
Planning & Design Statement

Land West of the SportsPark Pavilion,
Whiteknights Campus, University of Reading, RG6
6DJ

Planning Statement

Land West of the SportsPark Pavilion, Whiteknights Campus,
University of Reading, RG6 6DH



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Appendix 1 - Pre-application Response (ref. 230692, dated 07th July 2023) from Reading Borough Council

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1. Introduction

- 1.1. This Planning & Design Statement has been prepared by Savills on behalf of our client, the University of Reading ('the University'), in support of a full planning application relating to Land West of the SportsPark Pavilion, Whiteknights Campus, University of Reading, RG6 6DJ ('the Site' or 'the Application Site').
- 1.2. Specifically, full planning permission is sought for the following development:

"Full planning permission for the proposed installation of Air-Source Heat Pumps with associated enclosure, landscaping and associated works."
- 1.3. The Planning Statement considers relevant policies within Reading Borough Council's (RBC's) Development Plan, taking into account necessary material considerations, including the National Planning Policy Framework (July 2021).
- 1.4. The proposal supports the University of Reading's objective of achieving net zero carbon by 2039 and accords with the Development Plan and national planning policy.

Planning Statement Structure

- 1.5. The remainder of this Statement is set out as follows:
 - **Section 2** describes the Site and its surroundings;
 - **Section 3** summarises the nature of the proposed development;
 - **Section 4** sets out the previous pre-application advice provided by RBC, together with relevant stakeholder engagement;
 - **Section 5** considers the prevailing Development Plan context;
 - **Section 6** identifies material considerations in support of the development;
 - **Section 7** sets out the planning balance and assesses the development against the Development Plan; and
 - **Section 8** summarises our conclusions supporting the grant of planning permission.

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2. Site Context

The Site and its Surroundings

- 2.1. The SportsPark and Pavilion are located towards the western section of the Whiteknights Campus, accessed from Queen's Drive via the Shinfield Road entrance. The SportsPark is a substantial building of traditional design, up to three storeys in height, with surface parking provided to the south of the building. The Pavilion is a more modest building located to the east of the SportsPark and is of a contemporary design. It was developed as a replacement for the Athletics Pavilion (demolished under App No. 140129).
- 2.2. A number of mature trees lie in the vicinity of the Site, including at the northwest corner of the SportsPark and adjacent to Elmhurst Road. The application proposals do not however directly effect any of these existing trees.

Statutory and Non-Statutory Designations

- 2.3. Figure 1 below shows the proposed location of the ASHP and enclosure in the context of the Reading Borough Council Local Plan Policy Proposals Map (2019). It is relevant to note that the Site falls entirely within the Whiteknights Campus to which adopted Local Plan Policy ER2 applies. The Redlands Conservation Area is located c.60m north of the Site, with Elmhurst Road forming its boundary. The Site is located outside of a proposed/existing green link that crosses part of the Whiteknights Campus (Local Plan Policy EN12).
- 2.4. There are no Tree Preservation Orders in the vicinity of the Site.

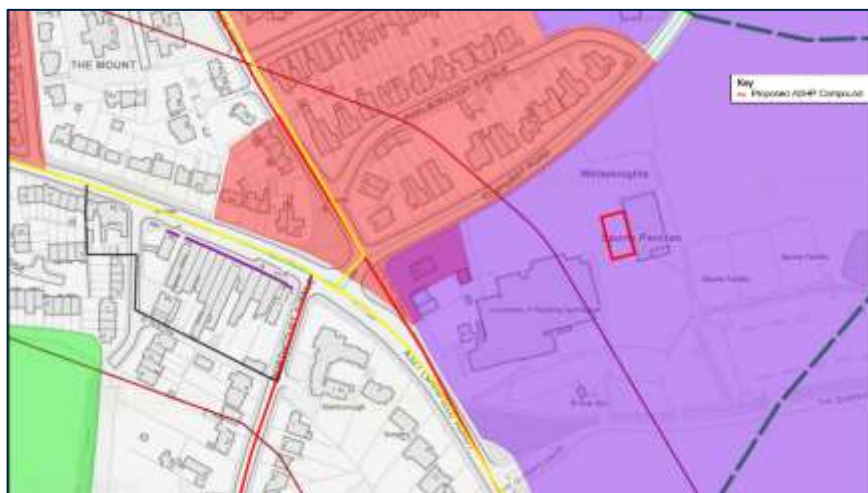


Figure 1 - RBC's Policy Proposals Map (2019)

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- 2.5. In accordance with the Environment Agency's Flood Mapping Database, the Site is wholly located within Flood Zone 1 (i.e. at the lowest risk of flooding) for both fluvial and surface water flooding.

Relevant Planning History

- 2.6. The SportsPark building and the SportsPark Pavilion have been the subject of a number of applications, as set out in Table 1 below:

LPA Ref:	Description	Decision
05/00740/FUL	<i>Extension and refurbishment of the University Sports Centre comprising an enlarged gym, café area and new squash court.</i>	Approved: 09 September 2005
07/01492/FUL	<i>Change of Use of Part (59 sq. m) of the Athletics Pavilion from D2 assembly / leisure to A1 shop and new front.</i>	Approved: 11 January 2008
09/01361/FUL	<i>Construction of a single storey extension to the rear of the existing Sports Park building to provide additional storage facilities.</i>	Approved: 05 October 2009
10/00679/FUL	<i>Construction of a single storey extension to the existing Sports Park Building to house a new café facility</i>	Approved: 03 August 2010
140129	<i>Demolition of existing Athletics Pavilion accessed from Elmhurst Road and construction of a new single storey pavilion with changing rooms and club room.</i>	Approved: 25 June 2014
220334	<i>Retrospective planning application for the erection of roof-mounted photovoltaic panels and associated works.</i>	Approved: 25 May 2022

Table 1 – Relevant Planning History

- 2.7. Application Number. 140129 (dated 25th June 2014) relates to the demolition of the Athletics Pavilion formerly located adjacent to Elmhurst Road and the construction of the current SportsPark Pavilion with changing rooms and club room. The application was determined by Committee on 18 June 2014. The parts of the Committee Report relevant to the consideration of the ASHP proposals are discussed within Section 7 of this Statement.

3. Proposed Development

- 3.1. This application seeks full planning permission for the following development:

“Full planning permission for the proposed installation of Air-Source Heat Pumps with associated enclosure, landscaping and associated works.”

- 3.2. The proposal involves the following elements: two Air-Source Heat Pumps (ASHPs), two thermal storage vessels and primary and secondary pumps, which will be sited west of the SportsPark pavilion. The thermal storage vessels and pumps will be housed within a fully enclosed purpose-built plantroom. The proposed location of the plant is indicated on the accompanying Proposed Site Plan (drawing ref. 230155-1-101) and measures 19.11m in length, 10m in width and 3.5m in height. Underground pipes and cables will link the ASHPs to the SportsPark building.
- 3.3. The plant will be enclosed in a compound constructed of ‘hit-and-miss’ white oak timber fencing 3.5 metres in height. This type of fencing is already a feature of the wider Whiteknights Campus. Mixed hedgerow planting is proposed on the northern and western boundaries of the enclosure as indicated on the Proposed Planting Plan (drawing ref. GM230801PP), which will provide screening and deter ball games against the fence.
- 3.4. The ASHPs will replace the traditional heating and hot water plant within the existing SportsPark that is some 30 years old. This will contribute to the University’s objective of achieving net zero carbon by 2039. It will deliver a cost-efficient solution whilst reducing carbon emissions by 86 tonnes per annum.

4. Pre-application Engagement

- 4.1. The University has undertaken detailed pre-application engagement with RBC and local residents to inform the proposed development.

Pre-application Advice

- 4.2. The pre-application meeting request was submitted on 18th May 2023. The submission outlined the nature of the proposed development, the broad approach to be undertaken to comply with relevant planning policies, and the scope of planning documents which would be submitted in support of a planning application. The submission was also accompanied by a proposed site layout plan, proposed elevations, ground floor plan and site photos of the SportsPark Pavilion. The Council's pre-application response (ref. 230692) was received on 07th July 2023, and a site visit with the Case Officer took place on 10th July 2023.
- 4.3. A summary of the Council's pre-application advice is set out below:
- No in principle objection to the proposed development; the provision of an ASHP would comply with and/or support the overarching aims of Local Plan Policies CC1 to CC3 and with the Sustainable Design and Construction SPD (2019).
 - The design, modest scale and location of the new development would not have a detrimental effect on the character and appearance of existing buildings or impact negatively on the character of the wider area.
 - The proposed planting on the northern and western boundaries of the enclosure was supported. Details of the height and species of the proposed planting should be submitted with a planning application.
 - An Arboricultural Impact Assessment should be submitted.
 - A Noise Impact Assessment should be submitted.

Response to Pre-application Advice

- 4.4. The Applicant has addressed the advice received, and the planning application is accompanied by:
- A detailed planting and landscaping plan that identifies the specification, height, maintenance strategy and planting schedule;
 - A Noise Impact Assessment; and
 - An Arboricultural Impact Assessment and Method Statement (including Tree Survey and Tree Constraints Plan).

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Public Engagement

- 4.5. The University has actively engaged with residents of Elmhurst Road, Northcourt Avenue Residents Association and Friends of Christchurch Green through a letter and informal discussions. These discussions are set out in the Statement of Community Involvement that accompanies the application.

5. The Development Plan

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the “*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*”. The adopted Development Plan for RBC consists of the Reading Borough Local Plan (November 2019).
- 5.2. Reading Borough Council has commenced a review of the adopted Local Plan. However, the Local Plan Partial Update is at a very early stage and attracts no weight at this stage.
- 5.3. Material considerations also include national planning policy, which is primarily expressed through the National Planning Policy Framework (NPPF) (July 2021), as well as additional guidance by the Council in the form of Supplementary Planning Documents (SPDs).

The Adopted Development Plan

Reading Borough Local Plan (November 2019)

- 5.4. The Reading Borough Local Plan was adopted in November 2019 to guide development across the Borough until 2036.
- 5.5. **Policy CC1: Presumption in Favour of Sustainable Development** – Policy CC1 states that a positive approach will be taken to considering development proposals that reflect the presumption in favour of sustainable development as provided in the NPPF. This policy provides a requirement for the Council to work proactively with applicants to find solutions to ensure that proposals can be approved wherever possible.
- 5.6. **Policy CC2: Sustainable Design and Construction** – This advises that new development will be acceptable where the design of the buildings and site layout uses materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 5.7. **Policy CC7: Design and the Public Realm** – Consistent with the NPPF, high-quality design should be secured, which maintains and enhances the character and appearance of the area of Reading in which the site is located.
- 5.8. **Policy CC8: Safeguarding Amenity** – The policy contains relevant considerations in determining whether a development will have a detrimental impact on the living environment of existing residential properties:
- “Privacy and overlooking;
 - Access to sunlight and daylight;

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- *Visual dominance and overbearing effects of a development;*
- *Harm to outlook;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell;*
- *Crime and safety; or*
- *Wind, where the proposals involve new development of more than 8 storeys.”*

- 5.9. **Policy EN1: Projection and Enhancement of the Historic Environment** - Historic assets and their settings will be protected and enhanced where possible, with any harm to or loss of a heritage asset requiring sound justification, usually in the form of public benefits.
- 5.10. **Policy EN3: Enhancement of Conservation Area** – The policy confirms that the special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness.
- 5.11. **Policy EN14: Trees, Hedges and Woodland** - Existing trees, hedges and groups of trees should be protected against damage or removal due to development. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage or off-site in appropriate situations, to improve the level of tree coverage within the Borough.
- 5.12. **Policy EN16: Pollution and Water Resources** - Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution. Proposals for development that are sensitive to the effects of 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.
- 5.13. **Policy EN17: Noise Generating Equipment** – Policy EN17 states that where noise-generating equipment is proposed, the noise source-specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise-sensitive receptor.
- 5.14. **Policy ER2: Whiteknights Campus, University of Reading** – The policy states that “...the Whiteknights Campus as shown on the Proposals Map will continue to be a focus for development associated with the University of Reading. Such development may include additional staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses”. Furthermore, the policy asserts that development proposals should not have a detrimental impact on the amenity of neighbouring residential properties.

6. Material Considerations

6.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations should be taken into account in decision-making. The following material considerations are relevant to this planning application and are considered in turn below:

- National Planning Policy Framework (NPPF) (July 2021); and
- The Reading Climate Emergency Strategy 2020-25 (November 2020).

National Planning Policy Framework (July 2021)

6.2. The revised National Planning Policy Framework was published in July 2021. The revised Framework sets out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).

6.3. Paragraph 38 states that local planning authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the area's economic, social and environmental conditions. Decision-makers at every level should seek to approve applications for sustainable development where possible.

6.4. Paragraph 96 confirms that LPAs should work proactively and positively with private entities to ensure that the requisite amount of public service infrastructure is supplied, including infrastructure related to educational institutions.

6.5. Paragraph 158 states that:

“When determining planning applications for renewable and low carbon development, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”

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The Reading Climate Emergency Strategy 2020-25 (November 2020)

- 6.6. This document establishes Reading Borough Councils' overarching target for the whole of the Reading local authority area to achieve net zero carbon emissions by 2030. A key action under the Renewable Energy – Heat sub-category is to encourage the installation of ASHPs (Action E12).

7. Planning Assessment

Principle of Development

- 7.1. Local Plan Policy CC1 seeks to secure sustainable new development consistent with paragraphs 8 and 11 of the NPPF. The ASHPs will provide an upgrade to energy infrastructure by replacing the existing traditional heating and hot water plant at the SportsPark and accordingly will directly support the University's objective of becoming Net Zero Carbon by 2030.
- 7.2. Support for the development is also provided by Local Plan Policy ER2, which allows for a range of new development to take place within the Whiteknights Campus, including:
- “...additional staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses” (our emphasis).*
- 7.3. As confirmed by the Council's pre-application advice, the provision of an air source heat pump would comply with and/or support the overarching sustainability aims of Local Plan Policies CC1-CC3 and the Sustainable Design and Construction SPD (2019).

Design and Visual / Neighbours Amenity

- 7.4. The ASHP and its enclosure will adjoin the existing SportsPark Pavilion and will appear as a subservient addition to the existing building.
- 7.5. The ASHP compound will be constructed of 'hit-and-miss' white oak timber fencing 3.5 metres in height. This type of fencing is already a feature of the wider Whiteknights Campus. Mixed hedgerow planting is proposed on the northern and western boundaries of the enclosure as indicated on the Proposed Planting Plan (drawing ref. GM230801PP), which will provide screening and deter ball games against the fence.
- 7.6. The nearest residential properties are some 60m north, separated from the Site by open space and the car park to the former Athletics Pavilion (demolished under planning permission ref. 140129) and Elmhurst Road. The Committee Report for the SportsPark Pavilion considered the amenity of the residential homes along Elmhurst Road at Paragraph 6.6, which states that:

“The proposed building would be visible from the first floor of the residential dwellings set opposite however will be seen in the context of the existing much larger Sports Park building. Also due to the low scale of the proposal it would not significantly encroach into the wider open area in this part of the campus and with the existing pavilion replaced by open space the open character of this part of the campus is considered to be adequately retained.”

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- 7.7. Given the distance between the ASHP and its enclosure, the modest scale of the enclosure and the use of natural materials combined with new planting, there will be no negative impacts on the amenities of the adjacent residential properties.
- 7.8. Accordingly, the proposals comply with Adopted Local Plan policies CC7 and CC8.

Trees and Landscaping

- 7.9. An Arboricultural Impact Assessment and Method Statement (incl. Tree Survey and Tree Constraints Plan) has been prepared by Challice Consulting. These confirm that the Root Protection Areas of the existing adjacent trees will be unaffected by the proposed development. However, to safeguard the surveyed trees (both above and below ground) during the development works and preserve the soil structure, a number of tree protection measures have been implemented, which are set out in Section 15 of the Arboricultural Impact Assessment and Method Statement.
- 7.10. The scheme, therefore, complies with Local Plan Policy EN14.

Noise

- 7.11. The Noise Impact Assessment provided by CPWP examines the acceptability of the proposal in the context of Local Plan Policy EN17. The assessment is based on a noise survey undertaken in July 2022, which has been used to inform the current application. The survey confirmed that road traffic on Elmhurst Road and Shinfield Road (A327) is the dominant source of noise in a position representative of the Site and nearest Noise Sensitive Receptors.
- 7.12. The Noise Impact Assessment concludes that based on the modelling exercise undertaken for this assessment, it has been demonstrated that current proposals are compliant with the Local Planning Authority noise emission requirements as set out in Local Plan Policy EN17.

Redlands Conservation Area

- 7.13. The ASHPs will be sited some 60m from the southern boundary of the Redlands Conservation Area, screened by existing tree and hedgerow planting along the campus's northern (Elmhurst Road) boundary. On this basis and given the modest nature and scale of the proposals, the ASHPs and their enclosure will not impact on the character or setting of the Conservation Area.
- 7.14. In coming to this conclusion, consideration has been given to the Committee Report for the SportsPark Pavilion, paragraph 6.6 of which states that:

“The proposed building is set over 45 m from the road edge and a hedge lies along the Elmhurst Road boundary that screens the site from views from street level. Officers, therefore, do not consider that the proposal would have a detrimental visual impact on the Elmhurst Road street scene or the character of Redlands Conservation Area.”

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7.15. In this context, the proposals will comply with Local Plan Policies EN1 and EN3.

8. Summary and Conclusions

- 8.1. Full planning permission is sought for the installation of an ASHP and associated enclosure, landscaping and associated works on land west of the SportsPark Pavilion within the Whiteknights Campus, University of Reading.
- 8.2. The proposal will deliver a range of benefits. These include: making the campus more resilient to and addressing the causes of climate change in accordance with the Adopted Local Plan and paragraph 158 of the NPPF; providing a more efficient and sustainable heating and hot water system within SportsPark, the existing infrastructure largely dependent upon the use of fossil fuels. The proposal supports the University of Reading's objective of achieving net zero carbon by 2039.
- 8.3. As demonstrated by the assessment provided in this Planning Statement and the other documents that also support the application, the proposals comply with the relevant policies in the Adopted Local Plan and will have no adverse impacts on local amenity, the amenities or nearby residents, or the character and setting of the Redlands Conservation Area.

Appendices

Mr. Joe Wood
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7 July 2023

Your contact is: **Beatrice Malama, Planning**

Dear Mr. Wood,

PRE PLANNING APPLICATION ENQUIRY RESPONSE

Enquiry Reference: 230692

Address: Land West of the Sports Park Pavilion, Whiteknights Campus, University of Reading, RG6 6UR

Proposal: Pre-application advice for proposed air-source heat pumps and enclosure

Thank you for your recent pre-application enquiry.

Site Description

The application site is land within the Reading University – Whiteknights Campus. The proposal site adjoins the sports park pavilion on the western side. There are a number of mature trees near the site. Located approximately 60m north of the site are residential dwelling houses. The site is not listed and lies outside of the Redland Conservation Area.

Proposal

The proposal is for the air source heat pump and its enclosure measuring 12.4m deep by 19.1m wide.

Policies

Reading Borough Local Plan (2019)

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC3: Adaptation to Climate Change

CC7: Design and the Public Realm

CC8: Safeguarding Amenity

EN15: Air Quality Management Area

EN16: Pollution and Water Resources

EN17: Noise Generating Equipment

ER2: Whiteknights Campus, University of Reading

SPDs

Sustainable Design and Construction SPD (2019)

Assessment

The main issues to be considered are as follows:

- 1) Principle of development;
- 2) Design;
- 3) Noise Generation; and
- 4) Natural Environment (trees)

1) **Environmental Sustainability**

The provision of an air source heat pump would comply with and/or support the overarching sustainability aims of Policies CC1-CC3 and the Sustainable Design and Construction SPD.

2) **Design**

The pumps and plant enclosure would be sited adjacent to the sports park pavilion on the western side of the pavilion. The design of the exterior and the finishes would be similar to the existing sports park pavilion building. Given the design, modest scale, matching exterior finishes and location, the new development would not appear to have any detrimental effect on the character and appearance of existing nearby buildings. In addition, the proposal includes hedging on the north and west sides which would provide some form of screening and thus any visual impact on the surrounding would be considered negligible.

3) **Noise Generation**

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 A+2019 methodology.

The noise assessment needs to establish the predicted noise rating level taking account of any characteristic factors like tonality or impulsiveness of the noise. The rating level should be compared with the background noise level.

Policy EN17 of the Reading Borough Plan states for proposed new plant:

The noise source specific noise level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor and the rating level should not exceed the background level (as measured in accordance with BS4142:2014 A+2019).

It is likely that a noise assessment will be required for this development, unless noise data can be submitted that clearly demonstrates that, due to low noise level of the plant and the distance from the nearest residential properties, the noise level will meet the policy.

4) **Natural Environment (trees)**

The site itself (the red line area) does not present an issue with regards to the trees, however the services routes might raise concerns with regards to being within Root Protection Areas:



Any future application should plot all trees within 15m of any part of the proposals, include associated services routes – their accurate trunk position and Root Protection Area (RPA). If the services are required within RPAs, a method statement for installation should be provided, alongside a tree protection plan during installation.

The proposed Site Plan indicates that the service routes are routed to avoid trees, but it is unclear whether this refers to RPAs as not all the trees are plotted and the one that is, is shown indicatively. Arboricultural information is required on submission of an application to demonstrate acceptability. The supporting letter indicates an Arboricultural Impact Assessment will be provided, as would be expected. The letter also states: '*A native hedgerow is proposed around the perimeter of the enclosure; this will have a beneficial screening effect*' – details of this should be provided on submission of an application, along with maintenance details to avoid a pre-commencement landscape condition.

Conclusion

The proposed development would offer sustainability benefits and at this stage appears worthy of further consideration, noting that additional details would be required for any future planning application in order to demonstrate acceptability. Noise data would be required to demonstrate that there would be no harm to amenity of the nearby residential properties. In addition, Arboricultural information would be required on submission of an application to demonstrate acceptability. Furthermore, details of the proposed hedgerow together with the proposed maintenance plan would be required to avoid a pre-commencement landscape condition.

Please note that the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

SDV

PP

Beatrice Malama
Planning Officer