

Lochailort Thames Quarter Ltd

PLANNING STATEMENT

Outline: erection of a 2.5, 3.5 and 4.5 storey building comprising 47 apartments (including 30% affordable housing) in a mix of one, two and three-bedroom units; landscaping; cycle & car parking; and associated works (all matters reserved except layout and means of access).

**Land on the corner of Weldale Street
and North Street, Reading**

September 2018

LOCHAILORT

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PREFACE

“Planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”

National Planning Policy Framework paragraph 118
July 2018

At the heart of the *National Planning Policy Framework* is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the Development Plan without delay; or where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

This *Statement* will clearly demonstrate that the proposed residential development is in accordance with the Development Plan and that there are no material considerations that indicate otherwise. There is strong policy support for this type and form of development at national level, as this *Statement* identifies and explores.

The presumption in favour of sustainable development is engaged and the benefits of the development would not be outweighed by any adverse impacts. Accordingly, planning permission should be issued without delay.

1.0 INTRODUCTION

Background

- 1.1 This Statement accompanies and supports an outline planning application (with all matters reserved except layout and means of access) for the redevelopment of the vacant former *Reading Family Centre* site on the corner of Weldale Street and North Street. The application proposes the following:

- 1.1.1 A residential apartment building over 2½, 3½ and 4½ storeys, including a focal element on the corner of Weldale Street and North Street which frames a retained existing *Norway Maple* tree;
- 1.1.2 47 apartments in a mix of one, two and three bedroom units;
- 1.1.3 30% affordable housing;
- 1.1.4 Car parking spaces accessed via North Street, with secure cycle parking in a conveniently located outbuilding;
- 1.1.5 High quality onsite landscaping including replacement tree planting;

- 1.2 Matters for consideration at this time are:

- 1.2.1 Layout (includes buildings, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development); and
- 1.2.2 Means of access (covering accessibility for all routes to and within the site, as well as the way they link up to other roads and pathways outside the site).

- 1.3 Matters reserved for consideration at a later date (by way of a separate reserved matters application in due course) are:

- 1.3.1 Appearance (the aspects of the building which affect the way it looks, including the exterior of the development);
- 1.3.2 Scale (to include information on the size of the development, including the height, width and length of each element of the proposed building); and
- 1.3.3 Landscaping.

Notwithstanding that these matters are reserved, nonetheless detailed indicative elevation drawings and landscaping proposals are included to support this application.

- 1.4 A more in-depth assessment and explanation of the proposed development can be found in the ***Design & Access Statement*** that accompanies the application.

The application site and its context

- 1.5 The site currently disused vacant land on the north-west corner of Weldale Street and North Street. The site is generally flat, set down slightly from Weldale Street and extending to approximately 0.2 hectares. As set out in the ***Tree Survey*** there are a number of poor quality trees on the site that need to be removed, none of which are worthy of retention. There is an area of hardstanding in the centre of the site where a building formerly stood, and a car park at the eastern end accessed via a gated entrance onto North Street. There is no planning permission for public usage of this modest redundant car park, albeit it appears to be used in

conjunction with the nearby *Reading Youth Offending Service* offices. As explored in **Section 4** below, the site is allocated in the *Reading Central Area Action Plan ("RCAAP")* for residential redevelopment. The land currently has no lawful use.

- 1.6 This part of Reading is close to the town centre and the *Inner Distribution Road ("IDR")* and is characterised by a mix of residential and commercial uses. To the north is an ambulance station and to the east are light industrial units, allocated in the RCAAP for mixed-use redevelopment. To the south and west are established flatted developments (Stratheden Place and Burford Court, respectively). To the south-east (on the opposite corner) is the former Iceland/Wickes site, whose recent planning permission for comprehensive high-density residential redevelopment is explored in **Section 2** of this Statement.

A sustainable location for development

- 1.7 The *Framework* confirms that there are three dimensions to sustainable development:

- 1.7.1 Economic
- 1.7.2 Social
- 1.7.3 Environmental

These dimensions give rise to the need for the planning system to perform a number of roles to deliver its *Framework* paragraph 6 purpose of contributing to achieving sustainable development.

- 1.8 The proposed development fulfils the **economic role** by contributing to building a strong, responsive and competitive economy. The development will provide additional homes for the local workforce, as well as introducing further resident population close to the town centre which will in turn boost retail and leisure spend in the central area.
- 1.9 The **social role** is fulfilled by contributing to meeting the Borough's well-documented housing need, in terms of both market and affordable dwellings. The proposed mix of apartment types and sizes has been informed by pre-application discussions with the Local Planning Authority, responding to the town's demographic needs in line with population growth projections and the policy imperative to deliver high-quality residential developments in the most sustainable locations.
- 1.10 The **environmental role** is fulfilled by enhancing the natural and built environment through:
- 1.10.1 The appropriate and efficient reuse of previously-developed land, which maximises its potential thus avoiding the need for equivalent development to be directed to virgin greenfield sites in arguably significantly less sustainable locations;
 - 1.10.2 Retention of an existing *Norway Maple* tree on the corner of North Street and Weldale Street;
 - 1.10.3 Onsite landscaping (including replacement tree planting) of the highest standard, including a west-facing residents' garden;
 - 1.10.4 Enhancements to the public realm, as per the concepts explored in the submitted ***Design & Access Statement*** and to be considered in more detail at reserved matters stage.
- 1.11 Accordingly, as explored further elsewhere in this Statement, there is no impediment preventing the presumption in favour of sustainable development from being engaged by this application.

2.0 PLANNING HISTORY

Application site planning history

- 2.1 The site is understood to have been used as a Local Authority Social Services facility for a number of years, evidenced by a “Day Nursery” annotation on the 1972 Ordnance Survey map. This had changed by 1989 when planning permission reference 880059 approved an “Extension to form enhanced service for families”. The enlarged building was subsequently demolished in March 2007 and the site cleared, leaving the foundation slab to remain.
- 2.2 In December 2014 a temporary two-year planning permission was granted for:
- “A new temporary school of modular construction, single storey and flat roofed. New fencing and gates to site perimeter. New hardstanding for car and cycle parking, a pupil hard play.”*
- 2.3 The Committee Report for that application explained that the temporary school was required on a limited short-term basis whilst the nearby permanent primary school at Hodsoll Road was constructed. The temporary school opened in September 2015 and operated for only 12 months before then relocating to its permanent location on Hodsoll Road in September 2016.
- 2.4 The temporary school buildings were then removed and from that point the site ceased to benefit from any lawful use. The site currently has a “nil” planning use status.

Adjacent sites planning history

- 2.5 On 8th November 2017 the *Planning Applications Panel* resolved to grant planning permission at the former Iceland/Wickes site (**Figure 01**) (reference 170326) for:

“Demolition of all existing buildings (including 3 retail units) and structures, and erection of new buildings ranging between lower ground & 4 storeys to lower ground & 11 storeys in height, providing 427 (233x1, 182x2 & 12x3-bed) residential units (Class C3) and 1 flexible ground floor retail shop (Class A1) or restaurant and cafe (Class A3) unit, together with new public realm, landscaping, accesses, parking and associated works (amended description).”

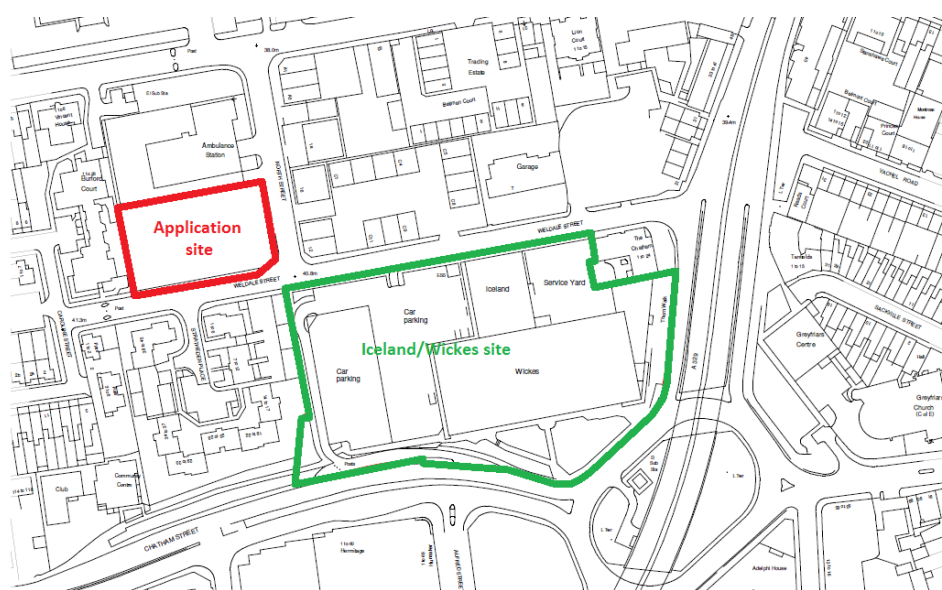


Figure 02: former Iceland/Wickes site

- 2.6 The approved former Iceland/Wickes site scheme is for a high density residential-led development, rising from 5 & 8 storeys closest to the application site to 11 & 12 storeys fronting Chatham Street (**Figure 03**).



Figure 03: approved development to the immediate south-east

- 2.7 The 427 dwellings approved on the 1.32 hectare former Iceland/Wickes site equate to a net development density of 323 dwellings per hectare, more than double the 206 dwellings per hectare proposed on the (0.228 hectare) application site.

Planning history: summary

- 2.8 This is a brownfield, previously-developed site which has no lawful use and is currently vacant and disused.
- 2.9 The application site is an in area of significant change, not least following the resolution to grant planning permission for the comprehensive high-density redevelopment of the former Iceland/Wickes site on the opposite side of the Weldale Street/North Street junction.

3.0 NATIONAL PLANNING POLICY

- 3.1 The importance of delivering sustainable development cannot be understated – a presumption in its favour is at the heart of the July 2018 *National Planning Policy Framework*.
- 3.2 Whilst the legislative starting point in the determination of planning applications remains as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004, nonetheless the *Framework* is a key material consideration which provides a fundamental backdrop and context to the statutory Development Plan.
- 3.3 The Government's intentions are clear in this respect, and are encapsulated at paragraph 11:
- "Plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means...approving development proposals that accord with an up-to-date development plan **without delay**."* (our emphasis)
- 3.4 Of particular relevance is Annex 1, which deals with implementation and which advises how decision-makers should deal with Development Plan policies which were adopted prior to the *Framework*'s publication in July 2018. Paragraph 213 is clear: it is not open to decision makers to simply and blindly rely upon Development Plan policies which were adopted before July 2018. Rather, "due weight" must be given to relevant policies in existing plans, governed by their degree of consistency with the *Framework*. Simply put, the closer the policies in the Development Plan are to those in the *Framework*, the greater the weight they can be given.
- 3.5 The corollary, of course, is that where a pre-July 2018 Development Plan policy departs from its counterpart in the *Framework*, it must be given less weight accordingly. Depending on the nature and level of difference between the comparative policies, there may be situations whereby an Adopted Development Plan policy is so fundamentally at odds with the *Framework* that it can be given very little weight indeed, if any. In such circumstances, it is clear that the relevant *Framework* policy will be an important material consideration capable of outweighing Development Plan policy. This position has been upheld by the Courts in the case of *Wynn-Williams v Secretary of State for Communities and Local Government* [2014] EWCH 3374.
- 3.6 Given that the Council's *Core Strategy* was adopted in January 2008 and the *Reading Central Area Action Plan* in January 2009, it is clear that *Framework* paragraph 213 and the requirements of Annex 1 are fully engaged.
- 3.7 It is in this context that the ***presumption in favour of sustainable development***, summarised at *Framework* paragraph 14 but at the heart of that document, must be considered. Where a proposal accords with the Development Plan, the presumption in favour of sustainable development is engaged.
- 3.8 Only in those circumstances where the adverse impacts of granting planning permission would "significantly and demonstrably" outweigh a scheme's benefits should planning permission be refused.

3.9 In essence, the decision maker must undertake a planning balance exercise which starts with the weight firmly in favour of granting planning permission. Accordingly, in the specific context of the Development Plan's applicability to this proposed development, a two-stage assessment is required:

3.9.1 Firstly, on a policy-by-policy basis it is necessary to compare and weigh each policy against its counterpart in the *Framework*, identifying (if any) the level of inconsistency and assessing how much weight can be attributed to local policy; and

3.9.2 Secondly, if it found that the Development Plan is absent, silent or out-of-date, the presumption in favour of sustainable development must be applied and an assessment made of whether the grant of planning permission would result in any "significant" or "demonstrable" adverse impact.

3.10 As explored in **Section 4**, Policy RC4b of the *Reading Central Area Action Plan* (the "RCAAP") allocates this site for development under the heading "Other Opportunity Sites". The site is allocated as location RC4b, "Reading Family Centre, North Street", with the policy text specifically confirming that, provided development "accords with the principles set out in this policy", the site is allocated for:

"Residential development (25-40 dwellings)."

3.11 There are no site-specific criteria with which development must comply and the bracketed figures are for guidance, rather than being determinative. Consequently, subject to complying with other general and generic policies in the Development Plan, **it is clear that the proposed residential development is policy-compliant.**

3.12 As a direct consequence, *Framework* paragraph 11 gives very clear instructions as to how decision-makers must proceed:

"For decision-making this means:

- **approving development proposals that accord with an up-to-date development plan without delay;** or
- *where there are no relevant development plan policies, or the policies which are the most important for determining the application are out-of-date⁷, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"*

(our emphasis)

3.13 Accordingly, the clear direction contained in the *Framework* is that planning permission must be granted **without delay**, unless doing so would "significantly" and "demonstrably" outweigh the benefits of doing so.

- 3.14 The following chapters of this *Statement*, and the accompanying *Design & Access Statement*, review the material considerations associated with the proposed development. Together with the findings of the other supporting reports submitted with this application, they confirm that there would be **no significant or demonstrable harm** from the proposed development that would outweigh the clearly-identified **significant public benefits** associated with the grant of planning permission.
- 3.15 In light of all of the above, proper application of the *Framework's* policies requires that **planning permission is granted without delay**.
- 3.16 Furthermore, the *Framework's* purpose of significantly increasing housing supply in part through making better use of derelict urban land is particularly important to this application:
- "118. Planning policies and decisions should:*
- c) **give substantial weight to the value of using suitable brownfield land within settlements for homes** and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- d) **promote and support the development of under-utilised land** and buildings, **especially if this would help to meet identified needs for housing** where land supply is constrained and available sites could be used more effectively."*
- 3.17 The application site is clearly one to which paragraph 118 applies, and given the site's sustainable location the requirements of paragraph 123 are also engaged:
- "123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, **it is especially important that planning policies and decisions avoid homes being built at low densities**, and **ensure that developments make optimal use of the potential of each site**. In these circumstances...plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be robustly tested at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should **seek a significant uplift in the average density of residential development within these areas**, unless it can be shown that there are strong reasons why this would be inappropriate."*
- 3.18 The submitted ***Design & Access Statement*** clearly demonstrates how the proposed development makes best use of this derelict urban site, whilst respecting the site's context and constraints.

4.0 THE DEVELOPMENT PLAN

4.1 At the time of writing, the Development Plan comprises:

- 4.1.1 Core Strategy (January 2008)
- 4.1.2 Reading Central Area Action Plan (January 2009)
- 4.1.3 Site and Detailed Policies Document (October 2012)
- 4.1.4 Proposals Map (December 2012)

4.2 As the Council's *Core Strategy* and *Reading Central Area Action Plan* ("RCAAP") were both adopted a number of years before the publication of the *Framework*, so paragraph 215 confirms that they cannot automatically be attributed full weight. As such, policies contained therein must be tested against the *Framework* rather than accepted and implemented at pure face value and accordingly, the two-stage assessment explained at paragraph 3.9 of this Statement applies.

Core Strategy (January 2008 with Alteration Adopted January 2015)

4.3 Aside from the specific policies themselves, Chapter 3 sets out the broad aims of the document as a Spatial Strategy for the development of Reading over the plan period. There are a number of key re-occurring themes in the *Core Strategy*, such as that "*Major development should be located in areas of high accessibility where it does least harm to the environment and delivers most benefits to the wider community.*" (paragraph 3.4). Paragraph 3.6 sets out another key principle, which is worthy of replicating here in full:

*"The predominantly urban character of Reading Borough, exacerbated by tightly drawn boundaries, means that the vast majority of any future development will be in the form of redevelopment and regeneration of previously developed land. In particular, there are areas or sites that are **currently under-utilised**, and/or are visually and environmentally detrimental which need to be brought forward for mixed-use schemes and developed at an appropriate density with appropriate infrastructure provision...**Development must have excellent access to effective and efficient public transport.**"*

(our emphasis)

4.4 The principle of the strategy is therefore that development should take place within and in close proximity to the most sustainable locations, of which the centre of Reading is placed above all others. This is again consistent with the *Framework*'s requirement for development to take place in the most sustainable locations, and this the *Core Strategy*'s overarching theme can be attributed full weight.

4.5 Starting with the highest level principles which govern the spatial distribution of development in the Borough, **Policy CS4** ("*Accessibility and the Intensity of Development*") confirms that the scale and density of development in different locations will be related to their levels of accessibility. This is consistent with the general thrust of the *Framework*, and also accords July 2018 changes to the *Framework* which seek **a significant uplift in densities** in the most sustainable locations, such as the application site.

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- 4.6 Given the site's very close proximity to the centre of Reading, and its excellent access to public transport connections and the facilities that the town centre has to offer, this is patently one of the most sustainable locations within the Borough and, by implication, suitable for development at a commensurate scale and density. This must itself be considered in the context of the resolution to grant planning permission at the former Iceland/Wickes site.
- 4.7 The proposed development clearly fully complies with Policy CS4, which itself complies with the *Framework* and can be attributed full weight.
- 4.8 High-level design advice is given in **Policy CS7** ("*Design and the Public Realm*") which requires that new developments "*must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.*" The policy then goes on to set out a list of overarching urban design objectives that any development must achieve and continues by listing a number of generic design criteria that proposals will be assessed against, such as ensuring that they create safe and secure environments.
- 4.9 This policy is broadly consistent with the *Framework's* thrust of requiring high quality design and its recommendation that good design is indivisible from good planning (*Framework* paragraph 56). The policy is overarching in that it is setting out the principles against which new development will be assessed. It does not favour one design approach over another, which again is consistent with the *Framework's* instruction that Local Planning Authorities should not seek to impose particular architectural tastes or styles. To this end, the policy is compliant with the *Framework* and so attracts full statutory weight.
- 4.10 The accompanying *Design & Access Statement* clearly sets out how the proposal would meet the very detailed design criteria in Policy CS7, and how the proposed development accords with this part of the Development Plan. The proposal is for a quality residential development which enhances the area's sense of place and respects its current and emerging setting.
- 4.11 **Policy CS15** (*Location, Accessibility, Density and Housing Mix*") relates to these characteristics in new residential developments. The criteria-based approach sets out how development will be informed by a range of factors, linked to *Core Strategy* policies CS4 and CS7. Policy CS15 sets a **minimum density of 70 dwellings per hectare** in locations such as the application sites, but does not specify any density ceiling – the recent grant of planning permission at the former Iceland/Wickes site is testament to this. Again, this policy is broadly consistent with the thrust of the *Framework*. By setting no policy limit or cap on development densities in the most sustainable locations, the policy can properly be interpreted to mean that such locations are not just suitable for, but rather must be relied upon to deliver, higher densities than in more peripheral or less sustainable suburban locations. The policy carries substantial weight as a result.
- 4.12 The accompanying ***Design & Access Statement*** clearly explains how the proposed development would meet the criteria set out in Policy CS15, and consequently it must be concluded that the application accords with this part of the Development Plan.

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- 4.13 **Policy CS16** (*"Affordable Housing"*) was amended by a formal alteration to the *Core Strategy* in January 2015, and sets out that for developments of 15 dwellings or more, the Council will seek 30% of these to be for affordable purposes. This is consistent with the *Framework's* requirement that Local Planning Authorities should plan for a need for such housing where one exists, subject to viability considerations.
- 4.14 For the avoidance of doubt, the applicant proposes **30% of the apartments to be for affordable housing**, in compliance with Policy CS16's target. The tenure of the affordable homes will be confirmed in a Section 106 agreement.
- 4.15 **Policy CS33** (*"Protection and Enhancement of the Historic Environment"*) is not relevant, given that there are no designated or undesignated heritage assets nearby.
- 4.16 In respect of highway and transport-related matters, **Policies CS20** (*"Implementation of the Reading Transport Strategy"*), **CS21** (*"Major Transport Projects"*) and **CS23** (*"Sustainable Travel and Travel Plans"*) sit together as a suite of policies that seek to deliver major transport improvement schemes whilst at the same time fostering sustainable travel. When read in conjunction with **Policy CS5** (*"Inclusive Access"*), it is clear that these policies give substantial support for the *Mass Rapid Transit* scheme separately proposed across the northern site boundary, whilst seeking to safeguard and enhance the journeys of non-motorised users. These policies are all generally compliant with the transport and travel sections of the *Framework* and can be given significant weight accordingly.
- 4.17 Compliance with the Core Strategy's highways and transport policies is evidenced through the sustainable level of onsite car parking proposed, in accordance with the Local Highway Authority's preapplication advice.
- 4.18 **Policy CS38** calls for a net increase in tree cover in the Borough, which would be delivered by:
- 4.18.1 Retention of the existing *Norway Maple* tree on the corner of North Street and Weldale Street; and
 - 4.18.2 Onsite landscaping (including replacement tree planting) of the highest standard, including semi-mature trees approximately 6m tall;
- The enclosed **Tree Report** demonstrates that the building would remain outside the root protection zone of the retained *Norway Maple*. The precise details of species, layout, planting density and so forth is a reserved matter.
- 4.19 Finally and for completeness, **Policy CS34** (*"Pollution and Water Resources"*) requires that contaminated land is remediated to a standard appropriate to the nature of the development proposed, and that noise and air quality considerations are subject to *"adequate mitigation measures"*.
- Reading Central Area Action Plan (2009)**
- 4.20 The *Reading Central Area Action Plan* (*"RCAAP"*) allocates this site for development as an *"Other Opportunity Site"* at **Policy RC4**. The policy confirms that there are numerous opportunity sites within the RCAAP's spatial boundaries, but only identifies specific sites for allocations where they meet one of the following four criteria:

- Sites where development would contribute to significant environmental enhancement of the surrounding area;
- Sites where development would make a significant contribution to meeting the Borough's housing need;
- Sites where development would make a significant contribution to expanding or consolidating the range of facilities available in the centre;
- Sites where development would make a significant contribution to achieving the Spatial Strategy of the RCAAP.

- 4.21 The applicant contends that the application was specifically included within the RCAAP by virtue of meeting bullet points 1, 2 and 4.
- 4.22 All "*Other Opportunity Sites*" allocated under Policy RC4 are subject to the caveat that their development must "*accord with the principles set out in (the) policy*" which, by extension, means that where the Local Planning Authority wishes to give restricting or relevant factors significant weight in respect of each of these sites, those considerations must be listed in the policy.
- 4.23 There are no overriding factors or considerations listed in Policy RC4 that apply to all the opportunity sites but rather, where such factors exist, they are identified on a site-by-site basis.
- 4.24 The application site is allocated a site **RC4b** ("*Reading Family Centre, North Street*") with no restrictions other than a guideline development quantum range, as follows:

"Residential development (25-40 dwellings)"

- 4.25 Just then as the principle of development complies with the spatial distribution of development set in the *Core Strategy*, so too does the scheme comply with the site-specific allocation at Policy RC4b. Simply put, there can be no question whatsoever that the residential development proposed on this site is wholly and unequivocally in accordance with the adopted Development Plan's spatial policies. However, the RCAAP density range does not reflect the requirement to secure **a significant uplift in densities** and thus its figures can be attributed only limited weight.
- 4.26 **Policy RC5** relates to the design of new development specifically in the central area. This policy is broadly consistent with the *Framework's* thrust of requiring high quality design and its recommendation that good design is indivisible from good planning (paragraph 56). The policy is detailed in terms of some of the specific matters the development in the town centre should achieve, but is generally reflective of well-established and sound urban design principles. Policy RC5's remit is limited in this regard, and does not set out to favour any one specific design approach over another. It is consistent with the *Framework* accordingly and can continue to carry significant weight.
- 4.27 The accompanying *Design & Access Statement* sets out how this proposal would meet the detailed design criteria on Policy RC5 and consequently, how the scheme complies with this part of the Development Plan.

4.28 **Policy RC9** (*“Living in the Centre”*) lists the criteria against which residential developments within the RCAAP area will be assessed including mix, residential amenity, affordable housing and the provision of community facilities. The policy is broadly consistent with the *Framework* and thus carries substantial weight.

4.29 The submitted **Design & Access Statement** and **Noise Assessment** explain how the Policy’s criteria are met, and in respect of development mix the following is pertinent:

Unit size	Policy target	Actual proposed	Percentage
One-bedroom	Not more than 40%	15	32%
Two-bedroom	(none)	27	57%
Three-bedroom	Not less than 5%	5	11%
		47	100%

4.30 The over-provision of two-bedroom apartments is a positive benefit, whilst the quantum of three-bedroom apartments also exceeds the *“ideal”* mix. The housing mix has been formulated in consultation with the Local Authority’s planning and housing departments.

4.31 **Policy RC14** protects specific areas from development, which excludes the application site. RC14(i) and (ii) both endorse high-quality public realm improvements, which in respect of this scheme will include a new area of space surrounding the retained *Norway Maple* tree. Whilst the design of this will be confirmed at reserved matters stage, nonetheless the scheme complies with Policy RC14, which is broadly compliant with the *Framework* can which can be attributed full weight accordingly.

Sites and Detailed Policies Development Plan Document (October 2012)

4.32 This DPD was adopted post-publication of the *Framework* and, unlike the other Development Plan documents assessed above, contains a presumption in favour of sustainable development. It is not necessary to weigh its policies against those of the *Framework*.

4.33 Whilst the DPD’s policies apply in the Central Area where there are no other policies in place that cover the relevant consideration, in reality the policies in the Core Strategy and RCAAP – where they have been found to be consistent with the *Framework* – are most relevant to the proposed development.

4.34 **Policies DM1** and **DM2** both seek to mitigate climate change and are *Framework*-compliant. A condition is invited to ensure that the development complies with these policies.

4.35 **Policy DM3** deals with planning obligations and was adopted prior to the introduction of the Council’s Community Infrastructure Levy and amendments to the Community Infrastructure Levy Regulations which prevent the pooling of Section 106 contributions. The policy can carry very little weight as a result.

4.36 Be that as it may, the applicant has nonetheless committed to entering into a planning obligation of provide a contribution to improvements that are directly related to the proposed development. Whilst Section 106 discussions are underway the precise details of the contributions being discussed remain commercially confidential Exempt Information, but nonetheless for the purposes of demonstrating compliance with Policy DM3 these include:

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- 4.36.1 Affordable housing
30% affordable housing is proposed
- 4.36.2 Construction Employment and Skills Plan
The applicants have offered to commit to an appropriate training plan, in discussion with Reading UK CIC, as part of the Section 106 agreement.
- 4.37 **Policy DM4** seeks to safeguard the “amenities” (living conditions) of existing occupiers. The proposed development has been carefully designed to ensure that the full content and purpose of this policy is adhered to, through:
- 4.37.1 Engagement with the Local Planning Authority at pre-application stage, including *Design Review Panel* assessments in January and September 2018;
- 4.37.2 Avoiding any undue overlooking to Burford Court or any other nearby dwellings through careful siting and design;
- 4.37.3 Endorsing a modern architectural design language which, whilst a reserved matter for consideration at a later stage, nonetheless envisages large window openings with consequentially generous levels of internal light.
- 4.38 **Policy DM6** relates to the provision of affordable housing. The application proposes **30% affordable housing** integrated within the development.
- 4.39 **Policy DM10** relates to private and communal open space, and is generally compliant with the intentions of the *Framework* to deliver good quality design. As set out in the accompanying **Design & Access Statement**, the proposed development complies with Policy DM10 by providing:
- 4.39.1 West-facing ground level amenity space, including sitting-out, planting and clothes drying spaces;
- 4.39.2 A semi-private frontage to Weldale Street, set behind railings and a hedge;
- 4.39.3 Provide threshold planting in front of ground floor windows, to enhance occupiers’ privacy;
- 4.40 The submitted **Noise Assessment** and **Air Quality Assessment** documents assess the proposed development in light of **Policy DM19** and its requirement that the effects of poor air quality are mitigated. The application site is in a lightly-trafficked no-through-road location but nonetheless, appropriate mitigation measures are set out in the submitted documents, compliance with which can be secured by condition.
- 4.41 Given all of the above, the proposed development is clearly **entirely consistent with this part of the adopted Development Plan**.

5.0 OTHER CONSIDERATIONS

- 5.1 The law is clear that development proposals must be determined in accordance with the statutory Development Plan, unless material considerations indicate otherwise. As set out throughout this statement, the proposed development fully accords with the Development Plan and thus should be granted planning permission accordingly. Nonetheless, it is still necessary to identify and weigh any other material considerations in order to be able to properly perform the planning balance exercise.

Reading Station Area Framework SPD (2010)

- 5.2 The Reading Station Area Framework (“RSAF”) SPD is not relevant as the application site falls outside its spatially-defined area.

Reading Borough Council Community Infrastructure Levy

- 5.3 The Council adopted its Community Infrastructure Levy in 2015. CIL is calculated on the basis of floor area and consequently it is not possible to make an accurate estimate of the scheme’s CIL liability until reserved matters stage. Nonetheless, the 47 proposed apartments are likely to have a floor area in the order of 2,800m² Gross Internal Area, net of 840m² affordable housing (which will qualify for Social Housing Relief) at £147.29 per m², as being in the order of £280,000. This significant sum’s contribution towards the provision of additional infrastructure to serve the Borough is a material consideration in its own right.

Emerging planning policy

- 5.4 The Local Planning Authority is preparing a new Local Plan, which will replace the adopted Core Strategy, RCAAP and Sites & Detailed Policies DPD with a single new plan setting out how the town will develop up to 2036. Consultation on the *Pre-Submission Draft Local Plan* was underway at the time of writing (consultation period running from 30th November 2017 to 26th January 2018), with the *Pre-Submission Draft* itself being a revised version of an earlier draft that was consulted on in May and June 2017. The Local Planning Authority has subsequently submitted the new Local Plan for approval to the Secretary of State and, at the time of writing, the examination hearings were due to commence shortly.
- 5.5 The emerging Local Plan carries forward the current Development Plan’s recognition that this part of Reading is an area expected to experience significant change, recognising that regeneration of the western edge of the centre has been a long-held objective, and that the development of the Chatham Street area is now complete. The application site lies adjacent to the *West Side Major Opportunity Area* which seeks to allocate more than 3 hectares of land to the immediate east of the site (**Figure 04**) for a mixed-use residential-led development of up to 430 new homes:

“CR12b, GREAT KNOLLYS STREET & WELDALE STREET:

This area will be developed primarily for residential. Any development which would result in the loss of small business units should seek to replace some of those units, preferably on site. There should be a careful transition to the lower density residential areas to the west. Listed buildings and their settings in the area will be conserved and where possible enhanced. Indicative potential: 280-430 dwellings, no significant net gain of other uses.”

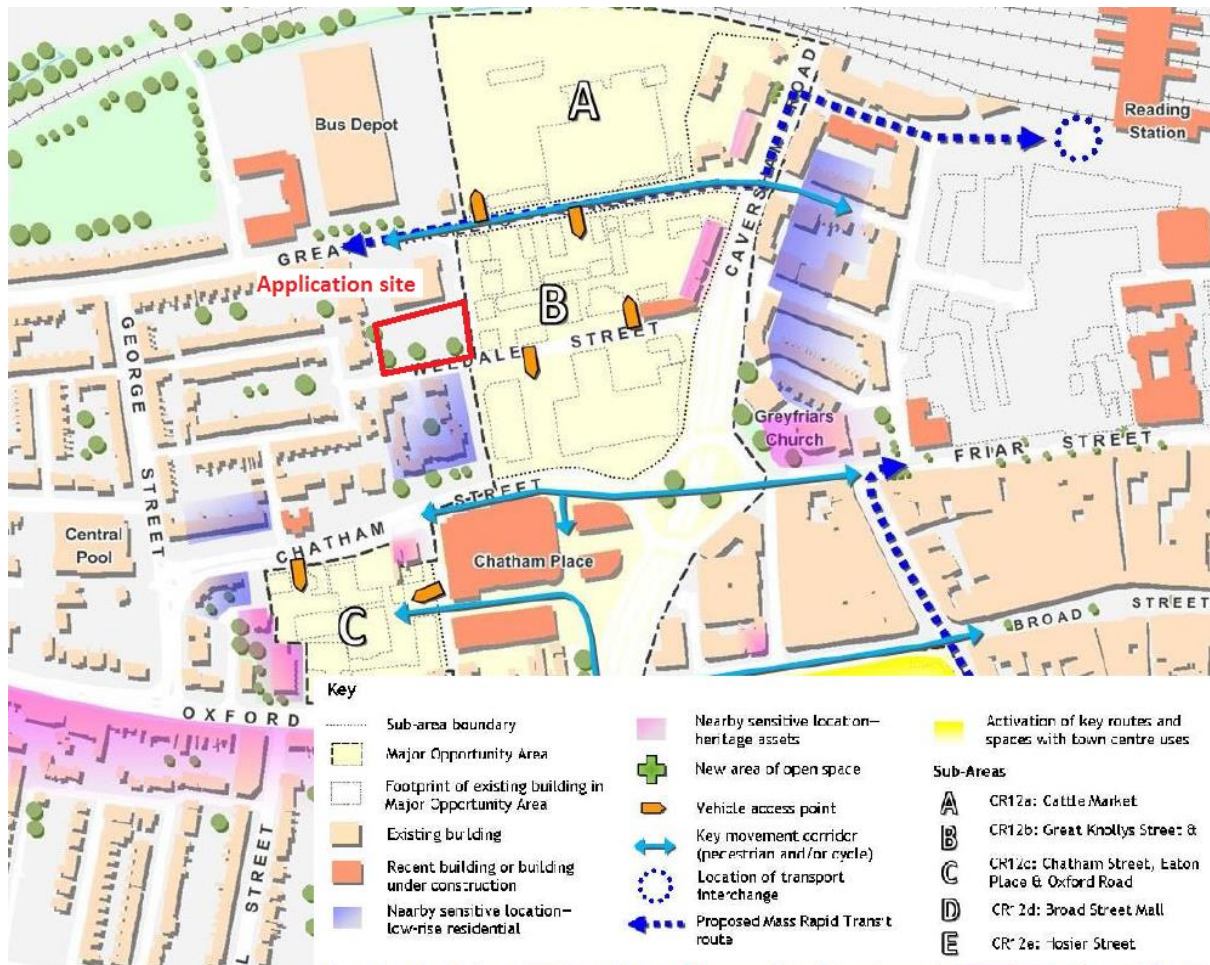


Figure 04: adjacency to a Major Opportunity Area in the emerging Local Plan

- 5.6 **Draft Policy CR14b** directly carries forward RCAAP Policy RC4b in terms of precisely the same land use and largely the same policy wording, but inserts references to air quality and archaeology:

Adopted RCAAP Policy RC1(h)	Pre-Submission Draft Local Plan CR11(h)
Residential development (25-40 dwellings)	Development for residential. Development should: • Address air quality impacts on residential use; and • Take account of potential archaeological significance. Site area: 0.23 ha 15-22 dwellings

- 5.7 The reduction in the site's notional capacity compared to the current statutory Development Plan (which for the reasons set out above continues to carry significant weight) is unexplained – particularly given the material change in the site's circumstances that has arisen from the grant of planning permission at the former Iceland/Wickes site.

- 5.8 Provided that the submitted scheme can be demonstrated to be acceptable at application stage, indicative quantum figures can only be considered as illustrative. This is confirmed at the draft supporting text at paragraph 5.4.33:

“Where dwelling or floorspace figures are included alongside the allocations, these are intended as a guide, and usually reflect an indicative maximum capacity. They are based on an initial assessment taking into account the characteristics of each site. However, the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. The fact that a site is allocated in CR14 does not preclude the need to comply with all other policies in the local plan, including, for residential developments, the need to provide affordable housing.”

- 5.9 The emerging local planning policy context, whilst attracting very little weight at the current time, also makes no material difference to the acceptability of the proposed development given that application complies with both the adopted and the emerging site-specific policies.
- 5.10 Other than those explored above, there are no other material considerations that have been identified as being relevant to the planning balance.

6.0 THE PLANNING BALANCE AND CONCLUSION

- 6.1 There are significant material public benefits that would flow from the proposed development:

Economic benefits

- 6.1.1 The provision of **additional homes in the town centre** would bring increased spend into the retail catchment, **enhancing the vitality and viability of the town centre**;
- 6.1.2 Additional homes in the Borough will enhance **workforce flexibility** and assist in employers attracting additional staff to the town;
- 6.1.3 The Council could expect to receive a substantial **Community Infrastructure Levy** payment and **Section 106 contributions**;
- 6.1.4 **New jobs** would be created during the construction phase as well as induced jobs (notably in the service sector) once the development is occupied.

Social benefits

- 6.1.5 The provision of **much-needed new homes** is in itself a significant benefit;
- 6.1.6 **30% affordable housing** will make a valuable contribution to a significant local need;
- 6.1.7 A *Construction Employment & Skills* obligation would bring additional training (notably apprentices) and other construction skills training to the local workforce;
- 6.1.8 Existing public transport would likely encounter **increased patronage** from the additional residential population in the proposed development;

Environmental benefits

- 6.1.9 The development would facilitate the **reuse of a vacant brownfield site**;
- 6.1.10 Replacing this disused site with a bespoke building of high-quality design would significantly **enhance the character and appearance of the area**;
- 6.1.11 There would be a **net biodiversity gain** through the provision of targeted habitat enhancements;
- 6.1.12 **New semi-mature onsite tree planting** (to be considered and approved at reserved matters stage) would replace existing examples that are of an inappropriate species or have limited longevity, making a modest ongoing contribution to **CO₂ reduction** targets;
- 6.1.13 Retention of the existing *Norway Maple* tree will retain its streetscene and habitat value;
- 6.1.14 Residential redevelopment of a site allocated for this purpose since 2009 will act as a further **catalyst to the area's regeneration**.

- 6.2 **No “significant” or “demonstrable” adverse impacts have been identified.** There would be no demonstrable harm to highway capacity. There would be no demonstrable harm to the living conditions of nearby occupiers. There would be no increased risk of flooding onsite or elsewhere. There would be no harm to landscape or heritage assets.
- 6.3 The proposed development is wholly compliant with the relevant policies in the statutory adopted Development Plan.

THE PLANNING BALANCE

- 6.4 A explored above, the proposed development would deliver **numerous and significant public benefits** which cumulatively carry **substantial** weight in the planning balance.
- 6.5 Against these benefits, there is a **complete absence of “significant and demonstrable harm”** with no disbenefits having been identified to be weighed in the planning balance.
- 6.6 Consequently, it is very clear that **the planning balance weighs firmly in favour of granting planning permission.**
- 6.7 As demonstrated throughout this statement, the proposed development is in accordance with the Development Plan and as per Section 38(6) of the Planning and Compulsory Purchase Act 2004, **planning permission should therefore be granted.**
- 6.8 There are no material considerations whatsoever that indicate that planning permission should be withheld. Indeed, in the unlikely event that the decision maker were to find that there was a conflict of some kind in relation to the provisions of the Development Plan, then the cumulative material planning considerations compellingly indicate that any such perceived conflict would be wholly outweighed, so still pointing to the grant of planning permission.
- 6.9 In this regard, the *Framework’s* presumption in favour of sustainable development is undoubtedly engaged and accordingly the decision-taker is instructed as a matter of Government policy to **grant planning permission**. As has been clearly demonstrated, there would be no adverse impacts whatsoever of doing so that might outweigh the benefits, either “significantly” or “demonstrably”.
- 6.10 There are no policies in the Development Plan or in the *Framework* that indicate that development should be restricted and accordingly, the Local Planning Authority should grant planning permission **without delay**.