



Former Private Car Park, East Street, Reading

Planning Statement

December 2018

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

1. Introduction 3

2. The Site & Surrounding Context..... 4

3. Planning History 6

4. Pre-Application Discussions & Public Consultation..... 8

5. Benefits of The Proposed Development 10

6. Planning Assessment 12

7. Conclusions 23

1. Introduction

- 1.1 This planning statement has been prepared by DP9 on behalf of Studious Development (Reading) Ltd (“the applicant”) in support of an application for minor material amendments to the existing planning permission concerning the former private car park, East Street, Reading (“the site”) which is located within the jurisdiction of Reading Borough Council (“the local planning authority”).
- 1.2 This application follows the granting on appeal of full planning permission earlier this year for a building of four storeys, providing 103 units of purpose built student accommodation (“the first permission”) at the site. The applicant is currently taking steps to prepare the site and to enable the implementation of the first permission, and has submitted applications to discharge the pre-commencement conditions, some of which have already been approved.
- 1.3 The minor material amendments proposed involve the creation of 5 additional student beds at ground floor level (increasing the building total to 108), with associated internal changes and external changes to the building’s facades at ground floor level. A reduction in the size of the consented basement, already granted under a separate non-material amendment application (181629) is also incorporated within the application proposals.
- 1.4 This planning statement describes the planning case for the development. It assesses the proposal in the context of both adopted and emerging planning policy at a national, local level, plus the associated national planning policy guidance and any other material considerations considered relevant.

2. The Site & Surrounding Context

- 2.1 The site comprises a private car park formerly used by the commercial occupiers of the neighbouring building, 1 New Century Place. Both 1 and 2 New Century Place buildings are currently in the process of being converted from office use to residential use under consents which preclude the occupiers from obtaining on-street car parking permits. As both conversions are car-free developments, the private car park is no longer required to serve the future residential occupiers of these buildings.
- 2.2 The application site, which is broadly 'L' shaped, measures approximately 0.127 hectares. As described the site comprises a surface level car park, formerly used by the commercial occupiers of a neighbouring building, now vacant. The site is located on the western side of East Street, which is a cul-de-sac that extends northwards from South Street, which can be accessed from London Street. The site contains an electricity substation, which is to be relocated before works commence (planning permission already granted).
- 2.3 To the west, the site abuts the rear of the raised area of car park, which falls outside the application site area. Further west is the rear of a terrace of buildings which face London Street. The terrace includes 31, 33, 35, 37, 39 and 41 London Street, which are all statutorily listed buildings. Buildings at 43 – 47 London Street and 1 – 4 London Court are buildings of townscape merit. Directly to the north of the site are 1 New Century Place and 2 New Century Place, both four storeys (plus pitched roof) which are the former office buildings now being converted to residential use.
- 2.4 To the east of the site is Bourne Stevens Close, a cul-de-sac surrounded by three storey residential buildings. To the south of the site is a single storey community use building, and further south beyond that, East View Place which is a residential development of up to five storeys tall. It is therefore clear that following the conversion of 1 and 2 New Century Place, the immediate surrounding land uses will almost entirely be residential.
- 2.5 Since becoming redundant the condition of the site has deteriorated and it is now a target for litter, anti-social behaviour, illegal fly-tipping and illegal

occupation by travellers. The site is neighboured by surrounding buildings in both commercial and residential use. In its current condition, the site detracts from the appearance and character of the surrounding area, including the Market Place/ London Street Conservation Area, which the site falls within. The site is previously developed, brownfield land located within a sustainable location within the town centre of Reading.

- 2.6 Reading is a major commercial and retail centre serving a large area within the Thames Valley. In the 2011 census, the urban area around Reading had an estimated population of 318,000 people, making it one of the largest towns in the UK without city status. It is home to the University of Reading, a top 30 UK institution and one of the largest employers in the region, directly contributing an estimated £650m into the local economy each year¹.
- 2.7 The site is located approximately 200m south the Oracle Shopping Centre which contains shops and restaurants, and there are a number of commercial uses located along London Street to the west. Reading train station is approximately 700m from the site, offering connections to the wider region. Of greatest importance, the site is located approximately 1.1 miles from the main University of Reading campus, which is approximately 20 minutes' walk or a 10-minute bus journey away. Furthermore, the University of Reading London Road campus is only 300 yards from the site.

¹ [Global Reach, Local Impact report \(University of Reading\)](#)

3. Planning History

- 3.1 The key planning application history relevant to the site will now be briefly summarised:

The First Permission (APP/E0345/W/17/3190317)

- 3.2 In August 2018, the Planning Inspectorate granted planning permission on appeal for the redevelopment of the application site, for the erection of a new building of 4 storeys to provide 103 units of purpose built student accommodation (Appeal Reference APP/E0345/W/17/3190317, Reading Borough Council Reference 170019). Steps are being taken by the applicant to enable implementation of the permission and applications to discharge pre-commencement conditions have been submitted to the Council.
- 3.3 The application as originally submitted was for a five-storey building to provide 116 units, however through the course of the application revised drawings were submitted reducing the height of the scheme to four storeys. Nevertheless, the application was refused by Reading Borough Council for 4 reasons, however by the time the appeal hearing commenced, further discussion between the appeal parties had enabled three of these to be overcome, leaving only one reason for refusal relating to the impact of the proposal upon heritage assets. These include the character and appearance of the Conservation Area, the settings of the listed buildings and the buildings of townscape merit.
- 3.4 Although not a reason for refusal, Reading Borough Council raised within its appeal statement an alleged conflict with emerging policy H12 from within its New Local Plan, which had been submitted to the Secretary of State for examination in March 2018. The Inspector considered the appeal on the remaining reason for refusal (heritage assets) and against policy H12 separately.
- 3.5 In his conclusions, the Inspector found that the scheme would result in a minor enhancement to the Conservation Area, which being a benefit to a designated heritage asset, carried significant weight and this balanced the minor harm to the settings of the listed buildings. Considering additionally the other public benefits identified, the Inspector concluded that the appeal should be allowed.

- 3.6 On the matter of policy H12, the Inspector agreed with the appellant's arguments that limited weight could be given to the policy in consideration of the appeal, since there were substantial objections to the policy from the appellant and the University of Reading amongst others, and policy had yet to be tested at examination.

Non-Material Amendment Application (181629)

- 3.7 Following the granting of the first permission, further design development was undertaken. This identified that the consented basement was considered to be oversized, and an application for a non-material amendment was submitted to reduce this. The application was granted by Reading BC in October 2018.

The Second Application (181849)

- 3.8 A separate application for full planning permission was submitted in October 2018 for the erection of a part 4, part 5 storey building to provide 135 units of purpose built student accommodation. The application is for a building of the same footprint of that approved, but one storey taller. The application also proposes enhancements to the architecture and design of the consented building, which were discussed with the Council following the appeal decision. The application is currently awaiting determination.

4. Pre-Application Discussions & Public Consultation

- 4.1 The National Planning Policy Framework (NPPF2) places an emphasis on pre-application engagement and front-loading the planning application process generally. Paragraph 39 provides that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”

Pre-Application Discussions

- 4.2 The appeal decision was issued in August 2018. This clearly established the principle of PBSA as an acceptable land use for the redevelopment of the site and granted consent for a building of up to 4 storeys.
- 4.3 Following this decision, the minor material amendments proposed within this application were discussed with Council officers earlier this year. Officers considered that the proposals were minor in scale, and as they were purely internal would optimise the consented scheme whilst having no additional impact through increased height or massing of the building. Both the internal and external changes were reviewed, and these were not considered to present any new issues.
- 4.4 Officers therefore invited the Applicant to submit an application for minor material amendments to the approved scheme. Officers advised that the full suite of technical documents would be required with the application, and these have been submitted.

Public Consultation

- 4.5 Aside from the fact there is an existing permission for student accommodation at the site, the applicant has also recently consulted the public and local community regarding the current, separate, application for a part 4, part 5 storey building through a public consultation exercise. Addresses in a wide area surrounding the site were mailed an invitation to a drop in public consultation event, which was held at the site.

- 4.6 Amongst the attendees there was strong support for the taller scheme, with respondents particularly supportive of the proposed layout and design, materials and landscaping, and to the principle of the site's use for student accommodation. There was no evidence of any concern regarding the proposed height of the building or the increased number of beds (135 as proposed through that application) based on public feedback.
- 4.7 Having undertaken this public consultation exercise so recently, and as the proposals submitted within this application are purely for internal changes to the building already consented, it is not considered any additional public consultation is required. Nevertheless the submitted Statement of Community Involvement includes details of the recent public consultation undertaken for the part 4, part 5 storey building.

5. Benefits of The Proposed Development

5.1 The already consented building offers multiple significant benefits, which are summarised briefly below:

- Redevelopment of a cleared, underutilised, brownfield site located within a highly sustainable location to provide 103 units of high quality purpose built student accommodation, thereby contributing towards the provision of much needed student accommodation within Reading, reducing pressure upon other forms of accommodation occupied by students such as HMOs, contributing to the success of the University and the economy of Reading
- The successful repairing of the existing urban realm, through the infilling of this redundant and visually unattractive gap site with an attractive building including the creation of new and defined street edges to East Street, and a focus point at the north-eastern corner through the chamfered corner of the building entrance
- The creation of a new building that sits comfortably at the scale proposed within its context of surrounding buildings, featuring high quality architectural detailing, and using traditional materials such as red brick which are a characteristic feature of the Conservation Area and other neighbouring buildings
- Creation of a new, efficient, environmentally sustainable modern building that achieves policy complaint of carbon reduction, provision of renewable energy sources, and other sustainability measures including BREEAM, new soft landscaping and a reduction in surface water run-off
- Removal of underused car parking in a highly sustainable urban location, accessible by public transport, and the redevelopment of the site for a car-free scheme with an associated reduction in trips generated, and a policy compliant provision of cycle parking to encourage sustainable transport options

- Through the scale, form and massing of the proposed scheme, the proposal would preserve and enhance the Market Place/ London Street Conservation Area – a public benefit – and will not affect what special architectural or historic interest exists within the neighbouring listed buildings or the buildings of townscape merit
- Creation of new jobs within the local Reading economy, including the associated local spending, both during the construction period and during the operational period once built and occupied
- The payment of a substantial Community Infrastructure Levy payment to Reading Borough Council to fund the provision of infrastructure within Reading, estimated at more than £500,000
- Payment of a s106 contribution to the Council to be used to fund the Construction Employment and Skills Measures and Provisions during the construction phase of the development

5.2 The proposed amendments build upon those benefits described above through a minor intensification of the existing consent. The smaller basement proposed will result in a shorter excavation period, with an associated reduction in construction vehicle movements.

5.3 The scheme provides 5 more beds than the first permission; this increase will enable the scheme to go further towards alleviating the demand for PBSA felt within Reading. The additional beds will increase the amount of spending within the local economy, benefiting local businesses.

6. Planning Assessment

- 6.1 Section 70(2) of The Town & Country Planning Act 1990 (as amended) and Section 38(6) of the Planning & Compulsory Purchase Act (2004) both require that applications for planning permission are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.
- 6.2 The currently adopted Development Plan for Reading Borough Council comprises the following documents:
- Core Strategy (2008)
 - Central Area Action Plan (2009)
 - Sites and Detailed Policies (2012)
- 6.3 Under the currently adopted proposals map within the Local Plan, the site has several planning designations. The site is located within:
- The Air Quality Management Area
 - An Area of Archaeological Potential
 - The Market Place/ London Street Conservation Area
 - The Central Area
 - The Settlement Boundary
- 6.4 Reading Borough Council is in the process of replacing the above documents with a New Local Plan, which once adopted will become the Development Plan. Examination of the New Local Plan began in September 2018.
- 6.5 In addition to the policies contained within the adopted Development Plan and those within the emerging New Local Plan, the Revised National Planning Policy Framework published in 2018 (NPPF2) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF2 constitutes statutory guidance that must be taken into consideration

during plan preparation, and is a material consideration in all planning decisions.

- 6.6 The National Planning Policy Guidance (NPPG) provides additional guidance and detail on how the policies within the NPPF2 should be applied.
- 6.7 The proposals will now be assessed against the aims and objectives of the relevant planning policies at a national and local level. Relevant material considerations and other guidance are also considered as part of the assessment.

Principle of Development & Land Use

- 6.8 The adopted Development Plan documents do not contain a policy that specifically addresses the circumstances where new purpose built student accommodation within Reading may be acceptable. Policy SA6 within the Detailed Policies and Site Allocations document refers to the University's Whiteknights campus only.

- 6.9 However, of relevance is adopted Policy DM8 which supports Policy CS18 and concerns residential conversions. Policy DM8 seeks to exert control over the conversion of houses to self-contained flats or HMOs, to prevent the loss of single family dwellings. Supporting policy text at 5.4.3. explains that

“In certain parts of the Borough, there are high concentrations of flat conversions and houses in multiple occupation, in part reflecting the very high student population which is especially prevalent around the universities. In the vicinity of the universities, a high proportion of the housing accommodates students. Given that they are predominantly present during term time only, it can leave some roads and areas feeling quite dormant at other times, failing to achieve a mixed and sustainable community.”

- 6.10 Within Reading's own draft New Local Plan, the impact that this has on the character and amenity of the surrounding area, is referred to within Policy H8. Supporting text at paragraph 4.58 recognises that

“Conversions, either individually or cumulatively, can also have a harmful impact on the character of the area through unduly diluting mixed and sustainable communities. In certain parts of the Borough, there are high

concentrations of flat conversions and houses in multiple occupation, in part reflecting the very high student population which is especially prevalent around the University. Given that students are predominantly present during term time only, it can leave some roads and areas feeling quite dormant at other times, failing to achieve a mixed and sustainable community. In locations with already high numbers of flats or houses in multiple occupation, conversions to single family housing could help create a more mixed and sustainable community.”

- 6.11 The impact of these conversions has already led the Council to introduce Article 4 Directions removing the automatic right to convert dwellinghouses to HMOs within two areas. One of these is a large area covering much of Katesgrove, Park and Redlands wards close to the University. This demonstrates the scale of the demand for private housing amongst students within areas close to the University. This demand can be lessened by new PBSA schemes.
- 6.12 Although Policy H8 only concerns the impact of HMOs on the amenity and character of the surrounding area, the economic impact of these HMOs is not considered. It is established that whilst these houses are occupied as HMOs by students, they are not contributing towards the local housing stock that would otherwise be available for local residents, which is also likely to contribute towards house and rental price increases for the remaining stock.
- 6.13 Draft Policy H12 within the submission version of the New Local Plan does set out where new purpose built student accommodation will be acceptable. The Council’s draft policy text provides that
- “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.”
- 6.14 As the site already benefits from planning permission for a PBSA scheme, which the applicant is taking steps to implement, the proposal complies with the Council’s draft Policy H12, which restricts new student accommodation either on or adjacent to existing campuses, or as an extension or reconfiguration of existing student accommodation. Since the proposal is to increase the amount

of accommodation at the site already consented, the proposal is aligned with the policy objective which seeks to maximise the potential of these sites first, before other sites are developed. Supporting text to draft Policy H12 at 4.4.98 explains the Council's approach stating 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.”

- 6.15 The proposal seeks to optimise the existing consent, and the development potential of the site for PBSA. Chapter 11 of the NPPF2 concerns making effective use of land. As Paragraph 123 advises

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at lower densities, and ensure that developments make optimal use of the potential of each site.”

- 6.16 The proposal is entirely aligned with the Council's approach within Policy H12 since redevelopment of the application site will enable the site to make a greater contribution to the number of student beds that Reading requires, and therefore places less pressure on other sites that may be suitable for C3 residential homes, including affordable housing. For these reasons it is considered that the proposal complies with draft Policy H12 and should be supported in land use terms.

Supply and Demand of PBSA in Reading

- 6.17 Supporting text to Policy H12 at 4.4.96 provides that the SHMA (2016) anticipated a growth in student numbers at the University of Reading from 13,135 in 2015 to 16,095 in 2018, but that this should not result in the need for significant new accommodation. However, supporting text also states that more recent evidence from the University indicates that this growth will generate a

need for new accommodation. In our view, the most recent evidence contradicts the SHMA findings that the anticipated growth in student numbers should not result in the need for significant new accommodation.

- 6.18 A Demand & Impact Assessment was prepared by Cushman & Wakefield in 2017 for the University of Reading, in support of their development proposals concerning the St. Patrick's Hall development. The report was submitted to the Council in June 2018 on behalf of the applicant in a rebuttal to the Council's comments on the appeal relating to the first permission.
- 6.19 The C&W report showed that there has been an 18% increase in full time students between 2010/11 and 2015/16, far above the national average for the same period (5%). This growth in student numbers overall is reflected in the number of students within two key groups, both of which are more likely to prefer a bed space in University-managed accommodation, but if there are none available, will still require accommodation. 59% of the full-time student population is now aged 20 or under (51% national average) and 29% of the student population is from outside the UK (23% national average).
- 6.20 The C&W report also explains that the University now recruits 29% of its student population from outside the UK, far above the 23% national average. Since 2010/11, the University has increased its non-UK student population by 49%, above the national average of 10% seen over the same period. International students (i.e. non-EU) have grown particularly strongly at 64% (vs. 12% national average over the same period).
- 6.21 International students are far more likely to demand purpose-built accommodation, valuing the security, ease and student experience it offers. The University is also recruiting more students from the rest of the UK, with those from within the region only growing by 1%. All of this growth means that the demand for student accommodation bed spaces in Reading is growing strongly.
- 6.22 In response to these increasing numbers, the University sought permission to expand its own accommodation at St Patrick's Hall, which was refused. The C&W report states that using the most up-to-date evidence, the demand pool of students most likely to require accommodation in the town, compared to the supply available results, in a ratio of 2:1. This indicates a need for additional

accommodation supply to meet demand and results in a larger than average proportion of students needing to find accommodation in the private rented sector.

- 6.23 The current demand/supply imbalance is evident through examining other factors and indicators. The University has had a waiting list of accommodation for the last three years which has grown to over 700 students in 2017/18. This has resulted in the University resorting to housing students in hotels until accommodation can be found in the local housing stock. According to the C&W report, there are currently fewer than 1,600 PBSA spaces available. Evidence supplied by the applicant relating to the previous application for the site showed that existing PBSA schemes in Reading consistently have 100% occupancy, despite year on year price increases.
- 6.24 The C&W report stated that the total increase in the number of students from outside of the region between 2010/11 and 2015/16 is 1,930 students. If student beds are not available either provided by the University or in PBSA, students are forced into the private rented sector, increasing pressures on the housing market. At an average of 4 students per household, this means 483 additional houses are used that could otherwise be added to the local housing stock for non-students. This is witnessed by HMO numbers in Reading where 16% of HMOs are occupied by students, double the national average. Conversely, the proposal for 108 beds may potentially free up 27 traditional houses within Reading for local residents.
- 6.25 In summary, all the factors described above, which are based on the most up-to-date evidence, clearly demonstrate that there is a significant supply/demand imbalance currently felt within Reading in relation to student accommodation. Such an imbalance is unlikely to be resolved solely by the University itself developing its own landholdings. As the St. Patricks' Hall development has been refused and is now the subject of an appeal, the Council's preferred approach is also likely to take longer, thereby worsening the demand and supply issue felt. In contrast, the application site is cleared and is available for delivery immediately upon the granting of planning permission.

Architecture, Design & Heritage Assessment

- 6.26 The site contains a vacant surface car park, the appearance and condition of which clearly detract from the Conservation Area and the amenity of the area generally. The site requires redevelopment to repair the existing urban fabric. In the Inspector's decision relating to the first permission, he acknowledged that the introduction of built form at the appeal site would enhance the character and appearance of the Conservation Area.
- 6.27 Planning permission has already been granted for a building with the same footprint as the proposed building, to provide 103 units of PBSA. That development was found to be acceptable by the Inspector. The proposed scheme is similar in nearly all aspects to the first permission, aside from the external changes to the ground floor facades, to facilitate the 5 additional rooms proposed. The Design & Access Statement demonstrates how the proposed amendments to the façade at ground floor level compare to the consented building.
- 6.28 It is relevant to note that the external amendments reduce the amount of curtain walling at ground level, to be replaced by brick. This has the visual effect of grounding the building with a more solid base. This approach was welcomed by officers in discussing the design enhancements to the building originally, that have been included within the other separate application for a part 4, part 5 storey building. The refuse store has been re-located slightly, and the former office will now be provided within the foyer, giving increased surveillance over comings and goings from the building.
- 6.29 As the Townscape, Heritage and Visual Impact Assessment (THVIA) submitted demonstrates, the proposed scheme will have no impact on designated heritage assets, since the proposals do not increase the height or massing of the consented building.
- 6.30 The proposal therefore complies with the requirements of adopted Policies CS7, Design & Public Realm and Policy CS33, Protection & Enhancement of the Historic Environment.

Assessment of Daylight & Sunlight Impacts

- 6.31 An assessment of the impacts of the proposal on the daylight and sunlight received by the surrounding residential properties has been undertaken and is submitted with this report. It should be borne in mind that the minor material amendments proposed are entirely internal and do not alter the impacts of the already consented building. Nevertheless, a daylight & sunlight assessment is submitted with this application. This report concludes that the consented scheme (and thus the proposed scheme) will have no detrimental effect on daylight and sunlight amenity of the adjoining residential accommodation.
- 6.32 The proposals are therefore considered to comply with adopted Policy DM4, Safeguarding Amenity which provides that “Development will not cause a significant detrimental impact to the living environment of existing or new residential properties”.

Transport Assessment

- 6.33 The submitted Transport Statement demonstrates that the site is highly accessible, and that the proposals would result in a substantial trip reduction, from the lawful use of the site as car parking, compared with the proposed use as 108 units of PBSA. The additional 5 beds will have no noticeable impact in transport terms and in total, there would be 224 fewer trips per day.
- 6.34 It is proposed that students will be restricted from applying for car parking permits, therefore ensuring that the scheme remains car free. 34 cycle spaces are proposed, in accordance with the Council’s policy requirements to encourage travel by sustainable modes of transport. A student Travel Plan is also submitted for approval.
- 6.35 Three existing car parking spaces opposite the site, on land owned and controlled by the applicant, will be made available for use at the beginning and end of student term when students arrive and check out of their accommodation. This is an approach that was agreed as part of the appeal for the first permission, and is considered to remain acceptable. No increase in spaces is considered necessary for the additional 5 rooms. The proposals are considered to comply with the adopted policies CS22, Transport Assessments, Policy CS23 Sustainable Travel and Travel Plans and CS24, Car/ Cycle Parking.

Sustainability inc. BREEAM & Energy Strategy

- 6.36 A Sustainability Statement including BREEAM Pre-Assessment, and an Energy Statement are submitted with this application. The BREEAM Pre-Assessment reports confirms that the development is considered capable of achieving a BREEAM ‘Very Good’ rating, and this has been targeted. As the scheme is a commercial (non-residential) development, this is the target required by adopted Policy CS1, Sustainable Construction and Design. Although emerging Policy CC2 of the draft New Local Plan requires that all major non-residential developments are required to meet BREEAM ‘Excellent’ – where possible – this is not considered achievable for the reasons explained within the Sustainability Statement.
- 6.37 Whilst an ‘Excellent’ rating has been targeted, and where possible, some of the minimum requirements could be met, other minimum requirements are not possible to meet. The overall score required for BREEAM ‘Excellent’ would be particularly onerous. As it is recognised within the policy text that schemes are required to meet BREEAM ‘Excellent’ where possible, it is considered that a ‘Very Good’ rating is appropriate in the circumstances.
- 6.38 The Energy Statement submitted with the application demonstrates that the proposal complies with emerging New Local Plan Policy H5, Standards for New Housing, as the proposal will achieve a minimum 19% improvement in the dwelling emission rate over the target emission rate as defined in the 2013 Building Regulations. This will be achieved through building fabric U-values, reduced air permeability, combined heat and power, air source heat pumps, and high efficiency LED lighting.

Assessment of Environmental Factors

- 6.39 The Flood Risk Assessment & Drainage Strategy submitted with the application demonstrates that the site is entirely located within Flood Zone 1 and that therefore, the Sequential Test is considered to have been passed. However, the Council has not confirmed its agreement to this, therefore a Sequential Test is also submitted. The report was considered by the Council previously in relation to the application for the first permission, and was found to be acceptable. The

FRA and Drainage Strategy demonstrates that the site is suitable for the proposed development and can be made safe from all sources of flooding.

- 6.40 A Phase 2 Ground Investigation report is submitted. The report contains geotechnical analysis of the ground conditions, and an assessment of the site's potential to contain contamination. The report demonstrates that the site is suitable for the development proposed. It is expected that the Council will apply suitable conditions to any grant of planning approval.
- 6.41 A Façade Noise Impact Assessment has been submitted which uses previously measured noise survey data to provide advice on the sound insulation levels for the proposed building in order that a satisfactory internal noise environment will be achieved.
- 6.42 The site is located within an Air Quality Management Area. The submitted Air Quality Assessment has assessed the local air quality and concludes that the site is considered suitable for the proposed use without the inclusion of mechanical ventilation. Furthermore, the temporary air quality impacts during the construction period are considered to be negligible.
- 6.43 The site is currently hardstanding and the submitted Ecology Assessment concludes that this is of negligible ecological value and that the proposed works will not impact any protected species, designated or non-designated wildlife sites. The proposals will provide a betterment in ecological terms.
- 6.44 A desk based Archaeological Assessment is submitted with the application which finds that despite the location of the site within a designated Area of Archaeological Potential, there are unlikely to be significant constraints to the site's redevelopment. The loss of any buried remains can be mitigated via the normal mechanisms.
- 6.45 A Landscaping Scheme for the site containing hard and soft areas of landscaping is submitted with the application for approval. This includes the provision of several trees which it is considered will significantly enhance the appearance of the site, and this part of East Street in general.
- 6.46 An Arboricultural Planning Statement is submitted which contains a survey of trees both on site and off site. The report identifies a total of 6 tree features that

have the potential to be impacted by the development proposals and which require removal. However, all these tree features are graded low quality, and therefore should not impede the site's redevelopment. Additionally, it is considered that the replacement tree planting and landscape scheme proposed will offset this loss.

7. Conclusions

- 7.1 In accordance with the approach advocated within the NPPF2 and Policy SD1 of the Development Plan, there is a presumption in favour of sustainable development. Planning policy seeks to make the best use of land – which is a finite resource – ensuring the development capacity of sites is optimised and the benefits that can be delivered from schemes are maximised. Planning permission is sought for the optimisation of the consented building, to provide an additional 5 units of student accommodation, a reduced basement, and associated external amendments.
- 7.2 Planning permission already exists for a building of the same footprint, granted by an Inspector earlier this year. The site will be developed for PBSA and this proposal offers the opportunity to optimise that permission and maximise the benefits that redevelopment of the site for PBSA can deliver. Draft Policy H12 supports the intensification of land and buildings that are already in student accommodation use, in order to reduce development pressure on other developable sites that could contribute to meeting the Council’s housing targets, including the provision of affordable housing. The benefits of the proposal are significant and demonstrable; these have been explained within the application.
- 7.3 This planning statement has demonstrated that the proposals accord with the relevant Development Plan policies and policy objectives. A substantial number of technical reports have also been provided to demonstrate the proposals comply with the more detailed policy requirements, and that the proposals can be carried out without detriment to the area and the amenity of neighbours.
- 7.4 It therefore follows that, consistent with the Inspector’s decision earlier this year, and recognising the minor nature of the proposed amendments which do not give rise to any new or increased impacts which would result in a different conclusion being reached this time, planning permission should be granted for the proposed minor material amendments.