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3rd November 2017

Planning Services
Level 8
Reading Borough Council
Civic Centre
Reading
Berkshire
RG1 7AE

Dear Sir or Madam,

SITE AT: 3-5 CRAVEN ROAD, READING, BERKSHIRE

RE: Erection of a part two/part three storey / part four storey building comprising 25 Retirement Living apartments with associated communal facilities, landscaping and parking (C3 use class) following demolition of existing buildings.

Please find enclosed a duly completed planning application (Reference: PP-06487589) for the abovementioned proposed development, submitted on behalf of McCarthy and Stone Retirement Lifestyles Ltd. The application is accompanied by the requisite fee of £9,625 attached to this letter and the following plans and supporting documents.

<u>Drawing No.</u>	<u>Plan</u>
SE-2372-03-AC-001	Site Location Plan
SE-2372-03-AC-002	Existing Site Plan
SE-2372-03-AC-012	Demolition Site Plan
SE-2372-03-AC-025	Proposed Site Plan
SE-2372-03-AC-026	Proposed Site Layout Plan
SE-2372-03-AC-028	Ground Floor Plan
SE-2372-03-AC-029	First Floor Plan
SE-2372-03-AC-030	Second Floor Plan
SE-2372-03-AC-034	Roof Plan
SE-2372-03-AC-037	Elevations 1
SE-2372-03-AC-038	Elevations 2

- Design and Access Statement

- Planning Statement
- Financial Viability Assessment
- Heritage Statement
- Tree Survey and constraints plan
- Landscaping plans
- Statement of Community Involvement
- Older Persons Housing Needs Survey
- Drainage Report and strategy plan
- Noise Assessment
- Transport Statement and Appendices
- Draft S106 legal agreement
- Supporting letter from Berkshire NHS
- Verified Visual Images

Planning History

An application was submitted in January 2016 for the redevelopment of the above-mentioned site for 39 retirement apartments for older persons with associated communal facilities, landscaping and car parking. The application was withdrawn in April 2016 but not before the case officer indicated the concerns of the local planning authority within an officer's report.

The officer's report expressed 8 areas of concern which were as follows; (and I summarise)

- Loss of a non-designated heritage asset,
- Siting, scale and appearance and its impact on the setting of adjacent listed buildings and conservation area,
- Loss of community facilities,
- Neighbourly impact on 1/1a Erleigh Road,
- Adverse impact on Highway Safety through resiting of bus stop,
- Failure to demonstrate an acceptable level of parking provision
- Absence of legal agreement to secure an acceptable level of affordable housing provision
- Absence of legal agreement to secure a suitable Employment, Skills and Training Plan.

The Council have subsequently issued an Article 4 direction in respect to number 3 Craven Road removing permitted development rights to demolish the existing building.

The revised application looks to address the previous reasons for refusal and also weighs the planning balance in favour of the proposal when considered against the proposed loss of the non-designated heritage asset which is required by Paragraph 135 of the NPPF.

1. Loss of Non Designated Heritage Asset

It is acknowledged that the proposed development would result in the loss of a non-designated heritage asset. A heritage statement has been submitted with the application which identifies that the existing non-designated heritage asset is of low significance.

The proposal needs to be determined on its planning merits against the NPPF and PPG and the Council's Core Strategy policies. Core Strategy Policy CS33 regarding the protection and enhancement of the historic environment predates the NPPF and needs to read in conjunction with it. The core strategy policy as drafted is contrary to the approach to non-designated heritage assets as set out in paragraph 135 of the NPPF. The Core Strategy policy advises that '*planning permission will only be granted where development has no adverse impact on historic assets*', whilst paragraphs

134 and 135 of the NPPF require the decision maker to make a balanced assessment of the extent of harm and its significance against the planning benefits of the proposed scheme.

Whilst, it is acknowledged that the proposal will result in the loss of a non-designated heritage asset that harm needs to be considered and balanced against the planning benefits of the proposed scheme. In that regard on balance it is considered that benefits to be accrued by the proposed scheme would outweigh the loss of the non-designated heritage asset given its low level of significance.

2. Siting, Scale, Appearance and its impact on the setting of adjacent listed buildings and Conservation Area

The officer's report to the previous proposal was critical in respect to the proposal's impact on the setting of the Lodge building which is part of Reading school and considered to be curtilage listed, and the setting of the Alexandra Road Conservation Area. It was considered within the officer's report that the application site is much more closely associated to the Victorian/Edwardian character of the Redlands area. This comment has been taken on board in the design approach to this revised scheme. The revised scheme also moves built form further away from the curtilage listed Lodge building within the grounds of Reading school. It is of course appropriate in considering the setting of the Lodge building to have regard to the existing relationship with the temporary single storey building currently on site. Without question the existing single storey temporary building detracts from the setting of the Lodge buildings and its removal and replacement with a building that has had regard to the vernacular character of the Redlands area would improve the setting of the curtilage listed Lodge, and the overall character of the area.

3. Loss of Community Facilities

Policy CS31 states that *'Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.'*

The officer in his report at 6.11 acknowledged a previous letter provided by the NHS setting out the inherent problems with the existing site for their Children, Education and Early Help Service. It is clear from the NHS letter from October 2017 that supports this application that the service would not be lost to the local community as the plan was to relocate the service elsewhere in Reading. The uncertainty at the time of the previous planning submission led the officer to conclude that this issue had not been satisfactorily resolved and remained contrary to Policy CS31. Since April 2016 the NHS have signed the lease on the STC building at the University of Reading. They took occupation on the 17th April 2017 when fit out commenced, with the enhanced service being relocated and active from January 2018. Accordingly, this provides the certainty that the community facility has not been lost and the officer's area of concern has been removed.

4. Neighbourly Impact

The officer's report for the withdrawn application suggested that the proposal would result in unacceptable harm to the amenities of neighbouring properties, specifically 1 and 1A Erleigh Road. The officer consideration of harm would appear to be based upon the fact the only areas of amenity space available to 1 and 1A Erleigh Road is to the front of the building line, and in this context the proposed building would have had an overbearing effect on the gardens by virtue of its height, mass and proximity. There is also the additional comment that light and movement at a higher level than is currently existing on the site would result in a perception of overlooking. There was no suggestion that the proposed building resulted in direct overlooking that infringe any Council's standards.

The revised proposal has a different layout plan which brings the built form further away from the boundary with Erleigh Road. The significant mature lime trees on Erleigh Road are also a material planning consideration as they lie between the proposal site and 1 and 1A Erleigh Road. Their size and canopy are such they have a bigger overbearing, overshadowing impact on 1 and 1A Erleigh Road, than the proposed redevelopment of this site with a flatted form of accommodation.

It is also considered difficult to substantiate a perceived overlooking of the amenity area of 1 and 1A Erleigh Road given this area is constantly being overlooked or the perception of people overlooking it with the public walking up and down the footway on that side of Erleigh Road. It is respectfully considered that the proposal will not result in an unacceptable level of harm to amenities of neighbouring properties.

5. Impact on Highway Safety from Bus Stop Resiting

The previous application attracted a highway objection from RBC Transport in respect to the resiting of the bus stop and how it may conflict with the right turn access into the hospital grounds. I have attached a technical note from our highways consultants, Paul Basham Associates which demonstrates that the proposed new access and bus stop resiting does not create conflicting traffic movements above and beyond the existing situation. In that respect the proposal and access complies with policies CS20 of the Reading Borough LDF Core Strategy (altered 2015) and Policy DM12 of the Sites and Detailed Policies Document 2012 (altered 2015).

6. Parking Provision

The previous application attracted a highways concern to the level of parking provision being proposed and absence of sufficient information to demonstrate its acceptability. The previous application proposed 26 parking spaces for 39 units at a ratio of 1 parking space per 1.5 units. RBC's revised parking standards SPD 2011 sets out a requirement for 1 space per unit plus 1 space per staff for sheltered/retirement accommodation (C3). The SPD advises that the onus is on the applicant to demonstrate the acceptability of a lower parking provision in that would not cause detriment to highway safety.

The proposal subject of this pre-application enquiry identifies 28 parking spaces for 26 sheltered apartments which complies with the Council's SPD. In that regard no further evidence is necessary as it complies with Council standards and therefore complies with Policy CS24 of the Reading Borough LDF Core Strategy 2008 (altered 2015) and Policy DM12 of the Sites and Detailed Policies Document 2012 (as altered 2015), and the Parking SPD 2011. Notwithstanding that I am also mindful of the policy objectives of Core Strategy and the Reading Transport Strategy to reduce the need to travel by car. Given the sites highly sustainable location with a public transport stop immediately outside of the site, and the nature of the proposed residents it is arguable that a lower level of parking provision would be equally sustainable, not result in detriment to highway safety and better meet the objectives of the Core Strategy.

7. Absence of a legal agreement to provide Affordable Housing

Mindful of Paragraph 173 of the NPPF the previous application was submitted with a financial viability appraisal to assess the level of affordable housing contribution that the proposal could viably provide. Whilst the Council's Valuer assessed the scheme no agreement was reached on the level of contribution that the scheme could viably provide. Again a revised viability appraisal has

been submitted with the application and it would be hoped that sufficient dialogue would take place to ensure agreement can be reached.

8. Employment, Skills and Training Plan

The applicant is content to enter into a S106 agreement to make an appropriate financial contribution to allow for employment, skills and training provision.

I trust this is sufficient to enable the Council to register and determine the application but if you require any further information, please do not hesitate to contact me on 01483 908637.

Yours faithfully,

Matthew Shellum
Principal Planning Associate
The Planning Bureau Ltd.