

Planning Statement

Reading Heights, Queen's Road, Reading

May 2018

Contents

Executive Summary	2
1. Introduction	4
2. Site Context	6
3. Proposed Development	10
4. Pre-Application Consultation	13
5. Planning Policy	15
6. Planning Assessment	25
7. Affordable Housing Statement	43
8. Conclusions	45
Appendix 1: Planning Policy Matrix	46

Jonathan Walton
Jonathan.Walton@Vocalism.co.uk

Client
Reading Heights Ltd

Our reference
VOC-17-48

May 2018

Executive Summary

1. This Planning Statement forms part of a suite of documents submitted to Reading Borough Council for consideration in support of the applicants' (Reading Heights Ltd) proposals for wholesale re-development of land at Clarendon House, 59 – 75 Queens Road, Reading.
2. This application comprises the proposed new build elements of the wider scheme, which support earlier applications for the change of use of the existing office building to residential accommodation and associated landscaping and façade improvements.
3. The design development process has been underpinned by very significant pre-application engagement with Council Officers, Members, the Design Review Panel, local interest and business groups and members of the public. The resultant proposals have therefore sought to incorporate comments, as appropriate.
4. Development of the site as proposed will generate very significant townscape and visual improvements, alongside a host of economic, environmental and social benefits. These include:
 - The application proposals will result in the redevelopment of a brownfield site, which is not environmentally sensitive, as determined by the various technical reports supporting the application and will thus achieve an efficient use of land.
 - The introduction of significant on-site planting will help provide visual and environmental uplift to the site and surrounding area, in turn helping to mitigate potential air quality and flood risk issues.
 - The inclusion of built form along the Watlington Street frontage will help provide additional air quality and acoustic mitigation to residents in Queens Wharf and Grantley Heights located behind this frontage, as a consequence of the side extension forming a meaningful barrier from pollution sources on the IDR.
 - During the construction phase a number of construction jobs will be sustained directly, with additional jobs being sustained or created through expenditure in the supply chain. The applicant is committed to sourcing the predominance of jobs sustained during the construction phase by people living in Reading area and wider region.
 - The future occupiers of the completed homes will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in Queens Road and the Town Centre.
 - Other related economic benefits include CIL contributions, the extent of which is set out in the S106 Heads of Terms, as well as the award of new homes bonus payments to the Council.

- The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock.
- The scheme provides visual uplift that will improve the outlook of nearest residential neighbours, whilst providing a missing portion of the urban grain, allowing a mansion block typology to emerge that gifts better security, privacy and an area for solace and reflection to those residents abutting the central amenity space.
- The provision of 1 and 2 bedroom dwellings will help to address an identified requirement over the local plan period, as well as provide much-needed 'windfall' accommodation to help meet the current shortfall in housing units identified in the emerging Local Plan.
- The scheme can accommodate 30% affordable housing on site to meet identified need in this regard.
- The proposed side extension will act as a continuation of the predominant run of flatted development emerging on Queens Road and the northern side of the Watlington Street junction, helping transform an area that has recognised problems with drug abuse and anti-social behaviour into a more welcoming location that features better natural surveillance and which introduces significant landscaping to improve visual appearance and environmental credentials.

5. The development fully accords with local, regional and national planning policy, as set out in following sections, and it is therefore respectfully requested that planning permission is granted.

1. Introduction

- 1.1 This Planning Statement forms part of a suite of documents submitted to Reading Borough Council for consideration in support of the applicants' (Reading Heights Ltd) proposals for wholesale re-development of land at Clarendon House, 59 – 75 Queens Road, Reading.
- 1.2 This latest application comprises the proposed new build elements of the wider scheme, which support earlier applications for the change of use of the existing office building to residential accommodation and associated landscaping and façade improvements.
- 1.3 This statement has been prepared by Vocalism on behalf of Reading Heights Ltd and sets out detail of the full planning application for:

'The erection of a one storey roof extension, a part six, part ten storey building and mews houses comprising 4,108 sqm (GEA) of new development, providing up to 50 residential units together with associated services enclosures, parking and landscaping'.

Supporting Documentation

- 1.4 The Planning Statement is submitted as part of the planning application documentation, as set out below, for the proposed development. In addition to this Statement, the planning application documentation comprises:
- Completed Full Planning Application Forms, with Certificates of Ownership;
 - Completed CIL Forms;
 - Planning Application Drawings, including Site Location Plan, Site Plans, Floor Plans, Elevation Drawings, Section Drawings and Accommodation Schedule (references are provided in full within the application forms);
 - Design and Access Statement
 - Air Quality Assessment
 - Affordable Housing Statement (see Section 7 of this Planning Statement)
 - Ground Conditions Assessment
 - Heritage and Townscape and Visual Assessment
 - Transport Statement
 - Energy and Sustainability Appraisal
 - Noise Impact Assessment
 - Statement of Community Involvement

- Flood Risk Assessment and Drainage Strategy
- Flood Risk – Sequential Assessment
- Utilities and Foul Drainage Assessment
- Landscape Scheme
- Daylight & Sunlight Assessment
- Planning Obligations Statement – Draft S106 Heads of Terms

Structure of the Report

1.5 The purpose of the Statement is to provide further detail of the proposed scheme, and to assess its merits against the development plan and other relevant material considerations. The Planning Statement is structured as follows:

- Section 2 provides the context for the development through a description of the application site, the surrounding area and its planning history;
- Section 3 provides details of the proposed development for which planning permission is sought;
- Section 4 summarises the pre-application consultation process that has been undertaken throughout the preparation of the emerging proposals;
- Section 5 sets out the relevant planning policies against which the proposals will be assessed, including consideration of the development plan and relevant material considerations;
- Section 6 assesses the current development proposals in the context of the development plan and relevant material considerations;
- Section 7 provides an Affordable Housing Statement; and
- Section 8 provides an overall summary and conclusion to the report.

2. Site Context

Site Location & Description

- 2.1 The Site is located at 59-75 Queens Road, Reading. As noted above, the wider site is referred to in this application as Reading Heights and comprises an existing 1980's commercial building (Clarendon House) and an associated car park which is located to the east and north of the existing building.
- 2.2 The site is bounded by residential and mixed-use residential buildings to the north and west and by Watlington Street to the east with residential development beyond, with Clarendon House situated on the southern border, adjacent to Queens Road, this section of Queens Road forming part of Reading's Internal Distributor Road (IDR)
- 2.3 Reading Heights is located within the Reading Central Area, in a location identified for Tall Buildings Clusters under Policy RC13 of the Core Strategy and is immediately to the south of the River Kennet and the Central Zone as defined by the Local Plan proposals map, October 2012. The Eldon Square Conservation Area is located immediately to the south-east of the site. The whole of the Reading Central Area is designated as an Air Quality Management Area (AQMA).

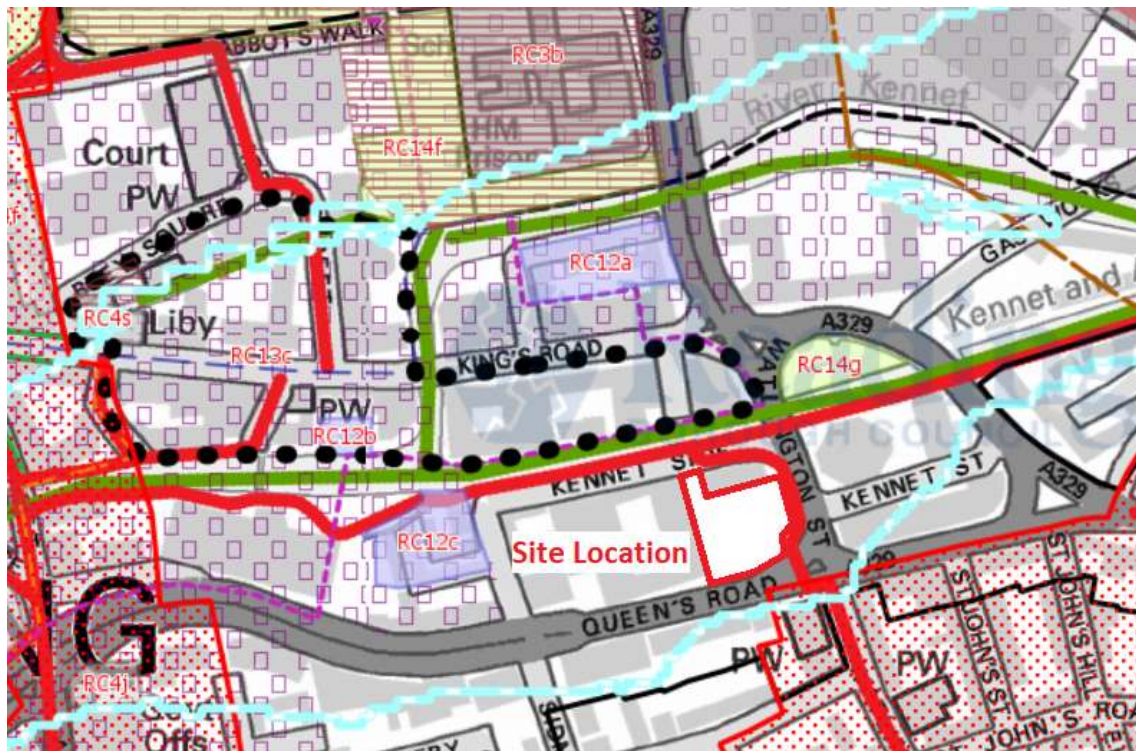


Figure 1 – Local Plan Proposals Map, October 2012 extract

- 2.4 Vehicular access to the site is via Kennet Side which runs along the north of the site. Reading Heights can be directly accessed by pedestrians from Queen's Road.

- 2.5 Reading Heights is ideally located adjoining Reading Central Core and is therefore highly sustainable in terms of access to shops, leisure, community services and public transport. It is 500m from the primary shopping core and 400m from the office core.
- 2.6 The site is just under 1km walking distance from Reading Station which provides direct rail links to London, the South West, Wales and the Midlands. Also, many of Reading's main bus routes, including direct links to Heathrow Airport, go via the station. Within the local area, various bus routes are also accessible on Kings Road and Queens Road, providing significant public transport connectivity.

Planning History

- 2.7 The development site has been subject to a short planning history and the most relevant decisions and applications are listed in the table below.

Application Number	Description	Decision	Date
180772	Application for discharge of condition 3 (contamination) of prior approval consent ref. 180156		Ongoing
180722	Change of use of building from Class B1(a) (offices) to C3 (dwelling houses) to comprise 49 dwellings. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.		Ongoing
180240	Additional and replacement fenestration and doors, new hard and soft landscaping, relocation of cycle store and revised car parking layout		Ongoing
180156	Change of use of building from Class B1(a) (offices) to C3 (dwelling houses) to comprise 49 dwellings. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Approved	15/03/2018
170905	Change of use of building from Class B1(a)(offices) to C3 (dwelling houses) to comprise 49 residential units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).	Approved	31/07/2017
980612	Erection of 5/6 storey residential development comprising 24 apartments (18 x 2 bedroom and 6 x 3 bedroom) with	Approved	16/12/1998

	associated car parking at ground/basement level		
980251	Erection of 5/6 Storey Residential development comprising 24 apartments (18 no 2 bedroom, 6 no 3 bedroom) with Associated car parking at ground/basement Level	Approved	07/08/1998

- 2.8 Clarendon House is currently a vacant office building and the remainder of the site is associated parking. Prior Approval was granted in July 2017 for the change of use of this existing building from Class B1a offices to Class C3 Residential (ref: 170905).
- 2.9 A subsequent Prior Approval application (ref: 180156) was approved in March 2018 which enabled minor internal changes to the approved 2017 change of use scheme to come forward. An application to discharge pre-commencement conditions pursuant to the March 2018 Prior Approval application was made in April 2018 and is currently under determination, ref: 180772.
- 2.10 In addition, there is currently an application, ref: 180240, which is being considered by the council which proposes minor alterations to fenestration, building entrances and landscaping detail in relation to Clarendon Houses. The purpose of these changes is to allow the building to successfully transition from office to a meaningful residential use, requiring window and entrance detailing to soften the visual appearance of the premises, which is aligned with changes to landscaping to soften the buildings surrounds and to in-build defensible spaces. It is understood that this application should be approved in the near future.
- 2.11 Following discussions and correspondence with Council Officers it has been deemed necessary to vary the Prior Approval permission so that parking and the layout attributable to Clarendon House can be separated from the proposals to provide new build development – the subject of this planning application. Accordingly, a new application, ref: 180722, was submitted to the Council on 27th April 2018 to help reconcile the various parts of the site-wide development proposed.
- 2.12 Plans to identify co-ordination of the various scheme aspects is provided within Section 5.5 of the Design and Access Statement (DAS), but to summarise:
- Permission to change Clarendon House from office to residential use, which includes details of internal layout, is established by ref: 180156 (Initial PD Scheme).
 - Ref: 180722 proposes amendments solely to site layout permitted under ref: 180156, retaining all internal detailing (Current PD Scheme)
 - Ref: 180240 seeks façade and landscaping improvements to support the above proposals (Fenestration Application)

- This 'new build' scheme seeks roof and side extensions to provide more effective wholesale redevelopment of the site, which includes landscaping proposals to gel all scheme aspects into a single, co-ordinated development.

Other relevant Planning Applications

2.13 There is a considerable amount of development taking place in Reading town centre. The following planning applications are considered to have some relevance to the proposed scheme:

- 170509 – Kenavon Drive – up to 11 storey building, 765 residential units, 1,384.6 sqm of retail and leisure floorspace. Resolution to grant planning permission subject to the signing of a legal agreement and any call-in from the Secretary of State.
- 160378 – Former Gas Works Building – Change of use, conversion, and extensions to create 20 residential units. Approved 28/10/2016.
- 150019 – Kings Point – up to 17 storey building, 103 units and 351.5 sqm of commercial floorspace. Approved 30/08/2015.

3. Proposed Development

Description of Development

- 3.1 The description of the proposed development at Reading Heights is:

'The erection of a one storey roof extension and a part six, part ten storey building, mews houses comprising 4,108 sqm (GEA) of new development, providing up to 50 residential units together with associated services enclosures, parking and landscaping'

Amount and Mix of Housing

- 3.2 The proposed development, as set out in the planning drawings supporting this application, seeks to provide up to 46 one to two bed residential units, comprising a mix of private and affordable housing, as well as wheelchair accessible units.
- 3.3 It is proposed that 14 of the 46 dwellings will be provided as affordable units, representing 30.4% of the total number of dwellings. The tenure distribution has been broken down into the following categories:
- Affordable Rent
 - Intermediate
 - Market Sale
- 3.4 A breakdown of the accommodation is shown in the table below.

Tenure	Unit Type	Number of units	%
Affordable Rent	1 bedroom 2 person	5	10.9
	2 bedroom 3 person	2	4.3
	2 bedroom 4 person	0	0
	Sub-total	7	15.2
Intermediate	1 bedroom 2 person	5	10.9
	2 bedroom 3 person	1	2.2
	2 bedroom 4 person	1	2.2
	Sub-total	7	15.2
Market Sale	1 bedroom 2 person	7	15.2
	2 bedroom 3 person	19	41.3
	2 bedroom 4 person	6	13.0
	Sub-total	32	69.5
Total		46	100

- 3.5 Of the 14 affordable units proposed, 5 units will be wheelchair adaptable; 3 within the affordable rent units and 2 located in the intermediate units.

Massing and scale

- 3.6 Whilst the proposed development is for 'up to 50 dwellings', the scheme currently envisages 46 dwellings in the mix set out above. On a development site of 0.22ha, this will result in a residential density of 209 dwellings per hectare (gross). Built form has been subject to significant negotiation which has culminated in co-ordinated proposals, as set out in paragraph 2.11 above. In respect of the new build application, this is proposed to comprise four main elements, referred to as 'Phases 2 and 3' on page 53 of the DAS:

- A single-storey roof extension to Clarendon House
- A part six, part ten side extension fronting Watlington Street
- A link building between the old and new build elements
- A small mews development to activate the western side of the new courtyard space created

- 3.7 To enable construction of the link building a small element of demolition will be required, which is effectively limited to the eastern staircore, roof plant and the eastern end roof parapet in Clarendon House. Drawing nos. EAAUK-220-BC-2-14-01 to 03 identify the extent of demolition relevant to the proposals.

- 3.8 In consideration of the new build proposed, pages 41 to 51 of the DAS highlight the approach to massing and scale, which has been heavily informed by the location, orientation and height of surrounding built form, in particular, the Wesley Church and Grantley Heights residential development.

- 3.9 The resultant proposals have enabled creation of four, distinct, yet fully co-ordinated aspects to built form, which wrap themselves around a generous courtyard space on three sides. Significant face to face separation between proposed built form and existing residential development ensures that existing residential amenity is appropriately protected. Pages 44 and 45 of the DAS ably demonstrate this point, highlighting a minimum 29.2m north to south and 45.9m east to west separation distance between windows of existing and proposed buildings.

Private Amenity and Open Space

- 3.10 The scheme proposes a mix of public and private space in order to enhance the setting of the development site and surrounding area and to provide meaningful and usable local amenity spaces.

- 3.11 The proposed development will provide a mix of private amenity spaces in the form of gardens/terraces, roof terraces, winter gardens, and projecting and inset balconies, totalling some 420 sqm, as follows:

- Garden/Terrace – 117.5 sqm

- Roof Terrace – 138 sqm
- Internal Balcony – 75.5 sqm
- External Balcony – 48.7 sqm
- Winter Garden – 40.5 sqm

3.12 As set out further in our landscape submission, there are proposals to provide a private communal courtyard for residents totalling approximately 60 sqm. The courtyard will provide wider visual uplift to adjacent properties, which currently have outlook onto the existing car park and the IDR beyond, both of which are of limited visual merit.

Access and Parking

3.13 Vehicular access to the site is via Kennet Side which runs along the north of the site. This remains unchanged up from the current access to the entrance to the courtyard area.

3.14 Bin storage has been located close to the site entrance in line with the servicing requirements for the site. Similarly, a vehicle loading/delivery bay is proposed on the northern boundary of the site to help accommodate deliveries. Further detail on the site servicing and delivery strategy is set out in Section 4.4. of the Transport Statement and on drawing number W321-PL-DR-203 Rev P01.

3.15 As set out in the ground floor landscape masterplan, ref: 1582-LS-01, it is proposed to provide 4 car parking spaces, 2 of which are identified for disabled users, to supplement the 4 car parking spaces associated with the current PD scheme (ref: 180722). In addition, 26 cycle spaces are proposed to supplement the 26 cycle spaces to be provided through the current PD scheme.

4. Pre-Application Consultation

Introduction

- 4.1 Reading Borough Council (the Council) has an adopted Statement of Community Involvement (SCI) in place which was adopted in March 2014. The SCI sets out how the Council will involve the community in both the preparation of the borough's Local Plan, as well as in planning applications.
- 4.2 The SCI encourages developers/ applicants to undertake pre-application consultation with the Council prior to the submission of an application for all types of development proposals, in order to provide for relevant community aspirations, local planning policy and address all other relevant considerations.
- 4.3 Further, whilst there is no statutory requirement for applicants to undertake their own public consultations as part of the planning application process, the Council encourages applicants to undertake some form of public engagement with the local community prior to the submission of an application. The SCI notes that this is especially important on applications which are sensitive or of a significant scale.
- 4.4 The scheme proposals do not meet the criteria to be considered sensitive or of a significant scale, but nevertheless, in accordance with the guidance set out in the SCI, pre-application discussions and consultations have been undertaken with the Council, the public and other stakeholders throughout the preparation of the current development proposals. A summary of these discussions and the feedback that has been received regarding the proposed development is set out below and is provided in detail in the Consultation Statement which supports this application.

Discussions with Reading Borough Council and Local Interest Groups

- 4.5 The applicant has entered into formal pre-application discussions with the Council as part of the consultation process in support of this planning application. A series of pre-application meetings have been held with the Council and its advisors to consider the development proposals at various stages throughout the design process.
- 4.6 Pre-application advice was first sought on in December 2017, where the principles of development and proposed planning programme was shared with officers and members.
- 4.7 Subsequently, meetings were held with technical officers, politicians, local advisory, interest and business groups to help identify issues of importance to design development, which in turn have influenced the Design Team's decision-making process. A brief summary of meetings held is set out below:
 - 18th January 2018 – Presentation to the Reading Design Review Panel (DRP), attended by Planning Officers
 - 5th February 2018 – Meeting with Ward Members

- 5th March 2018 – Meeting with Planning Officers
- 20th March 2018 – Meeting with Reading Civic Society and Conservation Area Advisory Committee (CAAC) Members
- 21st March 2018 – Meetings with Rev. Brian Stenton and Reading UK CIC
- 22nd March 2018 – Meeting with Planning and Heritage Officers
- 12th April 2018 – Second Presentation to the Reading DRP

Public Exhibition

4.8 As part of the pre-application consultation process, an exhibition was held for local residents and other interested parties on:

- 18th April 2018, between 3pm and 7.30pm at South Street Arts Centre, Reading

4.9 Full details of the Public Exhibition are set out in Sections 6 and 7 of the Statement of Community Involvement.

Response to Pre-Application Consultation

4.10 The feedback and comments from the Council, other stakeholders and local residents received during the pre-application consultation process have been taken into account throughout the preparation of the development proposals enclosed as part of this application.

4.11 This has been an ongoing process, which in turn has enabled a robust scheme evolution to the current form now proposed and it is anticipated that discussions will continue with interested parties during the post-submission phase. More detail on the consultation process is set out in the Statement of Community Involvement, which sets out issues raised and the resultant Design Team response. In addition, Section 5.4 of the DAS identifies how the design and layout has evolved during the pre-application phase.

5. Planning Policy

Introduction

- 5.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, development control decisions must be made in accordance with the adopted development plan, unless material considerations indicate otherwise. This section sets out the relevant planning policies of the development plan and supplementary planning policy documents to be considered in the determination of this application.

Key Policy Documents

- 5.2 The current, relevant adopted Development Plan consists of the Reading Borough Core Strategy (2008 amended in 2015), the Sites and Detailed Policies Document (2012 amended in 2015) and the Reading Centre Area Action Plan (RCAAP) (2009).
- 5.3 At a national level, the National Planning Policy Framework was adopted in March 2012 and is a material consideration in the determination of the application.

National Planning Policy Framework

- 5.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and outlines how these are expected to be applied to both plan-making and decision-making. The NPPF was introduced in March 2012, where it superseded the vast majority of Planning Policy Statements and guidance into one consolidated document. As a result, it is a material consideration in the determination of this development proposal.
- 5.5 At the heart of the NPPF is a '*presumption in favour of sustainable development*'. Indeed, Paragraph 14 of the Framework confirms that the presumption in favour should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development, as defined in the NPPF, includes three dimensions; economic, social and environmental.
- 5.6 For decision-making, unless material considerations indicate otherwise, this means approving development without delay where it accords with the Development Plan. Where a Development Plan is out of date this means granting planning permission unless:

'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; or specific policies in this framework indicate that development should be restricted.'

Dimensions of Sustainable Development

- 5.7 NPPF Paragraph 7 advises that there are three dimensions to sustainable development:
1. An economic role – the planning system should contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation;

and by identifying and co-ordinating development requirements, including the provision of infrastructure;

2. A social role – planning should support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
3. An environmental role – the system should contribute to protecting and enhancing our natural, built and historic environment, including using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.

Core Policies

5.8 The NPPF, at Paragraph 17, identifies 12 core land-use planning principles which it seeks to promote. The elements of these principles which are of particular relevance to this application (either in terms of plan-making or decision-taking) include:

- Encouraging effective use of land by reusing previously developed land not of high environmental value;
- Taking account of the different roles and character of different areas; proactively driving and supporting sustainable economic development;
- Making every effort to objectively identify the development needs of an area; responding positively to wider opportunities for growth;
- Taking account of market signals; setting clear strategies for allocating sufficient land suitable for development taking account of the needs of communities;
- Focusing significant development in locations that are or can be made sustainable.

Housing

5.9 Section 6 (Paragraphs 47 – 55) of the NPPF provides guidance on housing development, under the title '*Delivering a wide choice of high quality homes*'. The Government's overall objective for housing, as stated at Paragraph 47 of the NPPF, is to boost significantly the supply of housing.

Transport

5.10 NPPF Paragraphs 29 to 41 confirm the role of planning in promoting sustainable transport. There is a clear emphasis on promoting sustainable transport modes and Paragraph 34 sets out that developments potentially associated with significant transport movements shall be located where the '*use of sustainable transport modes can be maximised*'.

5.11 In considering the relative weight that transport matters can be afforded, in the balance of a planning decision, Paragraph 32 indicates that '*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*'.

Noise

- 5.12 NPPF Paragraph 123 seeks to control the impact of noise on the amenity of occupiers of new developments, as well as noise impacts arising from the development itself on surrounding properties, suggesting use of conditions to ensure appropriate mitigation.

Heritage

- 5.13 NPPF Paragraphs 126 to 141 set out criteria for assessing the potential impact and appropriateness of new development upon existing heritage assets and conservation areas. In particular, Paragraph 131 states that Local Planning Authorities should take account of:

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

Core Strategy (2008 amended in Jan 2015)

- 5.14 The Core Strategy sets out the Council's adopted planning strategy for the Borough. It sets out how planning and development will achieve the Reading 2020 Vision for the town. It provides a framework for how Reading can grow in a sustainable way in the future. The Core Strategy is clear that the Council will continue to support the development of Central Reading as the leading regional centre in the Thames Valley. The following Core Strategy policies are considered relevant to this proposal and are referred to later within this statement:

- **Policy CS1 (Sustainable Construction and Design)** - indicates that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- **Policy CS2 (Waste Minimisation)** - notes that development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.
- **Policy CS3 (Social Inclusion and Diversity)** – advises that development should demonstrate measures to enhance social inclusion in terms of access to housing, employment, services, community facilities, leisure, health, education, and other services and facilities

- **Policy CS4 (Accessibility and the Intensity of Development)** - states that the scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service.
- **Policy CS5 (Inclusive Access)** - denotes that all buildings should be located, sited and designed to provide suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.
- **Policy CS6 (Settlement Boundary)** - states that development will be permitted inside the settlement boundary as defined on the Proposals Map.
- **Policy CS7 (Design and the Public Realm)** - indicates that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- **Policy CS9 (Infrastructure, Services, Resources and Amenities)** - confirms that proposals for development shall make provision for appropriate infrastructure, either directly or through off-site contributions.
- **Policy CS14 (Provision of Housing)** - sets out that provision will be made for the completion of an average of at least 477 dwellings for the period 2001-2006, 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026. Identified sources of supply include previously developed land and windfall sites.
- **Policy CS15 (Location, Accessibility, Density and Housing Mix)** - states that proposals for residential development shall achieve an appropriate density and provide an appropriate mix of housing types, sizes and tenures.
- **Policy CS16 (Affordable Housing)** – requires all developments of 15 dwellings and above to provide 30% of the total number of dwellings in the form of affordable housing to meet the needs of the area, as defined in a housing needs assessment, unless accompanied by Viability Statement to identify why it is not commercially possible to meet this level of provision.
- **Policy CS20 (Implementation of the Reading Transport Strategy)** - denotes that proposed developments shall further the provision of a balanced transport network, as outlined in the Reading Transport Strategy.
- **Policy CS22 (Transport Assessments)** - indicates that development proposals shall ensure an adequate level of accessibility and safety by all modes of transport, particularly by public transport, walking and cycling.
- **Policy CS23 (Sustainable Travel and Travel Plans)** – identifies a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport.

- **Policy CS24 (Car / Cycle Parking)** - states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- **Policy CS29 (Open Space)** - sets out that development proposals shall make provision for appropriate amenity space.
- **Policy CS30 (Access to Open Space)** – advises that new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/ or facilitate the creation or linking of safe off-road routes to parks.
- **Policy CS33 (Protection and Enhancement of the Historic Environment)** states that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced.
- **Policy CS34 (Pollution and Water Resources)** – states that development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution; where it would preserve or ideally enhance ground and surface water quality; and where existing water resources, sewerage and wastewater treatment infrastructure are adequate to support the proposed development.
- **Policy CS35 (Flooding)** - states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, nor shall development be allowed to increase the risk of flooding elsewhere.
- **Policy CS36 (Biodiversity and Ecology)** – confirms that proposals for development shall assess, retain and protect ecological interests, and demonstrate that impacts on biodiversity can be minimised and/or appropriately mitigated.
- **Policy CS38 (Trees, Hedges and Woodlands)** - states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal.

Reading Central Area Action Plan (RCAAP) (adopted Jan 2009)

5.15 The Reading Central Area Action Plan (RCAAP) is made up of a number of different elements, which together form a comprehensive basis for managing change in the Central Area up to 2026. The RCAAP policies: which are considered relevant to the proposal and are referred to later within this statement include:

- **Policy RC5 (Design in the Centre)** – provides guidance to identify the need to integrate built form and layout with the surrounding urban grain and identify means to engage and enhance the public realm.
- **Policy RC6 (Definition of the Centre)** – identifies an urban hierarchy within which development is directed.

- **Policy RC9 (Living in the Centre)** – states that all proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three-bedroom units should be provided.
- **Policy RC14 (Public Realm)** – identifies important areas of public open space to be protected from development.

Sites & Detailed Policies Document (2012 amended in Jan 2015)

5.16 The Sites and Detailed Policies Document (SADPD) (2012 amended in 2015) includes further Borough-wide policies as well as identifying sites for development outside of the Reading Central Area. The Policies which are considered relevant to the proposal and are referred to later within this statement include:

- **Policy SD1 (Presumption in Favour of Sustainable Development)** - states that a positive approach to considering development proposals in accordance with the presumption in favour of sustainable development, as required by the NPPF.
- **Policy DM1 (Adaption to Climate Change)** – requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.
- **Policy DM2 (Decentralised Energy)** – advises that in meeting the most up to date Ecohomes (including Code for Sustainable Homes for new build residential) (now superseded by Part L Building Regulations), or BREEAM standard developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source, including CHP
- **Policy DM4 (Safeguarding Amenity)** - confirms that development shall not cause significant detrimental impacts to the living environment of existing or new residential properties.
- **Policy DM10 (Private and Communal Outdoor Space)** - states that dwellings will be provided with functional private or communal open space, in a manner that does not give rise to detrimental amenity impacts. Houses will be provided with private outdoor space, whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.
- **Policy DM12 (Access, Traffic and Highway Related Matters)** - states that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.
- **Policy DM16 (Provision of Open Space)** – indicates that publicly accessible open space shall be as laid out in the most up-to-date Open Spaces Strategy.

- **Policy DM18 (Tree Planting)** – states that new development shall make provision for tree planting within the application site, 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.
- **Policy DM19 (Air Quality)** - states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.

Supplementary Planning Documents (SPD)

- 5.17 The following SPD are also relevant in the assessment of the application:
- 5.18 **Sustainable Design and Construction SPD (2011)** - Provides practical advice on the forms of sustainable design and construction, as well as waste minimisation.
- 5.19 **Affordable Housing SPD (2013)** - This SPD provides a framework for determining the quantum, size, type, form and content of affordable housing that will be sought. Appendix 4 sets out a typology for the calculation of financial contributions/commuted sums in lieu of on-site provision. It states that any financial contribution should be broadly equivalent to the contribution that would have been made to provide the housing on-site.
- 5.20 **Planning Obligations Under S106 SPD (2015)** - This document denotes where contributions towards the provision of infrastructure shall be sought via CIL or through S106 Agreements.

The draft NPPF

- 5.21 Following on from Prime Minister Theresa May's wide ranging and lengthy speech to support the launch of the consultation phase in March 2018, this underlining the importance the Government places on seeking to resolve the housing crisis, weight should be given to the thrust of emerging policies when determining this application.
- 5.22 As the Prime Minister said: *'The picture we see today is the result of many failures by many people over many years. Fixing it won't happen overnight. But the size of the challenge is matched only by the strength of my ambition to tackle it.'*
- 5.23 To meet the challenge set to improve housing delivery to reach the 300,000 homes per year target, unsurprisingly the draft NPPF has a strong focus on housing. Chapter 5, and in particular paragraphs 60-81, deal with the goal of *'delivering a sufficient supply of homes'*, of which paragraph 69 is most pertinent. To summarise:

'69. Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less;*

- b) *use tools such as area-wide design assessments and Local Development Orders to help bring small sites forward;*
- c) *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;...*

- 5.24 In a similar manner, paragraphs 122 and 123 seek to support development that makes efficient use of land and where there is an existing or anticipated shortage of land for meeting identified housing needs, to ensure 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.
- 5.25 Further, paragraph 126 encourages the efficient use of land and buildings within a context of ensuring that good placemaking principles are upheld.

The Emerging Local Plan

- 5.26 The Council is currently working on producing a new Local Plan which will replace the current Development Plan (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document) with a new plan setting out how Reading will develop up to 2036.
- 5.27 The Submission Draft Local Plan was submitted to the Secretary of State in March 2018 and will be subject to public examination later in 2018. To this point, the Local Plan has been through three rounds of public consultation; Issues and Options between January and March 2016; Draft Local Plan between May and June 2017; and Pre-submission Draft Local Plan between November 2017 and January 2018.
- 5.28 In view of the stage of its preparation, it is considered that the new emerging Local Plan can be given some weight in the determination of planning applications.
- 5.29 The emerging Local Plan has been considered in the development of proposals and it is considered that the following policies are relevant to the determination of this application:
- **Policy CC2 (Sustainable Construction and Design)**
 - **Policy CC3 (Adaption to Climate Change)**
 - **Policy CC5 (Waste Minimisation)**
 - **Policy CC6 (Accessibility and the Intensity of Development)**
 - **Policy CC7 (Design and the Public Realm)**
 - **Policy CR2 (Design in Central Reading)**
 - **Policy CR10 (Tall Buildings)**
 - **Policy EN14 (Trees, Hedges and Woodlands)**

- **Policy EN15 (Air Quality)**
- **Policy EN18 (Flooding and Sustainable Drainage Systems)**
- **Policy H1 (Provision of Housing)**
- **Policy H2 (Density and Mix)**
- **Policy H3 (Affordable Housing)**
- **Policy H10 (Private and Communal Outdoor Space)**
- **Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)**

5.30 Critically, the emerging Local Plan identifies that delivering the level of housing currently envisaged by Policy H1, which specifies that provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036, will mean that there is a shortfall of 644 dwellings when considered against Reading's need. More consideration of current need is set out in the following section.

5.31 Further detail on relevant emerging policies, as well as those within the current Development Plan and supporting SPD, is set out within a Planning Policy Matrix, which has been used by the Project Team to inform decision-making throughout the design development process. A copy of this document is reproduced as Appendix 1.

Overview of Housing Need in the Borough

5.32 Produced on behalf of the Berkshire Local Planning Authorities in 2016, the Strategic Housing Market Assessment (SHMA) sets out an objective assessment of housing needs across the Housing Market Areas (HMAs) included within the study area. The analysis at SHMA Table 139¹ identifies an objectively assessed need (OAN), within the Reading Borough, for 699 homes per annum between 2013 and 2036, which represents a substantially higher need than is currently planned for in the existing Local Plan² and that initially determined as necessary within Policy H1 of the emerging Local Plan³.

5.33 The recent publication of the draft National Planning Policy Framework (dNPPF) which advises a standard methodology to determine Objectively Assessed Need (OAN) potentially reduces this figure to 611 homes per year, but nevertheless the Council has a challenge to find sufficient supply to meet forward requirements.

5.34 Further, and importantly, OAN Sensitivity Testing for the Housing Market Area undertaken by GL Hearn in March 2018 to consider the findings of the SHMA 2016 against more recent data has concluded that there is an increase in overall OAN in Reading (699 to 759 dpa), driven by demographic, economic and affordability factors, which will doubtless

¹ Berkshire (including South Bucks) Strategic Housing Market Assessment Final Report (February 2016), p. 269.

² Core Strategy, Policy CS14: 521 dwellings per annum, 2016 - 2016

³ Submission Draft Local Plan (March 2018), Policy H1: 671 dwellings per annum

form a central part of the Inspector's considerations during the Local Plan examination process

- 5.35 The SHMA also provides guidance on the form of housing required within the HMA. In this manner, at Table 101⁴ is indicated that, within the Western Berkshire HMA, 38% of the additional market housing required between 2013 and 2036, will be 1 and 2 bedroom dwellings. For affordable housing, this figure is more pronounced, Table 104⁵ identifying a requirement for 76% of all units required over the above time period to be provided as 1 and 2 bedroom dwellings.
- 5.36 Breaking this down to the local scale, Tables 107 and 108⁶ set out that (across the same period) 4,119 additional 1 and 2 bedroom market dwellings and 2,619 additional 1 and 2 bedroom market dwellings will be required within Reading Borough. This equates to 39.9% and 76.3% of the total number of market and affordable dwellings needed respectively.
- 5.37 Taking the above into account, our analysis of the proposals in light of policy and housing need factors is set out in detail within the following section.

⁴ Ibid (February 2016), p. 289.

⁵ Ibid (February 2016), p. 291.

⁶ Ibid (February 2016), p. 295/296.

6. Planning Assessment

Introduction

6.1 This section of the Planning Statement sets out an assessment of the application proposals against the main planning policy and any other material considerations which are relevant to the determination of this planning application. The relevant Development Plan Documents for the District currently comprise of:

- Core Strategy (2008 amended in 2015);
- Sites and Detailed Policies Document (2012 amended in 2015); and
- Reading Centre Area Action Plan (RCAAP) (2009).

6.2 Further documents which are relevant to this site and proposed development include:

- Affordable Housing SPD, July 2013
- Revised Parking Standards and Design SPD, October 2011
- Sustainable Design and Construction SPD, July 2011
- The Emerging Local Plan, Submission Version, March 2018

Weight to be given to Planning Policy Documents and Guidance

6.3 Whilst the NPPF and dNPPF do not form a statutory part of the Development Plan, these documents set out the Government's planning policies and future direction for England, as well as how these are expected to be applied. It is therefore expected that both documents should be afforded weight as a material consideration in the determination of this application.

6.4 The preceding review of the planning policy context also confirms the timing of the Adopted Core Strategy as a pre-NPPF Local Plan. Accordingly, the policies of this document can only be afforded weight to the extent to which they comply with over-arching Governmental guidance.

6.5 The other substantive Development Plan Document comprises the Sites and Detailed Policies Document. Adopted in 2012 (and prepared in the context of the NPPF), this part of the Plan carries relatively more weight. A number of other SPD's form part of the local policy framework and are considered to carry varying degrees of weight.

6.6 Significant weight can also be attributed to the Berkshire SHMA (as it represents the most up-to-date OAN figure and which should include the March 2018 OAN Sensitivity Testing), whilst limited weight can currently be attributed to the emerging Local Plan.

6.7 In addition, the aforementioned assessment of the planning policy context serves to identify a number of dimensions to be considered as part of the overall planning balance. In terms of principle, the redevelopment of previously development sites (in sustainable

locations) is promoted at both national and local levels. Similarly, the provision of new homes that meet identified local needs is a clearly stated policy ambition.

- 6.8 In respect of other considerations, both national and local planning policies require that developments shall achieve a high standard of design, which responds to the character of the local area. The policy context further confirms that development proposals shall not result in severe highways impacts or be detrimental to road safety.
- 6.9 A number of broader considerations, relating to air quality, land contamination and flood risk are identified through the assessment of planning policies described above. These factors are analysed in relation to the application proposals and are considered alongside an overall evaluation of the environmental, economic and social benefits of the proposals, as set out below.

Achieving Sustainable Development

- 6.10 The NPPF (at Paragraph 7) sets out three dimensions to sustainable development; an economic role, a social role and an environmental role. Paragraph 8 of the Framework confirms that these roles should not be undertaken in isolation, as they are mutually dependent. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 6.11 The attributes of the proposed development are set out below in the context of the three dimensions of sustainable development;

Environmental Benefits

- 6.12 The application proposals will result in the redevelopment of a brownfield site, which is not environmentally sensitive, as determined by the various technical reports supporting the application and will thus achieve an efficient use of land.
- 6.13 The application site is situated within the settlement boundary and is in a highly sustainable location. A wide range of retail and other facilities are located in the vicinity of the site and a bus stop, serving a strategic bus route, is located in the immediate locale.
- 6.14 The accessibility of the site ensures the rail network, as well as services, employment and leisure opportunities found in Reading Town Centre are easily reachable via excellent public transport, footpath and cycleway links. Section 3 of the Transport Statement assesses this point further.
- 6.15 The introduction of significant on-site planting will help provide visual and environmental uplift to the site and surrounding area, in turn helping to mitigate potential air quality and flood risk issues. More detail in this regard is set out within Section 7 of the Air Quality Report and Section 3 of the Flood Risk Assessment.
- 6.16 The approach to landscaping seeks to increase local biodiversity and accordingly, significant thought has been given to green spaces throughout the site. As set out in Section 6 of the DAS, a number of green and brown roofs support that proposed in the central courtyard space.

- 6.17 Further, the inclusion of built form along the Watlington Street frontage will help provide additional air quality and acoustic mitigation to residents in Queens Wharf and Grantley Heights located behind this frontage, as a consequence of the side extension forming a meaningful barrier from pollution sources on the IDR.

Economic Benefits

- 6.18 During the construction phase a number of FTE construction jobs will be sustained directly⁷, with additional jobs being sustained or created through expenditure in the supply chain. It is also relevant that the predominance of jobs sustained during the construction phase will be filled by people living in Reading area and wider region⁸. Measures undertaken by the applicant to directly employ a localised labour force, as well as a number of local sub-contractors will ensure that a greater proportion of salaries and expenditure arising from the construction phase is retained in the local economy in line with the Council's Economic policy. Commitment to provision of an Employment and Skills Plan is made within the S106 Heads of Terms in this regard.
- 6.19 Economic benefits also continue during the post-construction phase. The proposed development will result in the redevelopment of a brownfield site to provide new dwellings. The future occupiers of the completed homes will patronise local shops and facilities, and in so doing contribute to the viability and vitality of businesses in Queens Road and the Town Centre. Other related benefits include CIL contributions, the extent of which is set out in the S106 Heads of Terms, as well as the award of new homes bonus payments to the Council.

Social Benefits

- 6.20 The provision of high-quality and well-designed dwellings will provide direct amenity benefits for future residents and will also help to raise the quality of the local housing stock.
- 6.21 The DAS identifies the commitment to high quality living in terms of layout, amenity, outdoor space and materiality and it is considered that the scheme provides visual uplift that will improve the outlook of nearest residential neighbours, whilst providing a missing portion of the urban grain, allowing a mansion block typology to emerge that gifts better security, privacy and an area for solace and reflection to those residents abutting the central amenity space.
- 6.22 Meeting Reading's housing need is also a clear priority for the Borough, as evidenced by the SHMA findings. In this respect, the provision of 1 and 2 bedroom dwellings will help to address an identified requirement over the local plan period, as well as provide much-needed 'windfall' accommodation to help meet the current shortfall in housing units identified in the emerging Local Plan.
- 6.23 As part of the applicant's approach to delivering well-considered, joined-up thinking to help derive environmental, economic and social benefits, the approach to affordable housing on site has been subject to ongoing discussions with Council officers.

⁷ Based on research presented on the report '*The Labour Needs of Extra Housing Output: Can the House building Industry Cope?*' (HBF, 2005).

⁸ Based on a relatively high degree of self-containment in the local construction labour market (see ONS (2011) Census 2011 – 'Location of usual residence and place of work')

6.24 Whilst our proposals identify how the scheme can accommodate 30% affordable housing on site, our detailed assessment of which is provided later in this section, an earlier housing position paper was circulated to officers to help consider whether alternative provision would be more beneficial. Our rationale is based on a number of factors, including:

- Town Centre units are more expensive and therefore provision of an equal financial contribution would enable additional quantum or improved mix to be provided elsewhere
- The site is well-located in terms of the town centre and features good amenity spaces. However, as a family location it is not well-provided for in terms of access to play spaces and primary school provision
- The relatively small number of affordable units provided on site would be less attractive to a Registered Social Provider in terms of management and administrative costs than should this be provided as part of a larger scheme elsewhere in the Borough.

6.25 The applicant is committed to providing high-quality accommodation and has demonstrated a desire to work with the Council throughout the pre-application period. In this regard, the approach to affordable housing will reflect the completion of discussions with housing officers regarding that considered most appropriate for the Borough, taking into account that set out in the housing position paper.

6.26 Additionally, the proposed side extension will act as a continuation of the predominant run of flatted development emerging on Queens Road and the northern side of the Watlington Street junction, helping transform an area that has recognised problems with drug abuse and anti-social behaviour into a more welcoming location that features better natural surveillance and which introduces significant landscaping to improve visual appearance and environmental credentials.

The Principle of Development

6.27 The NPPF adopts a clear pro-growth stance and introduces a presumption in favour of sustainable development. It identifies that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local place the country needs.

6.28 In considering the relevant sections of the NPPF, it is noted that the Framework promotes the redevelopment of brownfield land and supports the efficient use of land. The NPPF (and dNPPF) also seeks to *'boost significantly the supply of housing'* and deliver a wide range of homes, of different types and tenures.

6.29 Policy SD1 states that the Council will take a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the NPPF. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

- 6.30 The 'Key Principles' of the RCAAP promote the Central Area as a place to live in, work in, study in, and visit. The RCAAP identifies housing as a main land use in the Central Area, in which the application site is located, and states that the centre of Reading is becoming ever more important as a residential location, not just the inner areas surrounding the core, but increasingly the commercial and shopping core itself.
- 6.31 In consideration of Policy RC9 of the RCAAP, the scheme promotes sufficient mix of different sized units within the development which also closely meet the requirements of the SHMA 2016 (as updated, March 2018), which will help to meet Policy CS14 objectives, as well as the shortfall identified in the emerging Local Plan.
- 6.32 Core Strategy Policy CS14 (approved in 2008) currently states that provision will be made for the completion of an average of at least 477 dwellings for the period 2001-2006, 572 dwellings per annum in the period 2006-2016, and 521 dwellings per annum in the period 2016-2026. These housing targets are currently under review in line with paragraph 47 of the NPPF which requires local planning authorities to meet the full objectively assessed housing need (OAN) within their area for both market and affordable dwellings, the findings of which are reported earlier in paragraphs 5.28 to 5.32 of this document.
- 6.33 The NPPF and the Planning Practice Guidance (PPG) state that local authorities should plan to identify enough land to provide for the full OAN to be met. It is clear from the evidence base to inform the emerging Local Plan, that the Council is struggling to provide enough sites to accommodate the level of housing need stated in the 2016 SHMA, let alone the higher OAN stated in the SHMA OAN Sensitivity Testing, which represents a 45% increase in the overall housing requirement. Within this, there is identified significant need for 1 and 2 bedroom units, particularly for affordable housing types, which the proposed new build will help satisfy.
- 6.34 Subject to agreement on principles, the scheme also includes a contribution towards affordable housing in line with Policy CS16 of the Core Strategy. This is currently proposed as on-site provision, as evidenced in the site and layout plans submitted in support of the application. A housing position paper has been forwarded to Council Officers, however, to suggest an alternative approach that the applicant considers will provide more overall affordable housing in a location and potentially of a mix that is more suited to meeting the Council's overall ambitions in terms of meeting housing need. Irrespective, the development or alternative proposals will meet or exceed affordable housing objectives and therefore can be considered policy-compliant in this regard.
- 6.35 In addition, extensive work has been undertaken by the Council to identify all potential development sites within the Borough, which has demonstrated that there is a reliance on allocation of sites, located outside of Flood Zone 1. The Sequential Test submitted with this application, and discussed further later in this report, reinforces this position, further to identification and consideration of 47 sites to meet officer's requirements arising from pre-application discussions. Further to review, none of the sites assessed are considered to represent reasonably available, sequentially preferable, alternative sites and it is concluded that sequential test has been passed in this case.
- 6.36 As the Council has confirmed in its evidence base to support the new Draft Local Plan that it cannot meet the need of the Borough in full through available sites within Flood Zone 1, it is contended that the Council should be maximising the potential of sites such

as Reading Heights which are located within Flood Zone 2, but are considered safe in terms of flood risk, in order to deliver the development needs of the Borough.

- 6.37 As such, it is considered critical that the Council should be maximising the potential of sustainably located, previously developed sites such as Reading Heights which are located within Flood Zone 2, but are considered safe in terms of flood risk, in order to deliver the development needs of the Borough which, for the most part, cannot be delivered in Flood Zone 1. Further detail on our approach to flood risk is set out later in this section.
- 6.38 The proposed development is considered to be acceptable in terms of the principle of development and therefore the proposed redevelopment of the site for housing use is acceptable and complies with the provisions of policy RC9 and contributes significantly towards the achievement of the housing targets within Policies CS14 and CS16.

The Application Site

- 6.39 The site is located within the settlement boundary and is in a highly sustainable location, which benefits from excellent access to services, amenities and public transport. In the immediate locale are a number of local shops and convenience retailers.
- 6.40 Employment opportunities and additional services are available within Reading Town Centre, and are easily accessible, as are other employment areas that are commutable by rail and bus. Indeed, a strategic bus route runs via the south-eastern corner of the site into the Town Centre, whilst the Queens Road/Watlington Street intersection also features pedestrian and cycle links to a number of key locations in the town centre and suburbs. The proposals are therefore consistent with Core Strategy Policy CS6 and CS4.
- 6.41 The site is previously developed and Core Strategy Policy CS14 envisages that the redevelopment of such land will facilitate the delivery of residential developments and contribute to the supply of new dwellings.

Design, Scale and Massing

- 6.42 The Central Area of Reading is in a period of transformation, typified by the emergence of high-quality commercial signature buildings such as The Blade, Forbury Place, Chatham Place and Kings Point changing the skyline and creating a more urban character within the Reading Central Area. The proposals seek to continue this step-change in design approach, whilst respecting heritage assets and neighbouring buildings.
- 6.43 The approach to design has been iterative: borne out of significant discussion with planning officers, members, local interest groups and the DRP, which has helped mould the final scheme and the detail of which is set out in the Statement of Community Involvement.
- 6.44 The proposal to introduce up to 50 dwellings, depending on final mix, responds well to the character of the local area and the properties in the immediate vicinity. The proposals follow existing building and roof lines where appropriate and provide height where it is appropriate to do so in design terms. Overall, the layout is consistent with the existing

pattern of development along the northern flank of Queens Road and that emerging on Watlington Street and the Central Reading Area in general

6.45 It is recognised that the site is located in an identified for Tall Buildings Clusters under Policy RC13 of the Core Strategy and the proposals to bring forward a signature building are therefore consistent with this.

6.46 Section V of this policy states that in addition to the area-specific requirements, all tall building proposals should be of excellent design and architectural quality, and should:

- *'Enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building;*
- *Contribute to a human scale street environment, through paying careful attention to the lower section or base of the building, providing rich architectural detailing and reflecting their surroundings through the definition of any upper storey setback and reinforcing the articulation of the streetscape;*
- *Contribute to high-quality views from distance, views from middle-distance and local views;*
- *Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style;*
- *Avoid bulky, over-dominant massing;*
- *Preserve and, where appropriate, enhance the setting of conservation areas and listed buildings;*
- *Use high quality materials and finishes;*
- *Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm;*
- *Locate any car parking or vehicular servicing within or below the development;*
- *Maximise the levels of energy efficiency in order to offset the generally energy intensive nature of such buildings;*
- *Mitigate any wind speed or turbulence or overshadowing effects through design and siting;*
- *Ensure adequate levels of daylighting and sunlighting are able to reach buildings and spaces within the development;*
- *Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting'*

6.47 Pages 41 to 64 of the DAS evidence the rationale to the morphology of the scheme proposals in this regard, reflecting the Project Team's strong desire to:

- Complete the urban block with a well-defined new building holding the edge of the site
- Enable a high-quality approach to materiality, taking influences from the existing urban grain
- Provide a design and layout that enables a signature building to emerge in a landmark location on the IDR
- Implement high sustainability credentials, allowing electricity to be given back to the local grid, biodiversity, flood attenuation and the local air quality and noise environment to be considerably improved
- Respect neighbouring amenity in terms of heritage, outlook, daylight and sunlight, noise, air quality and highways impact.

6.48 As part of this process, scheme designs have been tested to consider potential impact on amenity, relating findings to policy and legislative criteria, as well as identifying required mitigation, as appropriate and our findings in this regard are set out below.

6.49 The proposed development also makes effective use of an under-occupied office building and associated hard standing and accordingly, it is considered that the application proposals meet the requirements of Policy RC13 of the RCAAP, Policy CS15 of the Core Strategy and achieve a high quality of design as required by the NPPF.

Historic Impact

6.50 A Heritage Statement and corresponding Heritage and Townscape and Visual Impact Assessment (HTVIA) is submitted in support of the planning application, which together assess the significance of identified heritage assets and the impact, if any, that the proposed development would have upon their significance and setting in line with Policy CS33.

6.51 In line with pre-application advice from Council Planning and Heritage Officers, considerable importance and weight has been given to the significance of local heritage assets and the HTVIA therefore includes several verified views, as proposed by officers, to accurately demonstrate the visual impact of the Proposed Development, in particular from locations from where the spires may be appreciated and includes an assessment of view L of the Tall Buildings Strategy, which looks across the Site from the north (see view 8 in the HTVIA).

6.52 The HTVIA finds that the character and appearance of the Eldon Square Conservation Area would be preserved, as would the special interest of the Church of St John the Evangelist and Watlington House and that the proposed development is considered to cause less than substantial harm to the Wesley Methodist Church by virtue of the interaction with its spire, which is occluded in some views from the north. On a sliding scale, this harm would be 'very low', mindful of the improvements to the visual amenity of the site within the church setting, its function and the detailed design of the Proposed Development that has sought to reduce the visual impact in long views.

- 6.53 Notwithstanding the above, in accordance with paragraph 134 of the National Planning Policy Framework (2012), the HTVIA notes that this harm would need to be balanced against the benefits of the Proposed Development, including the improvements to townscape function and appearance.
- 6.54 In this regard, the HTVIA identifies that the proposals seek the redevelopment of the site to provide residential dwellings within a framework of buildings of up to 10 storeys in height, the scale of which is commensurate with the importance of the junction which it marks and the new ground floor frontage.
- 6.55 Following on from significant design evolution to respond to key views and the varied townscape context identified during pre-application discussions, it is noted that the principal building on the site is to be retained and the architectural treatment of its elevations improved, with this façade complemented by a low-rise block fronting the eastern boundary of the site to replicate this mass and form, thus providing a composition and reinstating the street block. The ground floor plan would provide an animated environment and present active frontages.
- 6.56 In respect of improvements to townscape function and appearance it is therefore concluded within the HTVIA that the proposed development would be congruent to the existing townscape and aspirations of the development plan and, as a whole, it would demonstrably improve the character, function and appearance of the area.
- 6.57 Taking the above into consideration, it is affirmed that the proposals comply with the requirements of Policy CS33 of the Core Strategy and Policy DM4 of the SADPD.

Residential Amenity

- 6.58 Policy DM4 of the SADPD states that development will not cause a significant detrimental impact to the living environment of existing or new residential properties. This next section sets out how the amenity of both new and existing residents will be maintained and protected as a result of the development proposals.

Amenity Space and Landscaping

- 6.59 The proposed landscape strategy for Reading Heights seeks to provide a green edge to the site through vertical planting elements and the potential enhancement of landscape at the south-east corner which lies outside the site boundary.
- 6.60 It also proposes the creation of an inner courtyard garden of c. 60 sqm area that provides additional amenity space for residents over and above that provided through inset, projecting balconies and terraces, which are a feature of all units from 3rd floor upwards across the new build element. Total amenity space provision taking into consideration balconies, terraces and courtyard spaces is c.480 sqm.
- 6.61 The courtyard garden seeks to create an oasis of green that still accommodates the requirements of vehicle movement, refuse collections and cycle parking that is required for the development.

- 6.62 The courtyard garden further acts as a connecting element of the wider scheme, linking the building entrance to Kennet Side through to the established pedestrian and cycle links to the town centre along the River Kennet.
- 6.63 In addition to the landscaping provided at ground level, green and brown roof areas, the total area of which is 594sqm and 227sqm respectively, are provided at roof level throughout the development in order to provide increased biodiversity and rainwater retention.
- 6.64 The approach to providing a series of landscaped spaces within the development will improve neighbouring outlook into what is currently a hardstanding, car-dominated environment which visually links to the IDR and large, object buildings of low visual merit beyond. As such, the approach to high-quality landscaping and materiality, as set out in detail within Section 6 of the DAS is considered to be a strong element of the scheme and is contended to provide improvement over that required by Policy DM10 of the SADPD.

Privacy and Overlooking

- 6.65 The proposed development has been designed to avoid significant detrimental harm to the living environment of both existing residents in the locality and the occupants of the new apartments in line with Policy DM4 of the SADPD.
- 6.66 As set out in Section 5 of the DAS, which considers the design evolution of the scheme and, in particular, approach to layout and massing, the scheme has been subject to initial review of the Reading DRP and Council Officers, following which more detailed proposals have been subject to testing in terms of air quality, noise and daylight and sunlight have been undertaken and their results used to finalise the design following further discussions with the DRP, Council Officers, local stakeholder groups and members of the public.
- 6.67 The design process has given significant regard towards the need to minimise adverse impacts in terms of privacy, overlooking, visual dominance, and overbearing effects, which has led to a perimeter solution being adopted to help maximise separation between old and new elements.
- 6.68 All face to face separation between habitable elements accords with the 20m minimum separation distance set out in Policy DM4, whilst internal layouts have been considered to ensure that there is no potential for overlooking arising from oblique views.

Daylight and Sunlight

- 6.69 Policy RC13 v) states that proposals for tall buildings should ensure adequate levels of daylighting and sunlighting are able to reach buildings and spaces within the development and avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting
- 6.70 The proposed development has been subject to a detailed assessment of daylight and sunlight impacts, considering BRE 2011 guidance to first set parameters within which proposed built form can emerge to ensure external impacts are within accepted guidelines, prior to reviewing internal amenity for new residents.

- 6.71 The assessment concludes that the range of detailed analyses undertaken are considered to demonstrate no material effects to daylight and sunlight amenity enjoyed by occupants of properties neighbouring the proposed development. As a result, the proposals are not considered to give rise to unacceptable, adverse impact on daylight and sunlight amenity are therefore considered fully compliant with Policy RC13 of the SADPD.

Air Quality

- 6.72 Policy DM19 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated.
- 6.73 With regard to Air Quality, the applicant has commissioned an Air Quality Assessment to consider the suitability of the site for residential development and consider the impact of the construction and operational phases relevant to the development on air quality at existing and proposed properties.
- 6.74 The assessment, which is submitted in support of this application, concludes that the baseline review did not find any exceedances of NO₂ concentrations from the RBC air quality monitoring local to the Application Site within recent years. In addition, background NO₂ concentrations modelled by Defra are not predicted to exceed annual mean NO₂ objectives.
- 6.75 A qualitative assessment of the potential dust impacts during the construction of the development has found that through good practice and implementation of appropriate mitigation measures, it is expected that the release of dust would be effectively controlled and mitigated, with resulting impacts considered to be 'not significant'. All dust impacts are considered to be temporary and short-term in nature.
- 6.76 Due to the low additional number of HDV trips anticipated during the construction phase of the development, there is predicted to be a neutral impact / insignificant effect on air quality from road vehicle emissions.
- 6.77 The results of the Operational Phase Screening Assessment also indicate that the additional development flows associated with the operation of the Proposed Development are not in excess of the EPUK and IAQM criteria for further assessment. Therefore, the potential air quality impact of additional development trips can be considered to result in an insignificant effect in accordance with the stated guidance.
- 6.78 Taking the above results into account, it is not considered that air quality represents a material consideration to the development proposals and that the development fully complies with NPPF and Development Plan principles.

Land Contamination

- 6.79 Given the nature of the end use, the applicant has commissioned a Geo-environmental Desk Study/Preliminary Risk Assessment to determine the nature and where possible the extent of contaminants potentially present at the site; to establish the presence of significant pollutant linkages; and to assess whether the site is safe and suitable for the proposed development or can be made so by remedial action.

- 6.80 The intrusive survey concludes that the site has a moderate to low risk of contamination and on the basis that the vast majority of the site is currently covered with hardstanding. Remedial measures in the form of imported clean soil are proposed where any areas of soft landscaping are to be incorporated into the scheme to protect end users from the lead and benzo(a)pyrene contamination.

Noise and Vibration

- 6.81 An environmental noise survey at the proposed site was undertaken in order to review the existing incident noise levels at the proposed residential development.
- 6.82 The assessment of the suitability of the proposed residential extensions for their intended use was undertaken in full accordance with the aims and requirements within the National Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). The NPPF is a material consideration for planning applications when the local plan does not align closely with its aims.
- 6.83 The assessment has demonstrated that the noise climate outside the proposed new habitable rooms will not give rise to significant adverse effects on health and quality of life. The assessment has demonstrated that based on the surrounding noise climate and the provision of whole house background ventilation, compliance with the building regulations will result in suitable internal noise levels for habitable rooms with no direct line of sight to the surrounding road network. A number of "hot spot" locations may require the provision of an external building fabric construction with an enhanced acoustic design and this may be controlled via a suitably worded planning condition.

Parking and Highways

- 6.84 It is noted that the application proposes to provide 4 off-street car parking spaces associated with the new build proposals, which in conjunction with the current PD scheme identifies provision for 8 car parking spaces in total, 4 of which could be provided to meet disabled parking standards.
- 6.85 Current policy within the Council's adopted Parking Standards SPD advises that proposals for flatted residential development shall provide between 0.5 to 1 spaces per dwelling, plus visitor spaces (based on zone 1 standards, see table below).
- 6.86 The SPD states that should a developer require fewer spaces, there would be need to be a demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result. In this regard, inclusion within the Council 'Core Area' and proximity to a range of car parking for visitors and good transport links provides rationale to proceed with lower parking provision.

	Residential Parking Provision			
	Zone 1	Zone 2	Zone 3	Zone 4
Residential				
C3 Retirement Home with Warden (spaces per individual units)	0.5 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff
C3 Dwelling Flat 1-2 bed	0.5	1	1.5	1.5
C3 Dwelling Flat 3+ bed	1	1.5	2	2
C3 Dwelling House 1 bed	0.5	1	1	1
C3 Dwelling House 2 bed	1	1	1.5	2
C3 Dwelling House 3 bed	1	2	2	2
C3 Dwelling House 4+ bed	2	2	2	3
Visitor Parking	0	1 space per 10 dwellings (Flats only)	1 space per 4 dwellings (Flats only)	1 space per 4 dwellings (Flats only)

6.87 It is notable that the SPD was adopted in 2011 and therefore pre-dates the NPPF, which at Paragraph 32, clarifies that *'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'*. Furthermore, Paragraph 39 which addresses the matter of local parking standards states that;

'Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.'

6.88 As a result of the above, the weight which can be afforded to the Parking Standards SPD must necessarily be lessened, as they can only be considered to be partially compliant with the NPPF. The proposals must therefore be considered on their merits, with it only being appropriate to impose parking standards (in full) should the LPA provide clear evidence and a compelling justification for such. Similarly, in the context of NPPF Paragraph 32, development proposals should not be refused on transport grounds unless the cumulative impacts of such were demonstrably severe.

6.89 In evaluating the nature of the proposals, it is clear that there are many sound planning reasons to depart from the standards set out in the Parking Standards SPD. First, much of the wider scheme benefits from permitted development and there are several examples of car-free development or low provision within the central area, as set out in Table 4.1 within the Transport Statement. Second, some provision is proposed, particularly to cover disabled provision and a servicing and delivery strategy and loading bay has been created, as set out in Section 4.4 of the Transport Statement, to accommodate other traffic

movements likely be generated by activity associated with the proposed residential development.

- 6.90 The proposals equally would not be materially significant in respect of highways impacts and would not result in severe adverse effects on road safety or the free flow of traffic. As a starting point, it is noted that the 2011 census (for the relevant super output area; Reading 008D - KS404EW), confirms that almost 45 percent of households in Abbey Ward, in which Reading Heights is located, are without a car and that a further 45 percent have access to one car only.
- 6.91 The Transport Statement makes the case for low car parking provision in consideration of the previous use of the site and that envisaged for the wider scheme and concludes that based on the comparison of the vehicle trips predicted to be generated from the previous B1 office use scheme, there will be a significant net reduction in vehicle trips associated with the site as a whole.
- 6.92 It is further contended that the location of the site lends itself to sustainable travel and the reduced level of car parking is justified by the excellent local transport links and nearby amenities within walking distance. There are a number of excellent, well maintained pedestrian and cycle links available to the residents of the site, as highlighted in both the DAS and Transport Statement.
- 6.93 As much of the site benefits from permitted development, it would also be considered unfeasible to provide numerous additional parking bays to provide a higher ratio of car parking, particularly where it would result in fewer dwellings. This would amount to an inefficient use of an urban, brownfield site, in a highly sustainable location. This approach further enables a comprehensive landscape package for the new courtyard area to come forward, providing wellbeing benefit, as well as mitigation in terms of flood risk and air quality.
- 6.94 As noted above in paragraph 2.2, it is recognised that the site falls within an Air Quality Management Area. In this regard, Policy DM19 indicates that where a development would introduce a 'sensitive use', appropriate mitigation measures shall be incorporated, such that air quality issues are not exacerbated. The supporting text to this policy notes that *'other mitigation measures may also include travel plans, restrictions in car access or parking'*. In this respect, a lower level of existing parking provision (for a site which is extremely well served by public transport), serves to further a key policy objective in the Development Plan.
- 6.95 In consideration of the above, the proposals therefore comply with Policy CS24, which states that car parking standards will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport and the NPPF.

Flood Risk and Drainage

- 6.96 Policy CS35 states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, where development would reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding.

- 6.97 The Environment Agency Flood Zone mapping identifies the site as being within Flood Zone 2 (1 in 1000 chance of flooding each year).
- 6.98 As the site is in Flood Zone 2, a Sequential Test has been prepared by Pegasus Group which demonstrates that there are no comparable, reasonably available sites at a lower risk of flooding than the application site. As such it is considered that the Sequential Test has been passed.
- 6.99 The FRA submitted with the application concludes that the site is not considered to be subject to significant or unmanageable flooding from the other sources identified in the Flood and Water Management Act 2010 (FWMA).
- 6.100 Minimum floor levels will be set at or above 38.16m AOD, 800mm above the modelled 1 in 100 annual probability flood level. The site will incorporate green/brown roofs and green space which will help reduce the existing extent of impermeable cover, improve runoff quality and help manage volume during smaller storm events.
- 6.101 Surface water runoff will, if possible, incorporate an element of disposal via infiltration and/or discharge to the Thames Water surface water sewer network (as is understood to currently be the case).
- 6.102 Taking this into consideration, the proposals fully comply with the requirements of Policies CS1 and CS35.

Housing Mix

- 6.103 Policy RC9 requires all proposals for residential development within the Central Area to contribute towards a mix of different sized units within the development. It states that as a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1 bed, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.
- 6.104 The proposed housing mix is set out in the table below.

Unit Type	Number of units	%
1 bedroom	17	37
2 bedroom	29	63
Total	46	100

- 6.105 It is considered that an appropriate mix of units is provided, which better accords with the dual requirements of the SHMA (as updated) and the need to provide significantly more housing units than envisaged within the current Development Plan. It is noted that the RCAAP, which sets the mix criteria for the central area, pre-dates the NPPF and should only be given limited weight in decision-making.
- 6.106 It is further considered that the lack of car parking proposed makes the site less attractive for larger families, who may expect some form of provision to meet demands specific to this style of living. The site instead seeks to provide accommodation for new starters or

downsizers. The location close to the town centre makes the scheme proposals attractive to both groups and the development of a calm, reflective courtyard area is in part reflective of the applicant's desire to provide meaningful accommodation for an older age group that in turn could release larger buildings back into the market, this providing more meaningful family-scale accommodation, where it is better matched to play space, education and other required infrastructure.

Affordable Housing

- 6.107 Policy CS16 requires that schemes of 5 units or over provide a minimum of 30% affordable units within a scheme, with the tenure as specified in the most up to date Housing Needs Assessment.
- 6.108 The SHMA 2016 (as updated) reflected a need for 75% - 80% affordable or social rented provision and 20% - 25% intermediate provision.
- 6.109 Currently, our scheme seeks to provide a 50:50 split between different tenures, which is considered to work optimally with the location of proposed flats within the development, allowing one core access and a vertical separation of tenures within the tower element to meet with management requirements.
- 6.110 Providing accommodation via one core allows for greater overall delivery of units, both market and affordable, and it is therefore considered that the proposals are sufficiently compliant with Policies CS14 and CS16 of the Core Strategy.
- 6.111 It is notable, in line with that stated in paragraph 6.34 above, that the applicant has approached the Council's Housing Department to suggest alternative provision, either through off-site purchase and delivery or via in-lieu payment, to enable delivery of additional affordable stock and we welcome early discussions with the Council in this regard.
- 6.112 More detail on our current proposed provision is set out in Section 7 of this document.

Sustainability and Energy

Approach to Energy Reduction

- 6.113 The proposed development is committed to comply with the current Building Regulations Approved Document Part L1A.
- 6.114 It is common practice to assess the effect of carbon dioxide emissions by using the following hierarchy:
- Be Lean – Use Energy Efficient measures to reduce energy use. This includes passive measures such as orientation, levels of insulation, ventilation strategies, and heating systems efficiencies and controls.
 - Be Clean – Source energy from the greenest sources. This could be to use CHP, or to link into an existing district heating system

- Be Green – Use on-site renewable energy to reduce energy and carbon emissions. The results show that when not using any renewables or de-centralised energy production the building will be compliant with building regulations.

6.115 The applicant has a strong desire to provide a highly sustainable building, which is evidenced in the conclusions of the Energy Statement, which shows that with the chosen CHP engine applied the proposed new build will achieve a 58% reduction in CO2 emissions, significantly more than the 20% reduction required by Policy CS1.

Sustainability Considerations

6.116 Opportunities to incorporate sustainable development features will be explored from an early design stage to provide flexibility to the design team, compensate for any design constraints, and improve the development's ongoing sustainability performance. This will include the key topic areas outlined below:

Minimising Water Use

6.117 The proposed dwellings will include, where appropriate, the following features for minimisation of water use:

- Water efficient Dual flush WCs
- Showers with efficient flow rates
- Garden spaces and incidental landscaping that will not require permanent irrigation systems or to be irrigated using treated rainwater

Surface Water Runoff

6.118 The following mitigation measures will be included within design proposals wherever feasible:

- Sustainable Drainage Systems (SuDS) are to be included to ensure that the peak rate of run-off from the site to the watercourses (natural or municipal) is no greater for the developed site than it was for the pre-development site. This will comply at the 1-year and 100-year return period events.
- Relevant maintenance agreements for the ownership, long term operation and maintenance of all specified SuDS will also be in place.

Construction Materials and Techniques

6.119 Sustainable waste behaviour will be encouraged and facilitated through the following measures during and construction:

- Construction waste will be segregated and recycled where viable
- Materials specified for low environmental impact where possible including:
 - Purchasing timber and timber products from legal sustainable sources, using external certification e.g. FSC as verification evidence

- Materials will be specified to achieve an 'A/A+ rating' as defined by the Green Guide to Specification
- Durability measures being in place across the proposed development whenever possible
- The use of Products with either no formaldehyde or low VCC (meeting the European standards) containing materials
- The use of thermal insulation which has a low embodied environmental impact relative to its thermal properties.
- The use of local materials (wherever possible)
- Re use of materials
- Good energy efficiency e.g. best practice U-value shall be used for the building fabric.

7. Affordable Housing Statement

Introduction

- 7.1 The purpose of this section is to provide the policy context for affordable housing and to set out the intended affordable housing approach for the proposed development at the Reading Heights site. It demonstrates how the provision for affordable housing on the development site meets national and local planning affordable housing policy.
- 7.2 The definition of affordable housing is stated in the glossary of the NPPF as: 7.1.2

'Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provision to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision'. (NPPF, 2012, pp.50)

Policy Context

National Planning Policy Framework

- 7.3 The NPPF sets out that a local authority should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (Paragraph 47).
- 7.4 Paragraph 173 of the NPPF states that to ensure viability, the cost of any requirement likely to be applied to development, such as requirement for affordable housing and other requirements should, when taking account of the normal costs of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Development Plan Policy

- 7.5 Core Strategy Policy CS16: Affordable Housing states that all developments providing 15 dwellings or more will provide 30% of the total number of dwellings in the form of affordable housing. It adds that *"in determining residential applications the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development."*

Affordable Housing Provision

- 7.6 As the development proposes the erection of 46 dwellings there is an affordable housing requirement of 14 affordable units. In line with this target the proposed development will provide 14 affordable units, equating to 30.4% of the total provision, with a tenure split of 50% (7 units) affordable rent and 50% (7 units) shared ownership.
- 7.7 The proposed affordable housing will comprise of the following house/flat types and tenure mix:

Unit Type	Affordable Rent	Intermediate	Totals
1 bedroom 2 person	5	5	10
2 bedroom 3 person	2	1	3
2 bedroom 4 person	0	1	1
	7	7	14

- 7.8 Whilst it is considered that the proposals meet requirements in terms of quantum and can provide an appropriate mix of provision, which can be integrated into the development to meet identified local need, it is recognised that the SHMA highlights greater need for social and affordable rented forms of accommodation.
- 7.9 The applicant has therefore submitted a housing position paper to the Council's Housing Team to identify how greater quantum or more appropriate tenure mix could be provided off-site and we welcome the Council's thoughts in this regard.
- 7.10 Should a significantly higher proportion of social and affordable rented provision be required over that set out above, it is likely that certain scheme elements may need to be reduced in order to enable the ongoing viability of the scheme. Accordingly, it is considered that the proposals strike the right balance in terms of on-site provision alongside a range of environmental, economic and social benefits.

Summary

- 7.11 The proposed development accords with adopted policy requirements in terms of the quantum provision of 30% affordable housing in new residential developments. The proposals will therefore make a positive contribution to meeting affordable housing needs within the Council's administrative area.

8. Conclusions

- 8.1 This planning statement has been prepared by Vocalism on behalf of Reading Heights Ltd in support of a planning application for the:

'The erection of a one storey roof extension and a part six, part ten storey building, mews houses comprising 4,108 sqm (GEA) of new development, providing up to 50 residential units together with associated services enclosures, parking and landscaping'.

- 8.2 This Planning Statement sets out the site context, explains the pre-application consultation process, and assesses the development proposals against government guidance, and regional and local planning policies.
- 8.3 Furthermore, in preparing this application and its proposals all relevant planning policy requirements together with specific issues identified by officers during pre-application consultations have been taken into account.
- 8.4 As a result, the development fully accords with local, regional and national planning policy and it is therefore respectfully requested that planning permission is granted.

Appendix 1: Planning Policy Matrix

14 Raglan Gardens
Caversham
Reading
RG4 5JH

T: 0118 437 0545
E: planning@vocalism.co.uk
W: vocalism.co.uk



PLANNING - ENGAGEMENT - DEVELOPMENT