



CHARTERED TOWN PLANNERS

PLANNING STATEMENT

LAND AT CROWN STREET AND SILVER STREET, READING

On behalf of Thomas Homes Ltd

JUNE 2017

The John Phillips Planning Consultancy

Partners:

Adrian Gould MRTPI Ltd

Neil Warner MRTPI Ltd

Henry Venners Ltd

Consultant:

Nik Lyzba MRTPI Ltd

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Thomas Homes and is in support of a detailed planning application for residential development comprising 80 new apartments on the corner of Crown Street and Silver Street, Reading.
- 1.2 In addition to this statement the application is supported by the following documentation:
- Design and Access Statement
 - Flood Risk Assessment
 - Remediation Action Plan
 - Air Quality Assessment
 - Archaeological Written Scheme of Investigation
 - Geo-Environmental Site Assessment
 - Noise Assessment
 - BRE Daylight and Sunlight Report
 - Sustainability Statement
 - Transport Statement
 - Landscape Management Plan
 - Ecology Report
 - Superfast Broadband Strategy
- 1.3 This statement describes the application site and the surrounding area, outlines the proposal, sets out the planning policy framework relevant to consideration of the application and then assesses the proposal against this framework.
- 1.4 This statement draws on current Government Guidance in the National Planning Policy Framework (NPPF), the Reading Core Strategy (Altered 2015), Reading Central Area Action Plan (2009) and the Sites and Detailed Policies Document (Altered 2015).

2.0 THE SITE AND PROPOSAL

- 2.1 The application site is located to the south of the Town Centre and within the Reading Central Area.
- 2.2 The land is allocated for residential development for between 50-85 dwellings, as per Policy RC4I of the Reading Central Area Action Plan.
- 2.3 The area measures approximately 0.33ha. The topography of the area is largely level.
- 2.4 There are a number of low-rise brick buildings occupying the centre of the site, the eastern section of the site remains covered in foliage, following the demolition of previous buildings on the site. A car wash business currently operates from the site.
- 2.5 Existing vehicular access is provided to the site both from the north-west corner onto Silver Street and from the south-east corner onto Silver Street.
- 2.6 The application site is not covered by any heritage designations, but does lie immediately to the southern edge of the Market Place London Street Conservation Area. Opposite the site is the six storey Crown House, with listed buildings of Nos. 3 and 5 London Road, which are also adjacent to Nos. 7-11 London Road which are noted as Buildings of Townscape Merit.
- 2.7 The surrounding context to the site is diverse in height, scale and character; comprising a mix of residential, commercial and retail uses.
- 2.8 A full detailed analysis of the site and surrounding context is provided in the accompanying Design and Access Statement by Woodfield Brady Architects.
- 2.9 The development seeks planning permission for the demolition of existing buildings, to provide for residential development consisting of 80 no. dwellings with associated access and landscaping works.

3.0 RELEVANT PLANNING HISTORY AND BACKGROUND

3.1 JPPC has undertaken a planning history search of all applications of relevance prior to submission of this application, those of relevance are provided below:

- 910338/FUL – renewal of time limited permission for car parking
- 911078/FUL – temporary use of land for vehicle car hire business and ancillary office accommodation – approved
- 091559/FUL – retrospective application for the use of part of the site for car wash/valeting with associated advertising
- 101072/FUL – change of use from storage and parking to car wash and parking – approved
- 151702/OUT – outline application for residential institution within Class C2 comprising 86 no. 1 bed and 10 no.2 bed assisted living units (landscaping reserved for future consideration) (amended description)
- 160868/OUT – residential institution (Class C2) comprising 74 no. 1 bed and 10 no. 2 bed assisted living units (resubmission of application 151702).

3.2 Most recent planning permission 160868/OUT granted outline consent (30th December 2016) for a Class C2 84 no. unit assisted living scheme. The proposal consisted of a single L-shaped building with two wings, with the building ranging in heights of four storeys to six storeys.

3.3 This application has been prepared using as a frame of reference the scale, design and massing of the permitted C2 scheme.

3.4 Prior to submitting these proposals the applicant undertook detailed pre-application enquiries with the Council, which were completed under two phases. The advice received confirmed that the principle of housing on the site, in a form no larger than that approved under reference: 160868, was considered acceptable. Following the advice received – primarily related to the final design of the scheme – the proposals have been amended and are considered to comply with officers' advice. The full detail of the design response is covered in the accompanying Design and Access Statement.

4.0 THE DEVELOPMENT PLAN

- 4.1 The legislative framework for consideration of this application is provided by the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004. Section 38 (6) of the 2004 Act states that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

- 4.2 Section 70(2) of the Town and Country Planning Act 1990 states also that in the determination of applications:

"The Authority shall have regard to the provisions of a development plan, so far as material to the application, and to any other material consideration."

- 4.3 The Development Plan for the area comprises policies of the Reading Core Strategy (Altered 2015), Reading Central Area Action Plan (2009) and the Sites and Detailed Policies Document (Altered 2015). These policies are discussed below, but first consideration is first given to national guidance as set out in the National Planning Policy Framework (NPPF) (March, 2012) and National Planning Practice Guidance (NPPG) which are powerful material considerations.

National Planning Policy Framework

- 4.4 The NPPF replaced previous Government guidance, as set out in Planning Policy Guidance Notes (PPGs) and Planning Policy Statement (PPSs).

Achieving Sustainable Development

- 4.5 The NPPF at paragraph 6 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 7 continues, to state that there are three dimensions to sustainable development: economic, social and environmental, and that these dimensions give rise to the need for the planning system to perform a number of roles:

- **An economic role** - contributing 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 coordinating development

requirements, including the provision of infrastructure;

- **A social role** - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **An environmental role** - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 4.6 Paragraph 8 makes it clear that those roles should not be undertaken in isolation, because they are mutually dependant.

Presumption in Favour of Sustainable Development

- 4.7 The NPPF establishes a presumption in favour of sustainable development and recognises at paragraph 14 that:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking".

- 4.8 Paragraph 14 also states that:

"For decision-taking this means:

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;*
 - or*
 - *specific policies in this framework indicate development should be restricted."*

Core Planning Principles

4.9 Paragraph 17 sets out the Government's Core Planning Principles and states that planning should:

- *"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*
- *support the transition to a low carbon future in a changing climate, taking account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources;*
- *contribute to conserving and enhancing the natural environment and reducing pollution;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;*
- *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs."*

Requiring Good Design

4.10 Paragraph 56 states that the Government attaches great importance to the design of the built environment, and that:

"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

4.11 Paragraph 58 states also that planning policies and decisions should aim to ensure that developments:

- *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; and*
- *are visually attractive as a result of good architecture and appropriate landscaping."*

The National Planning Practice Guidance

- 4.12 In March 2014, the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG). The NPPG is a web based resource providing information on various topic areas. Over 150 documents have been cancelled by the publication of the NPPG including Technical Guidance and Circulars.
- 4.13 The guidance supplements the national policies set out in the NPPF. In relation to decision taking where heritage assets are concerned, the NPPG notes that *"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework ([Paragraph 7](#)). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit"*.
- 4.14 A wide range of technical issues are considered in the guidance provided. These are not considered in detail here but have been taken into account in the preparation of the development proposals.

Reading Core Strategy (2008) (Altered 2015)

- 4.15 The following policies are considered to be of particular relevance to these proposals:
- CS1: Sustainable Construction and Design
 - CS2: Waste Minimisation
 - CS3: Social Inclusion and Diversity
 - CS5: Inclusive Access
 - CS7: Design and the Public Realm
 - CS9: Infrastructure Services, Resources and Amenities
 - CS14: Provision of Housing

- CS15: Location, Accessibility, Density and Housing Mix
- CS22: Transport Assessments
- CS24: Car/Cycle Parking
- CS29: Provision of Open Space

Reading Central Area Action Plan (2009)

4.16 The application site is located within an area of Reading covered by the AAP. The site being subject to allocation Policy RC4L: Other Opportunity Sites – Corner of Crown Street and Silver Street.

4.17 Policy RC4L states that:

“Corner of Crown Street and Silver Street Residential Development (50-85 dwellings). Development should address the following issues: relationship to Conservation Area, noise impacts, air quality.”

4.18 The application is accompanied by an air quality assessment, noise assessment and detailed design and access statement, which considered the identified issues in detail and explain how the scheme has factored such matters into the final layout and design.

4.19 Paragraph 7.4 of the AAP further states that:

“Where dwelling figures are included alongside the allocations, these are intended as a guide. The number of dwellings will ultimately depend on various factors, which need to be addressed at application stage. In line with policy within the RCAAP and Core Strategy, residential development on these allocated sites will be required to contribute to affordable housing, where they fall within the thresholds set out in CS16.”

4.20 Further policies of relevance to this application include:

- RC5: Design in the Centre
- RC6: Definition of the Centre

Sites and Detailed Policies Document (2012) (Altered 2015)

4.21 The policies as listed below are considered to be of particular relevance to this scheme:

- SD1: Presumption in Favour of Sustainable Development
- DM1: Adaptation to Climate Change
- DM3: Infrastructure Planning
- DM4: Safeguarding Amenity
- DM10: Private and Communal Outdoor Space
- DM12: Access, Traffic and Highway-related Matters
- DM18: Tree Planting
- DM19: Air Quality

Supplementary Planning Documents

4.22 Sustainable Construction and Design (2011) and Revised Parking Standards and Design (2011) SPDs are considered to be of relevance to the proposals.

5.0 PLANNING ASSESSMENT

Principle of residential development

- 5.1 The site is in a sustainable location to the southern edge of the Town Centre and within the 'Reading Central Area'. It is a 300m walk into town and is well served by outbound and inbound bus services. The sustainable location plays heavily in favour of approving this application.
- 5.2 It is also therefore clear that the site is in an accessible and sustainable location. Residents of the development would not be reliant on a private car and other transport modes can be encouraged.
- 5.3 Land at Crown Street and Silver Street is allocated for residential development as per Policy RCL4 of the adopted Central Area Action Plan. The policy indicates the site could accommodate between 50 and 85 dwellings.
- 5.4 The scheme proposals consists of 80 no. flats, across a mix of 1, 2 and 3 bed properties. Therefore in principle the nature and quantum of development proposed is considered to be acceptable and compliant with Policy RCL4.
- 5.5 The site is deliverable and submitted in detail so that it could be brought forward without delay; thereby boosting the Council's housing land supply.
- 5.6 The following sections of this statement will demonstrate that the proposed development is sustainable and that there are no adverse impacts associated with the proposed development that would significantly or demonstrably outweigh the benefit of adding to the supply of housing in the Borough of Reading when assessed against the policies in the NPPF taken as a whole.

Design, Mix and Character

- 5.7 The accompanying Design and Access Statement that has been submitted in support of the application provides greater detail as to the design rationale for the scheme, having regard to the site's opportunities and constraints and in consultation with the local planning authority. It looks in detail at the vision for the site, in relation to the historical and heritage significance, and the constraints before looking at the concept for the development.
- 5.8 The layout plans and supporting information demonstrates that the development proposed can be accommodated on the site while incorporating best practice urban design principles; providing future occupiers with a high quality living environment and respecting the character of the surrounding area.
- 5.9 The proposed development has been designed on the basis of the footprint and

massing of the extant consent for a C2 use class building on the site. Whilst there are additions and reductions at each floor, the proposal scheme has, overall, a lesser floor area than the C2 consent of some 245 square metres.

- 5.10 The development is arranged as two blocks, with the higher block onto Crown Street providing the larger share (70%) of the open market properties, and the lower block providing the affordable element. The full specifications and parameters of the scheme are provided within the accompanying Design and Access Statement.
- 5.11 The building would be arranged in an L-shaped footprint with each wing addressing either Crown Street or Silver Street. This creates an enclosed area within to be used as shared amenity space. All properties benefit from a balcony.
- 5.12 In terms of general principles, the massing has been carefully articulated so that elevations are broken down into discrete vertical elements. The proposed recessed balconies help contribute to the animated elevational treatment.
- 5.13 The top floor is also set back (as per the C2 scheme) to create a recessive upper floor and reduce any visual dominance.
- 5.14 The building will predominantly finished in a red/orange facing brick, which is considered to be in keeping with the character of the area.
- 5.15 The development is proposed to contain a mix of 1, 2, 3 bedroom apartments. The precise mix has been determined in consultation with the Council's officers and with regard to the mix stated in the Berkshire SHMA.
- 5.16 Policy RC9 of the AAP requires that, in developments of 15 or more dwellings, a maximum of 40% of units should be 1 bed, and a minimum of 5% should be 3 bed. The overall mix of the scheme consists of 31 x 1 bed, 42 x 2 bed and 7 x 3 bed. Such a mix would be consistent with the NPPF which encourages mixed and balanced communities; and with Policy RC9 which also expects proposals to contribute towards improving the range of housing accommodation in the Borough.

Affordable Housing

- 5.17 As well as providing market housing the scheme would assist in meeting local housing need through the provision of the full requirement of affordable housing. Policy CS16 of the Core Strategy requires the provision of 30% of the units to be secured as affordable housing. The Council's Affordable Housing SPD sets out that the largest affordable need is for smaller accommodation (1 and 2 bedroom properties).
- 5.18 As such, 24 of the 80 units will be affordable, consisting of: 12 x 1 bed and 12 x

2 bed apartments. The split proposed is 75:25 in favour of affordable rent; thereby complying with Policy CS16 and the Council's Affordable Housing SPD.

- 5.19 Paragraph 4.4 of the Council's Affordable Housing SPD states that consideration should be given to providing a separate access to the affordable element of the scheme, to assist in terms of housing management and private sale. The proposed plans provide for access to the apartment blocks, primarily from the basement and ground floor car/cycle parking areas, but also with building entrances on the courtyard side of the ground and basement levels of the building. This design rationale for this approach is considered further in the accompanying Design and Access Statement.
- 5.20 The applicant has undertaken a number of pre-application discussions with housing associations who operate in Reading, each of whom has confirmed their keenness to acquire the flats on the basis of the tenure, mix and flat sizes proposed as part of this application.
- 5.21 The split of housing as proposed is compliant both with Policy CS16 and Paragraph 173 of the NPPF. The development will make a meaningful beneficial contribution towards meeting the Borough-wide affordable housing need.

Air Quality

- 5.22 Policy RC4L of the RCAAP requires any development on the application site to duly consider and address the impact of air quality on proposals. The application is therefore supported by an Air Quality Assessment undertaken by Peter Brett Associates.
- 5.23 The report considers existing air quality and subsequently considers the suitability of the site for residential development, as well as assessing the impact of the construction of the development on air quality in the surrounding area.
- 5.24 Analysis finds that the construction works have the potential to create dust, and as such, during construction, recommendations are made for a package of mitigation measures to minimise the risk of elevated PM10 concentrations and dust nuisance to the surrounding area. The assessment concludes that, by incorporating the mitigation measures set out in Section 6.0 of the report, the construction impacts are not considered to be significant.
- 5.25 Furthermore, the analysis considers the predicted N02, PM10 and PM2.5 levels and concludes that the air quality across the site is considered to be acceptable for residential use. None of the relevant objectives are predicted to be exceeded and therefore no further mitigation is recommended for the proposed residential use of the site.

- 5.26 The development is therefore considered to comply with Policies RCL4, CS34 and DM19.

Noise

- 5.27 Policy RC4L also requires new development to address noise impacts. As such, a noise assessment specific to the proposed development has been prepared by John Waring Acoustic Consultant. This recommends measures to be taken so as to ensure that reasonable standards of peace and quiet can be achieved in the external amenity areas and constructed building.
- 5.28 The report has achieved this objective by measuring existing sound levels at the site and considering the amount of sound insulation required within the building envelope to ensure internal target noise levels are achieved.
- 5.29 The results of the noise survey, when calculated using data for double glazing, demonstrate that glazing would be sufficient to ensure noise levels within the dwellings are below design noise levels, on the proviso that specialist ventilation units are used.
- 5.30 The proposed garden area is located to the rear of the building and is therefore considered to be within the recommended noise limits.
- 5.31 Analysis has also been undertaken of the impact of the air handling plant on the existing surrounding residents. The assessment concludes that, provided the handling units do not exceed a sound level of 26 decibels at the façade of the nearest residents, the impact of development is considered to be acceptable.
- 5.32 The development will incorporate these measures and therefore complies with Policies RCL4, DM4 and CS34.

Transport and Access

- 5.33 One of the core planning objectives of national policy as set out within the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and to focus significant development in locations which are or can be made sustainable.
- 5.34 The NPPF further sets out that planning policy should aim for a balance of land uses so that people can be encouraged to minimise journey lengths. For larger scale residential developments, a mix of uses are encouraged by the NPPF in order to provide opportunities to undertake day-to-day activities (including work) on site. The application is supported by a Transport Assessment prepared by Glanville Consultants.

- 5.35 The application site is 350 metres south of Reading Town Centre and has two vehicular accesses: one from Silver Street, and one from Crown Street.
- 5.36 The roads surrounding the site are subject to double yellow lines, prohibiting waiting and loading at any time. Residential roads surrounding the site are controlled by Reading's Parking Permit Zone, restricting parking to permit holders between 8am and 8pm.
- 5.37 The development site is considered to be in a very sustainable location, within walking and cycling distance of a range of services and facilities. Reading train station is within walking distance of the site and numerous bus stops and services are readily available. The Transport Assessment therefore concludes that a significant proportion of trips to the development will be via sustainable modes of transport.
- 5.38 Pedestrian access to the site will be via new entrances onto footways of Crown Street and Silver Street. Further pedestrian access will be provided to the rear of the building.
- 5.39 It is proposed to form a vehicular access to the site approximately 1.5 metres to the south of the existing access onto Silver Street. The two existing accesses will be removed and the footway reinstated. Visibility can be achieved to the appropriate standards and therefore there are no highway safety concerns.
- 5.40 Refuse vehicles will be able to enter and exit the site in a forward gear, with the bin stores located to ensure waste carrying distances conform to Manual for Streets guidance.
- 5.41 Parking provision will consist of 54 car parking spaces and 44 cycle parking spaces. Given the sustainable siting of the development, pre-application discussions with the Council's highways officers has confirmed Zone 1 parking standards can apply, which in this instance would necessitate a minimum of 51 car parking spaces. The car spaces meet this standard and are therefore considered to be acceptable.
- 5.42 Cycle parking standards require 42 spaces and therefore this standard has also been met. The development is therefore, in terms of both car and cycle parking, considered to conform to the guidance contained in the Council's Parking Standards and Design SPD 2011.
- 5.43 In terms of vehicular traffic, the analysis by Glanville finds that level of increase in movements – equating to less than one vehicle every two minutes, on average – will not be detrimental to the capacity or safety of the surrounding road network.
- 5.44 The Transport Assessment concludes that the proposed development is in

accordance with the NPPF, and that the transport impacts cannot be considered as 'severe'. The development is therefore considered to comply with Policies CS20, CS24 and DM12.

Contamination

- 5.45 A Remediation Action Plan has been prepared by RSK Consultants. The report seeks to identify any required remedial works to mitigate any unacceptable risk from potential contamination to human health, controlled waters and other sensitive receptors, to ensure the site is suitable for residential use.
- 5.46 The Plan sets out a series of remedial actions to ensure the development does not have an unacceptable impact on future occupants or neighbouring uses. It also identifies any issues that may adversely affect the development of the site for the proposed use.
- 5.47 The report concludes that the overall risk to the on-site receptors is low and, by incorporating the remediation requirements set out in Section 8.0 of the report, that there is a low risk of contamination on the site. Accordingly there should be no significant geo-environmental issues that would prevent the site from being developed for the proposed use.
- 5.48 Therefore, the proposal is considered to be compliant with Policy CS34.

Ecology

- 5.49 The proposals are supported by an Ecology Report undertaken by Windrush Ecology. The site was previously the subject of an extended Phase 1 Habitat Survey, undertaken in May 2015 to accompany the proposals for a C2 development. The survey described and evaluated habitats present and assessed the potential for the site to support protected species, including a bat survey of the existing buildings. In March 2017, Windrush Ecology was appointed to provide update survey results, which supports this application.
- 5.50 The site contains no significant trees or hedges, and existing flora is considered to be of low ecological value. By incorporating the landscaping plans – as detailed in further sections of this statement and the accompanying Landscape Management Plan – which consists of a series of hard and soft landscaping measures (including the planting of a number of specimen trees), the biodiversity of the site is expected to increase as a result of the proposed development.
- 5.51 The report accompanying this scheme presents results of updated survey work. The updated report re-evaluates the habitats present and assesses the potential for the site to support protected and notable species. Included are recommendations for appropriate mitigation and compensation measures in the

light of the findings.

- 5.52 The survey work found no evidence of bats or other protected species. Nor was any evidence of bat droppings noted with the interior or exterior of all remaining buildings on the site.
- 5.53 There was also no evidence of nesting birds within the interior spaces.
- 5.54 The report concludes that the site offers no habitat to other protected or notable species, such as reptiles, amphibians or badgers.
- 5.55 As a consequence of the findings, no further survey work is recommended. Section 4.2 of the report identifies a number of mitigation measures that are recommended to be followed during the course of construction works, and incorporated into the development. These include the incorporation of swift nest boxes into the northern and eastern elevations of the building. These elements can be incorporated into the final build finish.
- 5.56 Given the above, and with detailed reference to the accompanying ecology report, the development is considered to comply with Policy CS36.

Archaeology

- 5.57 Paragraph 128 of the NPPF requires that applications should describe the significance of any heritage asset affected by the proposed development and any impact to their setting.
- 5.58 A Written Scheme of Investigation (WSI) has been prepared by CGMS and accompanies this application. The scheme has been prepared as a consequence of condition 33 of the previous C2 permission. The WSI presents a detailed methodology of evaluation and is submitted to the Council for confirmation of its content and approach, and is presented upfront in order to avoid any pre-commencement conditions in relation to archaeological evaluation.

Sustainability

- 5.59 The application is supported by a Sustainability Statement undertaken by Proport Eco-Services.
- 5.60 Policy DM1 requires measures to be incorporated within the building to minimise the effects of climate change. Policy DM2 requires consideration to be given to the inclusion of decentralised energy.
- 5.61 The pre-application response from the Council also stated that the development should demonstrate a 19% energy efficiency above TER.

- 5.62 The design principle adopted in the development is to reduce energy demand of the apartments by adopting a ‘fabric first’ approach. As such, the heat loss elements of the design have been designed such that they exceed minimum performance requirements of Building Regulations.
- 5.63 Decentralised energy – in the form of combined heat and power/combined cooling, heating and power – was considered as part of the design, however the nature of the scheme precludes the use of these forms of technology. Decentralised energy is less suited to exclusively residential developments (which tend to not have a constant heat demand). Consideration was also given to connecting to an existing or planned district heating network, however none exist in the locality.
- 5.64 Policy DM2 also requires consideration of the feasibility of incorporating a biomass fuelled community system. However given the limited space for plant and storage, and the need for regular fuel deliveries into the Town Centre, this has been ruled out as impracticable.
- 5.65 The report finds that the most suitable renewable energy option is the installation of PV panels on the roof space of the building. These could be sited away from the roof edges, to avoid visibility from ground floor level.
- 5.66 Along with the high standard of building fabric proposed, it has been calculated that the building could contribute to an overall reduction in CO2 emissions of 20.5%. Consequently, the development will comply with Policy CS1.
- 5.67 As discussed in greater detail in the flood risk and drainage section of this statement, the drainage scheme also incorporates SuDS, which, subject to soil infiltration tests, will improve surface water run-off from the site and comply with the requirements of Policy CS34.
- 5.68 The submission is also accompanied by a Superfast Broadband Statement. The document confirms that the applicant is committed to achieving the highest possible speeds to the development and, having consulted a number of established operators, it has been confirmed that speeds in excess of 24 Mbps can be made available to future residents.

Daylight and Sunlight

- 5.69 A Daylight and Sunlight is provided, undertaken by GVA, to advise on daylight and sunlight matters. The assessment has been undertaken with regard to BRE guidelines.
- 5.70 Full reference should be made to the detailed analysis in the accompanying GVA report, which concludes that, having undertaken a detailed study of the proposed development, the proposed development would leave almost all of the

neighbouring rooms in compliance with BRE guidance. In instances where this is not the case, in a very limited number of locations, the relevant identified windows are either obstructed by their own building design or see reductions due to the original open nature of the site providing exceedingly high levels of existing light.

- 5.71 The report notes that the BRE guidelines are intended to be applied flexibly, and in this instance their application would not result in any significant reduction in sunlight or daylight to existing surrounding properties. As such the development is considered to comply with Policy DM4.

Amenity

- 5.72 Residential amenity is considered in detail in the accompanying Design and Access Statement. The scheme has overall been designed with balconies as an essential element of the private amenity space, with the window/balcony relationship to existing neighbours being circa 40 metres, and therefore significantly in excess of the 20 metre requirement of Policy DM4.
- 5.73 Where units have the potential to overlook neighbours or undeveloped sites to the west of the application site, windows have either been tailored to be higher or fitted with obscured glazing and/or non-opening casements.
- 5.74 Existing views across to Crown Street and Silver Street are considered to be acceptable given the distances exceed 20 metres.
- 5.75 The orientation and positioning of openings and amenity space has been carefully designed with particular reference to the findings of the BRE assessment.
- 5.76 Overall, the scheme is considered to be of a sufficient distance from neighbours to avoid being either overbearing or un-neighbourly from overlooking. It is material to the assessment of this application to acknowledge the footprint and massing is almost identical to that of the approved C2 scheme.
- 5.77 The scheme has also carefully integrated bin storage into the scheme. Provision has been made for sufficient storage of 12 no. 1100 litre bin, which complies with the requirements of the Council's 2016 Guidelines. Detailed reference on this matter should be made to the accompanying Design and Access Statement and Sustainability Statement.

Flood Risk and Drainage

- 5.78 The application is supported by a Flood Risk Assessment (FRA) prepared by Infrastruct CS Ltd as required by the NPPF. The FRA identifies that the site lies within Flood Zone 1 'low probability' and is therefore classified as having little or

no risk of fluvial flooding.

- 5.79 The existing site is largely impermeable and the development therefore provides an opportunity to reduce runoff rates. The rates would be restored to greenfield values, which would provide both betterment to the site and the wider area.
- 5.80 Runoff will be routed to soakaways within the communal open space. The site access road will drain via gullies, and discharge to soakaways. All parking bays will be constructed as permeable block paving. The development will incorporate SuDS and the report concludes that the installation of permeable pavements and soakaways can be incorporated into the design.
- 5.81 As a consequence of the proposed drainage system, surface water runoff from the development will not increase flood risk; and the incorporation of SuDS will be used to attenuate discharge rates to at least pre-development.
- 5.82 In terms of foul water drainage, the site is served by an existing public foul sewer. It is proposed to connect to the existing sewer, subject to agreement from Thames Water.

Landscape and Trees

- 5.83 A Landscape Maintenance and Management Plan for the external site-wide landscape has been prepared by Fabrik and accompanies the application. The document sets out the management and maintenance objectives and the operations for the protection and enhancement of the landscape of the site.
- 5.84 Reference should also be made to the detailed accompanying landscaping plans and landscape specification document.
- 5.85 The landscape objectives for the site include: providing and maintain an attractive/visually appealing and robust landscape setting; retain the mature tree stock and to put in place a management scheme for their protection; and, to supplement existing trees with new tree planting.
- 5.86 A number of specimen trees are proposed across the site. These will be located to allow their full development; and to create a sense of place and create difference character areas within the development. It is also proposed to further establish the planting regime by including ornamental shrub areas.
- 5.87 It is also proposed to include bat and bird boxes across the site, to further enhance the biodiversity credentials of the site.
- 5.88 The maintenance and management plan sets out in detail the proposed measures, which are considered to be comprehensive and will ensure the development successfully integrates and enhances the local built environment.

It is therefore considered that the development proposals address the requirements of Policies CS38 and DM18.

Planning Obligations

- 5.89 The applicants acknowledge that there are likely to be planning obligations arising from the proposed development that are necessary to make the development acceptable in planning terms; are directly related to the development; and which are fairly and reasonably related in scale and kind to the development.
- 5.90 This Statement sets out the applicant's commitment to meeting the full affordable housing requirement, which will be secured by a S106 Agreement.
- 5.91 It is noted from the pre-application response that an Employment Skills and Training Plan for the construction phase of the development will be required. This can also be secured by a S106 Agreement.
- 5.92 The applicant also recognises the requirement to pay CIL at a rate of £120 per square metre. The requisite CIL additional information liability form is provided with this application.

6.0 SUSTAINABLE DEVELOPMENT AND THE OVERALL PLANNING BALANCE

- 6.1 The three roles of sustainable development are mutually dependent. Paragraphs 6-9 of the Framework indicate that ‘sustainability’ should not be interpreted narrowly. Elements of sustainable development cannot be undertaken in isolation but should be sought jointly and simultaneously. Sustainable development also includes ‘seeking positive improvements in the quality of the built, natural and historic environment as well as in people’s quality of life’.
- 6.2 The proposal would result in the development of 80 dwellings, which would add to the local housing stock and contribute to the identified need for housing within the area. This would be a significant benefit of the proposal and having regard to the aim of the NPPF, to boost significantly the supply of housing, should be given considerable weight. The land is allocated for residential development and is a sustainable location within Reading Town Centre.
- 6.3 Furthermore, the scheme would make provision for 24 affordable homes, in an area where there is a pressing need for affordable homes. Given the aims of the Framework, to deliver a wide choice of high quality homes and create inclusive mixed and balanced communities, including through the provision of affordable housing, this would add further weight as a benefit of this proposal.
- 6.4 The development would be located within good proximity of a number of local services and facilities, with ready access to good transport links. During development and following occupation, the development would have local economic benefits, including in support for existing services.
- 6.5 The development is able to be provided with a safe and convenient vehicular access and would have no adverse impacts on highway safety and convenience. Whilst generating traffic this would not result in unacceptable highway impacts.
- 6.6 There are no flooding or drainage constraints. The scheme will incorporate SuDS, which will be improve existing surface water run-off rates.
- 6.7 On biodiversity issues no significant negative ecological impacts have been found, the development is capable of resulting in enhancements to biodiversity, in part by incorporating swift nest boxes.
- 6.8 There would be benefits to the local economy from employment in construction, albeit for a limited period. There would be financial benefits to the district from the New Homes Bonus and local business may benefit from the additional local population increase.
- 6.9 Consequently the scheme would have significant social benefits, as well as a number of economic and moderately weighted environmental benefits, which

weigh in its favour and contribute to the aim of achieving sustainable development.

6.10 In terms of Paragraph 7 of the NPPF, the proposals would:

- Fulfil an economic role by helping to ensure that sufficient land of the right type is available in the right place and at the right time to support growth;
- Provide a social role in helping to provide the supply of housing needed to meet the needs of present and future generations in a location that provides accessible local services; and
- Fulfil its environmental obligations through the planned landscaping, which is an integral part of the scheme.

7.12 When assessed against the policies in the Framework taken as a whole there are clear benefits of the scheme. Consequently, the proposal would be sustainable development that would meet the aims of paragraphs 47-49 and 14 of the NPPF and the presumption should be in favour of the grant of planning permission without delay.