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Planning
Reading Borough Council Civic Offices
Bridge Street
Reading
RG1 2LU

FAO: Tom Bradfield

29 April 2024

Dear Tom,

EATON COURT, 104-112 OXFORD ROAD, READING, RG1 7LL

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION FOR FULL PLANNING PERMISSION – SUBSTITUTION OF DRAWINGS AND DOCUMENTATION

(APPLICATION REF: 210639)

On behalf of our client, Vento PropCo 1 Limited ("the Applicant"), we hereby provide an addendum submission (including substitution of drawings) in relation to the application for the redevelopment of Eaton Court, 104-112 Oxford Road, Reading, RG1 7LL.

The application is currently pending determination with Reading Borough Council ("RBC") (under reference: 210639) and proposes the following development:

"Demolition and residential redevelopment to provide three buildings comprising 120 residential units (Use Class C3), along with car parking, cycle parking, servicing bay and associated landscaping, amenity space, plant and refuse areas, and access arrangements".

This submission comprises of the following documents:

- Covering Letter & Planning Statement Addendum (i.e. this Letter), prepared by Montagu Evans
- Design Addendum to Design & Access Statement (January 2023), prepared by Squire & Partners
- Revised Application Drawings, prepared by Squire & Partners
 - PL050-3 – Proposed Site Location Plan
 - PL051-3 – Proposed Site Plan
 - PL001-6 – Proposed Ground Floor Plan
 - PL002-6 – Proposed First Floor Plan
 - PL003-6 – Proposed Second Floor Plan
 - PL004-6 – Proposed Third Floor Plan
 - PL005-6 – Proposed Fourth Floor Plan
 - PL006-6 – Proposed Fifth Floor Plan
 - PL007-6 – Proposed Sixth Floor Plan
 - PL008-6 – Proposed Roof Plan
 - PL010-3 – Proposed North Elevation
 - PL011-3 – Proposed South Elevation
 - PL012-3 – Proposed East Elevation
 - PL013-3 – Proposed West Elevation
 - PL014-3 – Proposed Building 1 Façade Bay Study
 - PL015-3 – Proposed Building 2 Façade Bay Study
 - PL016-3 – Proposed Building 3 Façade Bay Study
 - PL020-6 – Proposed Section AA East West
 - PL021-6 – Proposed Section BB North South

- PL022-6 – Proposed Section CC
- PL052-3 – Proposed Long South Elevation
- Daylight & Sunlight Addendum, prepared by Point 2
- Updated Fire Safety Strategy, prepared by Sweco.

POST SUBMISSION ENGAGEMENT

Following the original submission of the planning application to RBC in April 2021, and the submission of revised proposals in both March 2022 and February 2023, the Applicant has continued to engage with RBC Officers regarding the scheme. Most recently this included a meeting with RBC Officers at their offices on 19 March 2024.

A number of key themes relating to the acceptability of the Proposed Development have arisen from these discussions which this updated submission seeks to address. In summary, the main amendments are as follows:

- Reduction of amenity terraces and balustrades visible from the conservation area;
- Changes to the South and East building elevations, improving the setting of the neighbouring listed building;
- Adaptation to the Building 3 core to comply with building regulations;
- Amendments to the main reception area and landscaping to improve activation of the street frontage; and
- Amendments to the proposed residential unit mix to reduce the number of one-bedroom units.

PLANNING STATEMENT ADDENDUM

The planning application was most recently revised in February 2023. In the 14 months since, the Applicant and their appointed team have worked hard to adapt and amend the proposals to address the comments received from internal and statutory consultees. This Addendum explains the amendments, the rationale for these, and provides an updated assessment in planning terms.

This analysis is intended to be read as an addendum to the Planning Statement that was submitted with the earlier revised submission in February 2023. Information previously provided has not been repeated, and as such, this Planning Addendum only deals with matters raised as a result of the most recent proposed amendments to the submitted plans, and the revised information submitted in support of the planning application.

In terms of the planning policy context, the adopted Development Plan remains as it was when the original application was submitted in 2021.

The proposed changes to the applications proposals have been developed following constructive and positive post submission dialogue with the local planning authority. The 2023 Planning Statement addressed each planning consideration relating to the Application. Where relevant, this assessment has been updated to reflect the amendments.

Residential Unit Mix

Policy CR6 (Living in Central Reading) of the Local Plan requires residential development within the central area to contribute towards a mix of different sized units within the development. In particular, the policy seeks no more than 40% one beds/studios.

Following requests from RBC Officers, the unit mix has been amended to reduce the number of 1-bedroom units. These changes are summarised below.

Building 1:

- Apartment B1.01.04 amended from a 1 bed to a 2 bed.
- Apartment B1.02.04 amended from a 1 bed to a 2 bed.

Building 2

- Apartment B2.00.01 amended from a 1 bed to a 2 bed.
- Apartment B2.01.08 amended from a 3 bed to a 2 bed.
- Apartment B2.02.08 amended from a 3 bed to a 2 bed.
- Apartment B2.04.04 amended from a 2 bed to a 3 bed.
- Apartment B2.04.06 amended from a 2 bed to a 3 bed.

For clarity, there has been no change to the total number of units, but rather the mix has changed across the three proposed buildings.

The Proposed Development maintains 12 (10%) accessible units located across Buildings 1 and 2 on the first and second floors.

A comparison of the previous and revised unit mix is provided below.

Revised (2024) Unit Mix

Apartment Mix					
	Building 1	Building 2	Building 3	Total	%
Studio	1	9	0	10	8.3%
1 Bed	11	21	22	54	45.0%
2 Bed	10	16	24	50	41.7%
3 Bed	3	2	1	6	5.0%
Sub total	25	48	47	120	
<u>Dual aspect</u>	<u>5</u>	<u>15</u>	<u>25</u>	<u>45</u>	<u>38%</u>
<u>Single aspect</u>	<u>20</u>	<u>33</u>	<u>22</u>	<u>75</u>	<u>63%</u>
<u>North Facing Single Aspect</u>	<u>8</u>	<u>5</u>	<u>0</u>	<u>13</u>	<u>11%</u>

Previous (2023) Unit Mix

Apartment Mix					
	Building 1	Building 2	Building 3	Total	%
Studio	1	9	0	10	8.3%
1 Bed	13	22	22	57	47.5%
2 Bed	8	15	24	47	39.2%
3 Bed	3	2	1	6	5.0%
Sub total	25	48	47	120	
<u>Dual aspect</u>	<u>5</u>	<u>15</u>	<u>25</u>	<u>45</u>	<u>38%</u>
<u>Single aspect</u>	<u>20</u>	<u>33</u>	<u>22</u>	<u>75</u>	<u>63%</u>
<u>North Facing Single Aspect</u>	<u>8</u>	<u>5</u>	<u>0</u>	<u>13</u>	<u>11%</u>

Affordable Housing

The Proposed Development seeks to provide a Build to Rent scheme, and Policy H4 (*Build to Rent schemes*) of the Local Plan sets out that planning permission will be granted for developments of self-contained, private rented homes which:

Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.

Policy H3 (Affordable Housing) of the Local Plan outlines that on sites of 10 or more dwellings, 30% of total dwellings will be in the form of affordable housing. The policy confirms that for sites of 10 or more dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

In determining residential applications, Policy H3 confirms that the council will assess the site size, suitability and types of units to be delivered in relation to the current evidence of identified needs. The council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development.

Policy H3 goes on to state that in all cases where proposals fall short of the policy target, as a result of viability considerations, an open-book approach will be taken, and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.

A Viability Assessment has previously been provided confirming that the Proposed Development could not viably support any affordable housing as when 100% market rent units are assumed, the Proposed Development results in a deficit when compared to the Benchmark Land Value. Therefore, the Application as originally proposed did not include the provision the affordable homes.

However, notwithstanding the results of the Assessment, following consultation with RBC and recognising the priority to deliver affordable homes, the Applicant is willing to make the commercial decision to proceed with offering 10% (12 units) affordable housing on site, capped at LHA rates, and comprising of a unit mix as follows:

Affordable		
Beds	Unit No.	%
1	5	42%
2	6	50%
3	1	8%
Total	12	

RBC have requested clarity regarding the proposed letting agreements of these units. The primary resident should be in full time employment and the units should be capable of being owned and managed by the BTR Landlord/Manager to ensure the block remains unbroken.

A detailed accommodation schedule is provided within the Design and Access Statement Addendum. The revised floorplans detail the location of the proposed affordable units across the ground to fourth floor of Building 2.

Design & Heritage Considerations

Policy CC7 (*Design and the public realm*) sets out the general design policy principles for Reading. These are reiterated in Policy CR2 (*Design in Central Reading*) of the Local Plan which outlines that development within this area should "...build

on and respect the existing grid layout of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area”.

Policy CR2 requires the architectural details and materials used in the central area to be high quality and respect the form and quality of the detailing and materials in areas local to the development site.

Policy EN1 (*Protection and enhancement of the historic environment*) sets out that all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

Policy EN6 (*New development in a historic context*) states in such areas, new development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.

Comments have been received from RBC’s Design and Conservation Officer in respect of the Application. Following receipt of these comments and discussion with RBC, a number of design amendments are proposed to address the concerns raised.

In order to create a greater distinction between the Grade II listed Mannson House and the Proposed Development, the top white stone spandrel on Buildings 1 and 2 has been removed along the Oxford Road elevation, exposing the faced bricks underneath and terminating the parapet only with a metal sill. This seeks to ensure the Proposed Development respects the established character of the surrounding area, while also allowing the listed building to maintain its autonomy and be recognised as a distinct structure.

To further enhance the setting of the listed Mannson House, a change in materiality is proposed to emphasise the distinction between the existing and proposed fabrics. To ensure each building maintains its individual architectural presence, a darker brick is proposed to be implemented along the Oxford Road elevation. As shown within the Design Addendum, the original submission proposed Kenilworth Antique and London White Glazed brick to be used across the whole scheme whereas this revised submission seeks Loxley Red Multi brick along the Oxford Road façade.

Following feedback received on the visibility of the proposed balustrades, the design has been modified. This includes both the setting back of, and the removal of the balustrades on Buildings 1 and 2. To occupy the space instead a green roof has been proposed. Further details can be found within Section 2.2 of the accompanying Design Addendum.

Amendments are also proposed to the main building entrance to achieve a more unique, noticeable, and welcoming appearance. The primary residential entrance has been extended, strategically establishing key activation points between the site and the developing neighbourhood at Eaton Place. This enhances the visual link between the Proposed Development and Eaton Place, fostering a more unified urban environment. Further details can be found within Section 2.5 of the accompanying Design Addendum.

Due to the setting back of the balustrades of the top floor of Building 1 on the Oxford Road elevation, Juliette balconies have now been proposed on the fourth floor. Similarly, due to the modifications to the residential entrance, the private residential balconies above have been omitted and Juliette balconies proposed.

The revised proposals will continue to preserve the setting and significance of the Russell Stret / Castle Hill Conservation Area and nearby listed buildings. In summary, the Proposed Development accords with national and local policy through the provision of a scheme which is of the highest architectural quality, and which responds to its setting through carefully considered design and the sensitive use of materials.

Daylight & Sunlight

Policy CC8 (Safeguarding amenity) of the Local Plan sets out that new development adjacent to residential properties should not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of access to sunlight and daylight.

The April 2021 submission was supported by a Daylight, Sunlight and Overshadowing Report, prepared by Point2. It considered the likely penetration of daylight and sunlight into the proposed residential development and within the proposed outdoor amenity space. It also set out the proposed impact of the new development on existing surrounding residential properties. An updated Daylight, Sunlight and Overshadowing Report prepared by Point2 was then submitted with the revised scheme in 2023.

This 2024 submission is accompanied by an Internal Daylight & Sunlight Addendum report prepared by Point2 which considers the revised accommodation layouts. The Addendum concludes that the Proposed Development records acceptable internal light availability. When read in conjunction with the January 2023 report that considers the daylight and sunlight availability to the surrounding residential properties and sunlight availability to amenity spaces, the Proposed Development is considered acceptable.

The proposed design continues to demonstrate how generous separation distances will be achieved between the Proposed Development and the sites to the immediate north (115 Chatham Street and 10 Eaton Place) and the proposed massing, layout and orientation of Blocks 2 and 3 will not result in unacceptable daylight and sunlight conditions.

Therefore, in summary the Proposed Development accords with the relevant adopted planning policy relating to daylight and sunlight and falls within the practical application of the BRE Guidelines.

Fire Safety

To comply with recent changes to building regulations, the proposed design has been updated to include a second staircase to Building 3, as well as a lobby to the evacuation lift.

An updated Fire Safety Strategy has been prepared by Sweco and accompanies this submission.

Summary

This Planning Statement Addendum has been prepared to supplement the 2023 Planning Statement submitted in support of Planning Application Ref: 210639 at Eaton Court and should be read together.

During post-submission correspondence with RBC Officers and relevant consultees, concerns were raised regarding the residential unit mix, design and heritage. Revised proposals are hereby submitted.

This Planning Statement Addendum has assessed the revised proposals against the prevailing planning policy framework, including any relevant material considerations. The assessments, and findings, within this Planning Statement Addendum demonstrate that the proposals fully comply with the relevant national and local planning policy and guidance following the scheme revisions as set out in this Addendum and in the revised re-submission pack.

It is therefore requested that the proposals for the redevelopment of Eaton Court are recommended for approval at the earliest opportunity.

ADMINISTRATIVE MATTERS

To assist in the determination of this application a suite of revised application drawings and documents have been prepared and are submitted alongside this letter.



We trust the information submitted is in order and allows you to determine this application, however, should you require any further details please do not hesitate to contact Gareth Fox (gareth.fox@montagu-evans.co.uk / 07894 815 343) or Gabriella Bexson (gabriella.bexson@montagu-evans.co.uk / 07788 427 375) in the first instance.

Yours sincerely

A handwritten signature in black ink that reads "Montagu Evans".

MONTAGU EVANS LLP