

PLANNING STATEMENT

Riverside development comprising conversion and extension of former Gas Works Buildings to create 34 residential flats and associated facilities at Gas Works Road, Reading.



The application site



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PLANNING STATEMENT STRUCTURE

- 1.0 Introduction & Procedural matters**
- 2.0 Site description**
- 3.0 Proposed development**
- 4.0 Planning policy and Analysis**
- 5.0 CIL/S106 obligation requirements**
- 6.0 Conclusions**

1.0 INTRODUCTION & PROCEDURAL MATTERS

- 1.1 This Planning Statement and Design and Access Statement has been prepared to support an application for planning permission comprising the conversion of and extension of former gas works buildings to 34 residential flats and associated facilities at Gas Works Road, Reading.
- 1.2 It includes a written description of the proposed development and its setting; it also considers recent planning history and planning policy, an analysis of the relevant planning considerations and justification for the development and refers to Community Infrastructure and S106 matters.

2.0 SITE DESCRIPTION

- 2.1 The site is located on an island in the River Kennet. The site has an area of 651.6 square metres and is roughly triangular in shape. Its northern boundary approximately 43 metres long is marked by the northern course of the River Kennet, its southeast boundary fronts Gas Works Road for a distance of 42 metres. Its western edge adjoins a footpath linking Gas Works Road with the river's edge where it passes to the rear of the adjoining Prudential building. It is located immediately adjacent to a bridge linking Gas Works Road with Kenavon Drive on the north side of the river. The area is mixed in character with offices nearby and also residential development in the form of houses and flats on both sides of the river. A number of neighbouring buildings on both sides of the river comprise multi-storey buildings of six storeys and above.
- 2.2 The site is currently occupied by two buildings, both associated with the former gas works. The gas holder is located some distance away on the northern side of the river. One building backs directly onto the water and the second, smaller building fronts the road.
- 2.3 The site and its surroundings are all located within the Reading Central Area as defined in the Reading Central Area Action Plan (RCAAP) 2009.

3.0 PROPOSED DEVELOPMENT

- 3.1 This proposal relates to the creation of 34 residential units comprising 5 studio flats, 13 one-bedroomed apartments, 15 two-bedroomed and 1 three-bedroomed apartments. The buildings have stood unused for many years and have fallen into a state of serious disrepair, however consultation with the council has revealed a preference to see the buildings retained in some form rather than to see the site cleared and redeveloped. In an October 2013 newspaper article Abbey ward councillor Tony Page said "We very much welcome the marketing of this derelict building, which has been an eyesore and the source of regular complaints from local residents... We hope the building can be sold for an imaginative residential development that takes on board its historical location and the fact that most of the adjoining sites are now flats."
- 3.2 For over a year now the applicant has been liaising with the council's planning department to create a viable scheme that achieves the wishes of local councillors and sees this small site in the centre of the city brought up to the same standard as its surroundings. A number of plans have been proposed and revised until the current scheme was finalised.

The Development Site



- 3.3 The scheme now proposes 34 flats (28 in building 1 and 6 in building 2). The largest building on the river's edge will be extended upwards so that it would have flats on five levels. At the request of the planning officer now most of the flats will be dual aspect with windows facing both the street and across the river, plot 6 will have a small private garden and the largest three bedroom flat will have balconies. In a number of the other flats Juliet balcony's are incorporated into the design.
- 3.4 The smaller building fronting the street will have its basement area used for secure cycle storage and general storage accessed via a bespoke entry. Above this there will be five studio apartments and one 1 bedroom apartment.
- 3.5 Dividing the two buildings is a landscaped communal area totalling 194.38 sq m in area. Within this area, adjacent to the street is a location for the communal bins to enable easy collection from Gas Works Road.
- 3.6 Other than the entry onto Gas Works Road the site will be enclosed creating a very clear delineation between the public street and the private area of the flats. All communal areas will be overlooked as too will the street and adjacent riverside walk such that public safety will be improved.
- 3.7 It is intended that all works to the buildings will be undertaken using materials, finishes and architectural detailing that closely matches the existing building. Red bricks and slate roofs will be the dominant materials.

4.0 PLANNING POLICY AND ANALYSIS

National Planning Policy Framework (The Framework)

- 4.1 This document sets out the Governments planning policies for England and how these are expected to be applied.
- 4.2 Paragraph 13 states “the National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.”
- 4.3 Paragraph 14 emphasises that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. It 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 (my underlining), when assessed against the policies on this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.
- 4.4 Paragraph 17 identifies 12 core land-use planning principles. These include: be genuinely plan-led, not simply be about scrutiny, proactively drive and support sustainable development, encourage the effective use of land, always seek to secure high quality design and a good standard of amenity for all existing and future occupants, support the transition to a low carbon future in a changing climate, taking full 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 ...; and encourage the reuse of land; and conserve heritage assets in a manner appropriate to their significance.
- 4.5 Paragraph 23 refers to the vitality of town centres and includes advice to local authorities to recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.
- 4.6 Paragraphs 47 to 55 address the delivery of a wide choice of high quality homes. Paragraph 49 stipulates that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 4.7 Paragraphs 100 - 101 states that “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere ... A sequential approach should be used in areas known to be at risk from any form of flooding...” Paragraph 103 acknowledges the difficulties of achieving the balance between flood risk and growth by advising LPA’s to “only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:
- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
 - development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

- 4.8 Section 12 of the NPPF outlines the contribution that heritage assets play as an irreplaceable resource that should be conserved in a manner appropriate to their significance.
- 4.9 Paragraph 137 states Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

LOCAL DEVELOPMENT FRAMEWORK

Reading Borough LDF Core Strategy (2008)

- 4.10 Much of the vision of the Core Strategy focuses on the need to regenerate the city centre and make much better use of previously developed land and under-utilised land. The concentration of homes in the city centre is therefore a theme of the Core Strategy with development directed to areas in need of regeneration. The Reading Central Area is identified as a sustainable location for future development.
- 4.11 There is also an acknowledgement that “Significant parts of the Central Area, including parts of the major opportunity areas ... lie within zones of medium and high flood risk. Proposals for development or redevelopment within areas that lie in those zones will be considered against Policy CS35 and will need to demonstrate that the sequential test has been applied and, if appropriate, that the exceptions test has been passed.”
- 4.12 The application site comprises unused previously developed land and is within the identified boundaries of the Reading Central Area wherein despite acknowledged issues of flood risk very large areas of the central area have been identified as suitable for high density residential development. There are a significant number of new homes and flats within metres of the site on both sides of the river.
- 4.13 **Policy CS1: Sustainable Construction and Design** states that *“Proposals for new development ... 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.”*
- 4.14 Policy CS1 has now been largely overtaken by government advice and policy since the Core Strategy was adopted however for clarity the proposed development of course is inherently efficient in that it makes use of and converts existing buildings. This is one of the 12 core principles identified in Paragraph 17 of the NPPF “encourage the reuse of existing resources, including conversion of existing buildings” and the new homes will be constructed to a high standard on a ‘fabric first’ basis with high levels of insulation to ensure energy efficiency in accordance with the current building regulations. The site is also inherently sustainable given its location in the centre of the city, close to all its services and amenities and public transport. The accompanying site specific Flood Risk Assessment demonstrates that the development will not result in higher levels of flood risk either on or off site and will also look to include a sustainable urban drainage system in order to improve its impacts. A detailed scheme of surface water drainage can be secured by planning condition.
- 4.15 **Policy CS4: Accessibility and the density of Development** - *“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 ...”*

- 4.16 The application site is located in the Reading Central Area which is highly accessible, close to the railway station, city centre facilities, public transport routes and footpath and cycle links. Given that the development involves the retention and conversion of existing buildings and the limited size of the site this high density development in a city centre location is to be car free, the surrounding streets are subject to traffic regulation orders controlling on-street parking and so residents and visitors will be largely reliant upon movement by foot, cycle and public transport. This approach has been discussed and agreed with the council's highways team in their email of 12 June 2015 (attached at Appendix 1). The site will however make provision for 34 secure and covered cycle spaces for residents and visitors in accordance with the aims of Policy CS4.
- 4.17 **Policy CS5: Inclusive Access** - *"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."*
- 4.18 The proposed development is as far as possible for a scheme involving the conversion of buildings over 100 years old designed with level access and to current building regulations standards and the internal layout will make provision for wheelchair users.
- 4.19 **Policy CS7: Design and the Public Realm** *"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..."*
- 4.20 This is dealt with more fully in later sections of this Planning and Design and Access Statement however, the character and appearance of the existing buildings on the site has set the mark for the restoration and extension of the buildings. The extensions will be built to compliment the historic design of the existing buildings. Whilst the structures will be larger, the scale of the buildings (up to 5 storeys) is comparable to (if not smaller) than much established development in the vicinity. It is considered that the resulting development will effectively blend the origins of the site, maintaining its boundaries and historic appearance with its new residential use. Its scale and mass will appear harmonious and in context with its surroundings whilst bringing the long derelict site back into productive residential use. Instead of seeking to demolish these buildings which are clearly considered by some at least to be a heritage asset, the application proposes to restore them so that they can continue to play an important role in the historic urban fabric of the area. Detailed matters of design and materials can be controlled by planning condition.
- 4.21 **Policy CS8: Waterspaces** - *"Reading's waterspaces will be protected, so that they can continue to contribute to local and regional biodiversity and ecology, local character and visual amenity, and the provision of accessible leisure and recreational opportunities..."*
- 4.22 The proposed development will build upon the established character of the site and footprint of the buildings. The relationship between the site and the adjacent River Kennet will therefore remain much as at present save that the riverside building will be taller. Ecological investigations have revealed relatively low potential for protected species and opportunities for bio-diversity and wildlife enhancement are limited by the site size and dense nature of the development, however the development could include the introduction of features such as bat and insect refuges into the fabric of the buildings if deemed necessary. Such initiatives could be secured by planning condition.

- 4.23 Simply removing the dereliction of the site which has sadly become a magnet for anti-social behaviour and rather intimidating for many will make riverside walks more pleasant for all in the vicinity of the site to the benefit of the wider area.
- 4.24 **Policy CS9: Infrastructure, Services, Resources and Amenities** - *Proposals for development will not be permitted unless the local planning authority is satisfied that infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided or re-provided at the appropriate time, in order to ensure that the development is both sustainable and contributes to the proper planning of an area in accordance with relevant planning policies. Such contributions may be pooled, in order to allow necessary infrastructure to be secured in a fair and equitable way.*
- 4.25 The development of 34 modest flats in an area where potentially many hundreds of new homes will be built will have only a small impact upon the area however, as it is anticipated that a Community Infrastructure Levy Liability will arise from the development. Additional site specific S106 costs and benefits such as affordable housing provision/contributions will be subject to a viability assessment and negotiation however it should be noted that it is anticipated that the six flats in the smaller building will be offered as affordable shared equity homes.
- 4.26 In other respects however the redevelopment of this site will be one of the last pieces in the jigsaw. Much of the land surrounding the site has been redeveloped with this small site standing untouched and derelict for many years. This application provides the potential to see the site developed to a high standard.
- 4.27 **Policy CS15: Location, Accessibility, Density and Housing Mix** - *“The appropriate density and mix of residential development within the Borough will be informed by:*
- *An assessment of the characteristics, including the mix of uses of the area in which it is located;*
 - *Its current and future level of accessibility by walking, cycling and public transport, as defined in Policy CS4;*
 - *The need to achieve high quality design in accordance with Policy CS7; and*
 - *The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.*
- Developments should provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures, in accordance with the findings of a housing market assessment. The mix of dwellings should include an appropriate proportion of units designed to the Lifetime Homes standard.*
- Net densities of below 30 dwellings per hectare will not be acceptable.”*
- 4.28 The indicative range for development density on this town centre site is above 70 dwellings per hectare. The application proposal achieves this density, utilising a mix of flat sizes and by extending the existing buildings on the site in a style and form based upon its historic rivers edge appearance. The development will include a mix of flat sizes (5 x studio flats, 13 x 1 bed flat and 15 x 2 bed flats and 1 x 3 bed flat). It is intended also that flats within the smaller of the two buildings (6 flats) will be offered on an affordable shared equity basis).
- 4.29 The internal layout of the buildings is designed to maximise levels of privacy and amenity for both the intended residents and also the amenities of those in the vicinity. Whilst the units are compact this is in the main part due to the limiting dimensions of the buildings which of

course were not designed as flats. It is also noted that the council currently has no adopted policy seeking to specify internal space standards.

- 4.30 **Policy CS 16: Affordable Housing** - *“All developments of 15 dwellings and above will 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...”*
- 4.31 See above, 6 units in a self-contained building will be offered as shared equity affordable housing.
- 4.32 **Policy CS20: Implementation of The Reading Transport Strategy (Local Transport Plan 2006-2011)** - *“Planning permission will not be granted unless the proposed development contributes appropriately to the provision of a balanced transport network as outlined in the Reading Transport Strategy...”*
- 4.33 Because of its very sustainable position within the heart of Reading Centre and because of the limited size of the site the development is to be a car free residential scheme. The residents will therefore make considerable use of transport means other than the private motor car in accordance with the general aims of Policy CS20. A planning condition can be used to secure a travel plan for residents.
- 4.34 **Policy CS29: Provision of Open Space** - *“All new development should make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space. New provision will be sought on residential sites of 50 or more units, or for developments where the availability and quality of existing provision has been identified as deficient in the provision for open space. The provision and improvement of Children’s Play Areas and Neighbourhood Recreation Areas should be made, as appropriate, in order to ensure a satisfactory level of provision within the urban area. On sites of less than 50 dwellings or in areas not identified as deficient in the provision of open space, new open space provision/ improvements/ enhancements will be sought through appropriate contributions.”*
- 4.35 It is anticipated that a Community Infrastructure Levy Liability will arise from the development for use in meeting the council’s infrastructure priorities.
- 4.36 **Policy CS33: Protection and Enhancement of the Historic Environment** - *“Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced... Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located.”*
- 4.37 Whilst the buildings presently on the site are not heritage assets and do not appear on any local list the local community and the Borough Council clearly wishes to see them preserved. This scheme of conversion and extension has arisen as a direct result of pre-application discussions which caused an earlier scheme of demolition and redevelopment to be altered to the present proposal for conversion and extension, retaining the buildings. The resulting development now proposed shows the buildings restored and extended in accordance with community wishes. The footprint of development on site will therefore remain largely as existing and so is likely to have minimal impact upon the ground. Indications are that the

ground has been significantly disturbed in the past and so significant archaeological remains are considered unlikely. In view of the very limited extent of excavation if necessary a condition requiring a watching brief may be appropriate. The extensions will follow the design of the original buildings and maintain their historic presence on the banks of the Kennet where they have stood for more than 100 years. The site will be improved from its current state of dereliction and decay in accordance with the broader aims of the council's policies for regeneration in the heart of Reading.

- 4.38 **Policy CS34: Pollution and Water Resources** - *"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.*

Proposals for development that are sensitive to the effects of air, noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.

Development will be permitted on land affected by contamination where it can be demonstrated, to the satisfaction of the LPA, that the contamination can be satisfactorily remediated so that it is suitable for the proposed end use."

- 4.39 The application is accompanied by a desk top contamination report however given the limited size of the site and nature of the development being that of conversion, it is anticipated that there will be very limited intrusion into the ground and the resulting development will not have extensive areas of ground for cultivation. Any evidence of contamination will be mitigated in accordance with current best practice with the developer acknowledging their responsibility to leave a site in a condition that cannot be classed as contaminated. Such matters can be adequately controlled by planning condition.
- 4.40 As a city centre site there is potential for poor air quality despite its position alongside the open river/canal. An investigation into air quality has been undertaken and accompanies the application which confirms the quality of the air is likely to be within acceptable limits.
- 4.41 **Policy CS35: Flooding** - *"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."*
- 4.42 Extensive investigation and analysis has been undertaken to determine that the site does not lie in flood zone 3. This fact has been confirmed by the Environment Agency in their email of 08 October 2015 attached at Appendix 2.
- 4.43 In addition to this at the request of the council a sequential flood risk assessment has been undertaken to determine if there are sites within the Borough that should be developed in preference to the application site on the basis of the level of flood risk. The sequential flood risk assessment report accompanies this application however assessment of the council's allocated sites contained in Appendix 4 of Reading Borough Council's Consultation document on Issues and Options (Jan 2016) confirms that there may be only one site that may be better in terms of flood risk and which is broadly comparable with the application site in size and capacity. Even this site on the corner of Crown Street and Southampton Street is very

different in character from the application proposal comprising new-build rather than offering the chance of bringing a building requested by RBC to be treated as an undesignated heritage asset to be brought back into a viable use.

- 4.44 Notwithstanding that this site might be preferable in terms of their flood risk it does not meet the functional requirements of the application. Paragraph 11.20 of the Core Strategy acknowledges that “Appropriate weight will be given to the redevelopment of land at risk of flooding that provides significant regeneration benefits on previously developed land.” Much past and planned development within Reading Central Area Action Plan is on land with a similar level of flood risk, it is a natural consequence of topography of the city. The value of regeneration within the city centre has been clearly acknowledged by the council and is central to the council’s strategy of regeneration with many other sites facing similar issues. To be consistent this development should clearly be considered in the same way.
- 4.45 In its Strategic Flood Risk Assessment from 2009 Reading Council acknowledged that “flood risk is just one of many factors which should influence the spatial planning process and that a balance needs to be maintained between consideration of flood risk and other matters.” It also referred to a statement by the then secretary of state Yvette Cooper who considered the ways in which regeneration objectives can be considered alongside considerations over the risk of flooding as part of the sequential and exceptions tests. “The Minister states that “applying the sequential test in the case of regeneration sites would be likely to conclude that there are no reasonably available sites, where the proposal was for the regeneration of that site...seeking alternatives is often not an option. In that case development can take place there, subject to the Flood Risk Assessment indicating that any necessary reduction measures will reduce risk to an acceptable level over its lifetime”.
- 4.46 The council applied these principles to much of the Reading Central Area “where there are key regeneration sites within the central area for example, which lie within high flood risk areas, which for reasons of regeneration and economic development, and development being in the most accessible locations, will need to be considered” (para 12 Reading SFRA 2009).
- 4.47 The applicant simply asks that the application site is treated in the same way as it has been established that it falls within Flood Zones 2 and 1 where residential (more vulnerable) development may, according to Environment Agency advice, be permitted without an exceptions test being needed. It is previously developed land and is in much need of regeneration in accordance with the wider strategic objectives of the Core Strategy and Central Area Action Plan. It presents a sorry and derelict appearance amongst recently developed homes and offices in the heart of the city and adjacent to the River Kennet. Its residential use appears to be what some members of the council at least would like to see, its neighbours include established residential development and the landscape and streetscape benefits of its successful restoration and redevelopment will be considerable. Every effort should be made to secure its future as a matter of urgency.
- 4.48 This application provides an opportunity to tidy a neglected corner of the city centre and a site specific flood risk assessment clearly demonstrates that the level of flood risk can be satisfactorily mitigated and made acceptable and that sustainable urban drainage techniques can be incorporated into the sites drainage strategy.

4.49 **CS36: Biodiversity and Geology** - *“a) Development should retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes...”*

4.50 An ecological survey has been undertaken and accompanies the application. It demonstrates that the site is of little ecological value however with bio-diversity measures such as bat boxes incorporated into the extension and refurbishment its ecological value could be raised.

Reading Central Area Action Plan 2009

4.51 The application site is located within the Reading Central Area, just south of the East Side Major Opportunity Area which covers a considerable area of the town on the north side of the river (opposite the site).

4.52 **Policy RC3 Development in the East Side Major Opportunity Area** - seeks to promote higher density development in this area, including new residential development and also aims to “Preserve the historic features in the area and enhance their setting where possible”. Given the sites prominence directly opposite the policy area, on the edge of the river and adjoining a historic bridge crossing it is easy to understand why the council might want to see this relic of the town restored and made viable once again. This redevelopment proposal achieves the higher density of development sought in the city centre and will contribute towards the strategic policy aims.

4.53 **RC5 Design in the Centre** - Seeks well designed development that respects the pattern and form of development in the area and enhances the historical context of sites.

4.54 The application of course proposes to restore those buildings present on site and makes no change to the overall pattern of development in the area.

4.55 **RC9 Living in the Centre** - Seeks an ideal mix 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.” It requires that attention be given to issues of noise and air quality given the potential for other town centre uses to cause such problems and also that the development should make its contribution towards affordable housing in the centre.

4.56 The buildings were not of course designed with use as flats in mind and have challenging dimensional limitations however as a direct result of pre-application engagement with council officers the development mix has been changed to get closer to the council’s ideal mix. Whilst the site is located away from noisy uses and main roads and stands adjacent to the river and has no through traffic passing on Gas Works Road, an air quality assessment has been undertaken and it is clear that the site has acceptable air quality.

Sites and Detailed Policies Document including Alteration Adopted 2015

4.57 **Policy SD1 Presumption in Favour of Sustainable Development** - Reflects the advice contained in the NPPF regarding the presumption in favour of sustainable development and working 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.

4.58 **Policy DM3 Infrastructure Planning** - Identifies the council’s priorities for infrastructure spending and application of CIL.

- 4.59 **Policy DM4 Safeguarding Amenity** - Seeks to ensure that Development will not cause a significant detrimental impact to the living environment of existing or new residential properties by reason of factors such as noise and privacy and overlooking.
- 4.60 **DM10: Private and communal outdoor space** - Seeks to ensure that on flat schemes communal outdoor space, balconies and/or roof Gardens are provided to ensure a good level of amenity for residents that respects the character and size of similar spaces in the vicinity.
- 4.61 Paragraph 5.6.10 (c) recognises “Development in central Reading will not always be expected to comply with the standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.”
- 4.62 It is considered that the submitted scheme satisfactorily addresses the policy requirements and will result in a good standard of town centre living in modest flats making the best of the historic character of the building and its attractive setting next to the Kennet.

5.0 CIL/S106 obligation requirements/ Heads of Terms

- 5.1 The development will be liable for CIL based upon the floor space created. A CIL liability form accompanies the application.
- 5.2 Affordable housing issues are likely to be dealt with via a S106 obligation as too will the issue of employment, skills and training in accordance with the council's Employment Skills and Training SPD 2013 and also the issue of a travel plan may be dealt with in an obligation.
- 5.3 It is anticipated that these issues will comprise the heads of terms of any obligation and details required by the council.
- 5.4 The level of affordable housing provision referred to in sections above is not entirely policy compliant and so a viability assessment/statement has been prepared to justify in clear terms the level of affordable housing proposed. This information is commercially sensitive and so should remain confidential however it does demonstrate that the development is only likely to offer a commercial return to the developer on the basis of the reduced level of provision.

6.0 Conclusions

- 6.1 The proposal constitutes very sustainable development and complies with relevant policies of the adopted Reading Core Strategy 2008; the Reading Central Area Action Plan 2009 and the Reading Sites and Detailed Policies Document including Alteration Adopted 2015. Consequently, under the provisions of Paragraph 14 of the Framework there is a presumption in favour of the development and planning permission should be granted. It offers 34 essential homes in the centre of Reading in accordance with the council's strategic locational policies. It offers the retention of buildings considered of local heritage interest, making use of existing buildings on previously developed land in a very sustainable location close to all city centre facilities. It can be developed without raising flood risks on site or elsewhere and offers improvements to local flood risk conditions. It is an inward looking site offering good levels of security and surveillance both for residents of the flats and for surrounding areas where historically it has become the centre of significant anti-social behaviour that has resulted in the adjoining riverside walk becoming an intimidating and under-used amenity and a blot on the landscape.
- 6.2 Despite significant construction difficulties resulting from the poor condition of the buildings and the sites location right on the edge of the water the scheme continues to offer the promise affordable housing in the form of six units in a very manageable single block of flats.
- 6.3 The dis-benefits of the scheme are very limited in comparison with the actual economic, social and environmental benefits that will result from the development. The principle of allowing and encouraging sustainable housing development should therefore be grasped and planning permission should be granted.

7.0 DESIGN & ACCESS STATEMENT

Context

- 7.1 The existing buildings are in a state of dereliction adjacent the river and surrounded by more modern city centre often multi-storey development. They are a relic of the areas working past and whilst not listed have a character worth preserving.
- 7.2 The site is located on Gas Works Road, a non through road which consequently makes it a quiet backwater but close to the city centre. Newer developments on both sides of the river are much larger with much greater massing although there does remain a few more modest buildings which together provide a reminder of the areas past. These buildings are part of that heritage.

Amount

- 7.3 Initial plans were to demolish the buildings and to construct new purpose built flats on the site, much like has happened on nearby areas of land adjacent to the river. Discussions with the Council have resulted in a complete change of thinking such that now at the councils' request it is planned to restore the buildings and put them to a viable end use as flats and thus to preserve the presence of these distinctive and locally important buildings and the contribution they make to the banks of the Kennet. Various schemes have been proposed and changes made to the design and layout of the site to address both the policy objectives of the council and to produce 34 modest but practical working flats in the centre of Reading whilst preserving the character and appearance of the buildings.

Layout

- 7.4 As set out on the submitted plans shows many of the flats having a dual aspect with views over the river and onto the street. A secure and well observed area of communal space with ready access to the city and the river's edge with easy access for servicing onto the quiet Gas Works Road.

Scale

- 7.5 As set out in the plans shows buildings which are taller than the existing buildings present on site but which maintain the footprint of the buildings and the architectural character of the original. The number of flats proposed meets council aspirations for high density development and provides a viable form of development that will make the development of this difficult site on the edge of the river possible. Despite the increases in height proposed the buildings would continue to appear smaller in scale than many of their neighbours including the Prudential building immediately adjacent to the site.

Landscaping

- 7.6 The area of open space on the site is very limited however it would remain and offers modest scope for aesthetic and habitat improvements. Landscaping details can be secured by planning condition.

Appearance

- 7.7 The design of the extended buildings is a clear reflection of the existing buildings. Architectural features will be retained and repeated, materials will match those of the

existing building in terms of colour and texture. It is a traditional building that will be constructed of high quality materials that can be secured by planning condition.

Access

- 7.8 No vehicular access is required as the site is very centrally located with all of the city facilities on the doorstep. Secure cycle parking facilities are provided within building 2 sufficient for all residents. Access will meet current building regulations and ground floor flats will be suitable for the less mobile or for people using a wheelchair.

APPENDIX 1

From: Saunders, Chris [<mailto:Chris.Saunders@reading.gov.uk>]

Sent: 12 June 2015 15:27

To: Richard Fitter <richardfitter@entranltd.co.uk>

Subject: RE: Gas Works Road [private and confidential]

Sensitivity: Confidential

Richard

Thank you for your email and I have tried to phone but were advised you were busy.

Given the wish to retain the existing buildings I am happy to accept a car free development in this location especially if keeping the buildings and providing parking would have implications for viability.

As you say the neighbouring roads have either parking restrictions or are in controlled parking zones and therefore we would place our standard conditions and informatives on any permission given stating the occupiers were not entitled to any parking permits if they rented or purchased a property.

Obviously as you state a good cycle parking provision will be needed along with a travel plan.

If you need anything else, please let me know.

Kind Regards

Chris Saunders IEng, FIHE

Transport Development Control Manager

Transport

Department of Environment and Neighbourhood Services

Reading Borough Council

Civic Offices

Bridge Street

RG1 2LU

APPENDIX 2

Dear Rhys,

Thank you for your email dated 16 September 2015. The enclosed letter reference 2969/150916/RH sets out that the site is above the detailed 1 in 100 year flood level. The submitted topographical survey supports this showing ground levels around the site being much higher than the 1 in 100 year flood level. It appears that due to the coarseness of the grid in the model the extent is shown on the site. We can see based on the information that you have supplied that the 1 in 100 year stays within the channel in this location. We will now add this evidence through our flood map challenge process.

Please contact me if you have any queries or require further information.

Kind regards

Neil

Neil Landricombe

Partnerships & Strategic Overview (Berkshire & Buckinghamshire)

Flood & Coastal Risk Management, West Thames

01189 535401

Kings Meadow House, Kings Meadow Road, Reading, RG1 8DQ.

westthamesconsents@environment-agency.gov.uk

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From: Rhys Hughes [<mailto:Rhys.Hughes@weetwood.net>]

Sent: 16 September 2015 15:54

To: WT Enquiries

Cc: Landricombe, Neil; Rebecca Murphy

Subject: Gas Works Roads

Dear Sir/Madam,

We are currently looking at a site in Gas Works Road, Reading, and have a query in respect to the flood zone mapping at the site.

Based on the EA Flood Map, the site is located partly within Flood Zone 3, 2 and 1. We have been provided with the EA flood levels for the 1 in 100 annual probability event for the River Kennet, and based on a comparison between these flood levels and the site's topographic survey, we believe that the site should not be classified as Flood Zone 3. I have included some additional information in the attached letter, which outlines the comparison between expected flood levels and site levels in more detail. I have also attached the site's topographic survey.

I would be grateful if you could forward this query to the flood risk mapping team, in order for them to review the information included within the attached.

Kind regards,
Rhys

Rhys Hughes

Technical Engineer