

DELEGATED APPLICATION REPORT

SITE ADDRESS: 2 Norman Place, Reading, RG1 8DA

APPLICATION NUMBER: PL/25/0601

PROPOSAL: Discharge of condition 4 (Site Security Strategy) of planning permission PL/24/1725, as granted on 24/03/2025.

DETERMINATION DATE: 17/06/2025

CASE OFFICER: Jonathan Markwell

1. Site Description and Surrounding Area

- 1.1 The application site comprises the car park associated with the vacant office building at 2 Norman Place. The red line boundary is solely within the car park area, is broadly rectangular in shape (as shown below) and 0.23ha in size.



Above: Extract of Site Plan, as submitted by the applicant during the course of the application

- 1.2 The site currently contains 55 car parking spaces, with access from Norman Place and associated on-site trees, greenery and lighting. In the southern part of the site it is understood that there is an existing culvert which runs across the site following the line of Vastern Road, which is to the south of the site.
- 1.3 To the north of the red line boundary as per the original permission, also under the ownership of the applicant, is an unoccupied four-storey office building, beyond which is the Thames Path, the River Thames and Christchurch Meadows green space. To the east is the basement and 5-storey Clearwater Court (occupied by Thames Water), with staff parking to the south. Beyond this is Reading Bridge and the 10-storey Reading Bridge House office building. To the south is the busy Vastern Road, part of the town's Inner Distribution Road (IDR). Beyond this is a multi-storey car park, which leads towards the northern entrance of Reading Station. To the west, beyond Norman Place, are the 3-storey office Sovereign House, which includes parking to the north. To the north of this is the 4-storey Thames Court residential building. At present, Norman Place

provides an important pedestrian / cycle route between Caversham and Reading Station, following the opening of Christchurch Bridge in 2015. This is anticipated to evolve in time, as the permitted and now under construction redevelopment of the 55 Vastern Road site includes a more direct connection from Christchurch Bridge towards and from Reading Station.



Above: Site Photographs 13/06/2025.

- 1.4 The site is not specifically allocated within the 2019 adopted Reading Local Plan. As per the local plan, the site is however within:
- Reading Central Area (Policies CR1-10)
 - Air Quality Management Area (Policy EN15)
 - Central Core (Policy CR1)
 - Office Core (Policy CR1)
 - Flood Zone 1, 2 and 3 (Policy EN18)
- 1.5 It is however acknowledged that the wider site, also including the office building and space up to the Thames Path, is identified within the Local Plan Partial Update, which was submitted to the Secretary of State for examination on 09/05/2025. Within the submission draft (May 2025) the site is identified as a possible other site for development in Central Reading, as follows:

CR14v 2 NORMAN PLACE

Development for residential.

Development should:

- ***Contribute to enhanced bus priority on Vastern Road exiting the northern station interchange;***
- ***Contribute towards an extension and bifurcation of the BUZZ18 bus route, with an increase in daytime, evening and weekend frequency;***
- ***Include tree planting on the Vastern Road frontage to enhance the treed corridor;***
- ***Avoid a detrimental impact on, and where possible enhance, the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river;***

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- ***Address flood risk issues, including avoiding development in the part of the site within Flood Zone 3 insofar as is possible;***
 - ***Address air quality impacts on residential use;***
 - ***Address any contamination on site; and***
 - ***Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.***

Site size: 0.55 ha

130-190 dwellings

- 1.6 At this point in time, only a low level of weight is afforded to the Local Plan Partial Update policy, given the pre-examination stage of the process.
- 1.7 Beyond the red-line application site boundary, the following nearby characteristics (all based on the adopted local plan policy) are also of relevance:
 - Norman Place is a specified cycle route (Policy TR4). Within the Reading Local Cycle and Walking Infrastructure Plan (LCWIP) Norman Place is part of a strategic cycle route.
 - Vastern Road is a specified cycle route (Policy TR4). Within the LCWIP Vastern Road is part of an orbital cycle route.

- Vastern Road is part of the classified highway network (Policy TR3) and part of the proposed Mass Rapid Transit route at this point (Policy TR2).
- The site is between two 'Treed corridors' (Vastern Road and the River Thames) as per the Reading Tree Strategy, and hence is a high priority area for tree retention and planting, with a green buffer also expected on the riverside for any redevelopment of this site.

1.8 It is also relevant to note from the outset that the site is located outside of any Central Reading Major Opportunity Area (Policies CR11-13) and outside of any area of potential for tall buildings (Policy CR10).



Site photograph looking north from the multi-storey car park roof to the south (20/02/2024)

2. Proposal

2.1 This application seeks the discharge of condition 4 (Site Security Strategy) of planning permission PL/24/1725, as granted on 24/03/2025. More specifically, condition 4 states:

4. Within 4 (four) weeks of the date this application is permitted, a site security strategy shall be submitted in writing to the Local Planning Authority for approval. The site security strategy shall as a minimum include a formal surveillance strategy, with the possible provision of CCTV informed by an operational requirements study, and external lighting details. The subsequently approved measures by the Local Planning Authority, as contained within the Site Security Strategy, shall be implemented in full within 4 (four) weeks of being approved and shall be permanently retained and maintained thereafter for the lifetime of this permission.

REASON: To safeguard the amenities of the adjoining premises and the area generally, in accordance with Policies CC7, CC8 and CR2 of the Reading Borough Local Plan 2019.

- 2.2 The basis for this condition was set out in the officer report as part of permission PL/24/1725. More specifically, the Designing Out Crime Officer (DOCO) at Thames Valley Police and a paragraph within the amenity section of the assessment explain the background to the condition in full:

4.2 Designing Out Crime Officer (DOCO) at Thames Valley Police

- 4.2.1 The DOCO has reviewed the submitted documents and crime statistics for the area and the following comments are provided to ensure the application meets the requirements of;

- The National Planning Policy Framework 2024 paragraph 96(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
- The National Planning Policy Framework 2024, paragraph 135(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

- 4.2.2 It is appreciated that the car park is proposed for a temporary period until the site is redeveloped. However, it is noted that the car park is proposed to be accessible 24/7

and I have significant concerns with regards to the safety and security of proposed users of the car park without the inclusion of appropriate security measures.

- 4.2.3 The absence of natural surveillance of the site, particularly in the evening/at night, means that formal surveillance should be provided. CCTV is not a universal solution to security problems. However, it can help deter crime and criminal behaviour, assist with the identification of offenders, promote personal safety, and provide reassurance for users of the car park.

- 4.2.4 The provision of CCTV should be informed by an Operational Requirements Study. This should assess the specific requirements of the CCTV system for the site. It should include detailed plans as to what the role of each camera is, their location, camera type and specification and how the system will be managed/monitored.

- 4.2.5 The CCTV operational requirements study and implementation of the CCTV system could potentially be a planning condition if planning permission is proposed to be granted. However, the CCTV system will need to be considered in relation to the lighting for the site.

- 4.2.6 It is noted that there are existing lighting columns covering the car park. However no detail has been provided with regards to lux levels or site coverage.

- 4.2.7 The lighting of the car park should meet the general standards of BS 5489-1:2020 and ensure that the entire parking area is well lit. Bollard lighting is not an appropriate lighting method, and should be avoided. Not only can they be damaged by reversing vehicles, more critically they do not provide sufficient light at the right height to aid facial recognition and reduce the fear of crime. It also does not deter crime and antisocial behaviour. Lighting details should be provided within the application.

- 4.2.8 The above comments are made on behalf of Thames Valley Police and relate to designing out crime only.

Amenity

- 7.8 As per the consultation response from the Designing Out Crime Officer at Thames Valley Police, as per section 4.2 above, there are some concerns raised regarding the safety and security of proposed users of the car park without the inclusion of appropriate security measures. Accordingly, a security strategy is required to be secured, with this having a particular focus on CCTV and lighting. This is considered necessary to protect the amenity of users of the car park and the general area from the on-going use. This feedback was provided to the agent at any early stage of the determination period, with view to details being submitted/assessed at application stage, with view to a compliance condition being secured. However, the agent has not provided any substantial response for submission (whilst acknowledging the requirement and this being prepared by the applicant). In the circumstances, it is therefore necessary to secure a security strategy in full via condition. In the context of the proposals being sought retrospectively, it is considered reasonable for the proposed strategy to be submitted within 4 weeks of the decision notice, with the subsequently approved measures to be implemented within a further 4 weeks of those measures being approved. The agent has been made aware of these timescales from the outset and has raised no issues with the intended approach.

2.3 Plans and documents considered

- ~~Site Security Strategy – April 2025 – 2 Norman Place, RG1 8DA – Security Strategy V1, as received 22/04/2025~~ – superseded 02/06/2025
- ~~Site Layout Plan, as received 22/04/2025~~ – superseded 21/05/2025
- Site Layout Plan, as received 21/05/2025
- Site Security Strategy - May 2025- 2 Norman Place, RG1 8DA – Security Strategy V1, as received 02/06/2025
- Norman Place – Reading – Euro Car Parks, as received 02/06/2025

Timeline of application stage discussions with the planning agent

- 22/04/2025 – Initial email from case officer to agent noting that the location of the CCTV camera appeared to be outside of the red line boundary of the application site. Clarification from a procedural perspective was sought as to how that could be secured given that context. In addition, it was advised that the layout plan within the security strategy did not appear to align with the approved layout and therefore clarification was sought. Separately, the agent was also advised that cars were parking within non-marked bays, taking the total number of parked cars beyond the maximum number permitted.
- 25/04/25 – initial acknowledgement of the above email by the agent.
- 30/04/25 – email from agent outlining how over occupancy would be managed.
- 09/05/25 – email from agent with amended layout plan submitted.
- 19/05/25 – email to agent providing feedback on the application, including concerns raised from DOCO. Applicant given until 02/06/25 to provide revised information.
- 21/05/25 – reply from agent with further amended layout plan and photographs.
- 02/06/25 – email from agent enclosing updated security strategy and information as to how the operator intends to manage parking outside marked bays.
- 06/06/25 – email to agent providing further feedback, upon receipt of further concerns by DOCO. Applicant given until 11/06/2025 to provide revised information.
- 13/06/25 – email to agent, advising in the absence of any response to feedback provided on 06/06/25 (which required responses by 11/06/25) that a decision would now be issued, by 17th June.
- 13/06/25 – email from agent advising that a response would be forthcoming, but not providing any indication as to the timeframes for such a response.

3. Relevant Planning History

Solely the red line boundary of the application site

- 3.1 PL/24/1725 - Retrospective change of use of existing car park associated with the former office premises to public car park (Sui Generis) for a temporary period of three years. Granted 24/03/2025.
- 3.2 PL/25/0857 - Non-material amendments to permission PL/24/1725 (granted on 24/03/2025) to alter the wording of conditions 2 and 3 to show an updated car parking layout and the extent of site ownership. Current application under consideration.

Wider site also including land to the north (office building and up to the Thames Path)

- 3.2 PL/94/0792 (FUL) - 1 No. 4 storey office block and 1 No. 3 storey office block and 1 residential block consisting of 32 flats. Granted 18/10/1995. Please note that this would appear to be the original permission relating to both the application site and Sovereign House / Thames Court.
- 3.3 PL/00/0025 (ADV) - Erection of high level individual letter signage applied to illuminated domed perspex domes. Advertisement Consent Granted 08/05/2000.
- 3.4 PL/14/1903 (FUL) - Erection of 1.5m high railings and automated gates adjacent to Norman Place. Granted Planning Permission 18/02/2015.
- 3.5 PL/15/1572 (FUL) - Erection of two bicycle shelters to provide 12 additional secure bicycle stands. Granted Planning Permission 04/11/2015.
- 3.6 PL/24/0828 (SCO) - Request for a Screening Opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the demolition of the Covea Insurance building and the construction of up to 300 build-to-rent residential dwellings within buildings up to 11 storeys with commercial use on the ground floor; approximately 30 car parking spaces; access from Norman Place; and associated infrastructure. A negative screening opinion, advising that the proposed development is not EIA development was issued on 29/08/2024.
- 3.7 PL/24/0958 - Demolition of existing office and substation buildings and residential-led site redevelopment within 1-11 storey buildings comprising residential (Class C3) and ground floor commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, car/cycle parking, hard and soft landscaping and a public open space adjacent to the river. Current application under consideration.

4. CONSULTATION AND PUBLICITY

- 4.1 Designing Out Crime Officer at Thames Valley Police (DOCO)
- 4.2 Original observations received on 13/05/25:

It is noted that a single ANPR camera is proposed to cover the entrance of the car park. This is not considered sufficient to provide an appropriate level of security for the whole car park. A single camera at the entrance (whether CCTV or ANPR) will not pick up people entering the car park on foot as it is open to pedestrian movement from the south. Given the site's town centre location, its proposed 24hour use and limited natural surveillance (particularly at night) additional coverage of the site by CCTV would be appropriate. CCTV is not a solution to all security problems, but it can help in the identification of offenders and help deter crime and criminal behaviour. In this case, this is not just in relation to theft and vandalism of cars, but also in relation to personal safety within the car park.

As noted in the condition the provision of CCTV should be informed by an operational study.

The above comments are provided on behalf of Thames Valley Police and relate to designing out crime only.

4.3 Follow up observations received on 06/06/25:

I note that CCTV has now been added to the Security Strategy, which is appreciated. However, the two proposed cameras will only have very limited coverage of the car park, and whilst one is proposed to be directed towards the pedestrian entrance into the car park, this is likely to be obscured by existing trees. Location of cameras needs to be carefully considered, in terms of coverage and in terms of the quality of picture they will provide. It is considered that additional and /or relocated cameras are necessary to provide better coverage of the car park and reduce the amount of blind spots. If the CCTV is to act as a deterrent, prominent signage stating their presence will also be required. The management of footage will need to be in compliance with GDPR. Further guidance on CCTV can be found in Secured by Design Non Residential Guide 2025 (Section 35).

The above comments are provided on behalf of Thames Valley Police and relate to designing out crime only.

4.4 Public consultation - None required for this type of application. No responses received.

5. Equality Act 2010:

- 5.1 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

6. Relevant Planning Policy and Guidance

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) – among them the ‘presumption in favour of sustainable development’. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). In this case the development plan consists of the Reading Borough Local Plan 2019.
- 6.2 In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).
- 6.3 Accordingly, the National Planning Policy Framework and the following development plan policies and supplementary planning guidance are relevant:

- 6.4 National Policy and Guidance
National Planning Policy Framework 2024
National Planning Practice Guidance (2014 onwards) (PPG)
- 6.5 Reading Borough Local Plan 2019

 CC7 Design and the Public Realm
 CC8 Safeguarding Amenity
 CR2 Design in Central Reading
- 6.6 Other relevant documentation
Reading Borough Local Plan Submission Draft Partial Update, May 2025
- 6.8 Local Plan Update
- 6.9 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024 and the Local Plan Partial Update Submission Draft was published on 9th May 2025.
- 6.10 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.
- 6.11 Officer advice in respect of the Local Plan policies pertinent to these applications listed above is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’.

7. APPRAISAL

- 7.1 The proposed security strategy has been considered in detail by officers and the specialist DOCO at TVP. At the time of the original application (Ref PL/24/1725) a number of concerns were raised and feedback provided to guide the applicant in providing a level and nature of information required to satisfy the subsequently attached condition. At this approval of details stage, the submitted security strategy has been shown to be inadequate, with feedback provided by the DOCO (see section 4 above), first to the originally submitted strategy, and secondly to a revised strategy submitted during the course of the application. Despite this, a series of concerns remain, most significantly that the proposed CCTV provision does not have sufficient coverage across the site, to the detriment of users of the car park and the wider area.
- 7.2 There is also a procedural point in relation to the CCTV camera location is outside of the red line boundary of the original permission. Although the applicant has submitted a

s96a application with view to addressing this matter (a blue line is proposed around the wider site, indicating wider site ownership than the original red line plan), this application has not been determined at the time of writing.

- 7.3 Moreover, the original application was retrospective in nature, meaning that the wording of condition 4 included two time-based trigger points. First, the details of the condition were required to be submitted within 4 weeks of the original decision (the application was received 4 weeks and 1 day [on 22/04/25] after the original decision [on 24/03/25]. In light of the subsequent refusal of these details, the applicant is now in breach of this condition. Accordingly, it is recommended that an informative is added onto the decision notice stating that this matter will now be passed onto the Planning Enforcement team to investigate further.

8. CONCLUSION

- 8.1 The local planning authority consider that insufficient information has been submitted to satisfy condition 4 and therefore the condition is refused to be discharged.

Reason for refusal:

The site security strategy details submitted, by reason of its proposed lack of CCTV coverage and related details, fails to demonstrate that the amenities of the users of the car park, adjoining premises and area generally is safeguarded to the satisfaction of the local planning authority, contrary to Policies CC7, CC8 and CR2 of the Reading Borough Local Plan 2019.

Informatives:

1. The Local Planning Authority has worked positively and proactively with the agent of the applicant to see if relevant concerns could be resolved to allow details for condition 4 to be granted. However, no revised information has been received to the follow-up feedback provided on 06/06/2025, meaning it has not been possible to resolve matters within the prescribed target timescale. Therefore the decision to refuse to discharge details associated with condition 4 of planning permission PL/24/1725 has been taken.
2. In light of this decision and the wording of condition 4, this matter will now be passed onto the Council's Planning Enforcement Team to investigate this matter.
3. In reaching this decision, the Local Planning Authority has taken into consideration the following information:
 - Site Layout Plan, as received 21/05/2025
 - Site Security Strategy - May 2025- 2 Norman Place, RG1 8DA – Security Strategy V1, as received 02/06/2025
 - Norman Place – Reading – Euro Car Parks, as received 02/06/2025