the sustainability of the location would give "no reason to suppose that students would congregate in a particular location" and that an appropriately drafted Student Management Plan would be sufficient to control such potential issues. Further, it was noted that the Inspector considered that pick-up and drop-off movements would likely be limited in number and thereby not pose a risk to highway safety or convenience and that PBSA would be preferable to HMOs and would reduce the impacts on the living conditions of neighbours of such properties.

- 6.146 In summary, the East Street appeal demonstrated that firstly, emerging Policy H12 can only be afforded limited weight in the determination of an application for student accommodation until the emerging Local Plan process has progressed (i.e. at such a point as the Inspector has produced her report on the soundness of the Local Plan), and that an appropriate Student Management Plan would be sufficient to manage student behaviour and potential impacts upon local residents.

Woodley Arms Public House, Waldeck Street (Council reference 171893; Appeal reference 3199152)

- 6.147 The above appeal brings little in the way of relevant comparison with the Proposed Development on the Site adjacent to King's Road. However, it is relevant to note that the Council considered it appropriate and compliant with the Development Plan for the proposals to include limited parking provision, and that it was a material consideration that the proposals would utilise a brownfield site in a location deemed sustainably located due to being relatively close to the University of Reading London Road campus.
- 6.148 The relevance of referring to the above application is that the specific location of the proposals were considered acceptable and in compliance with the Development Plan on the basis that students would be able to conveniently access the University's London Road campus within a short walk. This is worth noting in the context of the Proposed Development which would, if permitted, be located on a Site which is next-door-but-one to Reading College, and a short walk to the University's London Road and Whiteknights campus locations (in addition to nearby services and facilities).

Principle of Development Summary

- 6.149 Inherent within the requirements of emerging Policy H12 is the need to demonstrate the need for further student accommodation through PBSA. Following such a demonstration, emerging Policy H12 then would require a sequential approach be taken, appraising the suitability of policy preferable locations for further PBSA. Should the emerging Local Plan be adopted in its current form (which cannot be confirmed and attributed significant weight until its adoption) with the draft residential allocation for the Site (ER1g), the demonstration of need for further PBSA would also need to be balanced against the need for further general C3 Class market housing.
- 6.150 In providing such evidence of need for further PBSA, this Planning Statement has drawn on a number of sources, including the University's UoR Accommodation Strategy report,

and the Student Demand report submitted with this application. It is notable that the Student Demand report uses the same, but more up-to-date HESA data the Council's SHMA used and depended upon at the recent emerging Local Plan EiP.

- 6.151 The University's published figures within their evidence to the emerging Local Plan EiP for the 2017/18 academic year demonstrated the shortfall of student accommodation when considering available University accommodation supply against the number of students who registered interest in taking up a University Halls of Residence place. Having accounted for the additional supply provided by private PBSA, it has been found that for the 2017/18 academic year, the shortfall was at least 1,659 student bedspaces. Looking forward to the 2020/21 academic year intake and accounting for private PBSA supply means a projected shortfall of at least 3,519 student bedspaces. By 2028/29, this shortfall may reach a very significant 9,509 bedspaces.
- 6.152 The evidenced need for further PBSA is therefore significant as existing and projected, as set out above. This is further set against the backdrop of a very healthy pipeline of general residential development which is either under construction or consented and likely to commence construction in the short to medium term. It has been found that whilst there was a 220-dwelling shortfall in housing delivery against the emerging Local Plan OAN of 671 dwellings per annum between 2013/14 and 2016/17, the current residential pipeline is so healthy that against the annual housing requirement, it would equate to at least 6 years supply of housing. This would increase to around 6.57 years housing supply if current planning applications at Green Park Village (Phase 6A) and Bristol and West Arcade are approved.
- 6.153 Whilst there is an evidenced current and future significant PBSA need, there is a contrasting healthy current pipeline supply of general housing. In order to satisfy the requirements of the NPPF to provide for housing needs of specific groups, such as students, it would be a policy compliant position to take to permit PBSA on the Site in preference to draft allocation ER1g, thereby addressing a greater current need than general C3 Class Use housing.
- 6.154 Having considered the above, it is therefore apparent that there is a need to accommodate further PBSA within the Borough and attention draws to the requirements of emerging Policy H12, which would need to be complied with in the event that the emerging Local Plan is adopted in its current form.
- 6.155 This Planning Statement, supported by the evidence supplied with the planning application, demonstrates that;

- 1) There is insufficient capacity to accommodate the current and / or the projected need for student accommodation within the Borough on the campus of higher / further education institutions;**
- 2) Having explored 1) above, there is insufficient further capacity to accommodate the current and / or projected need for student accommodation on land adjacent to existing higher / further education institutions; and**
- 3) Having explored 1) and 2) above, there is insufficient further capacity to accommodate the current and / or projected need for student accommodation through the extension or reconfiguration of existing PBSA within the Borough.**

6.156 In light of the above, the second paragraph of draft Policy H12 is satisfied in that there would no longer be a justified material planning objection to proposals for new student accommodation on other sustainable sites for PBSA, such as the application Site.

6.157 Further to the above, it has been demonstrated that the Site would be particularly well suited to PBSA by virtue of;

- 1) its close proximity (within walking distance) to the University's London Road and Whiteknights campuses, and to Reading College which is next-door-but-one;**
- 2) proximity and sustainable access by walking, bicycle and public transport to locations where services and facilities are readily available, including Cemetery Junction and Reading Town Centre;**
- 3) the surrounding area is characterised by a mix of uses within various buildings of scale which would mean the Proposed Development would integrate well in terms of design, scale and massing, and in terms of its intended use for student accommodation.**

6.158 Finally, it has been demonstrated, as supported by the submitted Office Market Report, that there is little or no demand for standard leasehold office accommodation in this location, and that the building is highly unlikely to attract office tenants either in its current condition, refurbished, or redeveloped. There would therefore be no conflict with current Core Strategy Policy CS11 or emerging Local Plan Policy EM3.

6.159 The above assessment comprehensively demonstrates that there are no justified planning principle grounds upon which to refuse to grant planning permission for the Proposed Development. The following section will appraise the Proposed Development against other, general planning policies within the current Development Plan and Emerging Local Plan.

General Planning Considerations

Transport and Accessibility

- 6.160 Core Strategy Policy CS4 (Accessibility and the intensity of development) requires that the scale and density of development be related to the level of accessibility to the district and local centre with a good range of facilities by pedestrian routes and to a public bus stop. The Site is located in a highly sustainably location with Reading Town Centre within a convenient walking distance to key facilities such as the Oracle Shopping Centre (c.15 minute walk or 6 minutes by bicycle) and Reading Railway Station (c.20 minute walk or 7 minutes by bicycle). A number of other employment, retail and leisure opportunities are also located within the Town Centre. Cemetery Junction also provides a wide range of services and facilities and is only a 3-5 minute walk from the Site.
- 6.161 Being student accommodation, and given that students would not be permitted from bringing cars to their accommodation, or within a 1km exclusion zone, it is also important that students would be able to benefit from sustainable access their place of study. It is therefore relevant to note that the University's London Road campus is only c.12 minute walk (c.5 minute bicycle ride), the Whiteknights campus is only a c.15 minute walk (or c.8 minute bicycle ride) and Reading College is next-door-but-one from the Site. Supplementing the ability to walk to the above services, facilities and places of study, students would also benefit from a number of regular public bus services which are accessible from a nearby bus stop on King's Road. Further detail on the accessibility of the location is available within the submitted Transport Statement.
- 6.162 It is therefore evident that the Proposed Development would comply with the requirements of Core Strategy CS4, and the requirements of emerging Local Plan Policy CC6, in that the proposals would bring forward an appropriate scale of development (182 bedspaces) within sustainable reach of a wide range of services, facilities and places of study. Similarly, the Proposed Development would also comply with Core Strategy Policy CS15 in that the site is very accessible for all users and Policy CS23 by virtue of the location and Student Management Plan and Travel Plan supporting and encouraging sustainable means of travel (i.e. through not permitting students from bringing cars to the Site or parking within 1km).
- 6.163 In terms of the requirements of Policy CS24, current Council standards require that student accommodation proposals are zero rated for parking provision for students, but would require 2 staff car parking spaces and 3 disabled car parking spaces. In terms of

cycle parking, the Council's adopted Revised Parking Standards and Design (2011) would require 38 spaces (1 space per 5 students and 1 space per 3 staff). In the interest of promoting student use of sustainable transport options, those standards would be exceeded through the provision of 46 cycle parking spaces. The Proposed Development would therefore also comply with the requirements of Policy TR5 of the emerging Local Plan.

6.164 The Sites and Detailed Policies Document (altered January 2015) at Policy DM12 requires that potential traffic generation is considered in terms of potential impact on the surrounding transport network. This has been considered within the submitted Transport Statement, which concludes that there would be a large decrease in trips made by single vehicle occupants, and a significant increase in pedestrian movements. The Proposed Development would therefore comply with the requirements of Policy DM12 and that of emerging Local Plan Policy TR3.

6.165 In summary, it is clear that in transport terms, the Proposed Development would have a lower impact on the highway network than the consented scheme and would comply with the requirements of adopted Development Plan policy, those within the emerging Local Plan, and Section 9 of the NPPF. For further detail, please refer to the submitted Transport Statement and Travel Plan.

Heritage and Archaeology

6.166 Adopted Core Strategy CS33 (protection and enhancement of the historic environment) seeks to protect the historic environment, whilst emerging Local Plan Policies EN1 (historic environment) and EN2 (areas of archaeological significance) echo similar principles.

6.167 In order to ensure compliance with the above policies a Heritage Desk-Based Assessment (the "Heritage Assessment") has been commissioned and is duly submitted with this planning application.

6.168 The Heritage Assessment surmises that the area is known to have potential archaeological assets. Whilst the current Alexander House development will have removed potential archaeological remains, the potential for surviving isolated pockets of archaeology would remain. The Heritage Assessment continues to state that from discussions with Berkshire Archaeology it has been agreed that to mitigate the loss of any potential surviving remains, a programme of archaeological investigations could be conditioned on any

planning permission, which would determine the presence, extent and nature of any remains.

6.169 In terms of potential impact on built heritage assets, the Heritage Assessment has reviewed, in particular, the potential impact upon local designated heritage assets, including the Grade II Listed Gladstone Club, Wycliffe Baptist Church, Entrance Lodges and Gates to Reading Cemetery and Reading Cemetery (Grade II Listed Park and Garden). Given their proximity to the Proposed Development, it would not harm the significance of any of those designated heritage assets. Further detail on this assessment is available within the submitted Heritage Assessment.

6.170 The proposals would therefore comply with the requirements of adopted Development Plan Policy concerning heritage considerations, the Policies within the emerging Local Plan, and Section 16 of the NPPF.

Design, Scale and Massing (including potential impact upon General Amenity)

6.171 The applicant has sought to involve a number of stakeholders prior to submitting this planning application for the Proposed Development, including the Council through pre-application discussions, the Reading Design Review Panel, and the public and Councillors through a public exhibition and associated consultation exercise. This is detailed within the submitted Statement of Community Involvement. The intention of those discussions was to enable the evolution and production of a set of proposals which not only is policy compliant, but also accounted for any relevant material received feedback concerning design.

6.172 Matters of sustainable design and construction will be addressed within the following sub-section. This section will deal specifically with design, scale and massing considerations.

6.173 Core Strategy Policy CS5 concerns inclusive access, requiring that the location of the Proposed Development, and the design of it facilitates access for all potential users, including disabled people. This is covered in more detail within the DAS, however, accessibility has been at the centre of the detailed design for the Proposed Development, incorporating a suitable number of disabled accessible rooms, disabled parking and access to all levels by a lift system.

6.174 Core Strategy Policy CS7 requires a high-quality design, having due regard to the character and appearance of the area, responding positively to the local context. Similar requirements are stated within emerging Local Plan Policy CC7. The requirements within

this policy have been carefully considered, with the relevant detailed discussion on design provided within the DAS. It should be noted however that the Proposed Development has taken on board comments raised by the Council in determining the consented scheme and provided during pre-application discussions. Further in order to tease out further opportunities for an improved design, the proposals were, on 15th November 2018, taken before the Reading Design Review Panel ("DRP"). The DRP commented that "generally we would support this scheme, it appears to be an improvement on the previously consented scheme."

- 6.175 In the context of a surrounding area with varying architectural styles, buildings of generally larger scale than surrounding residential areas, and in an immediate context of buildings similar in height, the proposals would mark a notable improvement in quality along King's Road, a main route out of Reading. The Council are encouraged to review the DAS and the illustrations within which clearly demonstrate the high quality nature of the Proposed Development which not only remains within the general scale and massing of the consented scheme on the site, but also notably, marks an improvement on that scheme.
- 6.176 It is therefore clear, that in terms of design, scale and massing, the Proposed Development would comply with all relevant Development Plan, emerging Local Plan and NPPF policy requirements.

Potential Impact upon Amenity

- 6.177 Amenity considerations inevitably have a degree of crossover with those concerning the quality of design, and the general scale and massing of what is being proposed. In this context, this appraisal is making particular reference to the requirements of Policy DM4 of the adopted SDPD and the emerging Local Plan Policy CC8. Both current and emerging policies require that any Proposed Development avoids detrimental impact on the living environment by virtue of privacy, access to sunlight, visual dominance, noise and disturbance and a number of other considerations.
- 6.178 Dealing with sunlight first, a Daylight and Sunlight report is submitted with this planning application which demonstrates that the daylight and sunlight that would be received by neighbouring residential properties following construction of the Proposed Development would be acceptable. Further, the report confirms that within the Proposed Development, every habitable room at each level would also satisfy BRE criteria. The Council are directed

to that report for further detail on the methodology used and the detailed findings on daylight and sunlight considerations.

- 6.179 It is also apparent, with the proposals falling within the general parameters considered appropriate by the Council in terms of the general scale and massing of the consented scheme, that the potential visual impact on neighbouring properties would also be at an acceptable level, set in a context of generally larger scale buildings (The Pinnacle and Crossway Point in particular).
- 6.180 In terms of potential noise impacts upon the eventual student residents, a Noise Impact Assessment has been conducted and included within this submission. The findings of the report conclude that subject to sound insulation being incorporated within the constructed building, potential noise impacts would be appropriately mitigated.
- 6.181 The same noise mitigation stated within the above paragraph would also mitigate noise emissions from emitting within the building. General potential disturbance generated by student occupants would be monitored and controlled closely through the proposed arrangements set out in detail within the submitted Student Management Plan.
- 6.182 External lighting has been designed to minimise impact upon adjacent properties, whilst enabling appropriate security and illumination of key areas around the building. Plan referenced 4479-EX-00-DR-E-200, revision P3, clearly demonstrates the low impact of the proposed lighting within a very short distance beyond the building.
- 6.183 Whilst it has been set out within the earlier discussion concerning relevant transport policies within the adopted Development Plan and the emerging Local Plan, the applicant is aware from a public exhibition conducted in December 2018 that it is a potential local concern that students may park in the locality, to the detriment of nearby residents and their ability to park their own vehicles.
- 6.184 In order to address any concerns regarding potential impact as a result of student parking, it should first be noted that the Proposed Development does not provide any student parking facilities on-site, other than other than policy compliant three disabled parking spaces and two further spaces for staff. Students would also not be able to obtain parking permits for the local area through an agreed tenancy agreement, which would not permit any student to bring a vehicle to the Site or park within 1 km zone. There would be serious consequences should a student be found to be in breach of the tenancy agreement, sufficient to dissuade contravention. The parking control measures are set out clearly within the Student Management Plan.

- 6.185 It is relevant to note that the above provides a summary of how student parking would be discouraged. However, it is also relevant to note that not only would there be clear and effective measures in place that would dissuade students from bringing cars to the Site or within 1km of the Site, it would also be far more convenient for students to use public transport, walk or cycle to places of study, and nearby services and facilities.
- 6.186 It is noted that Rupert Street, adjacent to the site, permits non-permit holder parking between 8am to 8pm for 2 hours with no return within 2 hours, and permit holder only parking outside those times. Students would still be bound by the terms of their tenancy agreement which would prevent them from being permitted in bringing vehicles to the Site or park within 1km. Pick-up and drop-off arrangements would be tightly controlled at the beginning and end of term with students who are arriving and departing by vehicle at those times given time slots so that movements can be carefully managed. These matters are covered in more detail within the Student Management Plan.
- 6.187 It is considered that the above, read in conjunction with associated submitted details, clearly demonstrate that the Proposed Development would comply with the requirements of the adopted Development Plan and the emerging Local Plan with regard to any potential impact upon amenity.

Sustainable Construction

- 6.188 Sustainable construction is a key element of how development can meet the challenge of climate change, and is covered in the NPPF at section 14. In terms of local planning policy, whilst there is general continuity between the adopted Development Plan and the emerging Local Plan, there are some differences which will be set out below.
- 6.189 Core Strategy Policy CS1 (sustainable construction and design) requires that 50% of the Proposed Development meets a minimum BREEAM 'Excellent' standard, and that it looks to maximise energy efficiency, conservation and explores options for on-site energy generation. The emerging Local Plan takes sustainable design and construction a step further with draft Policy CC2 which requires the whole Proposed Development to meet BREEAM 'Excellent' where possible. The Council's Sites and Detailed Policies Document at Policy DM1 and emerging Local Plan Policy CC3 then requires consideration on how a development has looked to incorporate measures to adapt to climate change. Reinforcing the requirement to address climate change factors, SDPD Policy DM2 and emerging Local Plan Policy CC4 require the consideration of decentralised energy. Core Strategy CC2

additionally seeks for waste to be minimised, and specifically the provision of waste management facilities. These are detailed within the submitted DAS and are also covered by the submitted Travel Statement at section 3.6.

6.190 A key component of developing an energy efficient and sustainable building has been the consideration of how the building could be designed to make it energy efficient and any opportunities for sourcing sustainable energy. These are considered in detail within the submitted Energy Strategy and Sustainability Statement (the "ES & SS") which demonstrate compliance with the above policies.

6.191 As stated within the ES & SS, there are a number of measures incorporated into the proposals that would ensure the Proposed Development is sustainably constructed with consideration to employing methods that would reduce the buildings emissions and carbon impact. These are;

- 1) Improving levels of insulation where practical to improve the building fabric beyond current regulatory requirements;
- 2) Incorporation of passive and active design features to maximise natural light;
- 3) Use of high thermal insulation to reduce energy demand and moderate internal temperatures through the year;
- 4) Use of energy efficient lighting and other systems which use less energy;
- 5) Use of CHP technology which illustrates a 33.39% improvement over the baseline energy, thereby exceeding the policy requirement of 20% energy consumption to be met by CHP/renewable sources; and
- 6) Energy efficient measures in combination would reduce Carbon emissions by 24.35% compared to the baseline.

6.192 The measures proposed for inclusion with the Proposed Development, as demonstrated by the submitted BREEAM pre-assessment, would meet the emerging policy requirement of being able to achieve BREEAM 'Excellent'. Overall, the proposals demonstrably meet the requirements within the adopted Development Plan, emerging Local Plan and the NPPF.

Air Quality

6.193 The Site is located within an Air Quality Management Area. SDPD Policy DM19 requires that measures are explored to improve air quality and reduce the effects of poor air quality. This is also covered within emerging Local Plan Policy EN15.

- 6.194 The submitted Air Quality Assessment ("AQA") concludes that during the construction phase, assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated would not be significant. In terms of air quality, the report concludes that the Site is suitable for the Proposed Development from an air quality perspective without the need for mechanical ventilation. With regards to exhaust emissions, the report concludes that road vehicle exhaust emission impacts are not considered to be significant and therefore air quality is not seen as a constraint to the Proposed Development.
- 6.195 It is evident that the Proposed Development would comply with the requirements of SDPD Policy DM19 and emerging Local Plan Policy EN15. Further, it is worth noting that being within an Air Quality Management area where there is the risk of impacts from vehicle emissions along King's Road, the Proposed Development without balconies should be seen as a more appropriate form of design than the consented scheme in terms of mitigating air pollution impacts on future occupants.

Landscape & Open Space

- 6.196 There are a range of policies which are relevant to landscape and open space issues within the adopted Development Plan and the emerging Local Plan. These will be dealt with in turn.
- 6.197 Core Strategy Policy CS3 concerns social inclusion and diversity, looking for the demonstration of measures to enhance social inclusion, access to housing, services, facilities and education. The Proposed Development would provide facilities within the building and amenity areas around which are designed to foster social interaction and inclusiveness amongst the new resident community. Students would have convenient access to a number of facilities within the building, but also to those in the surrounding area by virtue of the specific location of the proposals, within a short walking distance to Cemetery Junction and Reading Town Centre.
- 6.198 It should also be noted that the policy advocates social inclusion and diversity, including the ability for students to access housing and education. The current significant shortfall in PBSA means that students who cannot find accommodation in University Halls or private PBSA have a choice between alternative forms of accommodation (such as HMOs) which may be less desirable and / or appropriate to their needs. Over time, such a shortfall of suitable PBSA may start to damage the reputation of further and higher education

institutions within Reading, particularly the University which has an International reputation that is highly beneficial to Reading's current and future prosperity. It is therefore a policy compliant position to provide PBSA in a location which facilitates convenient access to places of study and that provide for the specific needs of students, who without being permitted to bring cars, are reliant on public transport, walking and cycling.

- 6.199 In terms of Core Strategy Policy CS7 (Design and the Public Realm), it is required that landscaping is used to maintain and enhance the character and appearance of the area, making a positive contribution. The provision of private and communal space is covered by SDPD Policy DM10, whilst the emerging Local Plan covers similar ground at Policy EN9, requiring that provision is commensurate to the needs of the development. This is covered in some detail within the DAS within a dedicated section. The front and rear amenity areas would be landscaped with high quality hard landscaping which incorporates planting, particularly tree planting to the front facing King's Road. In order to be accessible to all, ramps would be provided and communal spaces would benefit from passive overlooking. Lighting would be used to good effect to assist access and improve security (also covered by CCTV cameras).
- 6.200 The rear amenity area would benefit from a shared surface which would incorporate trees and ornamental planting, seating and a small number of car parking bays (5 in total). This would be accessed from within the building for students wishing to use the amenity area or access bicycles stored in the lower ground floor storage area, and from Rupert Street through a gated access to allow returning students to drop off bikes within the internal store area.
- 6.201 Amenity areas would be managed and their use by students controlled by the terms of their tenancy agreement, regarding which, further details are available within the submitted Student Management Plan. These measures would ensure compliance with Policy DM4 of the SDPD and CC8 of the emerging Local Plan.
- 6.202 It should be noted that in order to comply with policy requirements within SDPD Policy DM10 regarding safety and the perception of safety within communal outdoor amenity areas, the rear amenity area would be enclosed, accessed by a controlled access gate, whilst all areas around the building would be monitored by CCTV cameras. This would have the dual function of providing safety to students using those areas and also monitoring student behaviour. Student behaviour management is covered within the Student Management Plan.

- 6.203 It is evident from the above, in conjunction with the submitted plans and detail within the DAS that the landscaping and open space proposed as part of the Proposed Development would comply with the aforementioned adopted Development Plan policies and those within the emerging Local Plan.

Ecology

- 6.204 Biodiversity is covered within the adopted Development Plan at Core Strategy Policy CS36 and to an extent within SDPD Policy DM18 (tree planting).
- 6.205 As an existing developed site, the Site has limited potential for biodiversity habitat, however, in order to demonstrate compliance with Core Strategy Policy CS36, and emerging Local Plan Policy EN12, an Ecological Impact Assessment is included with this application.
- 6.206 The submitted Ecological Impact Assessment concludes that roosting bats were likely absent from the site, but that it has been assessed as supporting foraging and commuting bats and has the potential to support breeding birds. The report accordingly recommends appropriate mitigation measures, following which, no residual or cumulative impacts are anticipated. Recommendations within the report include the inclusion, post-development, of additional bat roosting features and nesting opportunities which would, it concludes, result in an overall net gain for biodiversity.
- 6.207 In light of the above, and through the inclusion of landscape planting in excess of that currently on the Site, the Proposed Development would comply with the requirements of Core Strategy Policy CS36, SDPD Policy DM18, emerging Local Plan Policy EN12 and Policy EN14 of the emerging Local Plan. In doing so, the proposals would also comply with the requirements of the NPPF in terms of the protection and enhancement of biodiversity opportunities.

Flood Risk and Drainage

- 6.208 The adopted Core Strategy at Policy CS34 (covered by emerging Local Plan Policy EN16) refers to the need to consider potential pollution through ground and surface water, including sewerage and wastewater. The noise and light pollution considerations within the Policy have been considered elsewhere within this Planning Statement, with detail available within the submitted Noise Assessment and lighting details.

- 6.209 A Flood Risk Assessment has been produced for the Site and included with this planning application. The assessment found that as the Site is located within Flood Zone 1, it has little or no risk of fluvial flooding and is therefore considered to have passed the sequential test, and would further not require an Exception Test. In terms of groundwater flood risk, whilst the site lies over a major aquifer with high groundwater vulnerability, there are no historical records of any groundwater flood events on or within close proximity to the Site. With discharge of surface water to ground not considered suitable by the report, and with no surface water bodies within the vicinity of the site, it is proposed to continue to discharge to the Thames Water surface water sewer in Norwood Road. The assessment took full account of potential climate change and concludes that the uncertainties of flooding have been satisfactorily addressed and there are no flooding or drainage related constraints to the development of the Site.
- 6.210 It is therefore apparent that the Proposed Development would comply with the requirements of Core Strategy Policy CS34, emerging Local Plan Policy EN16 and the NPPF with regard to flood risk and drainage. It is further worth noting that as the Flood Risk Assessment considered within its assessment the potential impact of climate change on flood risk, the requirements of Policy DM1 of the SDPD and emerging Local Plan Policy CC3 have been complied with.

Utilities and Broadband

- 6.211 Core Strategy Policy CS9 requires that the infrastructure needs of new development is considered; also covered by SDPD Policy DM3 and emerging Local Plan Policy CC9.
- 6.212 The submitted Transport Statement effectively demonstrates that the site is served by appropriate transport infrastructure in compliance with the above policies. In terms of gas, electricity and water supply, relevant supplying companies have confirmed that connections are feasible to accommodate the Proposed Development. This is set out within the submitted Infrastructure Report and demonstrates compliance with the aforementioned planning policy, both adopted and emerging.
- 6.213 Finally, in terms of broadband availability, a Broadband Statement is submitted with this application. The statement finds that BT Super-Fast Broadband is available in the area of the Site at a speed of 80Mbps. Virgin Media also offer Super-Fast broadband in the area

7.0 DRAFT SECTION 106 HEADS OF TERMS AND CIL

7.1 As noted from planning applications for student accommodation which have been approved by the Council or allowed at appeal, there would be the requirement to enter into a Section 106 Agreement. It is anticipated that a Section 106 Agreement would need to cover the following;

- 1) the provision of an Employment Skills Plan;
- 2) restriction of the Proposed Development to student accommodation (Sui Generis); and
- 3) the compliance with the details of an approved Student Management Plan.

7.2 It is also noted that the Proposed Development would be subject to CIL contributions on the basis of the Council's adopted CIL Charging Schedule (2015), which sets a rate of £120sqm (which would be indexed to the date of permission). It should be noted that in accordance with the CIL Regulations, a discount in CIL would be available on the basis that the building was last lawfully used over a continuous period of at least 6 months for office purposes up to September 2017. This has been set out within the submitted CIL form.

8.0 CONCLUSIONS

- 8.1 This Planning Statement has covered a significant amount of detail, in particular focusing on the principle for the development, an area identified by the Council as a key area for consideration.
- 8.2 The Council, at pre-application stage discussions, considered the key planning principle areas that required consideration to be;
- 1) the need for further student accommodation in Reading;
 - 2) compliance with emerging Policy H12 (student accommodation);
 - 3) justification for the loss of office floorspace within Alexander House in line with the requirements of Core Strategy Policy CS11 and emerging Policy EM3; and
 - 4) the development of the Site for student accommodation in the context, if adopted, of an draft allocation (ER1g) for residential development on the Site within the emerging Local Plan.
- 8.3 Following the recent appeal decision at 40 Silver Street, this Planning Statement has also drawn on the need for PBSA in the specific location of the Site as a planning principle matter.
- 8.4 The Student Demand report submitted with this application has effectively demonstrated and reinforced evidence presented by the University of Reading to the Reading Local Plan EiP that there is a significant current and projected shortfall in PBSA within Reading. If unchecked, this would, as asserted by the University in their submissions to the Reading Local Plan EiP, have the potential to cause detriment to the reputation of the University, an institution which has considerable societal and economic benefit to the Borough. This is recognised by the Council within the adopted Development Plan and the emerging Local Plan.
- 8.5 The University's published figures for current and projected shortfall of supply within University Halls of Residence, when measured against registered demand for that accommodation, are notably significant. The UoR Accommodation Strategy puts the shortfall figures at 5,015 bedspaces for 2017/18; and are projected to rise to c.6,875 by 2020/21 and 12,865 by 2028/29 if current supply is not improved upon. Having then accounted for the additional supply provided by private PBSA, the conclusion on the shortfall of PBSA amounts to 1,659 in 2017/18; projected to rise to 3,519 by 2020/21 and to 9,509 by 2028/29. Supply would improve by a net of 654 bedspaces if the St Patrick's Hall appeal is allowed, reducing shortfall by a corresponding amount, however, it is not

possible to depend on that number at this point in time with the appeal yet to be determined.

- 8.6 What is important to note from the findings on student need is that there is a **current shortfall** in PBSA as at 2017/18, which is **projected to worsen** by 2020/21. Shortfall would significantly worsen should the projected figures be realised by 2028/29, within the emerging Local Plan period if the need is not met through efficient PBSA. Student housing requirements are therefore not being met, despite the NPPF clearly stating at paragraph 61 that the needs for student housing need to be accounted for when Policies look to provide for housing needs.
- 8.7 The significant current and projected shortfall in PBSA has been demonstrated within this report to be in stark contrast to the pipeline of residential developments which are either under construction and with planning permission. The residential planning pipeline would improve further if those residential applications currently with the Council for determination are included within the calculations.
- 8.8 The residential pipeline of development in the short to medium term indicates that there is a 6 year supply of housing using the emerging Local Plan housing requirement rate of 671 dwellings per annum; improving to 6.57 years housing supply if current planning applications at Green Park Village (Phase 6A) and Bristol and West Arcade are approved. It is therefore demonstrable that the short to medium term supply of housing is significant, yet the short to medium term supply of PBSA is significantly short of the need. It is further worth re-iterating that, using the Council's methodology for calculating the translating ratio of student bedspaces to general C3 housing (i.e. HMOs), the 182-bed Proposed Development, by adding to the supply of PBSA and reducing the shortfall, represent the equivalent of allowing sufficient accommodation to prevent further HMO growth at an equivalent of 46 dwellings. This would be a greater benefit to local housing than would the provision of 26-38 dwellings on the Site should draft allocation ER1g be delivered.
- 8.9 It would therefore be a policy compliant position to take, considering the requirements of the NPPF, to permit PBSA on the Site in preference to the draft allocation referenced ER1g; by virtue of the provision of PBSA representing a greater current need than general C3 Class Use housing.
- 8.10 Looking not towards other key planning principle matters and having addressed 'need', if draft Policy H12 is adopted as currently drafted within the emerging Local Plan, there will be a need to address its requirements. This Planning Statement has demonstrated a policy compliant position against the requirements of draft Policy H12 on the basis the policy may

form part of a new adopted Local Plan prior to determination. It should be noted however, that in light of recent appeal decisions, such as that at the former car park site off East Street, draft Policy H12 can only be afforded limited weight until the Local Plan is adopted. Whilst emerging policies could be given 'increased' weight at the time of the Inspector's report on the soundness of the emerging Local Plan, it would only be given full weight on adoption.

8.11 In light of the above, draft Policy H12 may only be afforded limited weight at the time this planning application is determined. Compliance has nonetheless been demonstrated comprehensively. **Compliance with draft Policy H12 can be summarised as follows;**

- 1) There is insufficient capacity to accommodate the current and / or the projected need for student accommodation within the Borough on the campus of higher / further education institutions;
- 2) Having explored 1) above, there is insufficient further capacity to accommodate the current and / or projected need for student accommodation on land adjacent to existing higher / further education institutions; and
- 3) Having explored 1) and 2) above, there is insufficient further capacity to accommodate the current and / or projected need for student accommodation through the extension or reconfiguration of existing PBSA within the Borough.

8.12 It is worth noting that **having explored all potential locations as set out within the first paragraph of draft Policy H12, there would be insufficient capacity to accommodate the current 2017/18 shortfall in PBSA.** This is assuming that 'all' potential capacity is developed out immediately, the entirety of which would be located either on the University of Reading campus locations or through the St Patrick's Hall proposals currently at appeal. Clearly, assuming all potential capacity could be delivered immediately would not be realistic, but would take a number of years, by which time the shortfall in PBSA would have worsened further.

8.13 **The case of need does not hinge on the projected growth of demand, which if realised is significant, but instead is based on the shortfall of PBSA as identified presently (2017/18 figures).** The Council have stated they hold no reason to question the extent of the current shortfall as confirmed within the Statement of Common Ground between the Council and the University, which has resulted in a proposed change to the supporting text of draft Policy H12.

8.14 Notwithstanding the current status of draft Policy H12, which carries limited weight at present, this planning application has demonstrated compliance with its requirements.

There is therefore no justified material planning objection on the principle of new student accommodation on suitable sustainable sites for PBSA, such as the application site.

- 8.15 Having established why there is a need for further PBSA, and that it would be policy compliant to provide it on the Site having had regard to draft Policy H12, this planning application has demonstrated there are **site specific reasons why PBSA would be appropriate on this site**. These reasons can be summarised as;

- 1) its close proximity (within walking distance) to the University's London Road and Whiteknights campuses, and to Reading College which is next-door-but-one;**
- 2) proximity and sustainable access by walking, bicycle and public transport to locations where services and facilities are readily available, including Cemetery Junction and Reading Town Centre;**
- 3) the surrounding area is characterised by a mix of uses within various buildings of scale which would mean the Proposed Development would integrate well in terms of design, scale and massing, and in terms of its intended use for student accommodation.**

- 8.16 In terms of the loss of office floorspace at Alexander House, it has been demonstrated, as supported by the submitted Office Market Report, that there is little or no demand for standard leasehold office accommodation in this location, and that the building is highly unlikely to attract office tenants either in its current condition, refurbished, or redeveloped. There would therefore be no conflict with current Core Strategy Policy CS11 or emerging Local Plan Policy EM3.

- 8.17 The assessment of relevant planning principle considerations has effectively demonstrated that there are no material planning principle reasons to justify the withholding of planning permission for the Proposed Development.

- 8.18 In terms of other general planning considerations, the planning appraisal found the following;

- 1) The Proposed Development has been designed within the general scale and massing of the consented scheme and would be similar to both adjacent properties;
- 2) The Reading Design Review Panel considered the Proposed Development to be an improvement on the design of the consented scheme;
- 3) The design would be very high quality as demonstrated by the submitted plans and illustrations within the DAS;

- 4) The Proposed Development would provide attractive and useable open amenity space which incorporates appropriate landscape planting, including trees along the King's Road frontage;
- 5) The Proposed Development has taken full account of the Council's pre-application comments on design and any comments received as part of the public consultation exercise;
- 6) The Proposed Development would be located within convenient walking distance to services and facilities at Reading Town Centre and Cemetery Junction, and potential places of study, including the University of Reading's London Road campus and Whiteknights campus, and **notably next-door-but-one to Reading College;**
- 7) A number of facilities, including a study room, gym, TV room, cinema room and a bookable space will be available for students within the building, encouraging resident students to interact and socialise with each other in a managed environment;
- 8) Parking provision is at a policy compliant level (zero spaces for students other than 3 disabled spaces and 2 for staff), with bicycle parking in exceedance of minimum requirements;
- 9) The proposed measures as set out within the Student Management Plan would effectively dissuade students from bringing cars, and monitor and regulate student behaviour to ensure no detrimental impact on the amenities of neighbouring residents;
- 10) There would not be an unacceptable impact on the daylight and sunlight available to residents in adjacent properties;
- 11) The Proposed Development would be sustainably constructed and will be energy efficient, able to meet BREEAM 'Excellent';
- 12) There would be no detrimental impact upon designated heritage assets and a Condition on any planning permission that requires a programme of archaeological investigations would be appropriate;
- 13) There would be no unacceptable impact upon or as a result of noise, air quality or dust as a result of the Proposed Development;
- 14) External lighting would be directional and would not cause detriment to the users of nearby land or property;
- 15) There would be no unacceptable impact on biodiversity but there would be opportunity for a net gain;
- 16) The Site is within an area at lowest risk of fluvial flooding (Flood Zone 1) and appropriate proposals are set out to manage surface water;
- 17) The site is well served by utilities and super-fast broadband.

- 8.19 As clearly set out above, within this Planning Statement and in conjunction with all submitted documents and plans, it is apparent that the Proposed Development complies with the adopted policies within the Development Plan and emerging Local Plan. The Proposed Development would therefore represent 'sustainable development' as set out within Policy SD1 of the SDPD and draft Policy CC1 of the emerging Local Plan.
- 8.20 The Proposed Development would comply with the NPPF definition of sustainable development and, as set out at paragraph 11 of the NPPF, should therefore be approved without delay.

Appendix A - P.J. Alexander Ltd pre-application advice request

Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

28485/A1/JL

19th July 2018

To whom it may concern,

RE: PRE-APPLICATION ADVICE REQUEST REGARDING THE REDEVELOPMENT OF ALEXANDER HOUSE, 205-207 KINGS ROAD, READING TO PROVIDE A 178 BEDROOM STUDENT ACCOMMODATION BUILDING

We are pleased to present to the Council a formal request for pre-application advice for the redevelopment of Alexander House, 205-207 Kings Road, Reading (the "Site") to provide a new 178-bedroom student accommodation building.

Please find enclosed the relevant fee for a Level 3 pre-application submission of £240, payable to Reading Borough Council.

Site description

Alexander House is a two-storey office building, located on the corner between Kings Road and Rupert Street. The existing building fronts onto Kings Road, with further service entrances off Rupert Street. Off-street parking and refuse bins are located to the rear of the building, accessed off Rupert Street.

Either side of the building there are two large residential apartment buildings. The Pinnacle is located to the immediate west, and was granted full planning permission in 2001 (reference 99/1128/FUL/PB and 992352), providing 52 flats within accommodation which reaches five, six and seven storeys in height. The Pinnacle replaced a former 1960s constructed 6 storey office building. To the eastern side of the Site, there is the Crossway Point residential apartment development. Crossway Point received planning permission (reference 030376) in 2003 for 98 affordable units within 7 storeys of accommodation. Both buildings provide height well in excess of Alexander House and therefore present an opportunity to develop the Site using high quality designs to further enhance the visual appeal of this part of Reading.

Further residential flats are located to the rear at Saxon Court, a three-storey building, with further flats opposite on the other side (south side) of King's Road at Sovereign Court.



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Kings Road is particularly characterised by a number of taller buildings of heights similar to that of The Pinnacle and Crossway Point to the degree that a building of similar height on the Site would not be out of character with the street scene. The character of properties along King's Road is varied and incorporates a number of modern structures of large scale (height and massing). It is noted that there are two nearby Listed Buildings, neither of which are adjacent or directly opposite. These are the Grade II Listed Gladstone Club (Listing reference 113509) to the other side of King's Road, and the Grade II Listed Wycliffe Baptist Church (Listing reference 1155966) near to the A329 King's Road / A4 London Road Junction.

It is also noted that the Site is Located within a designated Air Quality Management area.

In terms of sustainable access to services and facilities, the Site is well located. The University of Reading Whiteknights campus is only a 19-22 minute journey using a regular public bus service (which travels via Reading Town Centre), approximately 20 minutes direct walk via public footways, or less than 10 minutes by bicycle. The university of Reading London Road campus is only a 10 minute (0.5 mile) walk from the Site, whilst Reading College is adjacent to the Site involving less than a 50 meter walk to the west of the Site alongside King's Road, effectively 'next door but one' on the western side of The Pinnacle. Both the University of Reading and Reading College offer full-time further education courses, and both are accessible via sustainable modes of transport (public transport, bicycle and walking).

The Site is within extremely convenient and sustainable reach of a number of other services and facilities, including those within Reading Town Centre and the surrounding areas. A wealth of sustainable onward connections are also available from Reading Train Station, providing access to London Paddington and London Waterloo. This would significantly reduce dependence on the use of private vehicles, which would further be reduced with an appropriate parking strategy which encourages the use of sustainable transport modes.

The Extant Consent

Valid, extant planning permission exists on the site to demolish Alexander House and construct a new residential building incorporating 56 residential apartments, granted in 2017 under reference 162057 (the "permission"). The 56 residential apartments included 39 open market units and 17 affordable units (30% of the total). The consented scheme rose to 7 storeys (and basement level) facing King's Road, but tapered down to 4 storeys facing the flats at Saxon Court to the rear. The design incorporated a balcony for each flat, present on each elevation.

The permitted scheme incorporated new planting to the front along the King's Road frontage; an inclusion welcomed by the Council who considered it would provide a valuable contribution towards the improvement of King's Road as an "existing or potential treed corridor" as stated within the Council's adopted Borough Tree Strategy. Four objections were received in response to that application, all from the adjacent The Pinnacle residential building. In considering the potential impact on amenities, the Council considered that whilst some outlooks of some The Pinnacle residents may be affected, this would not be at a level which would warrant a sustained reason for refusal, and in terms of Crossway Point (98 affordable flats) to the east of the Site, impacts would not be significant (citing a blank façade to the west elevation of Crossway Point). Finally, in terms of Saxon Court to the north of the Site, the Council concluded that as the side elevation of Saxon Court facing the proposed new building is an elevation without habitable rooms, any potential overbearing / overlooking impacts as a result of the proposed building would not be significantly harmful.

Concerning the scale of the permitted scheme, the Council considered that given the context of the neighbouring The Pinnacle and Crossway Point residential blocks, in addition to the highly accessible location of the site, the density of development was considered appropriate at the scale proposed. Whilst the permitted scheme went further forward than the existing building line, because it was

generally in line with the building lines of neighbouring buildings, this was also considered appropriate by the Council. In terms of scale, again the Council considered the permitted development to be appropriate, responding to the local context with height comparable to adjacent buildings and an upper floor set back slightly to differentiate and reduce overall mass (with a similar approach to the Rupert Street Elevation).

Finally, in terms of potential impact on built heritage assets in the form of nearby Listed Buildings, and the nearby Listed Park and Garden at Cemetery Junction, the Council saw no conflict when assessed against relevant policies.

The proposed development outlined earlier in this letter, and illustrated within the attached documents Pre-Application Design Report, has had full regard to the Council's comments in approving planning permission for the above development and has used it as a guide to form a design which is both acceptable in line with the Council's previous considerations, and which looks for quality design enhancements where possible.

The Proposals

The proposals include demolishing the current Alexander House office building and redeveloping the site to create a seven storey, 178 bed student accommodation building. The accommodation would be split into 167 (93%) studios, 3 (2%) micro studios and 8 (5%) studios which have disabled access.

Student facilities would be located to the basement level, including laundry room, dining area, TV lounge, cinema room, games room and gym. Bicycle storage facilities would also be located at basement level.

The main entrance and frontage to the building would be off King's Road at ground floor level, with a study room and reception area. On the seventh floor there would be a small number of studio rooms (7 in total including one with disabled access) and a sky lounge with access onto a roof terrace.

Given the sustainable location of the site, and in line with the Council's parking standards as set out within the Revised Parking Standards and Design SPD (2011), which designates the Site as being within a Zone 2 parking area (Primary Core Area with walking distances up to 2km from the Town Centre, within walking distance of a railway station and well served by public transport) 6 standard parking spaces and 2 disabled parking spaces are proposed. The Council's parking SPD provides maximum parking standards for C2 halls of residence of 1 space per FTE staff and no spaces for students on the basis that the sustainable nature of the location means dependence on a private car is not necessary and should be discouraged.

The design solution proposed is high quality, reflecting the stepped levels of the adjacent The Pinnacle building, whilst incorporating unique design accents such as the proposed sky lounge and roof terrace. The accommodation is also highly sustainable (in addition to its accessibility to services and facilities) through the inclusion of a number of internal facilities allowing students to gather, socialise and study in a controlled environment.

Attention has also been given to appropriate landscaping, having regard to the Council's committee report for the extant permission at Alexander House which stated the importance of trees along King's Road, in that it enhances the local environment and amenity for this area of Reading. Therefore, in order to support the Council's designation of King's Road as an 'existing or potential treed corridor' as set out within the Borough Tree Strategy, tree planting is proposed along the King's Road frontage.

The proposed development would be energy efficient in line with part L of the current Building Regulations and would comply with BREEAM requirements.

The Need

It is documented that the University of Reading has need of further accommodation to satisfy a significant shortfall in student accommodation for existing and future students, whilst Reading College is also located a short distance to the west of the site. Both institutions provide a range of further education courses and would have their growth ambitions supported through the provision of student accommodation.

In particular, the University of Reading submitted, with application reference 172045 for development to accommodate 836 new student bedrooms (St Patrick's Hall), a Demand and Impact Assessment, dated November 2017. This assessment found that;

- The University has grown full-time student numbers by 18% over the last five years (2011-2016) far above the 5% national average;
- Reading has seen a 16% increase in the number of students living in HMOs over the last five years, double the national average increase of 8%;
- The University currently has waiting lists in excess of 700 students and more student accommodation is required to avoid having to place large numbers of students in hotels;
- The University is one of the largest employers in the region and it is reported that an estimated £650m goes into the local economy each year as a direct result of the University, plus around £3.5m of business tourism;
- The University's success means its national and international appeal is growing, reflected in a 49% increase in non-UK students between 2011-2015.

The University of Reading is very important to Reading and surrounding areas. The Council's Submission Version of the emerging Local Plan states (paragraph 4.4.95) that the University makes a "major contribution to its (Reading's) economic success" and that "it is important that sufficient accommodation is provided to enable students to live close to where they study".

Reading has an increasing international appeal, to the betterment of the local economy; support to the University through the increase of new student accommodation (and therefore the capacity to accommodate the increasing number of international students) will support this growing status of Reading on the international stage as a leading contributor to the knowledge-based economy. The success of the university (including supporting its growth) is recognised within paragraph 1.2.3 of the submission Local Plan which states that many skilled businesses in Reading "rely on the high level of skills in the area, and there are also strong relationships with the University of Reading".

It is clear that there is significant current and future demand for student accommodation which, if provided, would help support the continued success of the University. It is also clear that students (and by inference, student accommodation) also contributes significantly towards the Reading economy in terms of financial contribution (directly and indirectly), through the development of employable skilled students and through the generation of high value, knowledge-based research. This need (for student accommodation) cannot be provided for in full through developments on the University's on-campus locations, the largest of which is the Whiteknights Campus, recognised by the Council at paragraph 9.3.9 of the submission Local Plan to be highly constrained by virtue of a significant amount of 19th Century parkland, woodland and lakes.

It is further relevant to note that whilst the University is the dominant generator of need for further student accommodation in Reading, Reading College, a short distance to the west of the Site, could also benefit from student accommodation adjacent, effectively on its doorstep.

Finally, in relation to need, it is relevant to mention emerging National planning policy within the National Planning Policy Framework revision anticipated to be published by the Government by the end of July 2018. Should the text directly relevant to student accommodation remain as released

within the draft version of that document, it is relevant that at paragraph 62 the draft NPPF states housing need should cater for “different groups in the community” ... “including students”.

It is clear that whilst there is a significant need within Reading for market and affordable housing, the Council also needs to include provision for student accommodation. The lack of purpose-built student accommodation would not only hinder the growth of the University (and consequently the local economy) in being able to offer accommodation to first year students, it would also increase demand for a growing HMO economy. Unlike purpose-built student accommodation, HMO occupation (which do not have amenity facilities, sufficient waste collection, noise attenuation or management plans) cannot manage student activity sufficiently (e.g. noise, waste and parking).

The proposed development of Alexander House would provide for considerable existing (and future) market demand in a sustainable location close to facilities, the University of Reading and Reading College, in an appropriate and efficient way. It would also have a reducing effect on the growth rate of a growing HMO sector in Reading.

Current and Emerging Planning Policy

The Council's current development plan consists of the Core Strategy (Adopted 2008, amended January 2015), Sites and Detailed Policies (Adopted 2012, amended 2015) and the Reading Central Area Action Plan (Adopted 2009), a new Local Plan is currently under production. The emerging Local Plan is at an advanced stage, having been submitted to the Secretary of State on Thursday 29th March 2018, with Examination in Public due to commence on 25th September 2018.

Whilst the emerging Local Plan Policies carry a degree of weight at this stage of the Local Plan process, it cannot yet carry full weight given that the policies contained within have yet to undergo scrutiny through the examination process and as such may still be subject to amendment. The weight to be attributed can only be such that they warrant consideration as a set of policies which a planning application for new development on the Site may be assessed against 'if' the submitted version of the emerging Local Plan becomes adopted without amendment to the relevant policies. Having said this caveat to be applied to the emerging Local Plan until its adoption, consideration has been made to relevant policies, particularly emerging Policy EM3 (which the Council accept is identical to existing Policy CS11) which concerns the loss of office use at the Site, and new emerging Policy H12 which concerns the location of new proposed student accommodation.

In terms of current Policy CS11 and emerging Policy EM3 which consider the loss of an office use, in line with the advice within the previous pre-application advice, an updated market report will be provided, together with a complete assessment against the requirement of the relevant policy.

The central policy referred to by the Council in the previous pre-application advice for the redevelopment of Alexander House to accommodate new student accommodation was draft Policy H12, a policy with specific relevance to new student accommodation proposals. The Policy reads as set out below:

H12: STUDENT ACCOMMODATION

New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation.

There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites.

As referenced within this cover letter, there is a clear need for further student accommodation in Reading, and the forthcoming planning application will be accompanied by a full assessment of need and consideration of the availability of sites on or adjacent to existing further or higher education campuses. As part of this pre-application exercise, we would like to agree the area of search with the Council.

Notwithstanding the above, it is considered that the Site, next door but one to Reading College, is not only in a highly sustainable location with regard to services, facilities and onward connections, but would also be located within very close proximity to Reading College (virtually adjacent, with one sole property, The Pinnacle, providing separation), and be within a short walk to the University of Reading's London Road and Whiteknights campus locations.

Pre-application submission.

It is known that pre-application advice has been sought of the Council with regard to a potential 230 bedroom scheme towards the end of 2017 / beginning of 2018, with regard to which the Council responded with a letter dated 30th January 2018. The Council's response to that scheme has been reviewed and considered, with any matters of design addressed through the currently proposed scheme.

It is worth noting at the outset, that whilst it would have been unlikely to alter the Council's response, the Council's assessment was based on a submission which stated the proposals were to create a development which accommodates approximately 230 student bedrooms, whilst the plans submitted with that pre-application request appear to show 200 bedrooms.

The Council responded with the following key comments:

- Loss of existing office use was justified through point-by-point assessment of Policy CS11 and provision of an up-to-date market report;
- There were concerns regarding the principle for student accommodation development in that location with regard to its compliance with emerging Policy H12 and the requirement for new student accommodation to be provided on or adjacent to existing further or higher education campuses unless it can be demonstrated that such sites cannot meet the need;
- Concern over the cumulative impact of student accommodation along King's Road and the need for a Student Management Plan (SMP).

Matters of design:

- The scheme largely followed the footprint, with some increase to sixth floor massing but concluded that it would likely be acceptable (with the caveat that elevation plans were not provided to ascertain a view on overall height, particularly in comparison to neighbouring properties);
- A high quality design would be expected on this site, citing potential that a more contemporary scheme may be more appropriate;
- Raised concern that Rupert Street appeared to accommodate the main entrance to the proposals despite Kings Road providing the primary frontage and with the Rupert Street ground floor frontage lacking activity;
- The quality of accommodation was questioned, compromising basement level accommodation (lack of light and outlook), large number of single aspect north rooms, no natural light / outlook for above ground floor kitchen areas, open space/landscaping quality concern.

Whilst the abovementioned former pre-application exercise is unconnected with the current pre-

application submission, we consider it prudent to address the opinions raised by the Council. These matters are largely picked up in greater detail within the attached Pre-Application Design Report, however, this cover letter has dealt with matters of relevant planning policy.

The Council's pre-application response drew attention to the following planning applications, which have been considered in forming the current proposals:

- 172118 (40 Silver Street) – the Council's consider there to be some parallels between proposals for student accommodation at Alexander House and the proposals for 40 Silver Street;
- 150752 (Yell House) – as an example of level / nature of information required for a student accommodation scheme, particularly an SMP;
- 161205 (187-189 & 191 Kings Road) – as above;
- 170019 (Ease Street) – as above;
- 172045 (St Patrick's Hall) as above.

Relevant Planning Applications

Application reference 162057 (planning permission for 56 residential units) and the former pre-application scheme provide a baseline upon which to guide the current proposals, and relevant comments concerning the design of any building on this site in those two former examples have been fully considered.

The Council made particular reference to the student accommodation proposals at 40 Silver Street (172118) in reference to consideration of the principle of development in this location. In reviewing that application, it was refused on the basis of the below main reasons:

1. Design – bulk and height considered to represent overdevelopment;
2. Amenity – loss of privacy, overlooking and disturbance;
3. Community – over concentration of student accommodation failing to provide a mixed and balanced community;
4. S106 – absence of a legal agreement.

Every planning application is determined on its individual merits, and as such it would not be appropriate to appraise the merits of the Council's decision in relation to 40 Silver Street, however, it does draw some key issues which the Council would consider in relation to the proposals.

The proposals represent an appropriate and proportionate increase in scale, massing and height in comparison with the extant permission (162057), and having reviewed the Council's response to the former pre-application submission on the Site for student accommodation, it is apparent that there is very little deviation from what the Council have already confirmed would be acceptable in terms of scale, massing and height (and the potential impact on local character). The current proposals represent a high quality, enhanced design over both that which has already been approved on the Site and the plans presented for student accommodation on the Site earlier in 2018 (by other parties).

There is merit in considering potential impact on amenity and the local community. In relation to the former, it is relevant to refer to the Council's assessment of the proposals which benefit from the extant permission. The current proposals only propose minor enlargement from the permitted scheme; as such, the Council's appraisal of impact on general amenities of adjacent occupiers would be anticipated to remain consistent.

It is acknowledged that the Council have expressed concern regarding the concentration of student accommodation along King's Road. This also formed the basis of a reason for refusal for the proposals

at 40 Silver Street. It should however be noted that the built environment along Silver Street is very different to that of King's Road, and in particular the Site at Alexander House, surrounded by residential apartment buildings similar in scale to that currently proposed.

First and foremost, the concentration of student accommodation (with the proposed development) within an environment entirely different to Silver Street, would not be at a level which would result in inappropriate levels of impact on the amenities of the surrounding community. Impacts cannot be claimed to arise simply from young people occupying a building, but rather may arise as a result of concentrating people into accommodation without appropriate facilities for those people to meet and interact. The proposals at Alexander House address this through quality accommodation which allows students to obtain access to daily facilities (i.e. laundry) and more importantly areas to gather, study and interact in controlled environments. The current proposals include dining areas, a TV lounge, cinema room, games room and gym at basement floor level, a study room at ground floor level, and an impressive sky lounge on the set back seventh floor. These areas would prove popular with students and encourage congregation and interactions within environments controlled through good design and activity through an appropriate detailed Student Management Plan.

In terms of what would comprise an appropriate Student Management Plan, it is welcomed that the Council made reference to application 150752 (granted full planning permission in September 2015), which included a Student Management Plan (with addendum) that the Council considered appropriate. This will be considered in relation to an appropriate SMP for the proposals at Alexander House.

The Council also mentioned reference to the proposals for an increase in student accommodation (72 bed to 150) at 187-189 & 191 Kings Road (161205), through the change of use of an existing building, extensions and erection of a new 5 storey building. Having reviewed that application, and the Council's reasons for refusal, it is evident that the circumstances are very different and centre around the design proposed for that scheme with the potential resultant impact on the character of the area (particularly heritage assets) and local amenities. These matters have been fully considered in the formation of the proposals for student accommodation at Alexander House.

Finally, in addition to the above applications, other applications have been reviewed in order to guide the proposals, including the Council's assessment of the approved student accommodation at 79 Silver Street (applications 170685 and 180075 refer).

Summary

In summary, the current proposals have carefully considered the Council's assessments of previous proposals to ensure that the current proposed design for the redevelopment of the Site which currently accommodates Alexander House is both acceptable and reflects quality design principles. In doing so, the proposals have ensured compliance with all relevant policies within the Council's current and emerging Local Plan.

The provision of student accommodation at Alexander House would cater for a significant need arising primarily from the University of Reading and would align with the NPPF in providing for all residential accommodation needs, inclusive of student accommodation. Further, the Site is considered to be located in a position almost directly adjacent to the Reading College campus, and is a location which is highly sustainable with convenient access to Reading Town and beyond, Reading College, and the University of Reading's London Road and Whiteknights campuses.

Documents Required for Validation

Finally, we would like to confirm the documents which would need to accompany any planning application for the proposed development. From a review of the former pre-application advice, it is understood that the Council consider the following documents to be required:

- Application Form and CIL Form (including floor plans showing methodology on how floorspace liable for CIL has been calculated)
- Planning Statement
- Design and Access Statement incorporating landscape statement
- Air Quality Assessment
- Ecological Statement (to include a bat report where necessary)
- Updated Office Market Report
- Noise Assessment
- Daylight Assessment (to also assess sunlight matters, including to the amenity space provided for future occupiers, and impact on existing nearby occupiers)
- Energy and Sustainability Statement
- Heritage Desk-Based Assessment (including archaeology)
- Drainage Assessment (which follows Part 1 SuDS guidance, page 4)
- Superfast Broadband Statement
- Transport Statement and Travel Plan
- Utility Assessment
- All existing / proposed floor plans, elevations and sections to comply with the validation checklist (Section 18)
- Details of external lighting provided (section 9 of Council's validation checklist) where any proposed
- Section 106 Draft Heads of Terms (covering at least an employment and skills plan and student use).

In addition to the above, whilst not required for validation, it is understood that any planning application for student accommodation will need to be accompanied by an appropriate detailed Student Management Plan.

The Council's confirmation is sought that the above list represents the complete set of documents required to accompany a planning application for student accommodation on the Site at Alexander House, King's Road.

I trust the above, together with the enclosed, is of assistance in enabling the Council to provide detailed pre-application advice and to inform a pre-application meeting (date to be arranged), however, should you require any further clarity or information please do not hesitate to contact me further.

Yours sincerely,



JONATHAN LOCKE
Planning Associate

Enc.

cc. A. Jansons, Esq. (Jansons Property)
cc. P. Nash, Esq. (Jansons Property)

Appendix B - Council response to P.J. Alexander Ltd pre-application submission

Jonathan Locke
Planning Associate
Barton Willmore
The Blade
Abbey Square
Reading
RG1 3BE

Via email only to Jonathan.Locke@bartonwillmore.co.uk

Your contact is: Mr Jonathan Markwell, Planning

ADVICE PROVIDED WITHOUT PREJUDICE

Dear Mr Locke,

TOWN AND COUNTRY PLANNING ACT 1990

Enquiry Reference & Address: 181289/PREAPP - Alexander House, 205-207 Kings Road, Reading.

Proposal: Pre-application submission for the demolition of the existing office building and construct new student accommodation building (178 bedrooms - basement and up to 8 storeys in total).

Those in attendance at the meeting on 13th September: Jonathan Markwell (Reading Borough Council); Jonathan Locke (Barton Willmore); Ben Roberts (Net Plc); Andy Jansons (Jansons Property); and, David Anderson (Broadway Malyan).

Other RBC officers who provided input, but who did not attend the meeting: Natalie Lucas (Transport Development Control Officer); Rebecca Moon (Senior Environmental Health Officer); Sarah Duckworth (Assistant Natural Environment Officer); Giles Sutton (Ecology Consultant).

Information considered: Pre-application enquiry form; Letter from Barton Willmore Ref 28485/A1/JL dated 19/07/18; Site Location Plan; Pre-application Design Report - July 2018 - Issue 4 by Broadway Malyan, Ref 33443-07-Pre-Application Design Report.

Thank you for your recent enquiry in relation to the above site. Further to our meeting on 13/09/18, please see below this formal written feedback to you.

Introduction

Any planning application at the site would presently be considered within the context of the Council's LDF Core Strategy (2008, Altered 2015) and Sites and the Detailed Policies (2012, Altered 2015) documents. Supplementary Planning documents would also be applied where

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19th September 2018

relevant, together with national policy and guidance (the NPPF and PPG). Please use [this link](#) to view the local policies and guidance.

As you are already aware, a new local plan is emerging, although adoption of the [new local plan](#) (and its policies - replacing the existing policies referenced above) is not anticipated until the end of the 2018 / beginning of 2019 at present. It is also advised that the emerging policies can be afforded some weight in the determination of planning applications now that the draft local plan has been submitted to the government (The Local Plan was submitted to the Secretary of State on Thursday 29th March 2018. This marks the beginning of a process of public examination that will take place in late September 2018). This weight is limited at this time, but will increase in weight as the plan moves closer to adoption. Subsequent to the local plan examination the next step will be receiving a letter from the Inspector regarding the soundness of the local plan; it is presently estimated that this will be received in late November / early December. If/when the local plan is thereafter adopted, the new policies will be afforded full weight.

Land use principle matters

Loss of existing office use

At the time of permission 162057 at the site the loss of the existing use was justified through a combination of a point-by-point assessment of policy CS11 by the agent, supplemented by a market report. At the time of the consideration of that application this was accepted by officers as sufficient to justify the loss of the existing use. It is welcomed, as per p5 of your supporting letter, that you intend to submit an updated market report and point-by-point Policy CS11 assessment. It is advised that this level / nature of information would be required to seek to justify the loss of the existing use as part of these separate proposals. As you already note, you should be mindful of emerging [Policy EM3](#) (albeit the criteria is identical to the existing policy CS11).

Principle of proposed student use

There is presently no specific adopted student accommodation (sui generis) planning policy. As such, at the time of writing, should such an application be determined today by the local planning authority, there would be no in-principle land use concerns with the proposed use.

However, as you are aware, the [submission draft local plan](#) includes a specific student accommodation planning policy (H12). Although only limited weight can be afforded to this at the time of writing, this may change subsequent to the local plan examination (which commences on 25th September). For example, should H12 be adopted with no alterations it would result in there being a presumption against the proposal unless it can be clearly demonstrated how the proposal meets a need that cannot be met on existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation.

In this regard you have submitted commentary regarding what you consider to be a clear need/demand and that you intend to submit a full assessment of need / availability of sites at the time of a future application. It is considered that such assessments would be necessary in light of the emerging policy. In relation to the 'area of search' for such assessments, at the

present point in time it is considered that this should consist of the Reading Borough Council administrative boundary. Obviously should there be specific comments on this element at / after the examination and then within future adopted policy, then obviously this would also need to be taken into account by you too. As such, this specific element of advice is without prejudice to future emerging policy additions.

In more general terms it is advised that your future assessment should seek to be evidence-based, rather than what would respectively appear to be instances of anecdotal evidence referenced in your supporting letter. Furthermore, it is strongly advised that your future assessment comments on potentially conflicting evidence too, such as the 2016 SHMA. Your future submission would then be carefully considered by officers at the time of any application. It is not possible at this time to provide a steer as to whether the proposed use will be able to be supported by officers in principle, owing to a multitude of factors. Obviously this will become far clearer once the emerging policy is potentially adopted in due course.

Please also be aware that you will gauge from Planning Applications Committee meetings that elected members are particularly conscious of proposals for student accommodation in the borough. As such, this matter of principle is one which you should seek to evidence in the fullest terms possible, to assist in the any such proposal being supported by members when it is subsequently considered at Planning Applications Committee. You are advised to be under no illusions as to the potential difficulty this matter presents.

An additional land use matter to consider and comment on in your submission is the fact that the site has an extant permission for residential (Class C3) use, including the provision of 30% on-site affordable housing (of a tenure mix supported by officers and members). You will note from the officer report for application 162057 that this was considered to be a key tangible planning benefit of the proposed development. This is raised with the supporting text of emerging policy H12 in mind, which as a reminder states at paragraph 4.4.98 that:

The provision of new student accommodation needs to be balanced against other types of housing. Whilst it is likely that purpose built student housing can free up some existing homes to meet more general needs, there are many sites where development for students prevents a potential housing site being used to help to meet the more pressing needs for general housing, including affordable housing. Development for students should therefore be limited to established student locations, unless a specific need for a development in a certain location can be clearly demonstrated.

As such, your future submission should include commentary / evidence which seeks to address this matter explicitly, as it is likely to be a matter which elected members will be aware of and seek to question.

Moreover, the site is specifically allocated for residential use within the emerging plan. Policy ER1g states:

ER1g ALEXANDER HOUSE, KINGS ROAD
Redevelopment of offices for residential.

Development should:

- *Take account of potential archaeological significance;*
- *Address noise impacts on residential use;*
- *Address air quality impacts on residential use; and*
- *Ensure appropriate back-to-back separation from existing residential.*

Site size: 0.16 ha 26-38 dwellings

Please note by 'residential' this is taken to mean Class C3 accommodation, rather than (sui generis) student accommodation, for which there are explicit references (e.g. sites ER1a, ER1e, ER2, CR13a, CR14l).

As such, your future proposal should also seek to address this emerging policy designation. Should this subsequently be adopted, a proposed student accommodation use would amount to a clear conflict with the site allocation.

In overall terms of the principle of the proposed use, it is considered that there is uncertainty regarding the acceptability of the proposed student accommodation at this time, owing to the emerging policy context (both in terms of the proposed use and the specific site allocation for residential use). This will obviously become clearer at the local plan examination and subsequent to this, and confirmed if/when the emerging local plan is formally adopted in due course.

The remainder of this advice is provided on a without prejudice basis to the advice outlined above in the land use principles section above.

Bulk / scale and massing / character and appearance of the local area / heritage assets

In relation to these matters your covering letter summarises the proposals as a "proportionate increase in scale, massing and height in comparison with the extant permission" and "the current proposals represent a high quality, enhanced design" over the extant permission / earlier 2018 pre-application. The design report covers all such matters in more detail.

Considering first the overall bulk, scale and massing, as you note the extant permission provides a benchmark for your emerging proposals. It is acknowledged that at some points of your proposal the proposed footprint deviates from that approved, while in massing terms there are numerous changes. Most notably, a 7th floor (8th storey) of accommodation is proposed, meaning that the overall massing exceeds both neighbouring buildings, in contrast to the consented scheme which did not exceed the height of the neighbouring buildings. It is considered that any proposal which exceeds the height of the neighbouring buildings would need to be justified in the fullest terms (with this being a design-based narrative), to provide a basis for officers further considering this at the time of any future application. The only design rationale provided to date appears to be that it is a corner site. It is considered that a more detailed assessment of the local area is required to provide a basis for seeking to propose an overall height greater than the neighbouring buildings. It is considered possible that a case could be advanced in this regard, but without further analysis/justification there

would not be a sufficient basis to support this (also bearing in mind knock on implications in terms of day/sunlight for neighbouring occupiers for example).

In terms of the massing of the element fronting Kings Road (closest to Crossway Point), this appears uncontentious in the context of the consented scheme at the site. With regard to the massing of the element fronting onto Rupert Street (away from the corner with Kings Road), concerns are raised with the various increases in height in comparison with the consented scheme. Away from the Kings Road frontage the scale is far more of a domestic nature and the consented scheme took a gradual stepped approach to relate satisfactorily to Saxon Court. In contrast, the proposed scheme is 4 storeys at its closest point to Saxon Court and shortly increases further to 6 storeys. With regard to the massing of the development within the Rupert Street context, the proposal is considered to overwhelm Saxon Court, harmful to the character and appearance of the street at this point. It is considered that a 2-4-6 storey stepped approach would be likely to address these present concerns.

It is evident that the proposal seeks to create three building blocks, with a grid form and defined changes in-between the blocks and a contrasting feature on the Kings Road frontage. The general approach is understood and acknowledged, but it is questioned whether the contrasting feature on Kings Road should also be continued partly around the corner onto a smaller section of the Rupert Street elevation too? This would cover a smaller width than the Kings Road element so that this remains predominant, but would assist in better defining / viewing the proposals from the west on Kings Road and perhaps provide a stronger narrative for the additional height at this point? Furthermore, it would also potentially provide a further break in the extent of the grid form on the Rupert Street elevation.

A wider question resolves around what the form/material of the contrasting element is? This is not referenced explicitly in the submission and should naturally be carefully considered and demonstrated in due course. Another wider question is that based on the elevation plans one would naturally assume that the staircores are provided where the breaks between the blocks are proposed (given the additional glazing and lack of the grid form). However, based on the floorplans, this doesn't occur, with the cores within the centre / rear/east elevations. This perhaps questions the design integrity of the proposal.

With regard to the entrance point on Kings Road, based on the variations within the plans this is evidently an element in the early stages of development. There is commentary within the design statement regarding the main entrance being at the corner of the building, whereas the plans indicate this to be significantly set in on the Kings Road frontage. This element should be further refined, taking into account the multitude of factors (access / landscaping / design / functionality), some of which will be competing. It is obviously important for legibility purposes for a clear entrance to be provided and this to be of a high quality, both in itself and within the context of the composition as a whole and the wider streetscene.

In terms of detailed design matters, it is acknowledged that the final palette of materials has not yet been selected, but is likely to be substantially brick with contrasting metal cladding material. The inspiration for this appears to be taken from a student scheme in Reading town centre, a hotel in London, an office in Reading town centre and a student schemes in Leamington Spa, Oxford, Lancaster and London (as detailed in the document submitted). In

this regard it is noted that Policy CS7 details that all development would be of a high quality design that maintains and enhances the character and appearance of the area of Reading in which it is located and developments should respond positively to their local context and create or reinforce local character and distinctiveness. With this in mind, the design approach appears to take inspiration from far-away sites, rather than existing nearby sites. This may be deliberate on your part, but little commentary is provided to specify the exact rationale in this instance. It may be that you consider in itself the proposals will enhance the area, but links to the local area (if relevant) need to be detailed. At present, a criticism of the proposal could be that it lacks any local distinctiveness or relationship with nearby buildings.

Other comments in relation to these matters comprise:

- It is noted that only street elevations have been submitted for consideration. It is considered that the north and east elevations are equally important in terms of design quality and these elevations will be expected to be advanced with the same level of detail/quality as the street elevations.
- Although the massing comparison images are helpful, it is considered that they could be clearer if they are shown in simpler elevation form (rather than birds eye views) with the proposal shown and a different coloured lines showing the existing / consented massing (and another version showing the outline of the consented scheme massing with different coloured lines showing the existing / proposed massing)
- The proposed floorplans should indicate the outline (footprint and window positions) of neighbouring properties to assist the assessment of the amenity impacts of the proposals (window alignments and distances for example).
- Site levels and floor levels of the proposed development / existing neighbouring buildings should be detailed on the proposed elevation / section plans - this is to confirm floor to ceiling heights (as well as the exact height of the proposed building), as to the naked eye it would appear that there is not uniformity in the levels of the building at a floor to floor level (or it could just be that the fenestration differs?).

In light of the above, it is considered that your emerging proposals should be further considered through the Reading Design Review Panel (DRP). The Panel was only established after the previous permission at the site, but for a proposal of this nature it is a scheme which officers and members would expect to be considered by the DRP (in order to reassure members regarding the design quality of the scheme).

For your information, please see below some general information about the DRP process:

The DRP has been set up in partnership with local architects and meets once every 4 weeks, usually on a Thursday afternoon starting at 2pm. The Panel comprises mostly architects, although there are a small number of other design professionals, e.g. landscape architects, urban designers. It will primarily comment on design and urban design matters associated with an application. Each Panel will comprise 4 - 6 Members taken from a larger rota of members. As the case officer, I will also be present.

The format enables either the case officer or representatives of the applicant to briefly present the pre-application proposals to the Panel and to answer questions put by members of the Panel. The panel will then consider their views on the proposals. Those views will be conveyed back to you in writing by email. You would be invited to send a representative to the Panel to present your proposals. If you wish I can instead present the proposals to the Panel. Scheme details would be provided in the form of a PowerPoint presentation and should be timed to last no more than 15 minutes (it is advisable to limit the number of slides to enable presentations to be limited to the allotted 15 minutes). A projector will be available or I can ensure that details are available on the laptop that will be in the room. Panel members will be sent the information you have already submitted in advance of the meeting, so they will have already had an opportunity to familiarise themselves with your proposals in advance of the meeting.

For the panel to effectively review your proposals the submission should, as a minimum, include a site analysis, explanation of design concept, illustration of how the proposals work in the local context and materiality. A clear narrative to how the proposals have been developed should also be included. The Panel will usually ask questions that will be programmed to take up a further 15 to 20 minutes. Following questions, applicants and/or their representatives will be asked to leave the meeting. The Panel will consider the proposals at the meeting and the Chair will provide agreed written conclusions shortly after the Panel (usually within 14 days). I will convey the conclusions to you and will use them as the basis for providing written advice and any further discussion on the design of the proposals. Where there are particular issues or where a scheme is subject to significant re design, it may be appropriate for proposals to be considered more than once by the DRP. You should note that the Panel currently uses the following checklist to consider applications in the context of the advice on design n in the National Planning Policy Framework and in the policies in the documents that make up the Reading Borough Local Plan, e.g. Policy CS7, etc.

- Site	- Building	- Sustainability	- Detailing
- Layout - Urban Structure & Grain	- Layout - Density & mix	- Energy	- Craftsmanship
- Character of area	- Scale	- Materials	- Functional
- Quality of public realm	- Massing	- Water	- Longevity
- Landscape - continuity & enclosure	- Appearance	- Access	- Weathering
- Orientation	- Function	- Health	- Structurally honest
- Vehicle circulation	- Outlook	- Waste	- Historically correct

- | | | | |
|----------------------------|-----------------------|----------------------|---|
| - <i>Pedestrian routes</i> | - <i>Legibility</i> | - <i>Reuse</i> | - |
| - | - <i>Adaptability</i> | - <i>Inclusivity</i> | - |
-

You are advised that the upcoming DRP dates for the remainder of 2018 are: 18th October; 15th November; 13th December. The next step in this regard would be for you to clarify whether you wish to present the current proposals (at the October meeting) or a more refined version (at a later date). It is also recognised that Barton Willmore / Broadway Malyan has representatives on each of the panels, so it may be that these panel members would need to be excluded from discussions when the item is discussed at the meeting.

Finally, in terms of the impact of the proposals on nearby heritage assets, information should be submitted at application stage to justify the proposals in this regard. In light of the consented scheme it is likely that a case is likely to be advanced to satisfy this, but naturally the onus will be on you to demonstrate this within your future submission.

Quality of accommodation

A number of questions and queries are raised in relation to various elements of the proposals, which could all be relevant to the future assessment of the overall standard of accommodation for future occupiers:

- Basement level
 - the supporting letter refers dining areas, but no such area is annotated on the basement level plan - your future submission needs to make clear whether dining facilities are provided and the nature of these (i.e. managed by a company or informal spaces for future occupiers shared use);
 - It is not clear how the windowless basement rooms will be ventilated? This should be detailed in your future submission.
 - Within the consented scheme a key element was that a ventilation strip was required along the Kings Road frontage, but no such element is incorporated within this scheme. This may be due to the proposed uses at basement level contrasting between the schemes, but clarification is required.
 - It is not clear how the bins will be collected / managed? There is no indication of external access from this space, so this is unclear. It is presumed that the distance to the street will be in excess of 15m, so a dedicated management scheme would be required.
 - Similar questions are raised regard the bike storage and how accessible this will be? For example, would occupiers be expected to use the lift or stairs to access the ground floor?
 - It is unclear what the 39sqm bookable space consists of? Your future submission should clarify this.
 - It would need to be confirmed that the gym/games/tv lounge/cinema room are purely ancillary to the main student use, are solely for student occupiers and would not be separate facilities for use/hire by outside groups?
- Ground floor

- No details of the likely internal layout of each studio have been provided. This is required to demonstrate the facilities each unit would include - e.g. single or double beds? En-suites? Kitchenette / cooking facilities? Your future submission should make clear what is proposed to assist the future full assessment of any application.
- A number of disabled accessible rooms are denoted, but no evidence of the features which will make them such rooms are detailed. This will be required to demonstrate compliance with access requirements. For example, based on the information submitted the width of the entrance door appears identical to that of a standard room, which in reality would not be the case.
- A study room is shown next to the entrance - it is questioned whether this is the optimal location for such a room, given the likely noise next to the entrance and proximity to Kings Rd? Your submission should seek to explain this in detail.
- It is noted that the study room is annotated as 'amenity space' - it is advised that this is perhaps re-referenced as 'on-site facilities', with 'amenity space' solely referring to outdoor amenity space - for which there appears to be precious little proposed - in particular the intention to effectively share drop-off vehicle spaces with 'amenity space' appears somewhat disingenuous - commentary explaining precisely how this would be managed and operate in practice would be required (i.e. how would the safety of those using the amenity space be maintained / inherent conflicts between the two uses. Is the shared nature of this space an indication of the overdevelopment of the site?
- The plans detail two 'management' areas - the management of the site will need to be clearly explained in terms of day-to-day operations, parking requirements and on site living/sleeping arrangements (or not?) for example.
- Noting that there are two separate staircases through many floors of the building, please clarify whether access will be possible through the entirety of the building? If future occupants are able to access both stair cores, it is likely that the Crime Prevention Design Advisor (CPDA) at Thames Valley Police will consider that the layout includes excessive permeability (thereby raising safety concerns with vulnerable residents) and may seek for safeguards to be put in place. You are advised to separately engage the CPDA prior to any submission (Anne Chalmers | Crime Prevention & Design Advisor | Berkshire | Neighbourhood Policing & Partnerships | Thames Valley Police. Telephone number. 01865 309157 / Mobile: 07800703324 Email: anne.chalmers@thamesvalley.pnn.police.uk) to discuss matters such as physical security, CCTV, access controls, entrance measures, segregation and car park access.
- A number of 'micro studio' units are proposed - your future submission should clarify whether the size of the unit is the only difference to a 'studio', or whether there are fewer facilities too?
- A number of units are shown to be located next to sub-stations or plant rooms - your future submission should detail the specific additional steps to be taken to reduce noise/vibrations/disturbance at these points.
- No details about window sizes/outlook are detailed on the plans - this will obviously need to be detailed. It will be required to be demonstrated that each room will receive suitable outlook.

- The day/sunlight received by individual rooms will need to be demonstrated through a BRE based assessment. In particular the studio on the inward corner of the 'L' shaped building would be likely to receive limited day/sunlight and limited outlook due to the proposed layout (given the neighbouring unit to the east is set forward and the staircase also extends out nearby too). You should explore taking steps to improve this arrangement. Furthermore, based on the elevation plans it is questioned whether the units which align with the breaks between the grid form of the building (and those in the part of the Kings Road 'contrasting element') would receive adequate day/sunlight, as the windows appear smaller.
- Overlooking between separate future occupiers, in particular on the inward corner elevations. Measures to minimise opportunities should be detailed on the plans / in your future submission.
- The large number of single aspect north-facing rooms is considered to be a significant shortcoming of the proposed scheme. You are strongly advised to explore altering the internal layout to reduce the number of single aspect north facing rooms
- No details regarding CCTV provision is shown on the plans
- A detailed fire strategy should be outlined within the design and access statement or as a standalone document within your submission, as members are particularly concerned about this matter following Grenfell Tower.
- 7th floor level
 - This level specifies a sky lounge, but no details are provided as to the exact nature of the space - your future submission should explain this.
 - An external roof terrace is shown at this point. Concerns may arise in terms of possible noise and disturbance from this external area, to the detriment of the amenity of occupiers of the student units at the site, as well as existing nearby occupiers. Conversely, it is questioned whether a space at this level, directly adjacent to Kings Road would be actively used in practice, given the likely microclimate / noise at this point? Moreover, in all my previous personal experiences of student accommodation proposals, applicants have usually sought to ensure that rooftop amenity spaces are not provided in schemes. The rationale put forward by other providers of student accommodation is owing to higher than average rates of suicide by young adults living away from home for the first time (and rooftop terraces represent an opportunity for increasing this risk). As such, you are advised to carefully consider whether you wish to pursue this element of your proposals. If you do wish to provide a rooftop amenity space, then full details of steps proposed to secure this space should be provided. Moreover, case studies of schemes implemented elsewhere by the prospective applicant may be another means of providing a rationale for this element of the proposals.

Accordingly, based on the information submitted to date, it is evident that there are numerous potential issues raised with the quality of accommodation provided, which will need to be clarified in your future submission. Some of these elements could be incorporated / explained within a future student management plan, which you outline will be progressed/submitted as part of a future application.

Amenity of nearby occupiers

It is welcomed that you already acknowledge that a day/sunlight assessment will be required to justify the proposals in terms of protecting the amenity of existing nearby occupiers in these regards. You will note from the consented scheme that there were a number of shortfalls in this regard, particularly in terms of The Pinnacle. With the inclusion of an additional storey and the steps down being considerable less profound towards Saxon Court, the day/sunlight implications are envisaged to be worse than previously specified. Consequently, this is a potentially significant concern. It is likely that the local planning authority will seek for the future assessment to be independently reviewed, at your expense (as per validation requirement 5 - owing to the lack of information being submitted at pre-application stage in this regard).

In other regards, some cross-cutting matters have already been raised in the 'quality of accommodation' section above (e.g. noise and disturbance / student management plan), while I concur with some matters you raise in your covering letter (e.g. overlooking / privacy conclusions unlikely to be different on the basis of the footprint not increasing significantly).

Environmental Protection officer observations

The Environmental Protection team has potential concerns regarding:

- **Noise impact on development**
- **Noise transmission between dwellings**
- **Air Quality impact - increased exposure / new receptors**
- **Air Quality impact - increased emissions**
- **Construction and Demolition phase**

Noise impact on development (as noted in the emerging site allocation)

The proposed development is by a busy road so a noise assessment will need to be submitted with the full application. It may be possible though clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather. However, non-openable windows are not considered an acceptable solution due to the impact on living standards.

The mitigation measures would be secured via condition to be installed in accordance with the approved specifications prior to first occupation of any student unit.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (L_{Amax}) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB $L_{Aeq,8hour}$	
Living rooms (07:00 - 23:00)	<35dB $L_{Aeq,16hour}$	
Gardens & Balconies	<50dB $L_{Aeq,T}$	<55dB $L_{Aeq,T}$

Noise between properties - sound insulation of any building

To minimise the disturbance by noise of future student occupiers of the units and its effect on neighbouring residents, student accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

Air Quality - Increased exposure (as noted in the emerging site allocation)

The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.

You will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.

Where the development involves converting an existing building and allowing a buffer zone is not an option then it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation. If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list:

Mitigation against increased exposure:

- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones - consider increasing distance of the building façade from very busy roads
- Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source

- Mixed use - locate any sensitive uses on higher floors, allowing commercial use on lower elevations
- Balconies - consider avoiding use in areas of exceedance, especially on ground and first floor level
- Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants

Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

You should submit a scheme demonstrating sufficient mitigation to protect the student units from poor air quality.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA), for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development is located within an air quality management area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

Mitigation against increased emissions:

- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant
- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Provision of cycling facilities / residents cycles
- Improvements to local public transport

It may be appropriate in some circumstances for you to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure. However, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design,

mitigation and where required planning obligations to be used to help improve local air quality.

Construction and demolition phases

Officers have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase. Alternatively this could be secured via pre-commencement condition.

The hours of noisy construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior approval from the Local Planning Authority.

It is also outlined that no materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development should be burnt on site.

Transport officer observations

The site is located to the north of Kings Road (A329), a major transport corridor into Reading. The site is accessed to the east of Rupert Street, which forms a left-in/left-out vehicle crossover with Kings Road (A329). The A329 Kings Road is a major bus route with bus stops located on both sides of the carriageway and dedicated bus lanes allowing for bus priority in both eastbound and westbound directions. The site is currently occupied by a two storey office building with 47 parking spaces. The proposals include demolishing the current Alexander House office building and redeveloping the site to create an eight storey, 178 bed student accommodation building.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. The parking standards set for Halls of Residence located in this zone are 1 space per FTE member of staff and no requirements for students. However, there are no adopted parking standards for student accommodation which are provided “off campus” and operate as independent providers of higher education accommodation. Therefore, an application of this type is likely to be considered on its own merits considering local circumstances, including access to public transport provisions and the availability of parking and on-street regulations.

It is proposed to provide 8 parking spaces at the rear of the site accessed via the existing access off Rupert Street. It is indicated that these spaces will operate as drop off spaces and will serve as an external amenity space when they are not in use.

In principle, this arrangement is acceptable (purely from a transport planning perspective) but a detailed Car Parking Management Statement should also be submitted to accompany the application to detail how the arrivals and departures of students will be managed at the beginning and end of term (this could be part of the student management plan or a standalone document). This is to ensure that students are provided with a sufficient number of dedicated spaces to drop off and get picked up with their belongings so as not to park on the surrounding streets.

In addition, you should confirm how many staff will be employed on site to ensure there is sufficient parking provision for staff parking and drop/pick up spaces.

In accordance with the Councils Parking Standards and Design SPD, students should be prohibited from bringing vehicles to the site and conditions would be secured which outlines that future occupiers will not be automatically entitled to a car parking permit in the area. Furthermore, this will stipulate that all material used for advertising or marketing the student residential units for letting or sale shall make it clear to prospective tenants and occupiers that they will not be automatically entitled to a parking permit, but any application for a parking permit will be considered on its merits.

The development will be required to produce a Travel Plan to encourage safe, healthy and sustainable travel options. The framework for the Travel Plan should be included in the Transport Statement to be submitted with the full application. It is likely that the travel plan will be secured via condition, including a requirement for the submission of and approval of monitoring information subsequent to occupation.

A detailed review of pedestrian, cycle and public transport infrastructure in the vicinity of the site should be included in the Planning/Transport Statement.

In accordance with the Council's Revised Parking Standards and Design SPD, the development would be required to provide 1 cycle parking space per 3 staff and 1 space per 5 students. It is indicated that the cycle storage will be located at basement floor level, although it is not abundantly clear how this will be accessed. The cycle store must be accessed from a levelled access with no steps or obstructions. It appears that the cycle store is access from the parking area at the rear of the site?

Bin storage should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods. It should be confirmed whether refuse collection will be undertaken by the Council or by a private contractor, and whether a refuse vehicle will venture into the site. A bin store is located at basement floor level but it is unclear how the bins will be transported to the refuse vehicles on collection days and whether this will result in the stationing of refuse vehicles on the highway for extended periods of time? This should all be

addressed if a full application is submitted. In any future proposal it is recommended that this guidance is followed.

A Construction Method Statement will also be required for this development. This would be secured via condition as follows:

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and been approved in writing by the Local Planning Authority to provide for:

- space on site where vehicles of site operatives and visitors can be parked with details of how site operatives and visitors will be required to make use of the parking area provided
- location on site for storage of plant and materials used in constructing the development
- the erection and maintenance (including removal of any graffiti or fly posters) of security hoarding around the site
- any footpath closures or road closures needed during construction
- wheel washing facilities on site
- a scheme for recycling waste resulting from the construction works

The measures within the approved Construction Method Statement shall be maintained and adhered to throughout the course of the development unless changes are agreed in advance and in writing by the Local Planning Authority.

You are encouraged to submit details at application stage to avoid the need for a pre-commencement condition.

As such, you are advised to carefully consider the proposals on the basis of these comments.

Ecology consultant's observations

The pre-application site comprises a detached building where it is proposed to demolish the existing office building and to erect a new student accommodation building. A previous application (ref: 162057) was granted for the erection of a basement and a four - seven storey building following the demolition of the existing basement and two-storey office building. Since the site is the same and the plans are similar, and the conditions at the site for wildlife are unlikely to have changed, the ecological reports submitted with application 162057 (Ecological Appraisal and Building Inspection Report: Ref P16/35 1A; October 2016 and Phase 2 Bat Survey Report: Ref P16/35 2A; October 2016) are still valid.

There were no ecological constraints to the previous application and as such, since the plans are similar, it would be no necessary to submit new ecological reports with an application. However, condition 6 for application 162057 would need to be added to any planning consent to ensure to enhance the wildlife in the area.

In summary, there would be no objections to this application on ecological grounds if submitted as shown.

Natural Environment officer observations

Kings Road is one of the principal vehicular routes in Reading, providing the main route from Reading to the east of the town and Borough. It supports an almost continuous flow of vehicles and buses which inevitably leads to daily congestion at peak times. As such, trees along the Kings Road are very important for the local environment and amenity of this area of Reading.

The trees adjacent to the highway also provide screening for residents living adjacent to the road. Kings Road is designated as an 'Existing or potential treed corridor' in the adopted Borough Tree Strategy and the Borough Council has a commitment to retain and enhance the tree cover along these routes.

Alexander House is also located in an area which has been identified in the Tree Strategy as having poor tree cover (10% or less). Objective 6 of the adopted Tree Strategy expects new development to make a positive and sustainable contribution in supporting the objectives of the strategy in enhancing the town's urban environment. Such planting should be used to enhance streets and other public realm as part of planning permissions for all new relevant developments, particularly higher density urban developments.

Alexander House currently has a broad landscaped area along the frontage of Kings Road approximately 11m deep (measured from aerial photos) on which is growing some low-level shrubs and two small trees. The new block including basement does not appear to be set much forward of the existing footprint therefore there is potential for new tree planting and landscaping along the front of the site. Additional landscaping is proposed along the boundary with Rupert Road.

The suitability of the proposals in tree / landscape terms will be dependent on adequate provision being made for a sustainable and robust scheme of landscape planting. New trees will need to be potentially tall growing specimens so as to not be dwarfed by the larger scale of the student block.

Archaeology

As per the emerging site allocation, development should take account of potential archaeological significance at the site. At the time of permission 162057 a desk-based assessment was submitted, with a pre-commencement condition secured as part of the permission. It is considered that at least a similar level of information will be required to be submitted with any application, with further information to satisfy the pre-commencement condition also submitted should you wish to avoid a similar condition being attached to any future permission. Berkshire Archaeology will be formally consulted at application stage.

Sustainability, Energy & SuDS

Given the nature of the proposals a sustainability statement, incorporating a BREEAM pre-assessment will be required to be submitted with any future application, to demonstrate how the proposals would seek to comply with policy CS1 and SPD requirements. You will note from

the SPD that for larger developments of more than 1000sqm of non-residential floorspace (given the proposed use will be sui generis student accommodation) there is a requirement for a minimum 50% BREEAM level 'Excellent' and remainder BREEAM level 'Very Good'. In addition, although the proposals should ideally meet the 50% excellent / 50% very good standard, as a minimum alternative, where the above split is not appropriate for the development, the SPD outlines that the proposal could instead achieve a BREEAM score of 62.5%.

Conditions as follows would be likely to be included on any future permission:

No development shall take place until a copy of an Interim BREEAM Certificate in accordance with the BREEAM Sustainability Standard demonstrating compliance with a minimum standard of BREEAM 50% Very Good, 50% Excellent rating has been submitted to and receipt acknowledged in writing by the Local Planning Authority.

No development shall be occupied until a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor has been submitted to and receipt acknowledged in writing by the Local Planning Authority, demonstrating that the development has attained as a minimum the standard set out in the Interim BREEAM Certificate referred to in the above condition.

Reason: To ensure that the development is carried out in accordance with sustainable building standards. RBCS Policy CS1 and SPD Sustainable Design and Construction (2011)

Furthermore, given the floorspaces involved, an energy efficiency statement will also be required in line with CS1 and DM2. Moreover, owing to the floorspace involved you should seek to explore decentralised energy options in the proposal too, with commentary provided to detail the technologies incorporated / not incorporated and reasons for this.

In relation to Sustainable Urban Drainage System Proposals (SuDS), as a major application you will be required to submit a SuDS strategy at application stage.

Section 106 Legal Agreement

Typically for student accommodation permissions in the Borough, the use as solely (sui generis) student accommodation is secured via legal agreement.

At this earliest of stages it is also noted that there is likely to be a requirement (via s106) for Employment, Skills and Training. Please see the specific SPD in relation to this matter for further details.

Please follow section 11 of the validation requirements in terms of the level / nature of information to submit to validate the application regarding the future s106.

Planning Performance Agreements (PPAs)

In line with paragraph 46 of the National Planning Policy Framework, the local planning authority encourages applicants to enter into PPAs (at pre-application, application and potentially post-application stages).

There are considered to be several benefits of a PPA. First it provides a structured framework for steering development proposals through all the necessary stages of identifying issues, consultation and negotiation in order to arrive at a well informed decision. Entering into a PPA also leads to a more collaborative approach between the developer and local planning authority in which issues, timescales, costs and requirements such as community involvement or specialist supporting evidence are agreed at an early stage. Furthermore, at application stage, it provides an alternative route from the standard 13 week time-constraint that would otherwise be imposed for determining Major Applications in line with Government targets. Should you wish to enter into a PPA at pre-application or application stage, please advise me accordingly and I can forward through further information as to the normal level/nature of information required within a PPA.

Public / stakeholder engagement prior to submission

The proposals are considered to be both of a scale and sensitive nature to necessitate engagement with the local community and other relevant stakeholders at pre-application stage (in line with paragraph 40 of the NPPF). Please see section 7 of the adopted [statement of community involvement](#) for more information in this regard. I look forward to receiving your project plan for pre-application involvement and consultation in due course, at which point I can provide comments and assistance in identifying and providing contact information for local representatives, groups and individuals who should be invited by you to become involved in the proposals. Your future application submission should include a specific section detailing the public / stakeholder engagement at pre-application stage.

CIL

The proposals would be CIL liable, with CIL having been introduced from 1st April 2015. Please see the website for further details, including the approved charging schedule and guide for applicants available in full [via this link](#). The 2018 CIL rate (including indexation) is £147.2941176470588 per sqm. This rate is likely to increase (through indexation) in 2019. It is noted that it appears that Alexander House is now vacant, so the CIL form needs to include specific details about the date in which the building was last occupied, should a discount on the CIL payment be sought owing to this.

Validation requirements

As per the validations checklist, it is advised that the following will be required with any future submission):

All relevant part 1 requirements (in particular a fully completed CIL form & SuDS information)

2. Air quality assessment
3. Archaeological assessment

5. Daylight/sunlight assessment
6. Ecological survey and reports (see ecology consultant comments above for more specific details)
7. Energy efficiency statements
9. External lighting
11. Heads of Terms proposal
12. Heritage Statement (including archaeology)
13. Landscape principles
14. Materials details
15. Noise & vibration impact assessment
17. Planning Statement
18. Plans and drawings (please refer to all bullet point requirements)
19. Superfast Broadband Strategy Statement
20. Sustainability Statements
22. Transport Assessment & Travel Plans
24. Utilities surveys and proposals
25. Vehicle (including cycle) parking and waste collection details
26. Vent/flue & ventilation details

Notwithstanding the above, based on this pre-application advice (and your submissions to date) the following will also be encouraged (not statutory requirements) in this specific instance:

- Loss of office use justification
- Assessment of need / availability of other sites regarding the proposed student use
- Student management plan
- Construction Method Statement (including noise and dust measures raised by Environmental Protection officers)
- Statement of community involvement
- Proposed elevation plans also showing the outline of the existing / approved massing
- Fire safety strategy
- Disabled access details
- Justification for any high level external amenity space

Concluding remarks

In conclusion, it is considered that there is uncertainty regarding the acceptability of the proposed student accommodation use at this time, owing to the emerging policy context (both in terms of the proposed use and the specific site allocation for residential use). This will obviously become clearer at the local plan examination and subsequent to this, and confirmed if/when the emerging local plan is formally adopted in due course. Notwithstanding this, it is considered that the proposed massing / detailed design will be required to developed further / refined, while there are numerous questions/queries related to the quality of the accommodation / impact on neighbouring occupiers at this time. There are also a number of other specialist areas where further detail will need to be demonstrated at application stage to justify the proposals. In addition, in this case it is particularly important for public / stakeholder engagement prior to submission too.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council, in the event of a formal application for planning permission. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council.

Yours sincerely

Jonathan Markwell

Jonathan Markwell
Principal Planning Officer

Appendix C - Design Review Panel Response

Reading Design Review Panel Comments

Application No. 181289/PREAPP

Listed Building: Yes/No

Conservation Area: Yes/No

Proposal: Pre Application submission for demolition of existing office building and to construct a new student accommodation building (180 bed, up to 8 storeys in total).

Location: Alexander House, 205-207 Kings Road, Reading RG1 4LS

Site/Context	Building	Sustainability	Detailing	Design Approach
Street pattern	Character	Energy	Functional	Response to context
Orientation	Feel	Materials	Simple	Scale /Massing
Landscape	Layout	Water	Weathered	Quality
Topography	Function	Habitats	Structural honesty	Legibility
Pedestrian routes	Outlook	Microclimate	Historically correct	
Vehicle circulation	Appearance	Access	Texture	
Scale	Transitions	Health	Pattern	
Simplicity	Public/ private	Waste	Durability	
Historical context	External storage/ amenity	Reuse		
Neighbourhood	Cycle / car parking	Inclusivity		
Public realm				

Planning Status / Context / Legislative Guidance

- LDF Core Strategy, Sites and the Detailed Policies, Altered documents and Emerging Policy re. Student Housing etc. as set out in Council's Pre Apps notes.
- Applicant's design has evolved further submissions/ conversations with the Council prior to presentation to DRP.
- DRP asked to consider scheme design at this stage, not to comment on detail design or appropriate land Use or other issues.

Information Received

- Pre application notes received by DRP in advance of meeting.
- Applicant's team presented Report and responded to questions during the session.

Site / Context

- Setting is critical to the building landscape etc. Kings Road does not have a coherent character, other than at West End where Georgian Townhouses / Church.

Building

- The Applicant's architect's advised that their brief is to design for collaborative learning as much as accommodation of students. With this in-mind the design has evolved from 100% studios to ensuite bedroom clusters with more generous living/ learning facilities.
- The building is conceived as one main corner with subordinate blocks.
- The regular floor plan is generated by function and these functions are expressed in the elevations.
- The DRP is supportive of the generous habitable ramp at the front of the scheme, however, the design could be developed to improve the quality of the seating/ lunch space for eating and amenity use by occupants. i) Kings Road is a busy and noisy road with significant passing traffic and the next stages of the design will need to carefully address this e.g consider more transitional or defensible space. ii) The high level seating area could be widened and the relationship between the internal and external spaces improved to achieve better connectivity.
- Re. floor plans, it is understood that the Basement gym and cinema are not light critical. However as this level is just 1.7m below ground there are opportunities to improve the quality of the space, provide natural light and visual connection e.g. MICA's Queen's College New Library and Archive and similar schemes where natural light is brought into below ground spaces and activities are linked or visible to/from amenity areas.
- As with the point above, the quality of the landscaping to the rear is crucial to ensuring that the Basement and Ground Floors are successful and the spaces are properly connected. Nb. the on-site facilities are mainly on the Ground Floor and as such interconnectivity is key.
- Materially, the Berkshire red bricks with zinc as the subordinate /separating element is supported . Within the grid there are a few examples where the kitchen breaks out at the south and west elevations, however, the kitchens to the corner of the building are slightly problematic.
- The highly glazed facade at the entrance bay is considered appropriate and helps to sign post the corner etc.
- The massing of the building is uncontentious and respect is given to neighbouring buildings, including Saxon Court. The forms are repetitive and the 6th Floor is set back substantially.
- The DRP questioned the rooms over the sub station, they emphasise the slightly foreign nature of this block and the step is overly dominant in an otherwise elegant elevation. Our conclusion was that either pushing this element back in elevation or adding rooms above would achieve a more balanced elevation. Adding rooms i.e. another storey above would align with Saxon Court. It is understood that this is a matter for the Planning Officer. Alternatively it is suggested that the bedroom switch location with the kitchen at first floor thus the window to the elevation would not be necessary.
-

Sustainability

- To be developed and addressed further at later stages of design.

Detailing

- As mentioned above the Berkshire red / zinc is supported in principle.
- How the columns are clad, the facade steps back etc. are all critical to achieving articulation and quality, however, it is understood that the details are still being developed and conclusions have not yet been arrived at. e.g. the detail included on page 47 of the Report indicates the set back for relief of the primary grid around column, this is set back to provide shadow line.
- This is not a landmark building, rather it is to be a high quality contextual building, providing granularity. This is particularly evident in sketches on page 39. The restrained treatment of the building is to be continued throughout the detailing.
- Re. Street level views on page 39, it is noted that the deliberate box at the end over the site entrance could be stronger, the stepping down is not considered necessary by the DRP.

Design Approach

- Overall the scheme is very elegant.
- The nature of Kings Road, in particular the usability of the space at the entrance needs to address the competing demands of access landscape and design. It is noted that the design for this area is considered by the Applicant to be an entry point illustrating a direction of travel etc.
- Ground floor student units will need to be considered carefully.
- Access to outdoor space to the rear could be improved, more amenity would be preferred by the DRP. Currently there is a potential conflict with vehicles and impact of accommodation here. The Applicant advised that there are only spaces for operational cars. It would be a shame to under utilise the space, the amenity opportunity and the impact on neighbouring properties.

Any further comments

- Generally we would support this scheme, it appears to be an improvement on the previously consented scheme and we look forward to seeing the design development following these pre application conversations.

Date: 15.11.2018

Signed

On behalf of the Reading Design Review Panel

**Appendix D - Statement of Common Ground between the University of Reading and
the Council**

READING BOROUGH EMERGING LOCAL PLAN

Statement of Common Ground between the University of Reading (The UoR) and
Reading Borough Council (The Council)

November 2018

INTRODUCTION

- 1.1 The Statement of Common Ground (SoCG) has been prepared jointly by Barton Willmore on behalf of the University of Reading (UoR) and Reading Borough Council (the Council). This follows the request of the Planning Inspector (Louise Gibbons) holding proceedings for the examination of the submitted version of the emerging Reading Local Plan.
- 1.2 The UoR's main Whiteknights Campus is partially within Wokingham Borough Council's (WBC) area. A number of other UoR-owned and operated sites are also within Wokingham. As this SoCG is in response to a specific request from the Inspector, WBC are not a party to it. However, WBC have been provided with a copy, and will be a key partner in moving forward with any agreed actions.
- 1.3 There are four remaining matters of uncommon ground, which are: the capacity of bedspaces on site ER1e (St Patrick's Hall, Northcourt Avenue); the wording and sustainability appraisal of Policy H12, though the parties have agreed proposed changes to the supporting text; the need for increased flexibility in Policy CC3; and the need for increased flexibility in Policy EN14. The differences are in the section on each matter alongside the common ground which has been reached on all other matters arising from the University's representations to the emerging draft Local Plan.
- 1.4 The SoCG follows the following sub-sections;
- a) Sustainability Appraisal
 - b) Housing Land Supply and Site Capacity
 - c) Cross Cutting Policies
 - d) Environmental Policies
 - e) Housing Policies (including draft Policy H12)
 - f) Issue 13 – Caversham and Emmer Green
 - g) Issue 14 – East Reading

Sustainability Appraisal

- 1.5 The SoCG addresses;

- how Policy H12 has been tested by the SA

Housing Land Supply and Site Capacity

1.6 The SoCG covers the following matters;

- The wording of draft Policy ER1e in terms of the capacity of the site;
- Agreement on the wording of draft Policy ER1c to consider the capacity of the site and the potential for inclusion of student accommodation and academic uses.

Cross-cutting Policies

1.7 The SoCG covers the following matters;

- The wording of Policy CC3 to ensure appropriate levels of flexibility;
- The reference to contributions to monitoring in Policy CC9.

Environmental Policies

1.8 The SoCG covers the following matters;

- The wording of Policy EN14 to ensure appropriate levels of flexibility;
- The request for additional information to support the requirement of Policy EN17.

Housing Policies

1.9 The SoCG agrees that;

- Policy H5 would not apply to student accommodation.

1.10 Specifically in relation to draft Policy H12 and the evidence submitted by the UoR, the SoCG considers the following issues, and agrees a way forward for considering these issues;

- The growth in student numbers from the UoR and the need for further student accommodation;
- The capacity of the UoR campus to accommodate further student accommodation and the scope of opportunities on adjacent land to accommodate student accommodation;
- The benefits of PBSA versus HMO student accommodation;
- The benefits PBSA can make in terms of decreasing HMO demand from students;
- Any proposed changes to the supporting text to Policy H12;

- Identifies the remaining uncommon ground between the parties in relation to Policy H12.

1.11 In relation to draft Policy OU1, the SoCG agrees on;

- Proposed changes to Policy OU1 to reflect that not all development by the UoR within existing campus locations would generate an increase in student numbers.

Caversham and Emmer Green

1.12 The SoCG will agree wording for draft Policy CA1a, as set out within the UoR Hearing Statement for Issue 13, agreed in principle with the Council prior to the commencement of the EiP hearing sessions.

East Reading

1.13 The SoCG agrees the following;

- the wording of Policy ER2, in order to be consistent with changes to policy OU1;
- changes to the boundary of the areas of biodiversity importance on the Proposals Map, to the immediate East of the Mackinder Halls development.

SUSTAINABILITY APPRAISAL

- 2.1 The UoR made representations on the **Sustainability Appraisal of Policy H12 (Student Accommodation)** at Pre-Submission stage, and reiterated these points in the hearings on 25th September, specifically that option iii appraised does not appear to match the policy as drafted.
- 2.2 The Council's response remains as set out during the hearings on 25th September, and in the response to Pre-Submission representations from the UoR and Studios (see pages 400-409 of the Statement of Consultation on Pre-Submission Draft Local Plan, LP006), that there had been a mislabelling of the title of the option in the Sustainability Appraisal, and that it should have read 'adjacent to' rather than 'close to'. However, the actual appraisal relates to the policy as proposed.
- 2.3 In terms of whether a distinct option should be appraised that would reflect the wording changes to H12 proposed by the UoR, i.e. that student accommodation should be located on university or accommodation sites or other sustainable locations with convenient access, the Council maintains its position expressed in the hearings, that there is no practical difference between this and the 'no policy' option, because at the current time, without locational policy, student accommodation is being delivered close to the university and in the town centre in any case.
- 2.4 The UoR therefore maintains its position on the Sustainability Appraisal of H12, because the Council is not able to evidence that this was the way in which the draft policy was assessed, and the Council accepted in the Examination hearing that there was a difference between 'adjacent' and 'close to'. Both parties note that any main modifications to this policy or its supporting text will need to be supported by a review of the Sustainability Appraisal in any case.

HOUSING LAND SUPPLY AND SITE CAPACITY

- 3.1 In relation to site **ER1e (St Patrick's Hall, Northcourt Avenue)**, the parties agree that the St Patricks Hall site is the only specific UoR-owned site that has been identified by the parties as able to come forward immediately to meet a large part of the urgent need for an additional 1,000 bed spaces to allow UoR to accommodate first year students and to support the University in meeting its first-year guarantee (detailed at paragraph 6.9 of this SoCG).
- 3.2 The UoR has proposed that the dwelling capacity set out in the policy should be increased to 654 additional bedspaces. This would be in line with planning application 172045. However, on 23rd February 2018, this application was refused by Reading Borough Council. The Planning Applications Committee Report and Minutes have been added to the Examination Library as EC020, and these contain the reasons for refusal. An appeal was lodged on 7th September 2018.
- 3.3 The parties have not been able to reach agreement on changes to the dwelling capacity on this site, and both parties maintain their positions set out in Pre-Submission comments/Council responses to comments, responses to examination issues (see EP007 and EC005) and as stated during the hearing sessions themselves. The University seeks to reflect discussions at hearing session 3 and proposes that the upper range of bed spaces is increased to 654. The lower range would remain, indicating a broader potential range that is to be tested through the planning application process. The Council is concerned that the case for this level of development has not been made, as illustrated by the recent refusal. The parties await the outcome of the planning appeal. The University's concerns regarding the Local Plan as drafted with regard to the capacity for St Patricks Hall are set out in Appendix 1.
- 3.4 In relation to site **ER1c (Land rear of 8-26 Redlands Road)**, in discussions at the hearings on issue 3 on 26th September, the UoR argued that this site would be capable of accommodating up to 20 dwellings. In discussions on issue 14 on 5th October, this was reiterated, and it was further argued that there was potential for student accommodation or academic use within the site. The Council has considered the analysis of the site within the Campus Capacity Study submitted alongside the UoR's Response to Issue 7 (EP017), and, although it is not in a position to endorse specific options presented in that document, it agrees that it has been demonstrated that there is potential to accommodate up to 20 dwellings, and that, given that the site contains existing student

accommodation, there should be flexibility for student accommodation or other university uses within the site boundaries. Both parties therefore agree that the following change should be made to policy ER1c.

Document Reference	Reason	Change
Page 207 Policy ER1c	To reflect the potential for continuing use associated with the University as proposed in the University of Reading's Response to Issue 3 and in light of the University Capacity Study demonstrating a higher site capacity	ER1c LAND REAR OF 8-26 REDLANDS ROAD <i>Development for residential, <u>with potential for student accommodation or university uses reflecting the existing student accommodation use on the northern part of the site.</u></i> Development should: • <i>Make a positive contribution to the conservation area and to the setting of adjacent listed buildings;</i> • <i>Take account of potential archaeological significance;</i> • <i>Retain the wall fronting Morgan Road; and</i> • <i>Retain mature trees on the site and provide for a north-south green link, which will reduce the amount of the site that can be developed and will particularly limit development behind 14-24 Redlands Road.</i> Site size: 0.74 ha 12-18<u>20</u> dwellings

CROSS-CUTTING POLICIES

- 4.1 In relation to **Policy CC3 (Adaptation to Climate Change)**, the parties have not reached agreement on the need for changes to be made. The Council maintains its position that no change is necessary to make the policy sound. The UoR maintains its position that a change is required to allow sufficient flexibility, as discussed during the hearings session on Wednesday 26th September. The UoR considers that the following change would resolve the objection to this policy.

Document Reference	Reason	Change
Page 23 Policy CC3	To reflect circumstances where this may not be achievable as discussed at hearings on 26 September.	CC3: ADAPTATION TO CLIMATE CHANGE <i>All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development <u>wherever possible</u>:</i> • <i>New buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;</i> • <i>Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;</i> • <i>Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and</i> • <i>All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.</i>

- 4.2 In relation to **Policy CC9 (Securing Infrastructure)**, the UoR's Response to Issue 4 (EP011) reiterated the UoR's representations at Pre-Submission stage in proposing a change to the requirement for contributions towards monitoring, in line with a 2015 High Court decision. As discussed during the hearings session on Wednesday 26th September, the Council agrees that deletion of this requirement would reflect that decision. Both parties therefore agree that the following change should be made to policy CC9. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 32 Policy CC9	To reflect most up-to-date case law, as set out in University of Reading's Response to Issue 4 (EP011)	“Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.”

ENVIRONMENTAL POLICIES

- 5.1 In relation to **Policy EN14 (Trees, Hedges and Woodlands)**, the parties have not reached agreement on the need for changes to be made. The Council maintains its position that no change is necessary to make the policy sound. The UoR maintains its position that a change is required to allow sufficient flexibility, as discussed during the hearings session on Thursday 27th September. The UoR considers that the following change should be made to ensure that the policy is sufficiently flexible. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 55 Policy EN14	To reflect circumstances where tree planting may not be possible on or off site as discussed at hearings on 27 September.	<i>“New development shall make provision for tree retention and planting <u>where possible</u>, within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.”</i>

- 5.2 The UoR objected to the requirement in **Policy EN17 (Noise-Generating Equipment)** for the noise source specific rating of new equipment to be at least 10dBA below existing background levels. The Inspector has requested additional information on the reason for this level, and both parties understand that further consideration of this policy will be dependent on that information. No changes are therefore agreed in this Statement.

HOUSING POLICIES

Policy H5 – Standards for New Housing

- 6.1 In relation to **Policy H5 (Standards for New Housing)**, both parties agree that in terms of the housing standards, paragraph 4.4.36 confirms that Policy H5 would not apply to student accommodation.

Policy H12 – Student Accommodation

- 6.2 There was considerable discussion during the Examination hearings around the issue of provision of student accommodation. This included substantial information submitted within responses to examination issues. This matter was the main reason that the Inspector requested that a Statement of Common Ground be completed between the UoR and the Council.
- 6.3 The UoR's position in summary is that there is a substantial existing shortfall in purpose built student accommodation (PBSA), which is expected to worsen with growth in student numbers. The UoR therefore considers that the Council's draft policy position in H12, which directs new student accommodation to existing university or student accommodation sites in the first instance, is unduly restrictive and there should be greater flexibility to include other sustainable locations which are accessible to the relevant institution. New PBSA can make a contribution to housing supply through releasing existing homes occupied by students into the general market.
- 6.4 The Council's position in summary is that, given the limited range of potential development sites to meet general housing needs, exacerbated by the fact that the Local Plan already fails to meet the whole objectively assessed need for housing, there is significant concern about loss of housing sites to student accommodation. This is a trend which is already apparent in parts of Reading, particularly the town centre. The Council considers that the quantitative need for new PBSA is not as clear-cut and consistent as for general housing, and that housing ought to have priority on those sites where there is likely to be competition. Whilst new PBSA can free up existing homes, it cannot make as great a contribution to housing supply as general housing on those sites, and makes no contribution to the Borough's significant affordable housing needs. The Council's view is that sufficient flexibility already exists within policy H12 to demonstrate a need for student accommodation that cannot be met on existing university or accommodation sites on a case-by-case basis.

- 6.5 The UoR submitted two documents as appendices to its Response to Issue 7 (EP017), an Accommodation Strategy Part 1 and a Campus Capacity Study, and the Inspector specifically asked that this Statement covers those two documents.

Accommodation Strategy Part 1 – Gap Analysis, September 2018 – Cushman and Wakefield

- 6.6 The Accommodation Strategy Part 1 – Gap Analysis (referred to as URAS here) seeks to outline the scale of undersupply of student accommodation and determine the best approach to meeting existing and forecast demand.
- 6.7 The University is a global top 200 UK institution which attracted 14,005 full-time students in 2016/17 and has grown student numbers by 22% over the last 5 years and contributes some £650m annually to the local economy and employs over 3,700 people. This growth has been accelerating since changes to the tuition fee system and the removal of Student Number Controls which has created competition for students, coupled with record numbers of 18-year olds applying for higher education places.
- 6.8 The URAS identifies that student numbers have grown 28% between 2007/8 and 2016/17 (over four times the 5% national average), and that over recent years, UoR accommodation has experienced 100% occupancy, with a significant waiting list. In terms of student origins, in 2016/17 28% of the student body came from outside the UK, reflecting the importance of the University's global engagement strategy to maintain and grow its international reputation. For the same year, the University recruited 74% of its students from outside the South East.
- 6.9 The lack of available student accommodation to meet this growth means that the University is unable to meet its first-year student guarantee (students will be guaranteed a place in a hall of residence if they are a new undergraduate or postgraduate (i.e. not a returning student) who confirms the University of Reading as their firm (first) choice institution, and applies for accommodation before the 1st August in the year of entry and who makes all terms of their academic offer by the 31st August in the year preceding entry). Over 1,000 first year students have been unable to secure a bed in 2017/18. Across all years of study, for 2017/18, 5,000 students were unable to find a bed in PBSA, although it should be noted that this does not take account of whether PBSA would be the preference of all of those students. Lack of supply, in particular for first year students, risks damaging the University's reputation over the longer term, and causing harm to the

student experience of those who are forced to seek often low-quality HMO accommodation.

- 6.10 The Council has not been in a position to verify the exact figures taking account of existing supply and the planning pipeline, but does not have particular reason to doubt the general scale of existing shortfall identified. It should be noted that the shortfall mainly results in students housed within the private rented housing market, including within HMOs.
- 6.11 In terms of future growth, p46 of the URAS states that the UoR expects to grow from just over 16,000 students in 2017/2018 to 21,000 students by 2028. This represents a 31% growth over ten years. This growth would mean that the shortfall in meeting the first year student guarantee would rise to over 2,000 students by 2020/21 and over 3,000 by 2028/29. This widening gap between demand and supply is illustrated on p47 of the URAS. Moreover, an increased number of students without an increased supply of appropriate student accommodation would inevitably increase demand for HMOs. Across all years of study, by 2028, the number of students across all years who are unable to be accommodated within PBSA would rise to 12,865. Without enough purpose-built student accommodation, this will further increase HMO demand. As well as having very substantial implications for the demand for accommodation in Reading and Wokingham, such growth would mean a wide range of other significant implications for both authorities.
- 6.12 These growth expectations, or anything on this scale, had not been highlighted to the Council before the submission of the UoR's Response to Issue 7 in September 2018, and as such were not anticipated in the Local Plan. The Council has strong concerns about the implications of this level of growth, as expressed by the Council during the hearing sessions on Issue 7. The Council's views on the URAS are set out in Appendix 2. Appendix 2a does not constitute an agreed statement but is the Council's response to the Capacity Study and has been included for completeness alongside a clarification response at Appendix 2b provided by the University which again does not constitute an agreed statement. The parties agree that it is not reasonable to expect that this version of the Local Plan could take account of that level of growth.
- 6.13 Therefore, the Council and UoR, along with Wokingham Borough Council, need to continue to work together outside the Local Plan process to test these growth expectations and examine their implications, including consideration against the policy position in policy OU1 of the Local Plan which expects new academic development which generates a demand for additional student accommodation to be supported by appropriate growth in

accommodation. The UoR and Council, as well as WBC, will need to meet on a regular basis, at least twice a year, to keep these matters under review. Such joint working could aim towards an agreed document, such as a vision or agreed set of principles for the UoR's role in the town.

- 6.14 The Council and UoR agree to monitor the most up-to-date shortfall of PBSA. The Council's Annual Monitoring Report (AMR), published in December each year, provides an opportunity to identify the amount of bedspaces in PBSA in Reading Borough during the monitoring year, and compare this to the number of students enrolled for the academic year, as provided by UoR (and other local higher education providers), as well as the number of new students that would arise from permitted academic floorspace. This would include the number to which the UoR's accommodation guarantee would apply. The AMR could then provide part of the basis for assessing the clause within H12 regarding whether there is a need which cannot be met in the preferred locations, although it will also need to be considered alongside future growth.
- 6.15 Over time, the monitoring of the shortfall will feed into the five-yearly review of the Local Plan, and the Council will need to consider whether it results in a need to revise policy H12. This decision will also take account of the ongoing discussions around proposed UoR growth levels, as well as its location and timescale for delivery, including any agreed outputs from those discussions.
- 6.16 With regard to the existing difficulties in accommodating students which have been identified in the URAS, both parties agree that it would be reasonable for the supporting text to policy H12 to refer to the headline figures set out, namely the inability to fulfil the first year accommodation guarantee and around 1,000 first-year students being unable to secure a bed in 2017/18, and the overall amount of students currently not in PBSA of around 5,000.
- 6.17 The following change is therefore proposed by both parties to address this.

Document Reference	Reason	Change
Page 94-95 Paragraphs 4.4.95-4.4.98	To be more precise about existing need for student accommodation	"4.4.95 Reading has a strong student population, drawn by the University of Reading and also by Reading College. This population brings many benefits to the area, in terms of supporting services and facilities, and means a strong supply of well-qualified people, many of whom remain in the Borough after graduation and make a major contribution to its economic success. It is important that sufficient accommodation is provided to enable students to live close to where they study. The Council particularly

		<u>recognises the benefits of purpose-built student accommodation where there is a partnership arrangement with a further or higher education institution and where it offers accommodation that meets the needs of students in terms of facilities, convenience to places of study and in terms of the cost of accommodation.</u> 4.4.96 The SHMA (2016) looked at the issue of need for additional student housing. It anticipates a growth in student numbers at the University of Reading from 13,135 in 2015 to 16,095 in 2018. However, the SHMA notes that, as this is in line with historic high student numbers, that it should not result in the need for significant new accommodation. More recent evidence from the University indicates that this growth, <u>underpinned by changes to the tuition fee system and the removal of student number controls, will have</u> indeed generated a need for new accommodation. <u>In 2016/17, 74% of students were from outside the South East, and 28% were from outside the UK, and these groups are particularly reliant on student accommodation. There is current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation.</u> <u>4.4.97 It is considered that this existing need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence, subject to considerations of amenity and character. The St Patrick's Hall site has been identified in policy ER1e as such a proposed site. Its delivery will help to address the student guarantee (where first year students who have the University as their first choice are guaranteed accommodation). Additional accommodation beyond this will need to demonstrate why it cannot be met on those sites.</u> <u>4.4.978 However, the need for student accommodation is highly dependent on any expansion of the University. Whilst the University's plans for the next five years are clear, the intentions up to 2036 are less so, and there is therefore potential for change in later parts of the plan period. The University has expressed intentions for significant growth in student numbers up to 2028. Where such growth requires planning permission, it will need to be tested against policies OU1 and, depending on location, ER2, to ensure it can be supported by appropriate student accommodation. The need for future expansion of accommodation will therefore need to be kept under review.</u> <u>4.4.989 The provision of new student accommodation needs to be balanced against other types of housing. Whilst it is likely that purpose built student housing, where it is affordable to those students currently in HMOs, can free up some existing homes to meet more general needs, and there is evidence that in those recent years where numbers</u>
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		<u>of students in HMOs have dropped, this has coincided with the opening of large new on-campus student accommodation blocks. However, the Council considers that</u> there are many sites where development for students prevents a potential housing site being used to help to meet the more pressing needs for general housing, including affordable housing. Development for students should therefore be <u>limited to prioritised towards</u> established student locations, unless a specific need for a development in a certain location can be clearly demonstrated.”
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Campus Capacity Study, September 2018 – Barton Willmore

- 6.18 The Campus Capacity Study seeks to quantify the potential capacity of the University’s existing sites to accommodate additional academic and residential development. Its conclusions are that, in capacity terms, but without detailed design work, it is possible (subject to detailed design and layout) to accommodate c.1,900 new student bedrooms on University landholdings, on or adjacent to the London Road and Whiteknights campuses including the identified St Patricks site. The potential sites identified on the Whiteknights campus will be considered for future development, however many of the sites are not immediately available and will form part of the University’s longer-term future planning for the campus.
- 6.19 At this stage, there is not a full agreement on the conclusions of the Campus Capacity Study in terms of the amount of development that could be accommodated. The Council’s views on the Study are set out in Appendix 3. Appendix 3 does not constitute an agreed statement but is the Council’s response to the Capacity Study and has been included for completeness.
- 6.20 However, both parties agree that, whilst there is significant remaining capacity on the Whiteknights campus for additional development, the constraints of the site, including open space, protected trees and habitats and heritage assets, mean that there are limits to this capacity.
- 6.21 However, both parties recognise that to accommodate the level of growth to 2028 envisaged in the URAS, levels of growth around which the Council has significant concerns as expressed in paragraph 6.12 and at the hearings, it is unlikely that there would be capacity within or adjoining existing University campus and student accommodation sites to provide the necessary level of supporting student accommodation.

- 6.22 Both parties also agree that the Campus Capacity Study forms a valuable first step towards the development of a replacement Whiteknights Development Plan or framework for the University campus, and agree to work together along with Wokingham Borough Council to work towards such a document.

Evidence on the Link between PBSA and HMOs

- 6.23 During the hearings on 28th September, the Inspector requested that evidence be provided to demonstrate the relationship between the provision of purpose built student accommodation (PBSA) and the number of students living in houses in multiple occupation (HMOs). This information is largely set out within the URAS, an appendix to the UoR's Response to Issue 7.
- 6.24 In summary, the information submitted by the UoR details that significant recent growth and the limited availability of purpose-built student accommodation that students can be offered has increased pressure on the local housing market through greater demand for HMO accommodation. Consequently, the number of students living in HMOs has grown by 750 in the past two years. Since 2011/12, there has been an increase of at least 915 students living in HMOs. Figures for total recorded students residing in HMOs (as not all HMOs are officially registered with the Council) during 2016/17 reached just under 1,600 students (911 HMO registered properties).
- 6.25 Given the notable impacts on a local community from HMOs and the projected significant growth in HMO occupation, it is useful to highlight data that tests whether the number of students in HMOs can be reduced through the efficient provision of beds within purpose-built accommodation (i.e. increased density of students within effectively managed accommodation). On page 41 of the URAS this theory is tested. Only in two years between 2010/11 and 2016/17 were student numbers in HMOs found to have dropped. These two reductions coincided with the opening of two large student accommodation blocks (Childs Hall in 2012 with 594 beds, and Bridges Hall in 2014/15 with 649 beds), demonstrating a clear student preference for purpose-built student accommodation, where it is available.
- 6.26 The Council wishes to qualify the comments above, in that in its view the relationship between PBSA and HMO occupation depends in large part on the form and cost of PBSA accommodation. This is explored in more depth in the Council's views on the URAS in Appendix 2a.

- 6.27 Therefore, in order to reduce any undesirable impacts from students residing in HMOs, free up existing HMO housing stock to the open market and effectively manage student behaviour, there is a clear need to support the provision of purpose-built student accommodation on appropriate sites providing a range of different types of accommodation at different cost levels to the students that need accommodation. The Council's view is that these benefits are in large part related to affordability of the PBSA.
- 6.28 Both parties agree that there is a clear relationship between the two types of accommodation, and that it is clear that, where there is insufficient provision of PBSA, there would tend to be a greater number of students in private housing including HMOs, with knock-on effects for provision of family housing. The Council is concerned with the amount of small HMOs in the C4 use class in close proximity to the UoR's two campuses, and this was the main reason for making an Article 4 Direction covering parts of Katesgrove, Park and Redlands wards, in 2012. This aspect of the discussion is not therefore a matter of general dispute between the parties, although the Council is keen to emphasise that it considers that the relationship is dependent on matters such as rental levels.

Overall Conclusions on Policy H12

- 6.29 Both the UoR and Council maintain their positions in respect of the approach of **Policy H12 (Student Accommodation)**, as articulated in Pre-Submission comments/Council responses to comments, responses to examination issues (see EP017 and EC009) and as stated during the hearing sessions themselves. These positions do not need to be summarised here. As such, there is no agreement on changes to H12, other than to the supporting text outlined above.
- 6.30 However, both parties agree to continue to work together to understand the implications of any growth of UoR and its implications for Reading, not only in terms of student accommodation but for all other matters.

Policy OU1

- 6.31 In relation to **Policy OU1 (New and Existing Community Facilities)**, and as discussed during the hearings session on Tuesday 2nd October, the parties agree that a change can be made to ensure that the policy takes account of instances where new University development would not result in a need for additional accommodation. This change would resolve the UoR's objection to this policy.

Document Reference	Reason	Change
Page 115 Policy OU1	To take account of development that would not generate a material need for new accommodation as discussed at hearings on 28 September.	<i>“OU1: NEW AND EXISTING COMMUNITY FACILITIES</i> <i>Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that <u>it would not lead to a material increase in the need for student accommodation, or that additional students can be housed in it will be supported by an appropriate increase in existing or planned student accommodation.</u>”</i>
Page 116 Paragraph 4.7.9	To reflect changes to Policy OU1 set out above.	“However, it must be recognised that further and higher education expansion can put pressure on the housing market, through students being housed in existing dwellings, or through new student accommodation on sites that could otherwise be used to address the general housing need. Given the scale of the need for new homes in Reading, this must be carefully managed. Therefore, applications for academic development that would bring additional students to live in Reading must lead to a material increase in additional students needing student accommodation should be paired with supported by an corresponding appropriate increase in dedicated existing or planned student accommodation. This should be on existing campuses or existing student accommodation sites, considered in line with policy H12.”

CAVERSHAM AND EMMER GREEN

- 7.1 The UoR suggested a change in their Response to Issue 13 (EP030) regarding site **CA1a (Reading University Boat Club)**, to ensure that the policy allows for the retention of the boat club. As stated in the hearings on 4th October, the Council agrees that the change allows for the appropriate level of flexibility. Both parties agree that the change proposed in the UoR's response, as set out below, should be made.

Document Reference	Reason	Change
Page 198 Policy CA1a	To allow for retention of the Boat Club, as proposed in the University of Reading's Response to Issue 13	<i>"CA1a READING UNIVERSITY BOAT CLUB, THAMES PROMENADE</i> <i>Development for residential, subject to relocation of the boat club. Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy."</i>

EAST READING

- 8.1 The UoR has proposed changes to **paragraph 9.2.7** and **Policy ER2 (Whiteknights Campus, University of Reading)** that would be in line with the UoR's proposed changes to policy H12. However, as no agreement has been reached on changes to policy H12, no agreement has been reached on these additional changes.
- 8.2 In addition, the University proposed a change to Paragraph 9.3.2 to omit reference to indicative maximum capacity. This would be a change that would need to be reflected in the supporting text to similar policies across the document. As requested by the Inspector, the Council has produced a note on the approach to dwelling ranges (EC021), which sets out the Council's preferred approach. This issue is not therefore agreed as part of this SoCG.
- 8.3 The University considers that the omission of the indicative maximum capacities referred to a paragraph 9.3.2 is entirely consistent with Note EC021. Paragraph 3.1 of the Note reflects the Issue 3 hearing discussion, where it states that "the Council has previously permitted applications with dwelling numbers exceeding the figures set out in development plan policy". Paragraph 3.2 of the note advocates the potential "to take all references to development levels (both residential and commercial) out of the policy and include them within a table in the supporting text". The University supports this change. If this amendment is made, it follows that reference to indicative maximums should also be removed from paragraph 9.3.2, which is currently contrary to the statement made at paragraph 3.1 of the Note and discussion the Issue 3 hearing discussion.
- 8.4 The changes to policy OU1 set out in section 6 would result in the need for consequential changes to **Policy ER2 (Whiteknights Campus, University of Reading)**. The need for these changes was highlighted in the UoR's Response to Issue 14 (EP031). Both parties agree that the change set out below, which reflects the proposed change to OU1, should be made to address this issue.

Document Reference	Reason	Change
Page 211 Policy ER2	To bring the policy into line with the wording of OU1, as discussed at hearings on 5 October.	<i>"Where development would result in the <u>material</u> need for additional students to be housed in Reading, it should be supported by an appropriate corresponding increase in <u>existing or planned</u> student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated</i>

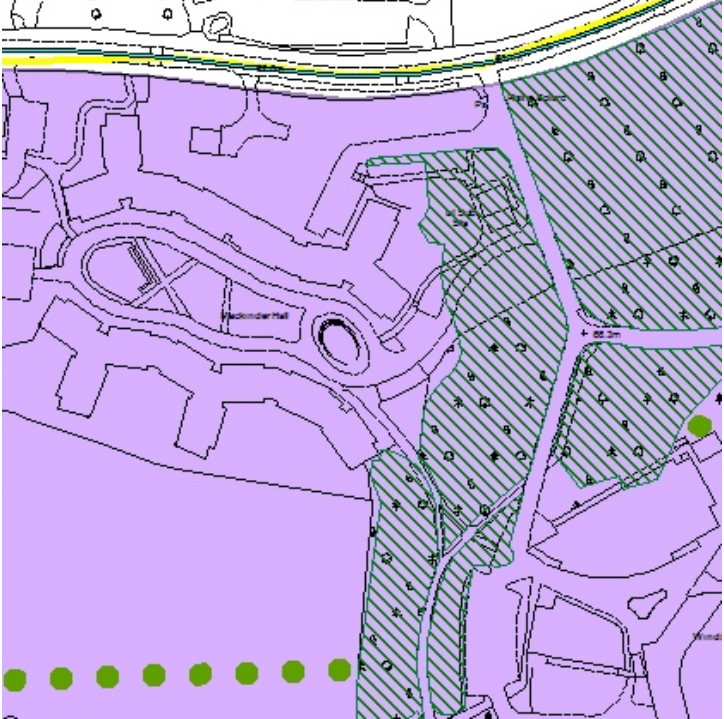
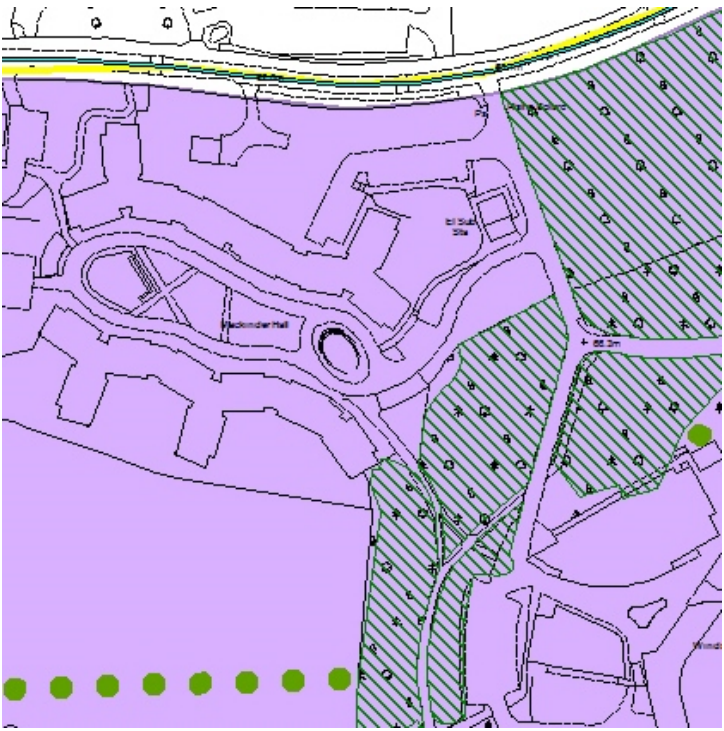
		<i>accommodation, will therefore be acceptable subject to other policies in the Plan.”</i>
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- 8.5 The changes to the supporting text to policy H12 would also need to be reflected in some additional changes to the supporting text to the section on East Reading. Both parties agree that the changes set out below should be made to address this.

Document Reference	Reason	Change
Page 205 Paragraph 9.2.7	To indicate the relationship between University growth and student accommodation	“The University of Reading is a vital part of Reading’s economy and life, and there will continue to be a need for development to support that role at its main Whiteknights campus, as well as its secondary campus at London Road. This development will be supported, where it does not result in significant adverse effects. However, there is clearly an issue around accommodating students in the area, with many of -existing homes in the area now occupied by students, and therefore concerns about various possible effects such as noise, parking and the sustainability of local services with less accommodation available for families. For this reason, an increase of purpose-built student accommodation is needed, but this <u>Council considers that first priority</u> should preferably be on the existing university sites, both to reduce the need to travel, particularly by car, and so that key sites elsewhere deliver much-needed general housing rather than student accommodation. The Whiteknights campus crosses the boundary with Wokingham, and it is important that policy across the site is consistent.”
Page 212 Paragraph 9.3.10	To indicate the need for student accommodation	“In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University’s principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Development Plan does not form part of the Council’s strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the development proposed in that plan has now been built out, but there remains the likelihood of further development over the plan period, <u>including for student accommodation as a result of a growth in student numbers of 28% between 2007/8 and 2016/17, together with any additional growth over the plan period.</u> ”

- 8.6 In relation to the **Proposals Map**, and as discussed during the hearings session on Friday 5th October, the UoR’s Pre-Submission representations and the UoR’s Response to Issue 14 (EP031) highlight that a small area of land east of Mackinder Hall, identified as being of biodiversity importance due to being an area of lowland mixed deciduous woodland on the Submission Draft Proposals Map, in fact has no tree coverage. The parties therefore agree that the following change should be made to the boundary of the area of

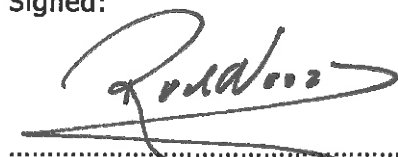
biodiversity importance on the Proposals Map to reflect this fact. This change would resolve the UoR’s objection to this element of the Proposals Map.

Proposals Map Map Sheet F	To reflect the fact that a small area immediately east of Mackinder Hall is not covered by woodland, as discussed at hearings on 5 October.	Delete  And replace with 
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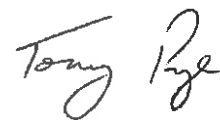
SIGNATURES

- 9.1 Both parties consider that this Statement represents a reasonable reflection of the areas of agreement and disagreement relating to the Reading Borough Local Plan.

Signed:



..... on behalf of the University of Reading
(Professor Robert Van de Noort, Acting Vice Chancellor)



..... on behalf of Reading Borough Council
(Councillor Tony Page, Deputy Leader and Lead Councillor for Strategic Environment,
Planning and Transport)

APPENDIX 1: UNIVERSITY OF READING STATEMENT ON CAPACITY OF ST PATRICKS HALL SITE

The University is seeking to establish flexibility within the policy for a number of reasons. Firstly, the Council conceded during hearing session 3 that it reduced the initial capacity of the site from an earlier withdrawn UoR planning application. It removed the number of spaces from the earlier submission in the location of Pearson's Court that became locally listed and is now to be retained. It was established at the hearing session however, that the Council did not seek to ascertain whether it was appropriate to reprovide lost spaces through the retention of Pearson's Court elsewhere within the development.

Secondly, at hearing session 3, the Council pragmatically described how it has previously permitted applications with dwelling numbers exceeding the figures set out in development plan policy. This point is now reflected within Note EC021 that is discussed at paragraphs 8.2 and 8.3 of this statement. Given the concerns with regard to the capacity calculation of the site, an increased upper limit would appear to allow for appropriate flexibility. It is considered that the Council would not be prejudiced by an increased upper limit as the acceptability of the precise number of spaces will be decided through the appeal process. The Council has pragmatically approved applications with higher capacities than policy states. Equally it follows that if it transpires that the higher, indicative, capacities cannot be achieved then the Council could seek to approve a lower number. In order to dissociate the local plan process from the appeal process, it may be preferable to refer to the upper limit of approximately 650 spaces, rather than 654 which is the precise number proposed by appeal scheme.

Thirdly, the University's hesitancy over an upper maximum capacity is that the planning committee used the emerging policy maximum of 450 spaces as a fixed position, even though at the hearing session officers advised that they are indicative. The last sentence on page 7 of the Planning Committee minutes (which the Inspector requested from the Council) specifically refers to the need to accord with the draft emerging local plan. Increasing the upper limit would therefore remove this current ambiguity.

Fourthly, in order to be consistent with the Council pragmatic approach to approved applications at higher than policy levels, it would assist if reference is deleted to the upper maximums at paragraph 9.3.2 of the Local Plan. This matter is further discussed at paragraph 8.2 and 8.3 of this statement.

APPENDIX 2a: ACCOMMODATION STRATEGY PART 1 GAP ANALYSIS, SEPTEMBER 2018 – READING BOROUGH COUNCIL'S INITIAL VIEW

The Council has the following initial comments on the Accommodation Strategy Part 1 Gap Analysis (referred to as URAS here).

Firstly, whilst the URAS aims to outline the scale of undersupply now and over the next ten years, it contains within it momentous levels of growth that have not previously been discussed with the Council at any point. These would have implications far beyond accommodation needs, including on transport infrastructure, the provision of services and facilities, pressures on the natural and historic environment, and impacts on existing communities. The growth anticipated is from just over 16,000 students in 2017/18 to around 21,000 students by 2028, a growth of 5,000 students, or 31% over ten years. As the Council stated during the hearings, 5,000 students equates to a small town.

The justification for this level of growth within the URAS is very limited. The document indicates that it is based largely on continuation of recent growth in student numbers, linked to changes in higher education system at a national level including increased competition, and a significant anticipated growth in the proportion of 18 year olds at a national level. However, the Council has not had a chance to fully examine how these figures have been derived, and does not therefore know whether there is a clear methodology behind them, or whether they represent educated guesswork.

Whatever the method used, it must also be recognised that there are very considerable uncertainties in forecasting such growth. University growth is highly dependent on changes to the higher education system at a national level, and we have seen the effects of this in recent years, where, over a short period of time (5-6 years), the UoR has moved from a situation where it was disposing of student accommodation sites, to the current substantial forecast shortfall. The influence of international students is also a strong part of UoR growth as set out in the URAS, and this will be affected by any changes to migration policy, in particular in the context of Brexit. At a more local level, growth will require the ability to provide sufficient academic and ancillary accommodation, and to adequately staff the University.

Even if these figures are an accurate forecast, the Council strongly believes that it needs the opportunity to consider whether Reading can accommodate this level of growth in such a short time period at all. As set out above, the implications of this level of growth will be hugely significant. Whilst the Council clearly recognises the essential role that the UoR plays in Reading's economic, social and cultural life, and the need to enable it to continue to grow and change to fulfil this function (as recognised within Local Plan policy ER2), this must be assessed against the effects on the town as a whole. Policy OU1 of the Local Plan expects that additional growth must be capable of being supported by existing or planned student accommodation, policy ER2 sets out some of the main constraints of the Whiteknights Campus itself, whilst other policies in the Local Plan deal with such matters as transport and other infrastructure provision, and proposals for growth will need to be considered against these matters.

In terms of the more detailed accommodation needs, the Council therefore wishes to draw an important distinction between existing accommodation needs as a result of growth that has already occurred or is committed, and future needs as a result of untested levels of further growth.

In terms of the former, the URAS refers to the guarantee that the UoR makes of accommodation for new students who choose the UoR as first preference at application stage. There is currently a shortfall of around 1,000 bedspaces in meeting this guarantee. The Council does not dispute these numbers, although it would point out that it is a matter for the UoR to fulfil any guarantees that it chooses to make, and that the actual waiting list as shown on page 34 of the URAS is somewhat lower at 745. It should be noted that this guarantee refers only to UoR accommodation, so the recent and ongoing trend of private PBSA, generally in the town centre, makes no contribution whatsoever to meeting this guarantee.

The URAS also refers to a shortfall across all years of study of 5,000 students being unable to secure a bed in PBSA in 2017/18 (page 8). This implies that these students have sought accommodation in PBSA, but the Council's understanding is that this is not the case and that the 5,000 is simply the number of students in other forms of accommodation, in particular HMOs. This does not therefore imply that all of these students would move into a PBSA place if available.

In terms of the projected increase in shortfall, this is tied to the future growth of the UoR, and therefore all of the comments made about that future growth in the previous paragraphs apply. The Council would be very concerned if these figures were used to justify changes to the policy position on student accommodation. The Council struggles to see how accommodating those student numbers within the town would be possible without severe impacts on supply of general and affordable housing, and potentially a range of other serious environmental and social impacts.

The URAS discusses the link between the provision of PBSA and the number of students in HMOs, and shows that, in recent years, the years where there have been a drop in the number of students in HMOs have coincided with the opening of Childs Hall and Bridges Hall, two large university halls. There clearly is a link in that the more students that are within student accommodation, the less students are likely to be within HMOs, and the Council accepts the general point.

However, there is an important caveat in that the student accommodation must be an affordable option for students. As the URAS recognises on page 36, the rents for the various private PBSA in Reading (mainly in Reading town centre) are between £185 and £296 per week, which reflects the fact that this is high-specification accommodation, usually featuring self-contained units with their own en-suite and kitchen facilities, and it is out of the price range of the average student. This compares to typical weekly rents in the majority of HMOs of £100 to £115 per week (page 38 of the URAS). This very much limits the degree to which this form of PBSA can reduce the number of students in HMOs. The examples of Childs Hall and Bridges Hall are quite different, being on-campus UoR halls of residence. Childs Hall comprises 8 or 10 bedroom flats with shared kitchen, living and toilet facilities. The URAS does not set out rental figures for UoR-provided PBSA such as these blocks, but the Cushman and Wakefield note that made up part of the UoR's Pre-Submission representations states that "98% of all University provided accommodation is priced below CityBlock's least expensive annual rent" (which was £184 per week).

This illustrates part of the current issue with student accommodation, in that sites, primarily in town centres, are being developed for PBSA which neither meets the town's need for general housing, particularly affordable housing, nor meets most of the UoR's needs for accommodation for its students.

APPENDIX 2b: ACCOMMODATION STRATEGY PART 1 GAP ANALYSIS, SEPTEMBER 2018 – CLARIFICATION RESPONSE FROM THE UNIVERSITY OF READING

The Council's initial response indicates concern that the justification for the level of projected growth is very limited. The overall University growth predictions are based on an assessment of the prevailing market conditions as of the 2017/18 academic year, the University's previous growth trajectory and demographics in the later years. It is challenging to project student number growth over a ten-year period, not least because government policy can change significantly over that period. The figures used in the report represent the University's projection based on the available evidence at the time.

With regard to the effect on projected growth as a consequence of our future relationship with the European Union, the URAS confirms that the significant growth in the number of international students has been from extra-EU students (with a significant number of students from the Far East and North America (45% growth between 2011/12 and 2016/17) rather than those from the EU27 Member States (29% growth in the same period). Indeed, only 6% of current students are from the EU27 countries (Page 22 of URAS). Therefore, it is not considered that the UK's future relationship with the European Union will have a significant impact on the predicted student growth.

The accommodation demand statistics shown in the URAS report are calculated by Cushman & Wakefield (C&W). The demand pool for accommodation has been refined by working with over 100 universities across the UK to determine demand for accommodation. It is trusted by universities, funders and rating agencies as an accurate way of assessing accommodation demand. Using C&W's licensed Higher Education Statistics Agency (HESA) data, C&W are able to determine which students require a bed space by removing those within a commutable distance that live in the parental home or their own residence. All levels of study (i.e. not just undergraduate) and demographic cohorts (not just 18-year olds) are examined with the remaining students requiring a bed space forming the demand pool for accommodation. This is the focus of the gap analysis; and is not challenged by the Council in relation to current demand.

The Council has noted the difference between the shortfall of first-year bedspaces and the waiting list of 745. For clarification, the first-year shortfall is calculated as indicated above. The waiting list numbers are assessed post 1st September in any academic year once there is clarity on how many students under the first-year guarantee (see 6.9 in main report) have achieved their academic offer. The waiting list comprises: students under the accommodation guarantee who have not been able to be accommodated; students who are not under the accommodation guarantee who want to be in University halls; students coming to the University through clearing: all these are 1st year students who are demonstrating a clear preference for University PBSA by electing to join the waiting list rather than source accommodation elsewhere. Other students in these categories who express a preference for University PBSA accommodation, when advised that spaces are not currently available, elect not to go on the waiting list but source accommodation elsewhere, therefore the waiting list does not reflect the full demand. There are also a small number of returning students on the list who have elected to wait despite having been advised in February that there are no more returner spaces available. Currently only a limited number of University PBSA spaces are made available to returning students. There are a proportion of returning students who would elect to live in PBSA if that option were available to them; it currently isn't available due to the need to reserve spaces for first year students. On average the University rejects between 500

-700 applications from returning students per annum who then go to the private market when their preferred living arrangements would be University PBSA.

The Council's comment that private PBSA "makes no contribution whatsoever to meeting this guarantee" is not supported by evidence. Many students who are advised that they are not guaranteed a place in University PBSA take up places in private PBSA which in part explains the difference between the size of demand and the waiting list. The University is also willing to enter into agreements with providers for the right product that deliver an appropriate student experience.

APPENDIX 3: CAMPUS CAPACITY STUDY, SEPTEMBER 2018 – READING BOROUGH COUNCIL'S INITIAL VIEW

The Council has the following initial comments on the Campus Capacity Study:

- The Campus Capacity Study is welcomed as a valuable contribution to planning to meet university needs over the coming years. It is agreed that it represents a good first step towards considering a revised masterplan for Whiteknights Campus.
- The Council's views on the Study must be understood in the context that Reading Borough Council is not the local planning authority for much of the main Whiteknights Campus, which falls within Wokingham Borough. Around half (13) of the sites on Whiteknights assessed within the Study are wholly or partly in Wokingham. It will be for Wokingham Borough Council to determine applications on sites within these areas.
- It would also not be appropriate for the Council to provide detailed comments on the assessment of individual sites at this stage, as that would require full consideration through the development management process, ideally beginning at pre-application stage. For that reason, the comments provided here are high level, and generally refer to the overall approach rather than individual sites.
- The Council has concerns about the overall way in which sites have been divided between academic and residential. It is understood that one of the main considerations has been the zoning approach of the Whiteknights Campus Development Plan. However, whilst elements of the Development Plan remain valid, it was prepared in a very different context in terms of the University's growth ambitions. As has been seen, a number of extensive University halls of residence (e.g. Wells Hall, Sibly Hall, Bulmershe) have been sold and redeveloped for general housing since 2008, which demonstrates that the current proposed level of growth was not anticipated at the time the plan was prepared.
- In that context, it is worth noting that, whilst the Campus Capacity Study identifies a need to accommodate a minimum of 25,000 sq m of academic space to meet its growth aspirations, its conclusions are that there is potential for a much higher 50,000 sq m of academic space, so a surplus over identified needs. In short, it appears to have very much prioritised meeting academic needs over residential needs. The need for new academic space to be provided in step with an appropriate level of residential provision is set out within policy OU1 of the Submission Draft Local Plan, and the approach of the Campus Capacity Study would therefore need to be considered against that policy. The Council would want to see consideration of whether some of the surplus academic space could be used to meet residential needs, and indeed whether it would be appropriate to meet the full ambitions for academic space, i.e. the 25,000 sq m, when there are such issues in providing supporting residential accommodation.
- Regarding the London Road campus, the Council agree that the site is heavily constrained and that opportunities for further development are limited and unlikely to be strategic in scale.
- In terms of Whiteknights, a number of sites including open car parks have been discounted at the outset due to the importance of retaining car parking. However, the Council would want to see consideration of whether there is scope to develop all or parts of sites such as 1.7, 1.9, 3.4 and 3.8 whilst retaining undercroft parking.
- The Council's view is that capacity for further growth on some sites may have been overestimated, and has particular concerns on some sites regarding loss of sports

facilities, landscape impacts and setting of heritage assets. This is particularly relevant, although not limited, to the sites identified as residential.

- In overall terms, on the sites assessed, the Council feels that the overall capacity of the sites assessed for academic space to accommodate development are broadly in the right area. Although we do not necessarily agree with each site's individual capacity, any over- or underestimates may broadly balance themselves out. On the sites assessed for residential, we consider that there has been something of an overestimate of available capacity, which could equate broadly to approximately 500 beds. However, as set out above, we consider that there may be scope for the suitability of other sites to be considered, and for a greater rebalancing of academic and residential space across the campus.

Appendix E – Existing PBSA Table

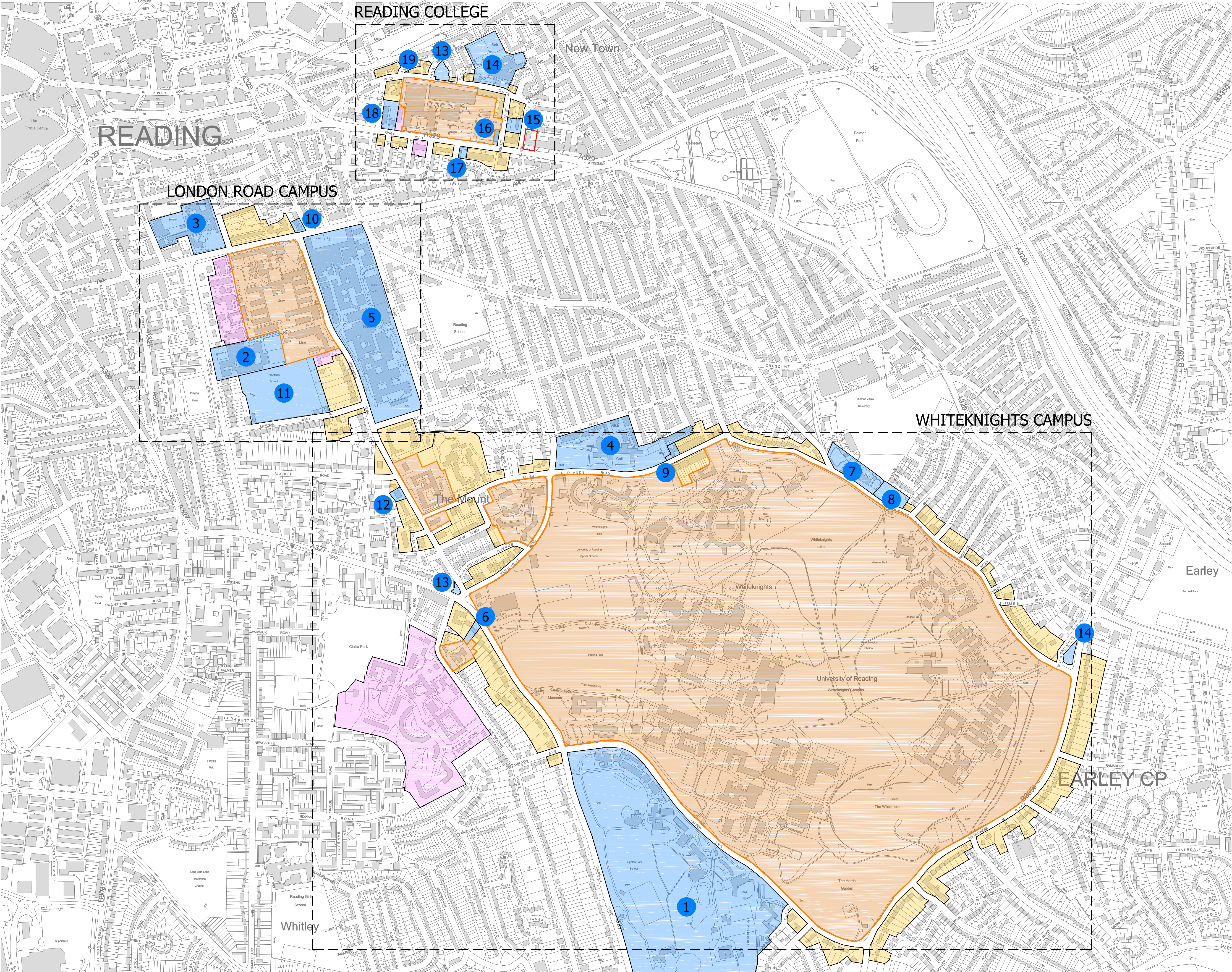
Number on Map	Name of PBSA	Notes	No. Bedrooms	Mapped
1	Crown House		99	Y
2	Kendrick Hall		604	Y
3	Saxon Court		83	Y
4	Loddon House	Constructed. Application 110289 granted full pp for 91 student bedspaces. Application 130331 (NMA) permitted two manager / warden flats to be instead be provided as student units, bringing the total to 93 bedspaces.	93	Y
5	Central Studios Reading		141	Y
6	Queens Court	Application 150752 – Sept 2015	395	Y
7	City Block 1, Berkshire House		145	Y
8	New Century Place 1	Converted. Application 161601 for 75. Application 172272 prior approval application to reduce the 75 to 72 approved February 2018. Construction complete.	72	Y
9	New Century Place 2	Converted. Application 161602 was approved for 58 self contained studio apartments. New prior approval application (172271) to increase the 58 to 63. Construction complete.	63	Y
10	191 Kings Road	Constructed. Owned and managed by Bagri Foundation	75	Y
11	Trinity Hall, South Street	Application 151356	45	Y
12	1 Brownlow Road	HMO application reference 141214, occupied as student accommodation	24	Y
13	Eastern Pearl, 177 Basingstoke Road	Application 150715.	34	Y
14	79 Silver Street	Applications 170685 (56) and 180075 (increased to 61)	61	Y
15	Former Private Car Park, East Street	Application 170019 (granted at appeal)	103	Y
16	Woodley Arms Public House, Waldeck Street	Application 171893 (granted at appeal)	38	Y
17	St Patrick's Hall	Currently at appeal (Application 172045) Appeal ref 3209702	836 (654 ¹ net gain)	Y
18	Benyon Hall	Operational	391	Y
19	Bridges Hall	Operational	649	Y
20	Childs Hall	Operational	594	Y
21	Greenow and McCombie	Operational	130	Y
22	Mackinder Hall/Dunsden Crescent	Operational	563 / 130	Y
23	Sherfield Hall	Operational	344	Y
24	Stenton Hall	Operational	402	Y

¹ Net gain is worked out on basis of the following, taken from St Patrick's Hall appeal documents. Existing number totals 346 (including Pearsons Court at 116, Sets at 4, New Court at 178 and Northcourt Avenue Townhouses at 48); if the St Patrick's Hall appeal is allowed, this would create total of 836 new bedspaces proposed, which when added to the retained 116 bedspaces within Pearsons Court and 48 bedspaces within Northcourt Avenue Townhouses totals 1,000 bedspaces. The calculation is therefore 1,000 bedspaces minus 346 equals 654 net bedspaces if St Patrick's Hall appeal is allowed.

25	Stenton Townhouses	Operational	300	Y
26	St George's Hall	Operational	423	Y
27	Wessex Hall	Operational	196	Y
28	Wantage Hall	Operational	224	Y
29	Windsor Hall	Operational	221	Y
30	Martindale Court	Operational	45	Y
31	St Patricks Hall	Operational	346 ²	Y
Total current Private			1,770	
Total Consented pipeline			305	
<u>Total private beds</u> (plus UoR St Patricks Hall)			<u>2,075</u> (2,729)	
Total UoR			4,958	
<u>Total Private and UoR</u> (plus St Patricks Hall)			<u>7,033</u> (7,687)	

² Figures taken from the University of Reading Statement of Case for St Patrick's Hall appeal

Appendix F – Areas adjacent to existing campus locations



- Alexander House
- University Of Reading Sites
- Residential
- Student Accomodation
- Other Uses

1.

Leighton Park School
2.

The Abbey School
3.

Kendrick School
4.

St Joseph's College (6th Form)
5.

Royal Berkshire Hospital
6.

Chancellor House Surgery
7.

Lakeside Residential Care Home
8.

Allotments
9.

St William of York Church
10.

Petrol Station
11.

Reading School
12.

Morgan Road Playing Fields
13.

Rosedale Clinic (Private Health Clinic)
14.

Public Open Space
15.

St. Johns C of E Primary School
16.

Religious Centre
17.

Young People's Hall
18.

Offices (ITS Construction Recruitment)
19.

Offices (WIPRO)
20.

Newsagents

Appendix G - Existing PBSA in Reading

