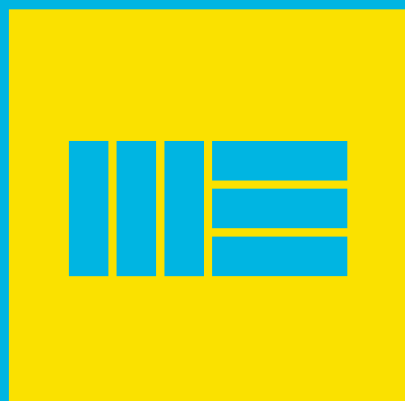


KING'S MEADOW VIEW, READING

PLANNING STATEMENT

24 NOVEMBER 2025



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1.0 INTRODUCTION

- 1.1 This Planning Statement forms part of the application for outline planning permission (“the Application”) submitted on behalf of abrdn Property Income Trust (“the Applicant / “abrdn”) to Reading Borough Council (“the Council” / “RBC”) for mixed use development comprising of up to 700 residential units and up to 3,000 sqm of commercial floorspace (“the Proposed Development” / “the Scheme”) on part of Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS (“the Site”). King’s View Meadow (“KMV”) is the name that has been given to the project.
- 1.2 Planning application ref. 230822 was submitted on 8th June 2023 and confirmed as valid on 14th September 2023. Consultation comments have been received and reviewed including requests for conditions as well as comments that requested amendments to the application.
- 1.3 A number of meetings have also been held with the case officer in relation to the design of the outline scheme. In the interests of responding to the consultation comments and discussion with Reading Borough Council a design review has been undertaken by the project team. This has led to a number of key changes which can be summarised as follows:
 - Reduction in maximum building heights adjacent to the railway and facing Kings Meadow;
 - Improved variation in heights of the blocks;
 - Reduction of block footprints, reorientation of the spaces within the development and increased sense enclosure;
 - Reduction in the size of the basement car park and therefore removal of the podium to the east allowing seamless integration of the site with surrounding areas;
 - Reduction in commercial floorspace;
- 1.4 On 3 November 2025, Reading Borough Council formally confirmed that Outline Planning Application reference PL/23/0822 had been disposed of. In order to build upon the progress made in relation to the previous application and engagement with the Local Planning Authority, this application is submitted as a new Outline Planning Application.
- 1.5 The proposed amendments within this new Application remain broadly within the scope of the previous scheme’s description of development, and again seeks all matters reserved, save for highway access.

THE APPLICATION

- 1.6 In summary the Proposed Development comprises:
 - Demolition of the existing buildings and structures on Site.
 - Construction of new buildings to provide the following:
 - Up to 700 residential units; and
 - Up to 3,000 sqm of flexible Class E floorspace.
 - Up to 130 parking spaces associated with the residential aspect of the development, all of which are to be located at basement level, and 53 parking spaces at ground level for the commercial uses.
 - Delivery of 600 cycle parking spaces,
 - Diversion of the existing sewer running through the Site.

- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.

- 1.7 The table below provides a summary of how the proposals have evolved and the implications on unit number, floor area, and parking as a result of the amendments and associated reduction in height and massing:

Table 1.0 Summary of Amendments to the Scheme (maxima)

	Previously Submitted	Amended Application	Change
Residential Unit Numbers	820	700	-110
Commercial Floor Area	5,500	3,000	-2,500 sqm
Car Parking Spaces	200	130	-70
Cycle Parking Spaces	820	600	-220

- 1.8 The proposed amendments remain within the scope of the previous description of development and only result in a reduction in a number of the maximum figures stated within the description, a track change version of the description of development is provided below for clarity:

“Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to ~~820~~ 700 residential units (Class C3) & up to ~~5,500~~ 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, ~~partial~~ basement excavation, up to ~~200~~ 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to ~~860~~ 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement.”

- 1.9 This Application seeks outline planning permission with all matters reserved, save for highways access. The amended description of development is as follows:

“Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, ~~partial~~ basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement”

- 1.10 The application format allows RBC and other relevant key stakeholders to assess parameters of the scheme against the statutory Development Plan (and other material considerations), whilst allowing flexibility for the Site to respond to changing market conditions, requirements and demands, with the Design Codes securing the key principles of design. Subsequent details in relation to appearance, landscaping, layout and scale will be submitted to and determined by RBC through future reserved matters applications and will have to comply with the approved Design Codes and fall within the limits set by the approved parameter plans and the Development Specification Report.
- 1.11 The outline application provides a robust framework for RBC to ensure that through detailed design development and subsequent reserved matters applications, high quality buildings and spaces will be delivered on the Site. This reflects that the outline Application has been tested robustly through Environmental Impact Assessment which is considered below.

FORMAT OF APPLICATION

- 1.12 The Application seeks outline planning permission for the development of the Site, as detailed above, with all matters reserved except for highways access.

- 1.13 Given the scale of the proposals, it was concluded that the proposals have the potential to have significant effects on the environment and that the Proposed Development constitutes Schedule 2 Paragraph 10(b) development, falling within the Category 'Urban Development Infrastructure Project'. The development involves more than 1ha of non-residential development, more than 150 dwellings and the overall area of the development exceeds 5ha, therefore it was accepted by the Applicant that an Environmental Impact Assessment was required in support of the Applicant. As such, a formal screening request to RBC was not considered necessary.
- 1.14 A request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) for an Environmental Impact Assessment ("EIA") Scoping Opinion, was submitted to RBC on 24 February 2023.
- 1.15 On 18 April 2023 RBC provided their formal response. As a result, this Application was supported by an Environmental Statement ("ES"), the scope and content of which has been considered and agreed with RBC. The amendments to this application remain within the maximum parameters of the originally proposed description of development and result in a reduction of the overall quantum of development. Furthermore, the scope of the ES is not proposed to change to that originally agreed as such no further scoping opinion is required in relation to this amendment, but an updated ES is submitted to assess the amendments to the scheme.

PLANNING POLICY CONTEXT

- 1.16 The Proposed Development has been guided by national and local planning policy, planning guidance and other material considerations. The Development Plan relevant to the Site comprises the Reading Borough Local Plan (adopted November 2019).
- 1.17 Therefore, policies relevant to the development proposal derive from the suite of adopted development plans listed above and the National Planning Policy Framework (NPPF) (2021). The proposal has been developed with consideration to relevant national and local policies and this Statement will assess the development against these policies. Relevant policies for the Site are set out in Section 4 and assessed in Section 5.

REPORT AND PURPOSE STRUCTURE

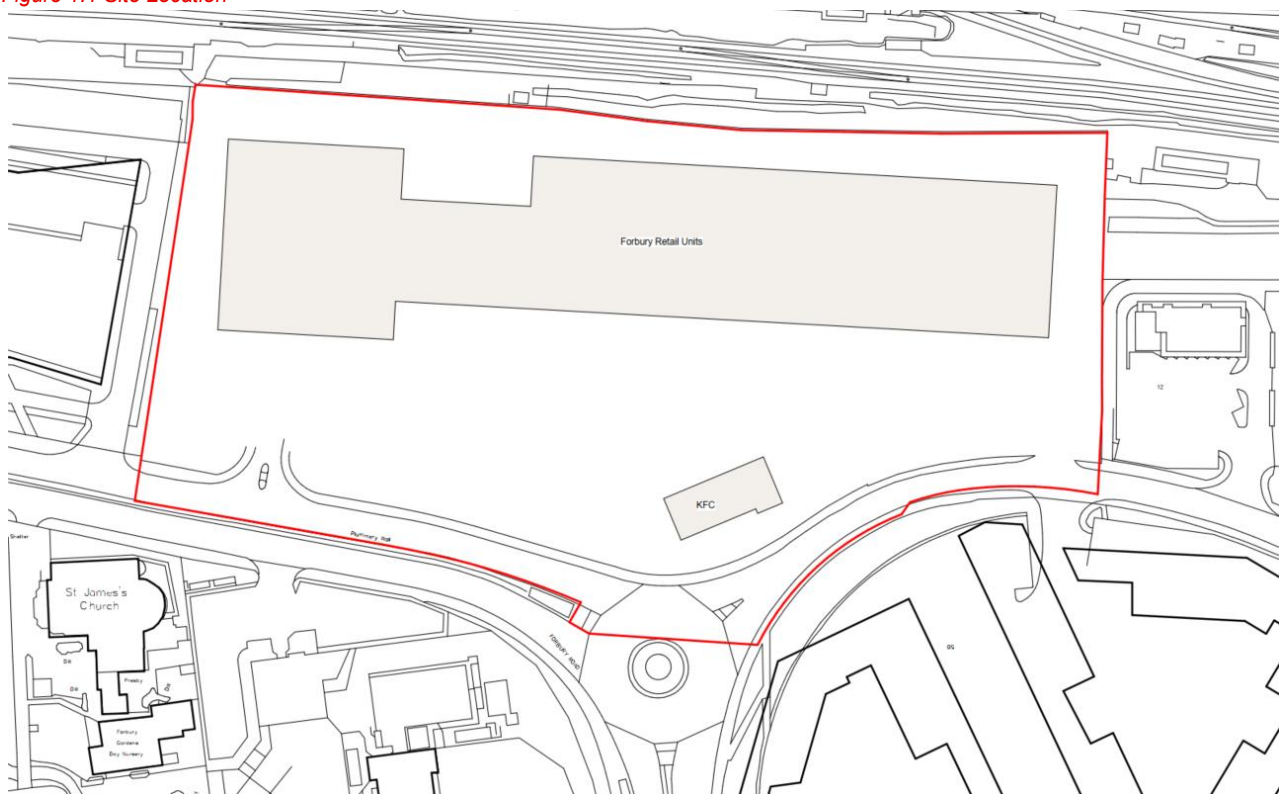
- 1.18 This supporting Planning Statement assesses the development proposal against relevant policies in the adopted Development Plan, outlined in 1.14 above, key national policies and other material considerations including supplementary planning guidance. Furthermore, this Statement seeks to highlight the wider social, environmental and economic benefits of the proposal and ultimately demonstrate why the Application is considered appropriate for the Site and surrounding area, adheres to national and local planning policy and is therefore acceptable in planning terms.
- 1.19 This Planning Statement is structured as follows:
- **Section 2 Site Location and Context** introduces the existing Site, its location and its surroundings, including the Site's planning history and relevant planning history from the wider area.
 - **Section 3 Proposed Development** outlines the details of the Proposed Development and Application.
 - **Section 4 Planning Policy Framework** provides an overview of relevant planning policy, including national and local policies and supplementary planning guidance.
 - **Section 5 Planning Assessment** considers the proposal against relevant policy and provides a planning assessment, including retail considerations, detailing how the proposal complies with relevant planning policy.
 - **Section 6 Summary and Conclusion** provides a summary and overview of this Statement and concludes that the proposal complies with the relevant policies and should be granted permission.

2.0 THE APPLICATION SITE AND PLANNING HISTORY

THE SITE AND SURROUNDINGS

- 2.1 The Site is located in Reading, to the east of the town centre. The Site is bound to north by the railway lines that serve Reading Station, beyond which lie a small number of 2/3 storey office buildings. The large area of open space which is known as King's Meadow, and from which the project name is drawn, is located to the north of the railway embankment. The Application Site within the wider area is shown outlined in red in **Figure 1.1** below.

Figure 1.1 Site Location



- 2.2 To the north-east, approximately 200m from the site, is a residential development known as Luscinia View comprising 6 buildings between 4 and 9 storeys in height, located between King's Meadow and the railway lines. Beyond this site to the east is a Tesco 'Extra' store, that is served by a large area of surface level car parking.
- 2.3 The east of the Site is abutted by the remaining part of Forbury Retail Park, comprising a large area of surface car parking, a standalone McDonalds unit, and a number of large retail units, with occupiers including Decathlon.
- 2.4 Along the River Kennet, approximately 350m to the south-east, is an area of residential land uses comprising a number of 3-5 storey buildings located between the River Kennet and the railway lines to the north
- 2.5 The Site is bounded by Forbury Road and Kenavon Drive to the south. Across Kenavon Drive to the southeast is the Huntley Wharf site, which has planning permission for 765 residential units and is now complete. To the south-west beyond Forbury Road is Reading Gaol; a Grade II listed building. Further west along Forbury Road are the Abbey Ruins and Forbury Gardens, forming a cluster of historic assets.

- 2.6 Abutting the Site to the west are three large floorplate office buildings known as Forbury Place, accommodating 41,209 sqm across 8 storeys. Occupiers include KPMG, Southern Electric Power Distribution and Osborne Clarke.
- 2.7 The Site itself currently comprises part of the Forbury Retail Park and extends to 2.62 ha. This part of the Retail Park comprises a terrace of retail warehouses. The occupiers include; Home Sense, dfs and SCS. There is also a standalone KFC drive through unit on the south part of the Site. The remainder of the Site comprises a large area of surface level car parking facing Forbury Road and Kenavon Drive.
- 2.8 The only amendment to the existing Site submitted with this package of amendments is that the Red Line boundary has been very slightly adjusted on the south boundary at the roundabout. The red line has been extended slightly to the south in order to incorporate all land necessary to carry out the sewer diversion detailed on parameter plan ref. 18111-SQP-ZZ-GF-DR-A-PL00004 rev P1 which was previously showing works outside the red line in error.
- 2.9 In relation to levels, the Site sits below Forbury Road with a 1-1.5m drop forming the boundary of the site along Forbury Road. The remainder of the Site is relatively flat, with another rise in levels between the site and the railway lines to the north.

ACCESSIBILITY

- 2.10 The main access to the Site is on its southern boundary from Forbury Road. This provides pedestrian access and ingress and egress for customer vehicles and egress for service vehicles. To the east of the south boundary there is a secondary access from Kenavon Drive. This provides ingress only for both customer vehicles and service vehicles. The existing service area is behind the retail units running along the north boundary of the Site.
- 2.11 Forbury Retail Park is served by the number 42 bus, which provides access to Reading Town Centre and Reading Station, as well as serving the residential land uses to the east of the Site. In relation to pedestrian and cycle routes, the Site is served by the existing routes along Forbury Road providing access to Reading Town Centre, with Reading Station being a 7-minute walk from the Site.

PLANNING HISTORY

SITE PLANNING HISTORY

- 2.12 Forbury Retail Park was constructed initially under permission ref: 940008, which was approved in 1995, for 5,727 sqm of non-food retail warehousing with associated parking and landscaping. The standalone KFC unit was approved separately in 2015 under permission ref: 150085. Since the park's construction, there have been a large number of asset management planning applications relating to alterations at the Retail Park. These include applications for mezzanine areas, minor external alterations, and advertisement consents and largely relate to new occupier requirements.
- 2.13 Planning application ref. 230822 was submitted on 8th June 2023 and confirmed as valid on 14th September 2023. Consultation comments have been received and reviewed including requests for conditions as well as comments that requested amendments to the application.
- 2.14 A number of meetings have also been held with the case officer in relation to the design of the outline scheme. As a result of responding to the consultation comments and discussion with Reading Borough Council a design review has been undertaken by the project team. This has led to a number of key changes which are summarised in the section 3.0 of this document
- 2.15 On 3 November 2025, Reading Borough Council formally confirmed that Outline Planning Application reference PL/23/0822 had been disposed of. In order to build upon the progress made in relation to the previous application and engagement with the Local Planning Authority, the application to which this statement relates is submitted as a new Outline Planning Application.

SURROUNDING PLANNING HISTORY

- 2.16 There have been a number of recent developments in area surrounding the Site to support the regeneration of the wider Forbury area, located to the east of the town centre.

Huntley Wharf

- 2.17 The Huntley Wharf site is located 20m to the south east of Forbury Retail Park. The site benefits from planning permission (ref: 170509), granted in October 2018, for the demolition of the existing retail structures and the erection of new buildings ranging from between 2 and 11 storeys, providing 765 residential units, 5 commercial units and associated works to the public realm, including a new riverside square and landscaping. The development is now complete.

Housing to the East of Decathlon / McDonald's

- 2.18 The housing approximately 300m east of Forbury Retail Park, between the River Kennet and the railway lines, was permitted under two applications.
- 2.19 Application ref: 04052 was approved in October 2004 for 457 dwellings and ancillary community and retail accommodation. This comprises predominantly 3-4 storey buildings running along the River Kennet, with an outlook over the river for the majority of dwellings.
- 2.20 Application ref: 131280 was approved in December 2013 for 192 dwellings with associated parking landscaping and open space. This comprises the housing to the north of this residential area, along the railway lines. The buildings are mostly 2-3 storeys, with an increase in height on the western part of the site nearer the Decathlon store, where the buildings range from 4-8 storeys.

Forbury Place

- 2.21 Forbury Place is immediately adjacent to the Site to the west, and comprises 8 storey office buildings, providing 41,209 sqm of office floorspace.

Reading Gaol

- 2.22 The main building of Reading Gaol is a Grade II listed building located opposite the Site over Forbury Road to the south-west. There have not been any recent significant planning permissions at the Site although it has now been acquired by the Ziran Education Foundation. However, the site is subject to a site allocation for uses compatible with its heritage. ZEF has plans to turn it into a museum and art-inspired hotel. It is no longer used as a prison.

3.0 THE PROPOSED DEVELOPMENT

This section provides an overview of the proposed development quantum, layout, design, use and access arrangements as well as the description of development.

DESCRIPTION OF DEVELOPMENT

3.1 This Application seeks outline planning permission for the demolition of the existing buildings and the construction of a residential-led development including commercial floorspace, which could include a foodstore, basement car parking, the diversion of the existing sewer and associated public realm, landscaping and other works. All matters are reserved apart from highways access.

3.2 The description of development can be summarised as follows:

Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement

APPLICATION STRUCTURE

3.3 The Application seeks to establish the principles of the proposed uses, the amount and scale of development, the appearance, layout and the landscaping of the development. All matters, except for access, are reserved for future consideration.

1.20 In summary the Proposed Development comprises:

- Demolition of the existing buildings and structures on Site.
- Construction of new buildings to provide the following:
 - Up to 710 residential units; and
 - Up to 3,000 sqm of flexible Class E floorspace.
- Up to 130 parking spaces associated with the residential aspect of the development, all of which are to be located at basement level, and 53 parking spaces at ground level for the commercial uses.
- Delivery of 600 cycle parking spaces,
- Diversion of the existing sewer running through the Site.
- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.

3.4 A set of Parameter Plans and Design Codes have been submitted for approval which define the: development zones and plot boundaries; land uses; site levels; amenity play space and publicly accessible open space; vehicular access

and circulation, and maximum building heights and minimum separation distances between blocks for the future development of the Site.

- 3.5 The **Proposed Land Use (Lower Ground Floor / Ground Floor / Typical Floor) Parameter Plans** outlines the proposed land uses within each development plot. Where land uses are given as 'Typical' Floor these are replicated on all of the floors above the ground floor commercial uses.
- 3.6 The **Development Zones and Plot Boundaries Parameter Plan** outlines the extent of the developable land and defines the maximum building footprint for each development plot and minimum separation distances.
- 3.7 The **Maximum Deviation Plan (Lower Ground Floor / Ground Floor / Typical Floor) Parameter Plan** sets out the maximum building parameters of the buildings proposed by this application.
- 3.8 The **Proposed Maximum Site Levels Parameter Plan (Lower Ground Floor / Ground Floor)** shows the proposed site levels for the Site.
- 3.9 The **Proposed Site Levels (Maximum Building Heights) Parameter Plan** details the maximum AOD building heights for each development plot excluding plant to show compliance with policy.
- 3.10 In addition to the Parameter Plans, a **Development Specification Document** is also submitted for approval. This covers matters that cannot be captured in the parameter plans such as use the maximum floorspace, accessibility and parking. Housing mix is illustrative at this stage and is not for approval.
- 3.11 The **Design Codes** which are submitted for approval provide the set of 'rules' which future applications for the approval of reserved matters must comply with. The plot layouts and the form of the buildings will be determined at the reserved matters stage based upon the rules set out above. If a reserved matters application does not comply with the Design Codes then they would be inconsistent with the outline planning permission and RBC could chose to refuse them.
- 3.12 While the Parameter Plans and Development Specification Document set a maximum envelope within which the development may be brought forward at the reserved matters stage, when the approved Design Codes are applied it means that an acceptable scheme cannot maximise all the parameters to the 'edge' of every envelope.
- 3.13 The Applicant invites a condition to require that all reserved matters applications shall be submitted to comply with the approved Parameter Plans, Development Specification Document and Design Codes.
- 3.14 A suite of supporting documents have also been submitted in support of this application and should be read alongside this Statement in the consideration of this application.
- 3.15 This includes the Design and Access Statement ("DAS") prepared by Squire & Partners which unlike the Design Codes is illustrative and not for approval. It explains that the evolution of the illustrative schemes that were discussed with RBC during the pre-application process have culminated in the illustrative scheme that shows one way of developing the Site in accordance with the approved Design Codes, Parameter Plans and Development Specification Document. The DAS includes a section on landscape and public realm prepared by Macgregor Smith landscape architects.
- 3.16 The illustrative scheme as per the Design and Access Statement does not represent the only way that the development of the Site could come forward and there is scope for variation as long as it is compliant with the approved Design Codes, Parameter Plans and Development Specification Document.
- 3.17 This approach allows for the flexibility to employ new building techniques such as Modern Methods of Construction ("MMC") as well as to introduce changes to meet occupational requirements while still applying the approved development principles set out in the Parameter Plans, Development Specification Document and Design Codes. This allows minor amendments to be made with certainty to the applicant and Reading Borough Council.

PRE-APPLICATION ENGAGEMENT

- 3.18 The applicant has engaged extensively with the Council and other key stakeholders throughout the pre-application ('pre-app') process which began in December 2019. This first pre-app comprised an initial meeting with the then case officer to establish the principles of the scheme. Following extensive design work five further pre-application meetings were held with the then case officer and his colleagues throughout 2021.
- 3.19 In addition to the pre-application meetings a Design Review Panel ("DRP") was held with Design South East ("DSE") in July 2021, comprising a detailed meeting as well as written feedback. The DRP addressed various key elements of the scheme including the location of cycle parking spaces, concerns over the number of single aspect units, and variation of massing. Following the detailed feedback provided by DSE the design team updated the scheme significantly to address the comments this included designing out all single aspect units resulting in a substantial loss of overall units, demonstrating a commitment to high quality design. These changes are charted in the Design and Access Statement prepared by Squire & Partners.
- 3.20 Through the DRP and 2022 pre-app meetings significant progress was made in terms of design, with Officers agreeing to key principles of the scheme such as building heights and pedestrian routes through the Site amongst others.
- 3.21 In January and February 2022 further meetings were held with Councillors including Councillor Page and Highways Officers. Subsequently the case officer left the Council, leading to two hand over meetings culminating in a meeting on 8th May 2022.
- 3.22 At the May 2022 meeting further important design considerations were addressed and agreed, notably separation distances were discussed. The new case officer raised questions over the separation distances below 18m and it was agreed that the design team would revisit any distances below 18m. However, there were also a number of areas where there were differences in officer opinion, for example the preference for the scheme to include a publicly accessible east-to-west route through the Site, whereas the previous officer had agreed the strategy of including the east west route along Forbury Road / Kenavon Drive.
- 3.23 In September 2022, there was another change in officer and pre-application meetings were held in September 2022 and January 2023. Further detailed elements of the design were discussed and commented on, however as a result of the multiple officers on the scheme and each with their own nuanced opinion, there were further requests for changes.
- 3.24 Seeking to address as many officer comments as possible balancing the requirement to ensure a deliverable scheme, there were further changes, the most substantial being the removal of the podium level, which has now resulted in the undercroft parking being replaced by a full basement and the public and private spaces being located at ground level with direct level access from adjacent routes ensuring seamless integration with surrounding areas. This represents a substantial design change at this late stage in the pre-application process as well as the multiple design iterations as a result of varying officer feedback. Given the evolution of the proposals this application represents a very carefully considered scheme, that is based upon the provision of high quality public and private spaces which provide a setting for the proposed buildings.

PUBLIC ENGAGEMENT

- 3.25 The Applicant undertook a range of pre-application consultation activities in February 2022, including both an online presentation and in person consultation event. The activities were developed and undertaken in accordance with the consultation strategy developed by Meeting Place PR Consultancy.
- 3.26 Due to Covid-19 part of the consultation exercise was undertaken digitally. The principles of the strategy were agreed with RBC during the pre-application process as a robust method of public engagement.
- 3.27 The approach to community engagement was based on national planning policy, as well as RBC's guidance on engaging with communities. Consultation with key stakeholders, local residents, local businesses and local community groups has taken place in an open and inclusive manner.
- 3.28 Some examples of the pre-application public engagement that has taken place includes:

- A dedicated webpage on the project website specifically for public consultation;
- Virtual public consultation briefings;
- In person public consultation events;
- Physical and downloadable feedback forms which could be e-mailed or sent via Freepost;
- Advertisements and public notices of consultation printed in local newspapers; and
- Freephone line for public comments and queries.

3.29 The range of communication methods utilised for public consultation ensures members of the public had ample opportunities to provide their feedback on the scheme.

3.30 The submitted Statement of Community Involvement outlines the full consultation strategy, methods and feedback received. The Statement of Community Involvement shows that an extensive level of pre-application consultation has been undertaken with a wide range of stakeholders.

3.31 The comments made through the cycle of pre-application consultation have been considered during the design development of the proposal. This is fully detailed in the submitted Statement of Community Involvement and the Design and Access Statement.

POST SUBMISSION ENGAGEMENT

3.32 Since the submission of application ref. 230822 on 8th June 2023 (validated 14th September 2023), consultation comments have been received and reviewed including requests for conditions as well as comments that request amendments to the application.

3.33 A number of meetings have also been held with the case officer in relation to the design of the outline scheme. As a result of responding to the consultation comments and discussion with Reading Borough Council a design review has been undertaken by the project team. This has led to a number of key changes.

3.34 On 3 November 2025, Reading Borough Council formally confirmed that Outline Planning Application reference PL/23/0822 had been disposed of. In order to build upon the progress made in relation to the previous application and engagement with the Local Planning Authority, this application is submitted as a new Outline Planning Application.

3.35 The proposed amendments within this new Application remain broadly within the scope of the previous scheme's description of development, and again seeks all matters reserved, save for highway access. The main amendments can be summarised as follows:

Reduction in maximum building heights adjacent to the railway and facing Kings Meadow

3.36 The building heights previously proposed in the application ranged from 6 to 12 storeys, with the blocks along the north boundary that face King's Meadow comprising two 8 storey buildings, three 12 storey buildings and an 11 storey building. RBC did not support the proposed maximum building heights as they reached the 12 storey definition of a tall building. Concerns were raised in relation to the concentration of height along the north boundary due to the potential impacts on King's Meadow.

3.37 In response to these comments the building heights have been adjusted substantially and reduced. The amended proposed heights now range from 5 to 11 storeys. As such no buildings reach the 12 storey definition of a tall building (as defined by Local Plan Policy CR10). Furthermore, along the north boundary, the heights now comprise one 7 storey building, an 8 storey building, two 11 storey buildings, and two 9 storey buildings.

Improved variation in heights of the blocks

3.38 The previous scheme raised comments from RBC about the relationship with the former jail and that consideration should be given to the potential to step the proposals down to Forbury Road. The amended proposals incorporate substantial steps down between the top of the blocks along the south side of the Site and Forbury Road resulting in stepped building heights of 5 storeys and 7 storeys directly opposite the former jail.

- 3.39 As a result the taller elements are now concentrated within the central blocks rather than along the entirety of the rear of the site. This is also enhanced through the reduction in maximum block heights in the eastern groups of blocks, which proposes three of the four blocks at 9 storeys, rather than the previous 11-12.

Reduction of block footprints, reorientation of the spaces within the development and increased sense enclosure

- 3.40 RBC raised concerns on the previously proposed public spaces, principally that they lacked clear definition and could be more generous. The amended proposals respond positively to these comments and seek to reorientate the blocks which frame the spaces so as to provide two very clearly defined spaces one at the core of the central group of blocks and another within the centre of the eastern group of blocks, whilst providing an improved and clearly defined east west route through the Site. The two eastern most blocks (2&3) incorporate chamfered corners, providing a more generous public space, whilst also assisting with wayfinding and experience along the east west route.
- 3.41 The reorientation and reduction in individual building footprints is facilitated by the inclusion of link blocks to the north of the central and eastern groups of blocks. The link blocks improve the sense of enclosure of both of the public spaces, whilst not impacting the overshadowing of the spaces, by virtue of their location to the north.

Reduction in the size of the basement car park and therefore removal of the podium to the east allowing seamless integration of the site with surrounding areas

- 3.42 The previous revision of the scheme raised viability concerns with RBC. In order to improve the position despite the reduction in unit numbers, the amended proposals reduce the proposed basement area by approximately a third by removing the basement area under the eastern group of blocks. Substantial construction costs are associated with basement construction, therefore the reduction by a third reduces costs. Furthermore, this also lowers the finished floor levels and further enhances the level access to the public realm provided within the Site, ensuring direct level access across all of the public realm.

Reduction in commercial floorspace

- 3.43 The previous revision of the scheme proposed ground level Class E floorspace within a single large unit at the western block as well as Class E floorspace at ground level throughout the Site. RBC feedback was that the Class E floorspace should be more dispersed. In response, the amended proposals retain the single large unit at the western block, and propose a reduced quantum of small unit Class E floorspace all located within the eastern group of blocks.
- 3.44 Overall, the amendments to the proposals seek to address all the matters raised by RBC, with a summary of key topics set out above. Principally the height and massing of the scheme has been reduced and the footprints of the blocks reduced and reorientated to provide more generous and improved public spaces.

SUMMARY OF THE CHANGES TO THE PROPOSED DEVELOPMENT

- 3.45 As a result of the changes this application now seeks outline planning permission for the demolition of the existing buildings and the construction of up to 700 residential units, up to 3,000 sqm (GEA) of commercial floorspace which is to including a foodstore, as well as basement car parking, the diversion of the existing sewer and associated public realm, landscaping and other works, with all matters reserved save for access.
- 3.46 The amended description of development is as follows

“Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement”

- 3.47 The Application continues to seek to establish the principle of use, amount and scale, appearance, layout and landscaping of the development. All matters, except for access, are reserved for future consideration.
- 3.48 The table below provides a summary of how the proposals have evolved and the implications on unit number, floor area, and parking as a result of the amendments and associated reduction in height and massing:

Table 1.0 Summary of Amendments to the Scheme (maxima)

	Current Application	Amended Application	Change
Residential Unit Numbers	820	700	-120
Commercial Floor Area	5,500	3,000	-2,500 sqm
Car Parking Spaces	200	130	-70
Cycle Parking Spaces	820	600	-220

- 3.49 The proposed amendments remain within the scope of the original description of development and only result in a reduction in a number of the maximum figures stated within the description, a track change version of the description of development is provided below for clarity:

"Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to ~~820~~ 700 residential units (Class C3) & up to ~~5,500~~ 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, ~~partial~~ basement excavation, up to ~~200~~ 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to ~~860~~ 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement."

ENVIRONMENTAL IMPACT ASSESSMENT

- 3.50 The submitted Environmental Statement has been prepared by Stantec and assesses the likely effects of the Proposed Development on the environment. This has used the Parameter Plans and Development Specification Document.
- 3.51 The Proposed Development would constitute an urban development infrastructure project involving more than 1 hectare of non-residential development, more than 150 dwellings and an overall area of development exceeding 5 hectares. Therefore, an ES is required as per Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The scope and content of the ES has been reviewed and agreed with the relevant planning authority, RBC.
- 3.52 The first version of the Environmental Statement was submitted with the original application on 8th June 2023, a revised statement is submitted with this amendment pack. The scope of the ES remains the same as the previously submitted Statement, with assessment undertaken of the amended scheme that remains within the original outline parameters, with a number of the parameters reduced, resulting in reduced impact.

4.0 PLANNING POLICY OVERVIEW

- 4.1 This section sets out a planning policy overview relevant to the consideration of this application. We consider national policy contained in the National Planning Policy Framework 2021 (NPPF) and the accompanying guidance contained in the Planning Practice Guidance (PPG).
- 4.2 Section 70 of the Town and Country Planning Act 1990 states that when determining applications for planning permission, the local planning authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

NATIONAL PLANNING POLICY

- 4.3 The National Planning Policy Framework (NPPF) was revised on 12 December 2024, and amended on 7 February 2025, and sets out the Government’s approach to planning matters. It is a material consideration in the determination of planning applications.
- 4.4 The NPPF states that *“the purpose of the planning system is to contribute to the achievement of sustainable development”* (NPPF, paragraph 7). Local planning authorities should seek to guide development to sustainable locations. Paragraph 11 identifies the importance of the presumption in favour of sustainable development and goes on to state that:

“For decision taking this means:

- a. Approving development proposals that accord with an up-to-date development plan without delay; or*
- b. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 4.5 Therefore, development management (i.e. the determination of applications such as this) and plan-making should act in a pro-active and positive way to facilitate planning and development. As this more specifically relates to decision making, the NPPF advises that Local Authorities should approach decision making in a positive and creative way and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area.
- 4.6 The overall purpose of the planning system, as explained in section 2 of the NPPF, is to contribute to the achievement of sustainable development, which is made up of three overarching and interconnected objectives; economic, social and environmental. To achieve these objectives a presumption in favour of sustainable development is central to the NPPF.

BUILDING A STRONG AND COMPETITIVE ECONOMY

- 4.7 Chapter 6 of the NPPF sets out the key principles for building a strong, competitive economy. In particular, paragraph 85 states that planning policies and decisions should help the conditions in which businesses can invest, expand and adapt, and give weight to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

DELIVERING A SUFFICIENT SUPPLY OF HOMES

- 4.8 Chapter 5 of the NPPF relates to housing delivery and the need for the planning system and development to deliver a wide choice of high-quality homes. Paragraph 61 emphasises the importance of identifying and bringing forward a sufficient amount of land to meet the housing needs of different groups. This includes ensuring homes are delivered to meet the needs of families with children, older people, people who rent their homes and other groups (Paragraph 63).
- 4.9 Considering the size, type and tenure of housing needed for different groups of the community, the NPPF advises this should be assessed and reflected in planning policies and so, in this sense, housing mix is led by local identified housing needs of different groups.
- 4.10 With regard to affordable housing the NPPF advises that the provision of affordable housing should not be sought for residential developments that are not major developments and where affordable housing is required it should, in the first instance, be delivered on-site unless off-site provision or a financial contribution can be robustly justified or the agreed approach contributes to the objective of creating mixed and balanced communities. Paragraph 66 of the NPPF expects that where major development involves the provision of housing, the mix of affordable housing required should meet identified local needs across Social Rent and other affordable home ownership tenures.
- 4.11 Throughout all development the NPPF seeks to secure high-quality design and, where applicable, a good standard of residential amenity.

ENSURING THE VITALITY OF TOWN CENTRES

- 4.12 Chapter 7 of the NPPF seeks to ensure the vitality of town centres through supportive policy which takes a positive approach to their growth, management and adaptation. Paragraph 90 identifies that a network and hierarchy of town centres should be identified, with specific strategies for each, in order to direct the correct mix of uses to each location and ensure suitable sites are available.
- 4.13 Paragraph 91 of the NPPF advises that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The purpose of applying the sequential test is to protect the vitality and viability of defined centres and ensure town centre uses are located in town centres. A sequential test will form part of this application. After defined town centres, the NPPF advises the next best location for town centre uses are edge of centre locations, followed by accessible out of centre sites.
- 4.14 In addition to the above, paragraph 94 advises local planning authorities should require a retail impact assessment when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, if the development is overall proportionate, locally set floor space threshold. This impact assessment should consider:
- The impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and
 - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment, as applicable to the scale and nature of the scheme.
- 4.15 Annex 2: Glossary of the NPPF provides more detailed guidance on what is considered a main town centre use. These include retail development; leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

PROMOTING HEALTHY AND SAFE COMMUNITIES

- 4.16 Chapter 8 of the NPPF establishes that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

4.17 Paragraphs 96 and 97 of the NPPF provide guidance on how healthy and safe communities can be realised spatially. For example:

- Through mixed use developments, strong neighbourhood centres and street layouts that allow for easy pedestrian and cycle connections and active frontages, all of which promote social interaction;
- Through the use of clear and legible pedestrian routes, and high-quality public space which encourages the active and continual use of public areas and safe and accessible spaces; and
- Through the provision of safe and accessible green infrastructure, sports facilities, local shops and layouts that encourage walking and cycling amongst other interventions, all of which enable and support healthy lifestyles.

PROMOTING SUSTAINABLE TRANSPORT

4.18 Chapter 9 sets out the importance of promoting sustainable transport in plan making and during the consideration of development proposals. Paragraph 115 states that applications for development should ensure that appropriate opportunities have been given to promote sustainable transport modes, ensure safe and suitable access to the site and mitigate any impacts from the development on the highway network.

4.19 Paragraph 116 of the NPPF makes clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network were severe.

4.20 Paragraph 117 outlines a hierarchy of priority with regard to transport modes. This paragraph states that priority should be given first to pedestrian and cycle movements, and secondly to facilitating access to high quality public transport.

MAKING EFFECTIVE USE OF LAND

4.21 Of particular relevance to the current proposal, Chapter 11 sets out policies to ensure development makes effective use of land, in particular brownfield sites in sustainable locations and emphasises the multiple benefits which can be derived from the effective reuse of land. Paragraph 126 also sets out the proactive role local planning authorities should take to help bring forward land which may be suitable for meeting development needs.

4.22 Paragraph 125 of the NPPF requires planning policies and decisions to encourage multiple benefits from both urban and rural land, including through mixed use schemes and to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. In addition, the NPPF makes clear planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing.

4.23 As a mechanism for facilitating development that makes efficient use of land, the NPPF advises that planning policies and decisions should support development that achieves appropriate densities. Paragraph 129 of the NPPF outlines the considerations of development density including:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area's character and setting, or of promoting regeneration and change; and,
- The importance of securing well-designed, attractive and healthy places.

4.24 The NPPF supports optimising development density, through the application of the above considerations, to ensure the effective use of land.

ACHIEVING WELL-DESIGNED PLACES

4.25 The NPPF recognises that the creation of high-quality buildings and places is fundamental to what the planning process and developments should achieve. Chapter 12 of the NPPF sets out guiding principles to ensure that the planning system delivers high-quality, well-designed places. Paragraph 135 states that planning policies and decisions should ensure developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING AND COASTAL CHANGE

4.26 Chapter 14 details how the planning system should support and plan for the challenges of climate change, flooding and coastal change. Paragraphs 170 to 182 of the NPPF outline the approach planning policies and decisions should take to planning and flood risk. The first principle of ensuring inappropriate development does not occur in areas at risk of flooding is to direct development away from areas at the highest risk of flooding.

4.27 Paragraph 162 encourages Local Planning Authorities to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

4.28 The NPPF advises that local planning authorities should ensure that flood risk is not increased elsewhere when determining planning applications and requires that a Flood Risk Assessment is required for all development in Flood Zone 2 and 3 or sites over 1 hectare in Flood Zone 1. The NPPF also encourages Sustainable Urban Drainage Systems ("SUDS") are incorporated into new developments.

CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT

4.29 Section 15 of the NPPF makes clear that planning policies decisions should contribute to and enhance the natural and local environment. The planning system should be utilised to prevent new and existing development from contributing to, being put at unacceptable risk to or adversely affected by unacceptable levels of soil, air, water or noise pollution. It is stated at Paragraph 187 that development should minimise impacts on, and provide net gains for biodiversity, including through establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 192 states that the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species should be promoted, and that net gains for biodiversity should be secured.

4.30 In addition, the Environment Act 2021 introduced provisions to make biodiversity net gain a mandatory requirement within the planning system in England, requiring all relevant developments to achieve a minimum 10% net gain in biodiversity units relative to a site's baseline biodiversity value. It is anticipated that the secondary legislation mandating the need for 10% net gain will be in place by November 2023.

- 4.31 Paragraph 200 of the NPPF makes clear that planning policies and decisions should ensure that new development can be integrated effectively with existing uses in the vicinity. The NPPF states that *"existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established"*. To establish the acceptability of a scheme, paragraph 201 notes that the focus of planning policies and decision should be on whether Proposed Development is an acceptable use of land.

NATIONAL PLANNING PRACTICE GUIDANCE

- 4.32 In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. Since their conception in March 2014, the NPPG's are periodically updated and revised. The below reflects the latest NPPG's at the time of writing.
- 4.33 A number of these NPPG's are relevant to this application and provide guidance on more detailed matters for consideration.
- 4.34 Of particular relevance to applications including retail elements is the **Town Centre and Retail PPG**. This provides guidance on retail considerations and, in particular, on the sequential and impact tests. The PPG details the purpose of the sequential test is to guide main town centre uses towards town centre first locations and then if no town centre locations are available to the next sequentially available site, these being edge of centre locations and then out of centre locations. The PPG advises a preference for accessible sites which are well connected to the town centre. The PPG also advises a retail impact test is required to consider the impact on the viability and vitality of town centre, over time, of proposed retail development in out of centre and edge of centre locations.
- 4.35 Another PPG of note for this proposed development is the **Effective Use of Land PPG**. This PPG supports the more effective use of land and outlines how local planning authorities can encourage the best use of under-utilised land and plan for higher density development. The PPG advises a range of tools to help identify the appropriate development density, including the assessment of site accessibility, characterisation studies and infrastructure and environmental assessments to determine the capacity of services and any environmental risks. These assessment tools are set out to ensure the appropriate development densities are focused to the right locations
- 4.36 The **Environmental Impact Assessment PPG** provides guidance explaining the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which is also of relevance to the Proposed Development. This outlines the purpose of an Environmental Impact Assessment ("EIA"), when an ES is required and preparing and considering an ES. The PPG states that the ES, along with other relevant information, must be taken into account by the local planning authority in deciding whether or not to grant consent for development but the PPG notes that EIA should not be a barrier to growth.

LOCAL PLANNING POLICY

- 4.37 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.38 The statutory development plan for Reading Borough Council comprises the Reading Borough Local Plan adopted in November 2019. The plan is therefore relatively up to date. The Development Plan also includes the adopted Proposals Map (2019) and Community Infrastructure Levy Charging Schedule (2015).
- 4.39 The relevant Supplementary Planning Documents (SPDs) include
- Affordable Housing SPD (March 2021);
 - Employment & Skills & Training SPD (April 2013);
 - Revised Parking Standards SPD (October 2011);
 - Planning Obligations Under Section 106 SPD (April 2015); and
 - Sustainable Design & Construction SPD (December 2019).

READING BOROUGH LOCAL PLAN

4.40 According to the Council's adopted Local Plan Proposals Map, the Site currently falls within the following designations:

- Allocated Development Site CR13b – Forbury Retail Park
- Borough of Reading Central Area – Policy CR1-10
- Air Quality Management Area – Policy EN15
- Major Opportunity Area (East Side) – Policies CR11-13 and SR1
- Area of Archaeological Potential – Policy EN2

4.41 As well as the Site being subject to the above policy designations, an assortment of other policies from the development plan are also considered to be relevant to the proposals. These are discussed in detail below.

4.42 **Policy CC1** (Presumption in favour of Sustainable Development) confirms that the council will adopt a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).

4.43 The Policy also confirms that in accordance with Section 70 (2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

4.44 **Policy CC2** (Sustainable Design and Construction) supports new development 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.

4.45 **Policy CC4** (Decentralised Energy) states that in meeting the sustainability requirements of the development plan any development greater than 20 dwellings shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

4.46 **Policy CC6** (Accessibility and the Intensity of development) stipulates that the scale and density of development should relate to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.

4.47 **Policy CC7** (Design and Public Realm) requires all development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:

- Layout: urban structure and urban grain;
- Landscape;
- Density and mix;
- Scale: height and massing; and
- Architectural detail and materials

4.48 Developments will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives:

- Character - a place with its own identity and sense of place
- Continuity and enclosure
- Quality of the public realm and provision of green infrastructure and landscaping
- Ease of movement and permeability
- Legibility - clear image and easy to understand

- Adaptability – capable of adaptation over time
- Diversity – meets a wide range of needs.

4.49 Developments will also be assessed to ensure that they:

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily; and
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

4.50 **Policy CC8** (Safeguarding Amenity) seeks to protect the living environment of existing residential properties and prevent unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- 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.

4.51 The policy continues that *“the position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy”*.

4.52 **Policy EN1** (Protection and Enhancement of the Historic Environment) seeks to protect historic features, areas of historic importance and other elements of the historic environment, and where possible enhanced. Proposals are 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.

4.53 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. Should proposals effect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

4.54 **Policy EN2** (Areas of Archaeological Significance) requires applicants to identify and evaluate sites of archaeological significance by consulting the Historic Environment Record, as well as conduct an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined.

4.55 **Policy EN5** (Protection of Significant Views with Heritage Interest) states that new development should not harm and where possible should make a positive contribution to views of acknowledges historical significance.

4.56 **Policy EN6** (New Development in a Historic Context) stipulates that new development in areas characterised by heritage assets, the historic environment will inform and shape new development that 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. The policy confirms that the following factors will be taken into consideration:

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
- b. Sensitivity to historic context;
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing); and
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.

4.57 **Policy EN7** (Local Green Space and Public Open Space) identifies a list of Local Green Spaces (LGS) and Public Open Spaces (POS) that will be protected from development. Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted. LGS EN7Cd Kings Meadow and Coal Woodland is located just over 100m to the north of the Site and has therefore been an important consideration within the development proposals.

4.58 **Policy EN9** (Provision of Open Space) requires all new development to make provision for appropriate open space based on the needs of the development. On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children's play areas and neighbourhood parks.

4.59 **Policy EN12** (Biodiversity and the Green Network) states that new development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

4.60 On all sites, Policy EN12 states that development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible. Development should protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

4.61 In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats and should be provided prior to development.

4.62 **Policy EN14** (Trees, Hedges and Woodlands) states that Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. 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, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

4.63 **Policy EN15** (Air Quality) seeks to protect and improve air quality and require development have regard to the need to improve air quality. The policy stipulates that development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated and that the following criteria should be taken into account:

- Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;
- Whether the development is within, or accessed via, an Air Quality Management Area; and
- Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.

- 4.64 Where development would introduce sensitive uses, including residential into Air Quality Management Areas, the policy requires detrimental effects to be mitigated. If there are any significant detrimental effects that cannot be mitigated the application may be refused.
- 4.65 **Policy EN16** (Pollution and Water Resources) states that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the Proposed Development prior to occupation. 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. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.
- 4.66 **Policy EN18** (Flooding and Drainage) directs development to areas at lowest risk of flooding in the first instance, and development is required to consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding.
- 4.67 The Site is not in an area at risk of flooding (within Flood Zone One), however the policy requires all major developments to incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology.
- 4.68 **Policy H1** (Provision of Housing) confirms that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The total need for the Borough in the plan period is 16,077 homes.
- 4.69 **Policy H2** (Density and Mix) stipulates that the appropriate density of residential development should be informed by:
- the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;
 - its current and future level of accessibility by walking, cycling and public transport;
 - the need to achieve high quality design;
 - the need to maximise the efficiency of land use; and
 - the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 4.70 An indicative density of 60 – 120 dwellings per hectare is set out for sites in the urban area. However, this is caveated by the criteria above that may indicate that a different density is appropriate. The Policy also confirms that residential development capacity figures within the site allocation policies are often based on these densities, and Forbury retail park (allocation CR13b) provides an indicative potential of 1,230 – 1,840 dwellings on the 6.99 ha Site. This provides a guide a key guide to appropriate density, however the policy requires that factors above and the design and layout to be carefully considered at application stage in order to guide density.
- 4.71 Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan, in particular for family homes of three or more bedrooms.
- 4.72 **Policy H3** (Affordable Housing) requires development of 10 or more dwellings to provide 30% of the total dwellings as affordable housing, with the provision to be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

- 4.73 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.
- 4.74 In determining residential applications the Council will assess the site size, suitability and type 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.
- 4.75 **Policy H4** (Build to Rent Schemes) states that planning permission will be granted for developments of self-contained, private rented homes which:
- Are secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met; and
 - Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and
 - Provide a high standard of professional on-site management and control of the accommodation; and
 - Provide a commitment to high-quality rental arrangements, through meeting Reading Borough Council's voluntary Rent with Confidence Standards or equivalent measures; and
 - Provide for a mix of unit sizes in accordance with Policy H2 or CR6; and
 - Meet the standards of design set out in Policy H5; and
 - 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.
- 4.76 **Policy H5** (Standards for new housing) sets out the standards that new build housing development should be built to unless it can clearly be demonstrated that this would render the development unviable, the following standards are relevant for the development proposals:
- All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations;
 - All major new-build residential development should be designed to achieve zero carbon homes;
 - All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).
 - On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.
- 4.77 **Policy H10** (Private and Communal Outdoor Space) states that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. For flats the provision may be made via communal outdoor space, balconies and/or roof gardens.
- 4.78 The Policy also requires the design of outdoor areas to respect the size and character of other similar spaces in the vicinity, clearly identifying whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.
- 4.79 **Policy TR1** (Achieving the Transport Strategy) states that Proposed Development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans. Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures. All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by

public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.

4.80 **Policy TR3** (Access, Traffic and Highway Related Matters) stipulates that in determining proposals involving the generation of addition trips or altered access to the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where;

- i. Accesses and works to the highway comply with the adopted standards of the Transport Authority;
- ii. The development would not have a material detrimental impact on the functioning of the transport network;
- iii. The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- iv. The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
- v. For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided

4.81 Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

4.82 **Policy TR4** (Cycle Routes and Facilities) expects development to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Furthermore the cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions.

4.83 **Policy TR5** (Car and Cycle Parking and Electric Vehicle Parking) requires development to provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Within communal car parks greater than 10 spaces for residential developments at least 10% of the spaces should provide and active charging point.

4.84 **Policy RL2** (Scale and Location of Retail, Leisure and Culture Development) states that retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, or other defined centres, a sequential approach should be adopted to identifying alternative sites.

4.85 All development will be required to comply with the relevant tests for retail, leisure and culture development set out in national policy.

4.86 **Policy RL5** (Impact of Main Town Centre Uses) requires proposals that include more than 1,000 sq m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location to demonstrate that there will be no significant adverse impact on existing centres. Ensuring that centres within areas of deprivation are not adversely affected is of particular local importance.

4.87 **Policy CR13** (East Side Major Opportunity Area) sets out the principles for development in the East Side Major Opportunity Area, which requires development to:

- i. Provide a more defined urban environment than currently exists, of a medium to high density;
- ii. Contribute towards the provision of a new residential community at the eastern fringes of the central area;
- iii. Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;

- iv. Safeguard land which is needed for mass rapid transit routes and stops;
- v. Conserve and enhance the listed buildings, scheduled ancient monument and historic garden in the area and their setting where possible;
- vi. Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;
- vii. Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;
- viii. Provide additional areas of open space where possible, particularly in the centre of the new community;
- ix. Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth; and
- x. Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

4.88 The Site itself forms the east part of Site Specific Allocation CR13b as shown by the extract below at Figure 2 from the Local Plan with the Site highlighted in red.

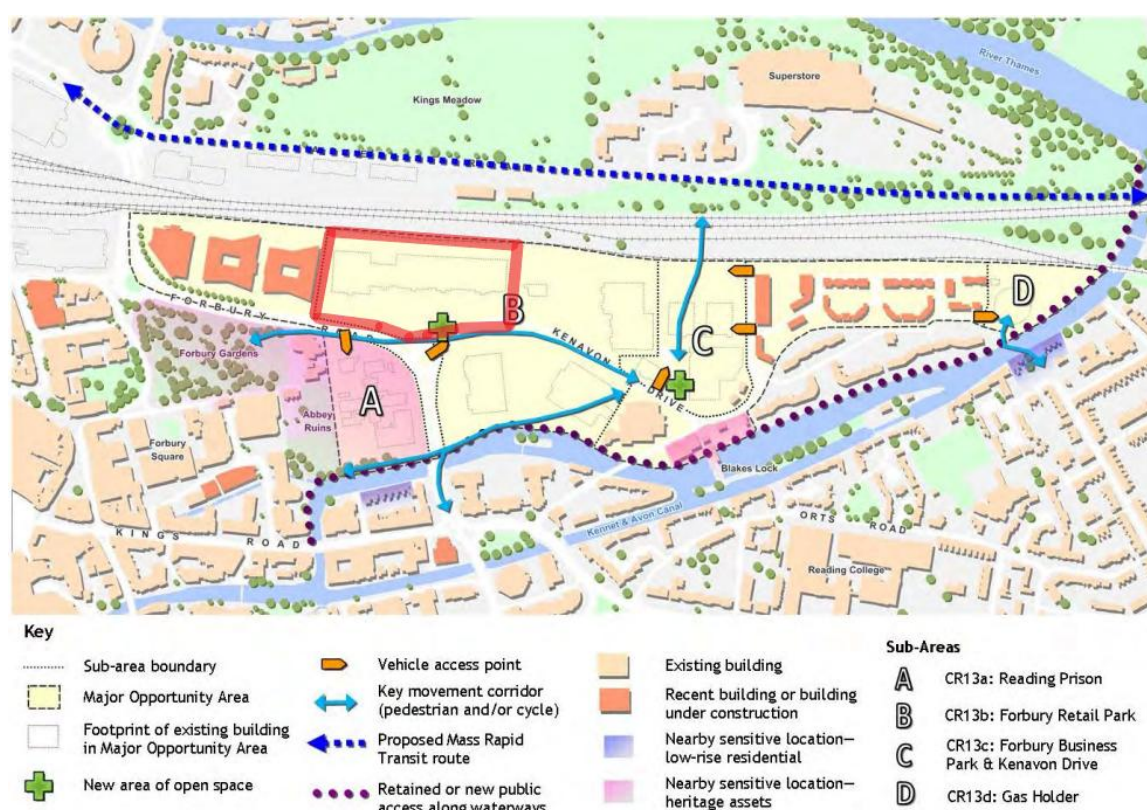


Figure 4.1 – Extract of CR13b Site Allocation in Local Plan

4.89 Allocation CR13b allocates the site for the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area.

- 4.90 Some parts of the site are likely to be implemented in the long term. The indicative potential of the 6.99 ha site allocation area is for 1,230 – 1,840 dwellings and no net gain of retail.
- 4.91 The Site forms part of allocation CR13b as denoted by the red highlighted area, the canal related policy therefore does not apply and the key relevant objectives are to deliver a new residential community alongside additional retail, leisure and community uses at a scale to serve the new residents. Hence the inclusion of class E retail as part of the development proposals. The Site area is approximately 2.94 ha, which when calculated on a pro rata basis, the policy allocation indicates would be suitable for approximately 517 – 774 dwellings.
- 4.92 As noted above, the Site is also located within the Central Area of Reading. The following extract at Figure 4.2 from the Local Plan sets out the Council's Strategy for the Central Reading Area. The Site is located within an area that the Council considers is an opportunity for major development.

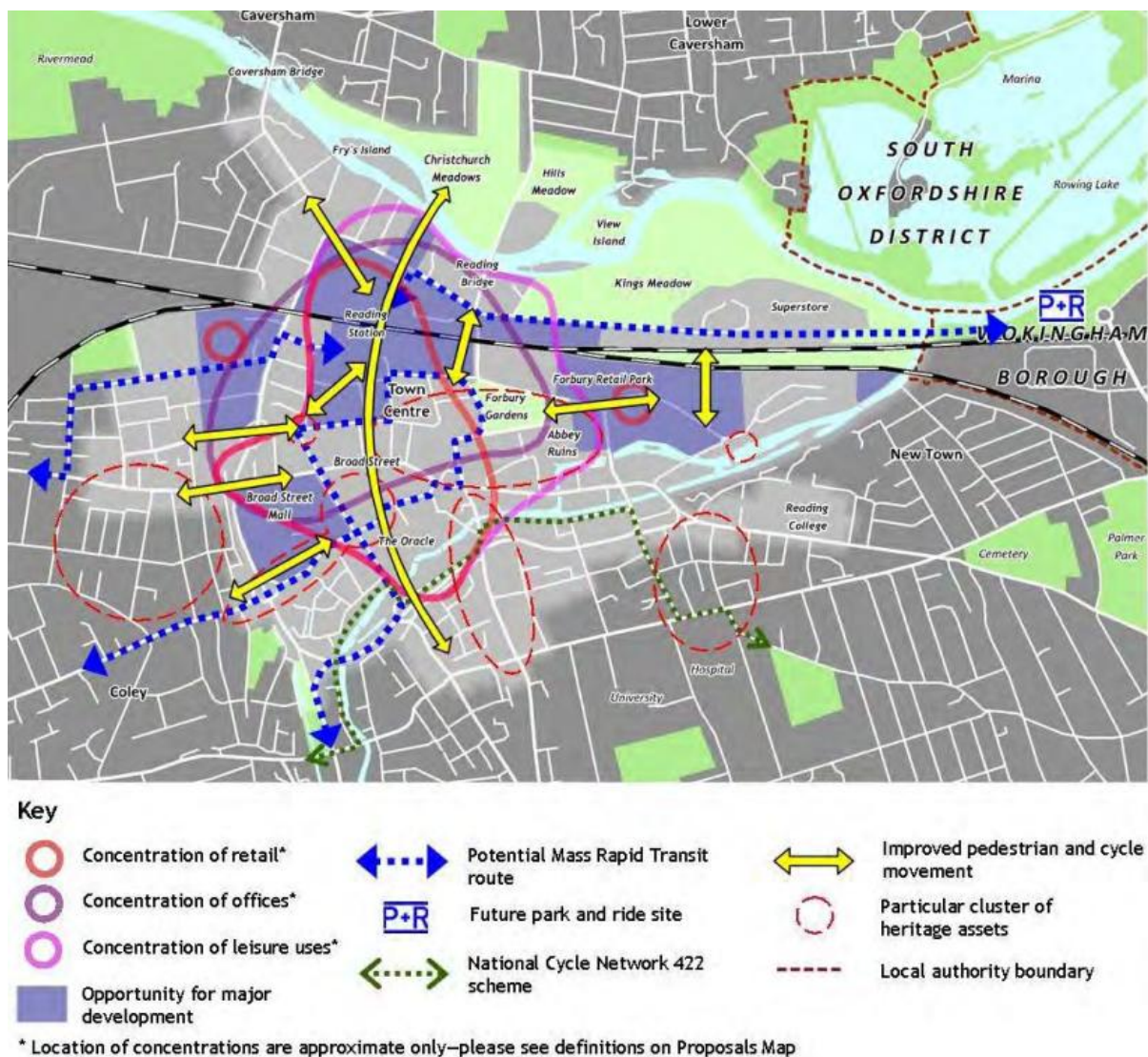


Figure 4.2 – Extract of Area Strategy for Central Reading in Local Plan

- 4.93 **Policy CR2** (Design in Central Reading) states that applications for development within Central Reading should demonstrate the following attributes:
- Development will build on and respect the existing grid layout structure 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;

- Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;
- Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;
- The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;
- Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and
- Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.

4.94 **Policy CR3** (Public Realm in Central Reading) states that proposals for new development will need to make a positive contribution towards the quality of public realm of the central area and will be assessed against the following criteria:

- All proposals on sites of more than 1 hectare within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development. Smaller developments will contribute towards improvements to the public realm;
- Imaginative uses of open space and the public realm, which contribute to the offer of the centre, will be encouraged, and new open spaces should be of a size and shape to be flexible enough to accommodate such uses. The provision of water features, trees (including street trees) and other planting, as well as hard landscaping, to create high quality spaces, will be expected, where appropriate;
- Development proposals adjacent to or in close proximity to a watercourse will retain and not impede existing continuous public access to and along the watercourses, and will provide legible continuous public access to and along the watercourses where this does not currently exist;
- The design of developments adjacent to a watercourse, including the refurbishment of existing buildings, will be required to enhance the appearance of the watercourses and to provide active elevations facing the watercourses. Development that turns its back on the watercourses and results in blank or mundane elevations facing the watercourses will not be permitted.
- The public realm should conserve and enhance the historic environment of the centre and the significance of heritage assets therein and their setting, including through layout, materials, hard and soft landscaping. There may be opportunities for areas of public realm to provide improved access to and visibility for heritage assets.

4.95 The Policy states that pedestrianisation, traffic management and/or environmental enhancements will continue to be implemented on appropriate streets.

4.96 **Policy CR6** (Living in Central Reading) states that proposals for residential development within the central area will be assessed against the following criteria:

- All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.
- Proposals for new residential development within the central area will be required to demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated.
- In meeting the requirement to provide affordable housing, in the central area an overconcentration of social renting for single persons will be avoided.

- Where proposals for serviced apartments and apart-hotels fall outside the C3 use class, they will be located within the Central Core. Such proposals will not be permitted unless the duration of occupation of residents is restricted, to ensure the units are used on a short stay basis and not as residential flats, and information monitoring the implementation of this restriction is regularly supplied.

EMERGING PLANNING POLICY

4.97 The Reading Borough Council is currently in the process of producing a partial update to its Local Plan, which will set out the planning framework for development in the borough up to 2041. Following public consultations in 2023 and 2024, the updated plan was formally submitted to the Secretary of State for Communities and Local Government for examination by on 9 May 2025, and is now under review by an independent planning inspector. Stage 1 hearings will be held in November 2025.

4.98 Therefore, Given the advanced stage in the plan-making process, the emerging planning policies contained within the Partial Update Local Plan will carry significant weight in the determination of this application as material considerations.

4.99 **Emerging Policy CR13** (East Side Major Opportunity Area) sets out the principles for development in the East Side Major Opportunity Area. Within the emerging Local Plan, the wording of this policy has been altered slightly – shown in red below as being removed and green being additions in the emerging plan policy wording:

- i. Provide a more defined urban environment than currently exists, of a ~~medium to~~ high density;
- ii. Contribute towards the provision of a new residential community at the eastern fringes of the central area. Development for education ~~and~~ healthcare will be acceptable within the site;
- iii. Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;
- iv. Safeguard land which is needed for ~~mass~~ bus rapid transit routes and stops;
- v. Conserve and enhance the listed buildings, scheduled ~~ancient~~ monument and historic garden in the area and their setting where possible;
- vi. Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;
- vii. Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;
- viii. Provide additional areas of open space where possible, particularly in the centre of the new community;
- ix. Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth; and
- x. Give early consideration to the potential impact on water and wastewater infrastructure and electricity infrastructure in conjunction with ~~Thames Water~~ relevant infrastructure providers, and make provision for upgrades where required.

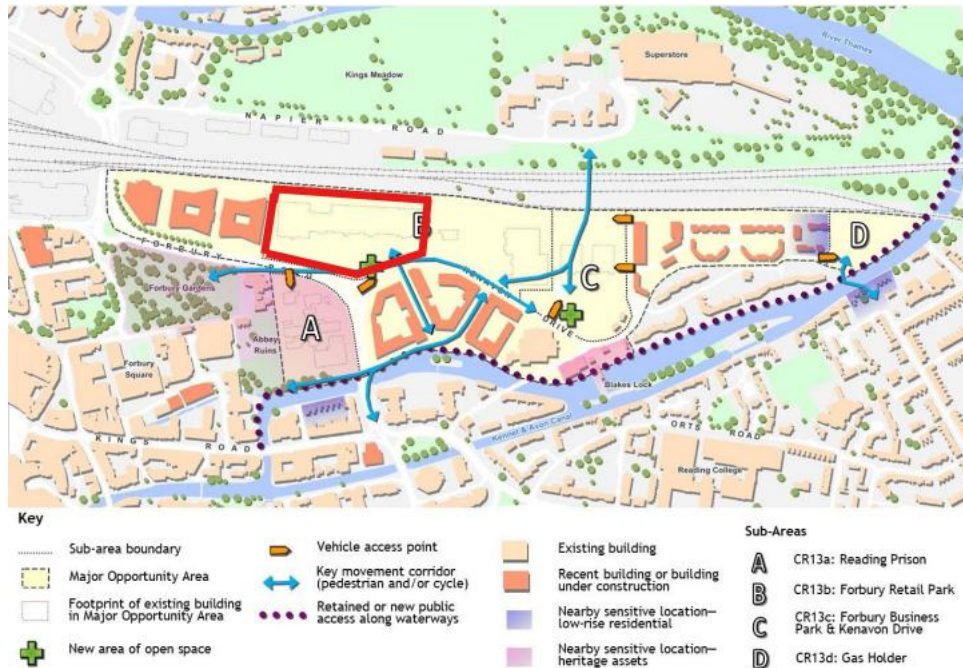


Figure 4.3 – Extract of CR13b Site Allocation in Regulation 22 Local Plan Partial Update

- 4.100 As in the adopted Local Plan, the Site is located within the East Side Major Opportunity Area, specifically area CR13b: Forbury Retail Park. This policy encourages the use of the Site to be the focus of a new residential community, alongside additional retail, leisure and community uses at a scale to serve the Kenavon Drive area. As per the adopted Local Plan, this policy states the allocation should include a new area of open space, however the policy no longer includes the need for an enhanced frontage to the canal or buffer zone to the top of the canal. This reflects the delivery of Huntley Wharf located 20 metres south east of the Site (ref. 170509) and the housing development located circa 300 metres east of the Site (ref. 04052 and ref. 131280), which have now been excluded from the allocation.
- 4.101 The allocation area has now been revised to 3.98 ha and the indicative potential of the revised site allocation area has been updated as follows: '~~1,230~~ ~~1,840~~ 870-1,300 dwellings, no net gain of retail.'
- 4.102 The amendments to the Site allocation affords the Site an increased allocation of density of dwellings per hectare. Which on a pro rata basis allocated the Forbury Retail Park Site (to which this application relates) has an indicative potential of 644 - 962 dwellings.
- 4.103 As well as the Site being subject to the above policy designations, a variety of other emerging policies from the development plan are also considered to be relevant to the proposals, which have been subject to amendments from the adopted Local Plan.
- 4.104 **Emerging Policy CC2** (Sustainable Design and Construction) continues to support new development where the design of buildings and site layouts use energy, water, minerals and other natural resources appropriately, efficiency and with care, as well as taking account of the effects of climate change.
- 4.105 The policy now contains an additional requirement stating that the demolition of existing buildings should be accompanied by a full justification for demolition, including demonstrating how 95% of all construction waste will be diverted away from landfill.
- 4.106 **Emerging Policy CC7** (Design and the Public Realm) maintains that all development should be of high-quality design that maintains and enhances physical character and appearance of Reading in which the Site is located. This policy now includes specific characteristics for homes and buildings, stating that proposals should create homes that function well and are visually attractive, healthy, safe and sustainable with good quality internal and external environments to promote health and wellbeing.

4.107 **Emerging Policy EN12** (Biodiversity) now reflects the requirement for a 10% Biodiversity Net Gain for all development, aligning with the Biodiversity Gain Requirements (Exemptions) Regulations 2025. Further, this policy states that development should meet the following requirements, unless there are clearly justifiable reasons for not doing so:

- *“Protect and enhance features of biodiversity interest on and adjacent to the application site;*
- *Provide new tree planting;*
- *Provide wildlife friendly landscaping using wildlife-friendly species (preferably native) as appropriate;*
- *Provide permanent bird and bat boxes wherever practicable;*
- *Provide wildlife friendly landscaping using wildlife-friendly species (preferably native) as appropriate; and ecological enhancements (such as wildlife ponds and bird nesting and batroosting opportunities integral within new buildings (such as universal swift bricks and bat bricks or tiles)); and*
- *Avoid increasing, and wherever possible reduce, artificial light at night in particular over trees, hedgerows and waterbodies.”*

4.108 **Emerging Policy EN14** (Trees, hedges and woodlands) establishes a new aim for increasing canopy cover in Reading by 25%, and ensuring all wards have a minimum of 12% canopy cover by 2030. Further, this policy establishes areas where there is a particular requirement for additional tree planting within new development. This includes:

- a) *Treed corridors (as shown in the Tree Strategy, including the main roads, where planting on frontages to create tree-lined streets should be incorporated, railways, rivers and green links);*
- b) *Low canopy cover wards (12% canopy cover or below);*
- c) *Air Quality Management Areas; and*
- d) *Areas of high treescape value such as wooded major landscape features and conservation areas.*

4.109 Additionally, the policy sets out that the following matters should be taken into account in relation to this policy:

- a) *Where possible, planting should align with other priorities such as Biodiversity Net Gain and Local Nature Recovery Strategies;*
- b) *Planting should consider the historic environment as appropriate and avoid potential future harm to designated heritage assets;*
- c) *Planting should contribute to a diversity of tree stock in Reading by ensuring proposed tree provision is diverse in its proportion of individual from and one Family, Genus and Species, and take biosecurity into account;*
- d) *Planting should prioritise inclusion of large canopy species wherever space allows, taking account of the size of the canopy at maturity, to ensure that canopy cover is maximised; and*
- e) *Planting space should allow provision of sufficient soil volume for the future requirements of trees at maturity.*

4.110 The emerging Local Plan includes an additional policy – **Emerging Policy EN19** (Urban Greening Factor). This policy establishes that major developments that are predominantly residential will require an Urban Greening Factor (UGF) score of at least 25%.

4.111 **Emerging Policy H1** (Provision of Housing) confirms that provision will be made for at least an additional 14,850 homes (averaging 689 homes per annum) in Reading Borough Council for the period 2023 to 2041. This is a decrease of 997 homes from the requirement of the adopted Local Plan for the period 2013 to 2036.

4.112 **Emerging Policy H2** (Density and Mix) outlines that residential development is expected to achieve at least 260 dwellings per hectare within the Town Centre. The estimated size of accommodation type required in Reading has also been amended, shown in figure 4.4 of the emerging Local Plan, with a greater emphasis on 3 bedroom and 4 bedroom dwellings compared to the previous local plan. This change is shown in Table 4.1 and 4.2 below.

(2019)	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	10.3%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
Overall	18.6%	30.5%	36.5%	14.4%

Table 4.1 – Reading Local Plan (2019) Estimated size of accommodation type required in Reading

(2025)	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	0.5%	15.4%	65.6%	16.1%
Affordable	31.7%	24.9%	28.7%	14.7%
Overall	18.0%	20.7%	44.9%	15.3%

Table 4.2 – Emerging Local Plan (2025) Estimated size of accommodation type required in Reading

4.113 **Emerging Policy H3** (Affordable Housing) maintains the requirement for development of 10 or more dwellings to provide 30% of the total dwellings as affordable housing. This policy now includes additional wording relating to 10+ dwellings, stating that affordable housing should be delivered “*with provision made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate*”.

4.114 Further, this policy sets out the requirements in the event that affordable housing contributions can not be secured at the application stage:

“In the event that a policy-compliant affordable housing contribution cannot be secured at application stage, a deferred contribution mechanism will be included in a Section 106 agreement that, based on the conclusion of a later viability review, secures an appropriate proportion of any increased profits over and above those identified at application stage as a financial contribution towards affordable housing”

4.115 **Emerging Policy H5** (Standards for new housing) sets out the standards that new build housing development should be built to unless it can be demonstrated that this would create unviability for the development:

- All new build housing will be built to achieve water neutrality where possible and as a minimum, all water fitting and appliances within new-build housing should be compliant with the ‘optional’ standards outlined in Table 2.2 Part G of the Building Regulations which requires a fittings approach.
- All new build residential development is required to achieve net-zero development and achieve the following:
 - Site average space heating demand of 15-20kWh/m2/annum;
 - Site average of total energy demand less than 35kWh/m2/annum;
 - No single dwelling to have a total energy demand in excess of 60kWh/m2/annum, irrespective of the amount of on-site renewable energy production; and
 - On-site renewable energy generation to match total use over the course of the year, with a preference for roof-mounted solar PV.

4.116 The policy states that in cases where the above can not be met, the highest possible standards are required, and the applicant must demonstrate the extent to which these standards can be met.

4.117 Further, Emerging Policy H5 states that on developments of 20 or more new build dwellings, at least 10% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. This is an increase of 5% from the adopted Local Plan policy.

4.118 **Emerging Policy TR1** (Achieving the Transport Strategy) retains an emphasis on encouraging the promotion of active travel and public transport. Further, this policy maintains that development proposals should make provisions for works and contributions to create healthy streets and ensuring an adequate level of accessibility – however the policy now explicitly states that this can include making appropriate financial contributions towards active travel, public transport or local highway works to address any impacts.

4.119 Further, this policy now refers to the transport objectives set out in the adopted Local Transport Plan (2024-2049), which are:

- Creating a clean and green Reading: Provide transport options to enhance quality of life, reduce emissions and improve air quality to create a carbon neutral town;
- Supporting healthy lifestyles: Create healthy streets to encourage active travel and lifestyles, improve accessibility to key destinations and increase personal safety;
- Enabling sustainable and inclusive growth: Enable sustainable growth and connect communities so that everyone can benefit from Reading’s success;
- Connecting people and places: Promote the use of sustainable modes of transport by providing attractive alternatives to the private car, helping to provide a transport network that is fast, affordable, connected and resilient; and

- Embracing smart solutions: Use technology to manage the network efficiently and allow informed travel choices, whilst enabling Reading to become a smart, connected town of the future

4.120 **Emerging Policy EN18** (Flooding and Sustainable Drainage Systems) now requires all (rather than only major) development to incorporate SuDS, unless not viable or feasible. A SuDS maintenance plan must also be submitted to demonstrate the maintenance of these. The policy establishes that planning permission will only be granted where proposals have fully considered the effects of flooding from all sources, over the lifetime of the development and accounting for climate change.

4.121 This policy now requires a Flood Risk assessment for sites located in Flood Zone 1, if they meet the following criteria:

- The site is 1 hectare or greater
- The site contains land identified by the Environment Agency as having critical drainage problems
- The land has been assessed in the SFRA as having increased flood risk in the future
- The vulnerability classification is increasing and may be subject to sources of flooding other than rivers or the sea. The site-specific Flood Risk Assessment should also demonstrate that:
- A sequential approach has been taken within the site, directing the most vulnerable uses to the areas of lowest flood risk;
- Resilient and resistant construction methods for managing residual risk and delivering an overall reduction in flood risk have been assessed;
- There is provision of sufficient space for flood water storage through the use of open space or areas above ground (where appropriate);
- There will be no loss in flood plain storage, and where possible it should be increased;
- Floor levels are raised above flood levels, taking account of all forms of flooding (where appropriate);
- Flood risk is not increased elsewhere and where possible reduced;
- There is safe access and egress to the development;
- All forms of flooding are taken into account, including groundwater, surface water, sewer and reservoir flooding; and
- The impacts of climate change on future flood risk have been considered in line with the latest guidance

SUPPLEMENTARY PLANNING DOCUMENTS

AFFORDABLE HOUSING

4.122 The Affordable Housing Supplementary Planning Document ('SPD') was adopted in March 2021. The purpose of the SPD is to provide further information to supplement policies in the Local Plan in achieving affordable housing. The SPD states that on developments of ten or more dwellings, provision of affordable housing is expected to take the form of on-site provision, as specified by Local Plan Policy H3. This means provision of either completed units or serviced land. Policy H3, as well as Policy H4 in the case of build-to-rent proposals, specifies that 30% of the dwellings proposed should be affordable. This relates to the total provision on-site, not to the net increase in dwellings.

4.123 The SPD recognises that the viability of residential development will vary from site to site, and that this may in some circumstances affect whether a development can provide a level of affordable housing that complies with policy provision. Policies H3 and H4 and their supporting text make clear that, where applicants can demonstrate exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on viability to potentially reduce the affordable housing requirement. The onus will be on a developer to clearly demonstrate the circumstances justifying a lower affordable housing contribution.

EMPLOYMENT SKILLS AND TRAINING

4.124 The Employment, Skills and Training Supplementary Planning Document ('SPD') was adopted on 15 April 2013. The purpose of the document is to set out the obligations which will be sought from developers at the construction and end user phases of development to contribute towards a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.

4.125 The SPD states that for both the construction and end-user phases of development, developers and occupiers will be required to work with the Council (and Reading's economic development company) to develop a site specific Employment and Skills Plan ('ESP'). A financial contribution will be sought where a developer chooses not to implement an ESP.

4.126 The ESP states that ESP's should typically cover the following outcomes (both construction and end use phases):

- Number of apprenticeships;
- Employment/training initiatives;
- Training and work experience for younger people, including those who are not in employment, training or education;
- Best endeavours to maximise local labour; and
- Local procurement agreement – potential for local businesses to be included in tender lists.

REVISED PARKING STANDARDS AND DESIGN

4.127 The Revised Parking and Standards Supplementary Planning Document ('SPD') was adopted on 31 October 2011. The SPD defines four zones within Reading and includes different standards for these four zones according to the accessibility of those zones. The SPD also sets out requirements for cycle parking.

4.128 The Site is located within Zone 3, which is stated as being a 'Secondary Core Area' in the SPD that features a variety of land uses and densities and includes some local centres for day-to-day needs.

4.129 The following maximum parking standards are permitted in Zone 3, as per Table 4.3.

Table 4.3 – Maximum Car Parking Standards

Land Use	Maximum Parking Standards
Food Retail	1 space per 30 sqm
Dwelling Flat 1 – 2 Bed	1.5
Dwelling Flat 3 + Bed	2
Dwelling House 1 Bed	1
Dwelling House 2 Bed	1.5
Dwelling House 3 Bed	2
Dwelling House 4 Bed +	2
Visitor Parking	1 space per 4 dwellings (flats only)

4.130 The SPD also provides maximum standards for lorry parking and loading bays. For food retail over 1,500 sqm the maximum standard in Zone 3 is three loading bays.

4.131 The SPD sets out minimum standards for cycle parking. The following minimum cycle standards will be sought by RBC in Zone 3, as per Table 4.4.

Table 4.4 – Minimum Cycle Parking Standards

Land Use	Minimum Cycle Parking Standards
Food Retail	1 space per 6 staff and 1 space per 300 sqm
Dwelling Flat 1 – 2 Bed	0.5
Dwelling Flat 3 + Bed	1
Dwelling House 1 Bed	1
Dwelling House 2 - 3 Bed	2
Dwelling House 4 Bed +	2

4.132 The SPD states that RBC will also require that sufficient additional facilities within a development have been provided to support the level of cycle parking provision. Such facilities include changing rooms, showers, clothing lockers, and where appropriate CCTV coverage. Cycle parking and storage facilities for all developments should be designed with consideration for the following objectives

- Conveniently located in relation to the trip origin and destination. It is considered that cycle activity is encouraged when parking is provided in more convenient locations to car parking, i.e. parking entrances;
- Easy to use; Where the cycle can be secured easily and quickly to the parking device;
- Secure; Where parking is overlooked by development nearby, located close to well used areas or is within the coverage of a local security camera system. After dark lighting is required to ensure personal safety for bike users; and
- Covered; Particularly important for overnight and all day parking at places of employment and transport interchanges.

4.133 In relation to accessible parking, the SPD states that where up to 200 spaces are provided, a minimum of 3 disabled spaces should be provided or 5% of the total parking capacity (whichever is greater).

4.134 For developments of more than 50 residential units in Zone 3, the SPD states that developers will be required to provide or support a car club on the site, or demonstrate that the development will have access to and the use of a car club on a nearby site, as well as create dedicated car parking spaces on the site for the car club. Car clubs must provide a minimum of 2 cars. Spaces will be required to be provided on site, easily accessible for all residents.

PLANNING OBLIGATIONS UNDER SECTION 106

4.135 The Planning Obligations Under Section 106 Supplementary Planning Document was adopted in April 2015. The SPD sets out the Council's approach towards seeking planning obligations, alongside the introduction of the Council's Community Infrastructure Levy ('CIL') Charging Schedule. The SPD sets out key principles the Council will follow to secure Section 106 planning obligations.

4.136 The Council will assess each application individually, to determine whether an obligation is needed, and what matters it should address, and will justify the reasons for seeking an obligation.

4.137 The SPD states that any requirement for a Section 106 will be raised with a developer as early in the process as possible. Details of the agreement will be recorded on the Council's Section 106 database. As the timetable for determining planning applications is 8 weeks for minor applications and 13 weeks for major applications it is advisable for heads of terms for Section 106 agreements to be agreed and documented prior to the submission of any planning application.

4.138 Draft heads of terms have been submitted in support of the application for planning permission.

SUSTAINABLE DESIGN AND CONSTRUCTION

4.139 The Sustainable Design Supplementary Planning Document was adopted on 16 December 2019 and explains planning requirements with regard to energy, climate change, water management and waste reduction. It is intended to supplement the policies of the Local Plan, particularly:

- CC2: Sustainable Design and Construction;
- CC3: Adaptation to Climate Change;
- CC4: Decentralised Energy;
- CC5: Waste Minimisation and Storage;
- EN18: Flooding and Drainage; and
- H5: Housing Standards.

4.140 Reading Borough Council is committed to working with the local community and businesses to respond to the challenges of climate change by reducing greenhouse gas emissions and preparing for the changes that climate change will bring.

4.141 The SPD states that to comply with the relevant policies and standards on energy, a combination of measures including those for energy efficiency, energy conservation and inclusion of renewable or low carbon sources should be considered and factored in from the design stage onwards. In this regard the SPD requires applicable planning applications to be accompanied by Sustainable Statements, which consider all aspects of development form which

can contribute to securing high standards of sustainable development from the outset, and Energy Statements, that demonstrate how the energy related aspects of the Proposed Development meet the requirements of local planning policy and BREEAM energy and emissions standards.

- 4.142 For residential development of ten dwellings or more the SPD states that the Local Plan requires 'Zero Carbon' development, unless it can be clearly demonstrated that this would render a development unviable or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero. The SPD also reiterates that the Local Plan requires BREEAM standards to be achieved for non-residential development.

5.0 PLANNING ASSESSMENT

- 5.1 In this Section we assess the Proposed Development against the Development Plan policies applicable to the Site and other material considerations outlined in Section 4.0 of this Planning Statement.

PRINCIPLE OF DEVELOPMENT

- 5.2 This Application seeks outline planning permission (apart from means of access) for a residential-led mixed use development with commercial floorspace. The Site currently accommodates ten retail warehouse units with ancillary customer car parking and dedicated service yard. The existing units comprise approximately 9,818 sqm. of Class E floorspace.
- 5.3 It therefore constitutes previously developed land as defined by the NPPF and can be considered as brownfield in nature. The Site is located in an accessible town centre location.
- 5.4 The NPPF states the overarching purpose of the planning system is to contribute to the achievement of sustainable development. Both Chapter 11 of the NPPF and the Effective Use of Land PPG make clear that development should, in particular, utilise brownfield sites to meet development needs as much as possible. Moreover, Paragraphs 118 and 119 of the NPPF make plain that planning policies and decisions should give substantial weight to the value of using suitable brownfield land and promote and support the development of under-utilised land and buildings, including through mixed use schemes and where the development will meet identified need.
- 5.5 Turning to the identified needs of RBC, the Site is recognised as an Opportunity Area and forms part of site allocation CR13b 'Forbury Retail Park'. The site allocation extends beyond the Application Site boundary to include two other major parcels of land and permits the following:

"This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term".

- 5.6 Given the Site's accessible town centre location as demonstrated in Figure 5.1 below, the existing developed nature of the Site, as well as its specific allocation for housing, makes it a suitable and sustainable redevelopment opportunity for the scale and nature of the residential-led development that proposed. Furthermore, in line with the allocation of the Site, there will be no net gain in retail floorspace. The existing Site represents poor utilisation of previously developed urban land, as a low height and density, and the allocation of the Site for development illustrates the in-principle acceptability and policy support for redevelopment of the Site, subject to detailed design considerations.

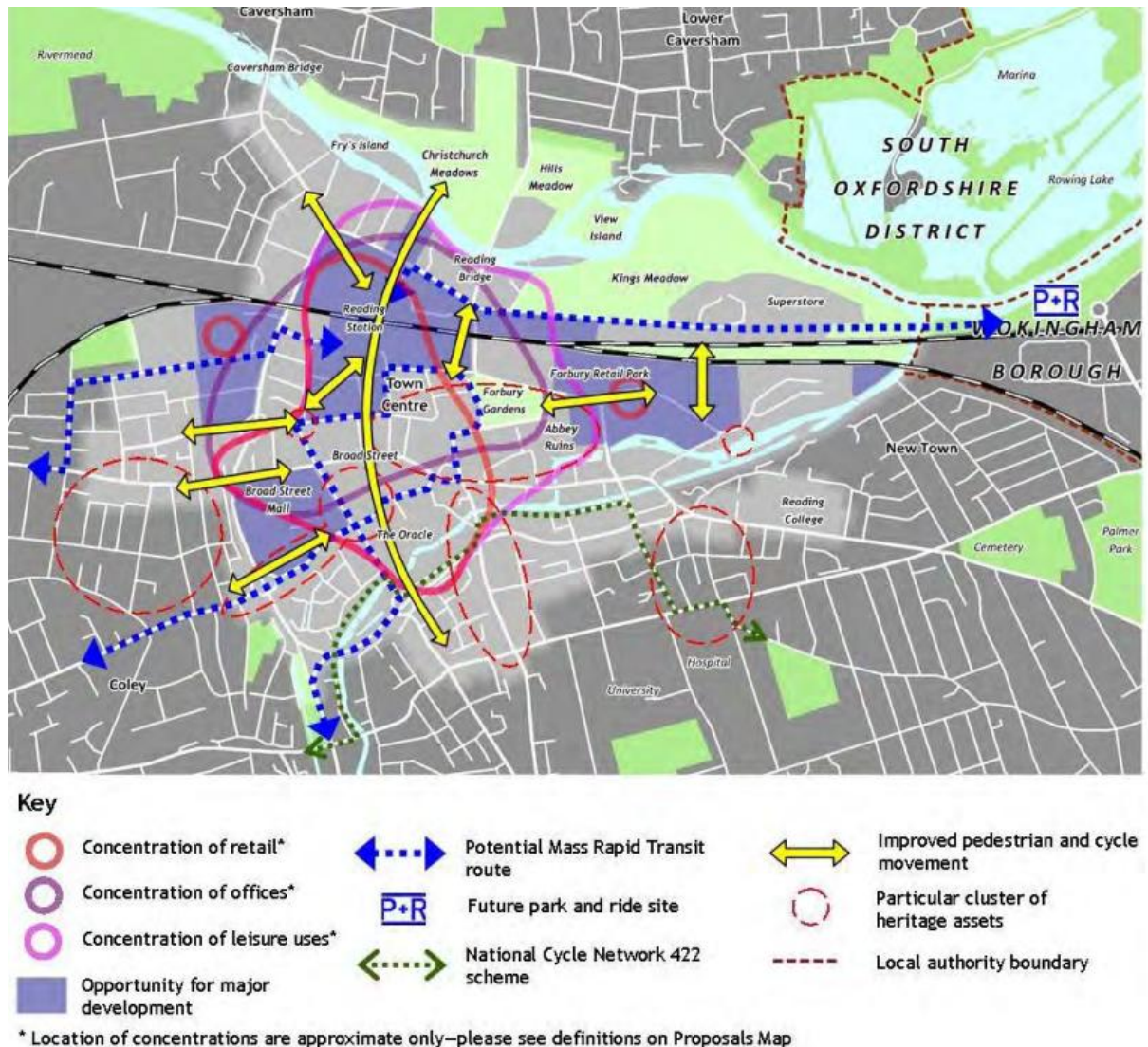


Figure 5.1 – Extract of Area Strategy for Central Reading in Local Plan

When assessed against the NPPF, the Proposed Development is considered to make effective use of underutilised brownfield land and brings forward a residential-led scheme to meet identified local development needs. It is therefore clear that the principle of the Proposed Development continues to accord with aims and ambitions of the NPPF and relevant Development Plan policies.

LAND USE: RESIDENTIAL

- 5.7 The Proposed Development will deliver up to 700 residential units, reduced from the previous proposals on the Site which proposed up to 820 units. As outlined previously, the Site benefits from site allocation CR13b, which states that the Site (and wider site allocation to the east and south) should be the focus of a new residential community.
- 5.8 The wider site allocation outlines an indicative residential potential of 1,230-1,840 residential dwellings, and no net gain of retail. The application site comprises approximately 50% of the overall site allocation, and therefore this results in a pro-rata proportion of 615-920 residential units. The proposed maximum of 700 units falls comfortably in this range. The reference to the frontage to the canal relates to a different area of ownership. The final sentence clarifies that the three main parts of the allocation will be delivered at different times.
- 5.9 The neighbouring Huntley Wharf site is now complete and has been considered in both the development of the design and technical assessment of the application proposals in the EIA submitted in support of the application

where the cumulative impacts have been assessed. This confirms that the Proposed Development will not result in unacceptable impacts.

- 5.10 The Local Plan (partial update) reflects the delivery of Huntley Wharf, and the Site allocation has been updated to exclude this and the reference to the Canal, however the policy continues to allocate residential dwellings to the remaining parts of the allocation (including the Site). The policy position stipulating no net gain of retail has been retained. The revised site allocation is now between 870 and 1300 dwellings. On a pro-rata basis this equates to between 644-962 dwellings for the Application Site. The proposed maximum of 700 dwellings falls at a lower end of this range and points to the impact of the policy height limit, rather than there being any issue relating to over-density of development. A higher number of units could be accommodated subject to townscape and heritage considerations.
- 5.11 Policy H1 (*Provision of Housing*) of Reading's Local Plan outlines that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The Policy goes on to state that the Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period.
- 5.12 The Local Plan Partial Update to Policy H1 outlines a target of 14,850 homes between the 18-year period that the emerging Local Plan will cover (2023 to 2041), increasing the target delivery of homes from 689 to 825 homes per annum, reflecting the increased requirement for new homes in the reading area.
- 5.13 The delivery of up to 700 homes on the Site will make a substantial contribution to the Council's housing targets. This is particularly relevant when considering the Council's annual target has increased to 825 home per year as reflected in the Local Plan Partial Update Policy H1.
- 5.14 The most recent Annual Monitoring Report 2023-24 which was published in December 2024 shows that the Council has 6.03 years' supply. This Report assumes the delivery of the Application site in 2031 and therefore includes the completed Huntley Wharf but excludes the rest of the site's allocation including the Application site. Whilst this is healthy and the Council is demonstrating its 5 Year Housing Land Supply, the Site is required to come forward within the supply period in order to maintain sufficient supply as it will contribute to through the provision of up to 700 dwellings.
- 5.15 With regard to the proposed housing mix, the NPPF advises that the size, type and tenure of housing for different groups in the community should be assessed and reflected in planning policies. Local Plan Policy H2 (*Density and Mix*) states that wherever possible residential development should seek to deliver a specified unit mix. However, discussions with officers during the post submission engagement clarified that the due to the constraints the Site is not expected to deliver a policy compliant housing mix and the flexibility afforded in the policy wording is to be applied in this instance.
- 5.16 The development proposes an appropriate mix of housing to be determined at reserved matters stage, reflective of the local need, the Site's city centre location and physical characteristics. The illustrative scheme provides the following unit mix:

Figure 5.2: Proposed Illustrative Unit Mix

Unit Type	Illustrative scheme
1 Bed / Studio	62%
2 Bed	35%
3+ Bed	4%

N.B. For Information not for approval

- 5.17 The exact mix of units is reserved at this stage and will form part of the forthcoming reserved matters applications, but will be provided in accordance with the approximate parameters set out in Figure 5.2.
- 5.18 In summary, the Application scheme will help meet the identified housing need in RBC and in particular the town centre, where 14,850 dwellings are needed over the plan period. The provision of residential units at the Site would

therefore make a significant contribution to meeting the housing needs of RBC on previously developed, allocated for residential, land in a highly accessible location.

LAND USE – RETAIL

- 5.19 The site allocation (CR13b) allocates the site for the focus of a new residential community, and, alongside residential, permits additional retail uses at a scale to serve the Kenavon Drive area. The allocation recognises that implementing this allocation may involve complete redevelopment or using new additional development to improve the existing urban form of the area. So far there has been limited provision of retail in the sites forming part of the allocation. In the Application Site there is sufficient Class E floorspace to accommodate a foodstore potentially. If this should be delivered this would serve the residents of the area included within the allocation including the new residents of Huntley Wharf. It would therefore be serving a wider need.
- 5.20 The indicative potential of the 6.99 ha Area b, within which the Site is located, is for 1,230 – 1,840 dwellings and the allocation allows for retail development on the Site provided there is no net gain of retail floorspace. Overall it is clear that the Site allocation supports the principle of retail floorspace on the Site as part of its redevelopment serving not only the Site but the wider area. This is particularly important as it is the right location to support shoppers walking and cycling requiring food and therefore is not reliant on car borne trade.
- 5.21 This Policy position is retained in the Local Plan Partial Update with 'no net gain of retail' stipulated in Policy CR13b so the same points apply
- 5.22 RBC Policy CR1: Definition of Central Reading, sets out the status of the Proposals Map in terms of applying the sequential Test, as set out in Paragraph 86 of the NPPF. This Primary Shopping Area boundary is tighter than the 'Central Reading' boundary set out in Section 5 of the adopted plan. This PSA boundary is to the west of the Site and the eastern boundary of the station. The Central Core boundary also defined under Policy CR1 is located to the immediate south west of the application Site on the southern side of Forbury Road and includes Forbury Gardens but excludes the former Reading Gaol.
- 5.23 The spatial strategy for Central Reading and the guidelines on Major Opportunity Areas (including Policy CR13: East Side Major Opportunity Area which covers the Site) gives guidance on the main locations for floorspace. This supports retail floorspace on the Site as part of a mix of uses including residential and is considered in more detail in the Retail Statement. The proposed commercial floorspace is of a scale to serve the Kenavon Road area and therefore accords with policy (CR13b: Forbury Retail Park).
- 5.24 The existing Forbury Retail Park accommodates over 9,000 sqm of retail floorspace, and the proposals seek permission for up to 3,000 sqm of Class E retail. Therefore, there will be a net reduction of approximately 5,000 sqm of retail floorspace as a result of the proposed redevelopment of the Site. The car-orientated existing retail warehouses and restaurant will be replaced by commercial floorspace, potentially being capable of being operated as a smaller foodstore, which will be fully integrated in the development with homes above. That store will be walkable from the town centre and the new area of homes proposed by the development and in the adjacent Huntley Wharf. It will also be well-served by cycling facilities including safe and secure cycle parking.
- 5.25 The retail floorspace is proposed to be Class E, with a larger Class E unit of approximately 2,000 sqm located at the ground floor of the western block and the remainder of the Class E floor area located within smaller units predominantly on the eastern blocks. Officers had previously commented that the Class E proposals could be operated for a large range of uses with a range of other implications, as such the applicant would be willing to agree to a suitably worded condition to control the range of uses, particularly in relation to the larger unit in the west block.
- 5.26 In terms of the sequential test, the site should be treated as edge of centre, albeit is an highly accessible location that is not completely car-reliant. Policy RL5 only requires the application of the sequential test where there is a net gain of over 2,500 sqm of floorspace. The Application proposes a reduction in retail floorspace and therefore policy does not require sequential testing. Furthermore, the proposals are in accordance with the Site allocation and do not exceed the existing floorspace quantum on Site, therefore the provision of up to 3,000 sqm of Class E retail floorspace is in accordance with the Development Plan.

DESIGN, DENSITY AND LAYOUT

DESIGN AND LAYOUT

- 5.27 With regards to the design and layout of the Proposed Development, the accompanying Design and Access Statement details the evolution of the indicative scheme design including how it has responded to policy as well as neighbouring developments and established land uses and Officers' comments.
- 5.28 As is clear from the Design and Access Statement, high quality design forms an intrinsic consideration within the scheme.
- 5.29 Chapter 12 of the NPPF expects the planning system to achieve high quality buildings and places which are visually attractive through good architecture, layout and landscaping as well establishing a strong sense of place and function well and add to the overall quality of the area.
- 5.30 The Parameter Plans ensure that the development is set back from the boundary of the Site. At the rear of the Site this ensures that access is maintained to the railway embankment while on the other boundaries this ensures that there is sufficient space between buildings that will be delivered in the Site and those on adjoining sites which have been built, are under construction and will be delivered in the future. In 6.2 of the Design Codes there is a requirement that the general arrangement of buildings must not significantly impact daylight and sunlight levels experienced by neighbouring developments. This is also tested in the EIA in the sunlight and daylight assessment which shows that there are no unacceptable impacts.
- 5.31 RBC raised concerns about the previously proposed public spaces, principally that they lacked clear definition and could be more generous. The amended proposals respond positively to these comments and seek to reorientate the blocks which frame the spaces so as to provide two very clearly defined spaces one at the core of the central group of blocks and another within the centre of the eastern group of blocks. The reorientation and reduction in individual building footprints is facilitated by the inclusion of link blocks to the north of the central and eastern groups of blocks. The link blocks improve the sense of enclosure of both of the public spaces, whilst not impacting the overshadowing of the spaces, by virtue of their location to the north.
- 5.32 The revised proposals improve the now clearly defined east-west route through the Site. The south eastern most block (East Block 3) incorporates parameters to define a chamfered corner, providing a more generous public space, also assisting with wayfinding and experience along the east-west route. The south west chamfer also ensures there is sufficient space for the proposed access road from Kenavon Drive.
- 5.33 The Design Codes require that building plots are not flexible and cannot shift from the maximum deviation boundary set by the Parameter Plans. Building lines should have a complementary relationship with adjoining plots.
- 5.34 Section 6.2 of the Design Codes also sets out how the EIA testing in daylight sunlight, wind and noise have informed the massing and built form.
- 5.35 The Proposed Development will offer a high quality design, guided by Design Codes. The Design Codes define the overarching character and materiality of the Proposed Development. Section 6.7.1 controls materiality. with 6.7.2 controlling elevational principles.
- 5.36 The proposed layout will ensure active frontages are adjacent to public spaces. Commercial. residential and servicing frontages are controlled in 6.8 of the Design Codes.
- 5.37 There are then specific Design Codes for each block in Section 6.9.
- 5.38 The Proposed Development enhances and promotes permeability across the Site, through the creation of new east-to-west pedestrian and cycle routes. These proposed links will create a permeable and legible development, drawing visitors and footfall through the Site from the City Centre and providing a future link to the wider Forbury Retail Park and the Biscuit Tunnel to the north.
- 5.39 In addition to the site allocation, Policies CC7 (Design and the Public Realm), CR2 (Design in Central Reading) and CR3 (Public Realm in Central Reading) have been central to the design proposal as they have developed,

resulting in the provision of a range of visually attractive, well designed open space and public, which utilises high quality hard and soft landscaped areas. These visually attractive spaces will assist in creating a sense of place within the Proposed Development, as well as contribute towards incentivising active travel and create a sense of community cohesion. The proposed open space and public realm will also contribute to the diversity of the Central Area of Reading. The open spaces and areas of public realm proposed are accessible and vary in size and shape and are considered to be capable of accommodating a range of activities across user groups.

- 5.40 It is clear from the above assessment that the Site will deliver a high-quality design that will create an attractive new residential community for Reading and deliver on the aspirations of site allocation (ref. CR13b). The layout positively and effectively relates to the Site's wider context including key views, and the creation of a high-quality pedestrian and cycle only green link. As such, the proposals meet the policy aspirations of the NPPF and local planning policies on design and layout matters.
- 5.41 The high quality buildings will draw on the design principles and material palette set out in the Design Codes, which is inspired by the Site's past and present context.
- 5.42 The accessibility of the Site lends itself to sustainable travel modes and the scheme has been designed to promote and encourage this where possible. The Site has been designed to create legible pedestrian and cycle links through the Site.
- 5.43 The scheme has been well-designed to create attractive and healthy places, prioritising pedestrian and cycle links, incorporating social and open spaces and a holistic landscaping and tree strategy. For these reasons it is considered the appropriate development density has been achieved onsite as per the NPPF and local Policy H2 (Housing Density and Mix) and this makes the most effective use of land in line with the character of the Site and the character of the surrounding area, which assist in the delivery of new homes for Reading.

DENSITY

- 5.44 As per Chapter 11 of the NPPF, one of the key mechanisms through which effective use of land can be realised is by achieving the appropriate development density. When reaching a conclusion on the appropriate development density, paragraph 122 of the NPPF outlines the important considerations which include:
- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - The availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use;
 - The desirability of maintaining an area's character and setting, or of promoting regeneration and change; and,
 - The importance of securing well-designed, attractive and healthy places.
- 5.45 RBC Local Plan Policy H2 relates specifically to Density and Mix and supports an appropriate density of residential development that is informed by the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas; its current and future level of accessibility by walking, cycling and public transport; the need to achieve high quality design; the need to maximise the efficiency of land use; and the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 5.46 The local development plan identifies a need for additional housing in the town centre and allocates the Site as available land to bring forward such development, in addition to other appropriate uses. The Site is located in close proximity to both services and infrastructure within the city centre. Reading train station is located within 500m of the Site.
- 5.47 The development parameters have been prepared in accordance with the site allocation (ref. CR13b). The allocation stipulates an indicative potential for the wider 6.99 ha allocation area of 1,230 – 1,840 dwellings, equating to 517 – 774 dwellings on the 2.94 ha application Site. The Local Plan Partial Update Policy CR13b accounts for the delivery of the adjacent Huntley Wharf and now excludes it from the allocation, stipulating a revised indicative potential for the wider 3.98 ha allocation area of 870 – 1,300 dwellings. This equates to 644 – 962 dwellings on the 2.94 ha Application Site.

- 5.48 The proposals are for up to 700 dwellings on the Site, which has been reduced from the previous application proposals of up to 820 units. The reduction in units therefore ensures that the proposals fall within the lower end of the range of units identified as suitable for the Site in the adopted Local Plan (517 – 774). However the Local Plan Partial Update has identified suitability of the Site to accommodate a higher density of dwellings (644 – 962). Once again the proposed maximum of 700 dwellings is at the lower end of the range of the allocation. This is suitable given the emerging policy context indicates suitability for a higher density of dwellings in this location. It also indicates that a higher number of homes could have been delivered on the Site if there was not the height cap in Policy CR10. Therefore, the proposed number of units is in accordance with the adopted and emerging Site allocation.
- 5.49 In order to align with the policy objective to deliver sufficient homes to meet the objective of the allocation in unit numbers an element of height is required to be incorporated to the approach to design. Notwithstanding the above, the building heights have been reduced from the originally submitted application to ensure that no building exceeds the tall building threshold of 36m or 12 storeys as stipulated by Policy CR10. The maximum height parameters are set out in Parameter Plan 13 (Maximum Building Heights, Drawing Number 18111-SQP-ZZ-05-DR-A-PL00013 P2)] show + 73.05 m AOD excluding plant on four of the tallest buildings proposed, the remaining 8 buildings are of a variety of lower heights. Parameter Plan 12 sets out the proposed site levels (Proposed – Site Levels, Drawing Number 18111-SQP-ZZ-GF-DR-A-PL00012 P2), the majority of the Site is proposed at +39.0 m AOD, with the parts of the Site nearest Kenavon Drive slightly higher at +40.0m and +41.5 m AOD due to the existing topography at the Site. For the avoidance of doubt the height of the buildings when measured from the lowest point of the Site (+39.0m AOD) is a maximum of 34.5m and therefore does not reach the tall building threshold of 36m when measured from any point of the Site.
- 5.50 The building heights previously proposed in the application ranged from 6 to 12 storeys, with the blocks along the north boundary that face King's Meadow comprising two 8 storey buildings, three 12 storey buildings and an 11 storey building. RBC did not support the proposed maximum building heights as they reached the 12 storey definition of a tall building. Concerns were raised in relation to the concentration of height along the north boundary due to the potential impacts on King's Meadow.
- 5.51 In response to these comments the building heights have been adjusted substantially and reduced, also reflected in the substantially lower maximum number of units. The amended proposed heights now range from 5 to 11 storeys. As such no buildings reach the 12 storey definition of a tall building (as defined by Local Plan Policy CR10), the tallest building is a total of 11 storeys (34.5m). Furthermore, along the north boundary the heights now comprise one 7 storey building, an 8 storey building, two 11 storey buildings, and two 9 storey buildings.
- 5.52 The previous scheme also raised comments from RBC about the relationship with the former listed jail and that consideration should be given to the potential to step the proposals down to Forbury Road. The amended proposals incorporate substantial steps down between the top of the blocks along the south side of the Site and Forbury Road resulting in stepped building heights of 5 storeys and 7 storeys directly opposite the former jail, rather than the previous 11-12 storeys.
- 5.53 As a result, the taller elements are now concentrated within the central blocks rather than along the entirety of the rear of the site. This is also enhanced through the reduction in maximum block heights in the eastern groups of blocks, which proposes three of the four blocks at 9 storeys, rather than the previous 11-12. In summary the amended proposals propose an appropriate form and density of development that accords with the adopted Local Plan as well as supporting emerging policy objectives. Whilst also being proportionate to the surrounding developments including No1 an No2 Forbury Place adjoining the Site to the west, and the recently delivered Huntley Wharf immediately to the southeast.

HERITAGE

- 5.54 The Council has a duty under the Town & Country Planning Listed Buildings & Conservation Area Act 1990, as amended, to ensure that the setting of listed buildings and conservation areas are not adversely affected by new development unless there is less than substantial harm.
- 5.55 Following the submission of the original proposal, on 20 October 2023, Berkshire Gardens Trust objected to the Proposed Development, arguing that it would result in 'less than substantial harm' in the moderate to high range to

the setting of Forbury Gardens and its group role in conjunction with all the other listed buildings and structures within and adjoining Forbury Gardens. Similarly, the original application was objected to by the RBC Conservation Officer on 12 December 2023, who stated that the excessive scale, massing, large footprint and grid layout, would detract from the setting of the listed building and dominate views.

- 5.56 Natural England considered that the Proposed Development would not have a significant adverse impact on statutorily protected nature conservation sites or landscapes (12 October 2023).
- 5.57 The amended Application has reduced the scale and density of the development, reducing the maximum number of residential units proposed by 120 and also reducing the Class E floorspace by 2,500 sqm. Furthermore, the maximum building heights have been reduced, ranging from 4 to 11 storeys rather than 6 to 12 storeys. The variation in heights of the blocks has also been improved, incorporating substantial steps down between the top of the blocks along the south side of the Site and Forbury Road resulting in stepped building heights of 5 storeys and 7 storeys directly opposite the former jail. Additionally, a reduction of block footprints, reorientation of the spaces within the development and increased sense of enclosure is proposed.
- 5.58 These amendments will ensure that the suggested adverse visual impact on the setting of Forbury Gardens and other listed buildings is reduced, and ensure that there is no detracting in the setting of the listed buildings in proximity to the Site. The proposals involve a scale, massing and layout that is appropriate for the site location.
- 5.59 The Built Heritage Chapter in the EIA identifies the following assets as being most likely to experience an effect by the Proposed Development by reason of proximity and/or relationship to the Site (for completeness the likely environmental effect arrived at through the ES methodology while also applying professional judgement is included):
- Reading Abbey Receptors (Grade I) – Minor to Moderate Neutral.
 - Forbury Gardens RPG (Grade II) – Minor to Moderate Neutral.
 - Reading Gaol (Grade II) – Minor Neutral.
 - Church of St James and St James's Presbytery and St James Former School Buildings (Grade II) – Minor to Moderate Adverse.
- 5.60 For the purposes of the policy analysis the following commentary is provided in relation to the Church of St James and St James's Presbytery and St James Former School Buildings.
- 5.61 For the avoidance of doubt, with regard to all other assets not discussed below, it is considered that the Proposed Development complies with relevant provisions in the Reading Local Plan (2019).

Church of St James and St James's Presbytery and St James Former School Buildings

- 5.62 It is judged that the Proposed Development would give rise to a minor harmful impact on the setting of the listed church through the appearance of the new buildings beyond the church's principal gable in linear views from within Forbury Gardens. This effect is illustrated in proposed View 2. It is considered that the presence of the new residential building changes to a small degree the prominence of the church's bell tower, currently experienced against a clear sky background. This is the view from the west only – other views of the church from the north are unaffected. The impact is one of setting only, and there is no harm to any intrinsic aspect of the asset's significance.
- 5.63 The harm identified, which is judged to be at the lowest end of the less than substantial scale, is limited to one part of the listed building's setting and would reduce or be removed entirely from other parts of the church's setting where the bell tower and principal gable retain their prominence. The Proposed Development does not diminish or detract from the intrinsic significance of the church, which would continue to provide an important local landmark. The Proposed Development does not detract from or restrict opportunities to appreciate the architectural quality and detailing of the listed building. The harm identified is limited to a small, transient effect when experienced in linear views from within Forbury Gardens.
- 5.64 It is judged that the limited harm identified is demonstrably outweighed by the public benefits delivered through the Proposed Development. It is therefore considered that the Proposed Development complies with the relevant provisions in the Reading Local Plan.

- 5.65 The first consideration must be that the quality of architecture prepared by Squires and Partners and controlled by the design code is of high calibre. It would demonstrably uplift the quality of the Site through a thoughtful and well-considered scheme and integrated landscaping masterplan prepared by Macgregor Smith.
- 5.66 The public benefits of the Proposed Development are as follows, and form part of the overall justification of the development:
- Introduction of new residential, commercial and flexible uses in keeping and complementary to the Site's town centre location and contributing to the regeneration and revitalisation of this part of the local townscape, including the setting of local heritage assets.
 - Creation of high-quality areas of green space and public realm within the Site which has beneficial impacts on local heritage assets and the character, appearance, and function of the local townscape.
 - Provision of high-quality architecture that draws on the local townscape context, both modern and historic precedents, as well as surrounding heritage assets.
- 5.67 On account of finding less than substantial harm and undertaking the balancing exercise, the proposals accord with Reading Local Plan Policies EN1, EN3 and EN6.
- 5.68 In addition, Section 66(1) of the 1990 Act states that "*in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses.*" The Proposed Development also conforms to the statutory duties established by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act.

VISUAL IMPACT AND VIEWS

- 5.69 The Proposed Development seeks to optimise the capacity of the Site, as is sought by national policy and the Local Plan. The Proposed Development will utilise the potential of an accessible, brownfield site, which benefits for an allocation for residential development as detailed within this Planning Statement. In developing the proposals, the design team have had regard to Local Plan Policy CR10 (Tall Buildings), which defines tall buildings in Reading as being above 10 storeys for residential development, equating to 36 metres, and sets out requirements that proposals for tall buildings must meet.
- 5.70 Planning policy expects the Site to take account of views in and out of the Site. As further detailed within the Design and Access Statement, and the Parameter Plans, the building heights would range from + 63.5 m AOD up to + 75 m AOD (as set out in Parameter Plan 13 (Maximum Buildings Heights)). East Block 3, Central Block 3 and Central Block 4 would have lower building heights than the tallest building proposed on the Site (+ 75 m AOD) and have been designed to respond to the massing of the adjacent Huntley Wharf development, which also forms part of the same CR13b allocation.
- 5.71 The height, overall mass and profile of the maximum parameters of development proposed for the Site have been considered from a number of viewpoints as set out in the Townscape and Visual Impact chapter of the ES.
- 5.72 As set out within this chapter, at completion, long-term and permanent visual effects that are assessed as beneficial and moderate levels of significance of effect, which are significant, are assessed for people's views and visual amenity at VL1 (Forbury Road), VL2 (Forbury Gardens), VL10 (Huntley Wharf) and VL12 (Kenavon Drive) towards Reading Prison. All other visual receptors were either assessed as receiving negligible or minor level of significance of effect at completion, which are not significant or have no change.
- 5.73 The Townscape and Visual Impact Assessment identified no cumulative effects arising as a result of the Proposed Development in addition to, or in combination with, committed developments. This is because the Proposed Development and committed developments are within the existing urban area; the Proposed Development would not alter key characteristics of townscape character areas in the surrounding urban area; and committed developments are in locations which would experience no, or very limited intervisibility with the Proposed Development.

- 5.74 It is considered therefore that the proposal would make a positive visual contribution to the town's skyline. It is considered that the high quality design of the Proposed Development, which will have differing characteristics as set out in the submitted Design Codes, will help to provide variety and interest in visual terms in Central Reading, as well as assist in creating a distinctive character for CR13b allocated site. The provision of taller buildings on the Site aligns with the character of the wider area, which will further create a strong reference point for the Central Area of Reading, allowing for greater urban legibility in the Borough.

AFFORDABLE HOUSING

- 5.75 The Financial Viability Assessment submitted in support of the application shows that the scheme is unable to support affordable housing.
- 5.76 Although it is recognised that Policy H3 (Affordable Housing), which is supported by the Affordable Housing SPD, requires residential development to make appropriate contributions towards the provision of affordable housing that meets the needs of Reading, Policy H3 and the SPD balance this requirement in relation to viability considerations. Where proposals fall short of the policy target, Policy H3 provides a mechanism for an open-book approach to be taken where a developer has the opportunity to clearly demonstrate the circumstances that justify a lower affordable housing contribution, based on the overall viability of a Proposed Development. This is reiterated in the emerging draft Local Plan Policy H3.
- 5.77 Accordingly, a Financial Viability Assessment was submitted in support of the previous iteration of the scheme and showed a deficit. Therefore, in accordance with Local Plan Policy H3 and emerging Policy H3, the assessment clearly demonstrated that the Proposed Development was unable to support a provision of affordable housing. Colliers provided an assessment of the scheme noting that the substantial deficit raises the question of deliverability of the scheme.
- 5.78 Given the previous viability concerns with RBC, in order to improve the position despite the reduction in unit numbers, the amended proposals reduce the proposed basement area by approximately a third by removing the basement area under the eastern group of blocks. Substantial construction costs are associated with basement construction, therefore the reduction by a third reduces build costs.
- 5.79 However, despite the substantial design alterations that seek to reduce the build costs, wider macroeconomic factors have significantly impacted the viability of development across all sectors, as build costs have remained high. There have been substantial increases in costs arising from the implementation of the Building Safety Act and the Gateway process. Furthermore, the design alterations that have been made to address RBC's comments have also resulted in a reduction of maximum unit numbers from 820 to 700 units. This has significantly reduced the Gross Development Value and impacts further upon viability. An updated Financial Viability Assessment, prepared by DS2 has been submitted with this application and continues to show a substantial deficit of £94 million, largely driven by the high current day construction costs and the strong benchmark land value noting the Site is currently a fully occupied retail park.
- 5.80 The assessment analysis demonstrates that the scheme is challenging on a present-day basis. This is consistent with existing market trends elsewhere in the current macroeconomic environment. Whilst there is a significant deficit, the assessment represents a present day snapshot of the viability position. It would be hoped that across the residential sector there will in due course be an improvement in the residential market, but the scale of deficit points to there not being any justification on the basis of the FVA alone to justify affordable housing.

SOCIO-ECONOMICS

- 5.81 The key objective of the NPPF is the principle of sustainable development, with three overarching objectives: economic, social and environmental.
- 5.82 The social objective supports strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

- 5.83 The economic objective is to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure (paragraph 8).
- 5.84 Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or compensatory measures should be considered.
- 5.85 The main consultee responses received in response to the application when originally submitted in relation to socio-economics were from RBC Policy; the Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board; and Reading's Economy and Destination Agency (REDA);
- 5.86 The RBC Planning Policy consultee response establishes that as the proposals see a reduction in retail floorspace on site, it is compliant with the 'no net gain' of retail floorspace identified in the indicative potential in the site allocation policy. However, they establish that it should be made clear that on what the open Class E use proposed within the original application would be used for specifically within Class E and highlighted a preference against office use. Accordingly the overall quantum of Class E floor area has been reduced from a maximum of 5,500 sqm to 3,000 sqm and the applicant is willing to accept an appropriately worded condition to control the range of Class E uses permitted at the Site.
- 5.87 Overall, they establish that the assessment of socio-economic impacts appears to be broadly robust. However, they queried why the major adverse effects on nursery education resulted in a conclusion of no mitigation required. An updated Socio Economic chapter is provided with this application which identifies a low adverse magnitude of change in relation to nursery capacity as a result of the proposed development, which is expected to generate a total requirement for 17 additional nursery places.
- 5.88 Reading's Economy and Destination Agency's (REDA) consultation response to the original application expressed support for Class E use at the ground floor to ensure footfall remained attracted to the Site. Concerns were raised about the potential for pressured on Business Improvement District services in the area, as well as issues raised by differing needs of residents. They concluded that an Employment and Skills Plan, or financial contribution in lieu of this, would be expected to ease these concerns. The applicant is willing to accept an employment and skills plan in relation to the construction of the scheme to be secured via a S106 as set out in the draft Heads of Terms appended to this Planning Statement.
- 5.89 On 12 October 2023, the Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board (BOB ICB) outlined in their consultation response to the original application that a predicted population increase of 1,968 would result in significant capacity issues and insufficient consulting rooms to cope with the increased population growth as a direct result of the increase in dwellings. BOB ICB requested a CIL or Section 106 financial contribution of £708,480.00. As Reading Borough Council have an adopted CIL charging schedule they are able to collect a substantial amount of CIL for this scheme (approximately £12,000,000) Reading's CIL Spend Protocol and Infrastructure Funding Statement (IFS) identify "Social / Community facilities" as a priority category for CIL expenditure. This category explicitly includes healthcare facilities alongside education, leisure, and cultural projects as such this contribution will be accommodated within the CIL for this scheme and no additional S106 contribution is required.
- 5.90 The amended proposal involves a reduction in residential units of 120 compared to the previous applications 820 dwellings proposed, which means that the number of homes (and therefore residents accommodated) will be at the lower end of the assumed level of housing delivery on the Site as set out in the adopted and emerging policy allocation. This will result in a lesser impact on capacity issues in relation to population growth as a direct result of the Proposed Development.
- 5.91 In order to demonstrate the socio-economic impacts and benefits of the Proposed Development socio-economics have been scoped into the ES and is set out in chapter 7 and have been updated to reflect the reduction in floorspace in the amended application.
- 5.92 The assessment scope relates predominantly to the operational phase of development including effects on jobs, homes, education, healthcare, recreation and public access. For the construction phase only the effects on jobs is scoped in as the construction workforce is not expected to move to the area, and the impact is identified as

beneficial, with a result of the Proposed Development expected to create approximately 18 Full Time Employment (FTE) (185 net additional per year equivalent jobs) in Reading and 59 FTE (591 net additional per year equivalent jobs) in the UK over the construction period within the assessed Labour Market Study Area.

- 5.93 Operationally, the Proposed Development will have a beneficial impact on housing and jobs through the provision of up to 700 new homes and 123 FTE jobs, therefore improving the area's economic vitality and housing provision.
- 5.94 The socio economic chapter identifies the potential for minor adverse effects in respect of Primary and Secondary Education, however the assessment confirms that the school provision for both categories currently meets local needs and has the capacity to absorb the expected number of school children generated from the development. Further mitigation against potential impact can also be provided via CIL contributions which as set out above the Reading's CIL Spend Protocol and Infrastructure Funding Statement (IFS) confirm that CIL funding is also allocated to education, as such the development is acceptable with regard to primary and secondary education with no requirement for an additional CIL contribution.
- 5.95 In relation to healthcare, the assessment identifies that the impact of the new residents on GP provision would be medium adverse, however the sensitivity of GP surgeries is identified as high. Therefore, we are mitigating this potential impact through substantial CIL contributions which support GP surgeries as clarified in Reading's CIL Spend Protocol and Infrastructure Funding Statement (IFS) therefore ensuring the proposed development is acceptable in relation to health care.
- 5.96 In summary the socio economic assessment within the ES demonstrates how the Proposed Development contributes to achieving the socio economic objectives of the NPPF specifically in relation to housing and jobs, and where impacts have been identified suitable mitigation measures largely through CIL and S106 contributions ensure that the socio-economic objectives are still achieved.

HIGHWAYS

- 5.97 Policy TR1 (Achieving the Transport Strategy) supports development that contributes to meeting the objectives of the Council's most up to date Local Transport Plan and proposals that commit to implementing measures that promote and improve sustainable transport facilities, including in relation to walking, cycling and the use of public transport. Emerging Policy TR1 also supports development that commits to implementing active travel and use of public transport.
- 5.98 In this regard, and in accordance with the adopted and emerging Policy TR1, the Proposed Development makes provision for measures that enhance accessibility to and from the site by utilising active and sustainable modes of travel in the first instance. The proposals submitted for planning permission enables and supports walking, cycling and the use of public transport.
- 5.99 On 1 November 2023, RBC Highways Authority consulted on the original application. They raised concerns regarding the submitted Transport Assessment, stating that it did not fully evaluate the impacts of the proposed mixed-use development, focusing on a discount food store rather than all potential uses. They highlighted insufficient analysis of walking and cycling infrastructure, lack of compliance with national design standards and missing drawings for key access points and crossings. RBC commented that provision of the cycle facility within the site was accepted in principle but to ensure a continuous link to the east, the internal cycle facility should re-join the footway that runs along Kenavon Drive prior to the eastern site entrance, which is likely to result in the loss of at least one tree. The loss of this tree was acknowledged by the Council, who stated that the design of this link therefore requires careful consideration and design.
- 5.100 RBC Highways Authority accepted that the Site is well served by public transport, but raised concerns about vehicle access, trip generation and parking provision. The eastern access is considered unsafe due to inadequate width for two-way movements, and inconsistencies across Design Codes and Parameter Plans was also identified. Parking provision for Class E uses was identified as below the maximum standards, raising concerns about potential overspill and highway safety, while visitor parking and car club bays required further clarification. Cycle parking provision was deemed acceptable.
- 5.101 RBC raised concern over the nature and scale of the Class E land uses within the proposal. The scale of this provision has been reduced in the amended proposals. In addition, in response to the post-application feedback

on the original outline application on the wide range of what would be permitted by a Class E land uses, ranging from retail to sports to health to employment to a creche. This has been recognised in the amended proposed scheme, given that the development is residential-led and therefore the type of Class E uses are intended to be complementary retail or community uses and not significant generators of travel demand in their own right. To better define this element of the proposals at this outline planning application stage, the applicant is content for RBC to attach a condition on the planning consent, to restrict the Class E sub-classes E(a), E(b) and E(c).

- 5.102 The updated outline scheme has been developed to provide good cycling facilities. A new route through the Site is proposed, as shown within the Movement Parameter Plan. This will route between the east and west site accesses, and route north of the TPO trees, although one TPO tree will have to be removed to facilitate the indicative cycle route and changes to the eastern access junction. the indicative cycle route could be delivered in accordance with the Parameter Plans, displaying a connection that will be made to the shared footway/cycleway along the northern edge of Forbury Road, routing north of the TPO trees. The eastern connection will require the removal of one TPO tree west of the eastern access. Further details will be provided via the reserved matters application.
- 5.103 In addition to responding to the consultation feedback, highways considerations are also assessed against the relevant policies.
- 5.104 A Transport Statement has been submitted in support of the application for planning permission, which has considered the impact of the Proposed Development on surrounding transport networks.
- 5.105 The Statement sets out that the Site is in an accessible central location within the Reading Central Area, with good access to public transport, shops and services. For example;
- The Site is within a 20 minute walk from the Town Centre;
 - The Site connects well with the existing cycle network with a cycle route running along the south boundary of the Site connecting to 3 identified cycle routes;
 - There are a number of bus stops within walking distance from the Site including those on Blagrave Street, Forbury Road, Kings Road and Station Road. The stops within walking distance are served by 19 bus routes that provide access across Reading and to the wider region, including to Bracknell, Newbury and Wokingham; and
 - Reading Station is a 10minute walk from the Site, which provides excellent railway access to London and across the south of the UK.
- 5.106 This demonstrates that the Site is in a sustainable location and in accordance with policy seeks to maximise the available sustainable modes of transport.
- 5.107 The enclosed Transport Statement confirms that the proposals include the provision of 130 car parking spaces at basement level for residents is significantly below the maximum parking standards for the proposed 700 units, therefore further encouraging the use of sustainable transport modes. In accordance with policy the 130 spaces will include a minimum of 5% disabled spaces, and 10% EV charging spaces. There will also be provision of 3 car club spaces across the proposals and a car club strategy is proposed to be secured via S106 obligation as set out in the draft heads of terms appended to this planning statement.
- 5.108 A separate parking provision of 53 spaces is proposed at ground level on the west of the Site to serve the commercial unit. The spaces are enclosed to the rear of the unit.
- 5.109 The total parking provision on the Site results in a reduction of the existing provision of 313 spaces to 183.
- 5.110 The approach to provide a lower level of parking is appropriate due to the accessible location for active travel and public transport and reflecting that there is not likely to be overspill parking arising and therefore no detrimental impact on highway safety. The approach to provide much lower levels of parking than the standards state is similar to other sites in and adjacent to Reading Town Centre, such as the development of Huntley Wharf and Station Hill.
- 5.111 Furthermore, the Site is proposed to contain car club spaces within the public realm surrounding the residential blocks, reducing the reliance on private car ownership and promoting sustainable modes of transport. The Framework Travel Plan submitted alongside this application will promote the car club to the Site residents. The car

club will also be accessible to the surrounding local community. This will reduce the reliance on private car ownership and promote sustainable modes of transport.

- 5.112 The proposed provision therefore accords with Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging) and the Parking Standards and Design SPD. The levels of car parking proposed align with, and do not exceed, the maximum provision permitted at the Site.
- 5.113 The Transport Assessment assesses the impact on trip generation for the existing and proposed uses at the Site, including both the residential and commercial floorspace proposed. This concludes that the Proposed Development is anticipated to generate 86 greater two-way car trips in the AM peak hour and 31 fewer two-way car trips in the PM peak hour, while across the day, there would be a decrease of 27 car trips. Therefore, it is concluded that the net change in traffic generation is not material to the wider operation of the highway network, and that the development is acceptable in highways terms.
- 5.114 Policy TR4 (Cycle Routes and Facilities) supports development, such as the submitted proposals, which make full use of opportunities to improve access for cyclists to, from and within a development site and that integrate the provision of new facilities that encourage cycling. Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging), which is supported by the Parking Standards and Design SPD, set out an expectation that developments will provided cycle parking that is at an appropriate level to the accessibility of a development site.
- 5.115 The Site benefits from strong existing cycle network links, and the Proposed Development seeks to retain and enhance the cycle route along the south boundary of the Site ensuring cyclists are not required to cycle on Forbury Road / Kenavon Drive. Furthermore, a total of 600 cycle spaces are proposed at the Site which is a significant increase from the existing 40 spaces, as well as exceeding the minimum parking standards by over 200 spaces. This represents a significant public benefit and private residential benefit.

FLOODING AND DRAINAGE

- 5.116 The National Planning Policy Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Local Plan Policy EN18 (Flooding and Sustainable Urban Drainage Systems) directs development to areas at lowest risk of flooding and states that all major developments must incorporate sustainable drainage systems in line with Government Technical Standards.
- 5.117 Emerging Policy EN18 states that all development must incorporate sustainable drainage systems and establishes that a Flood Risk Assessment is required as the Site is larger than 1 hectare.
- 5.118 A Flood Risk Assessment and Drainage Strategy was submitted with the previous revision of the scheme. Through the consultation in response to the original application, the Local Lead Flood Authority confirmed on 9 November 2023 that they had no objections to the Proposed Development, provided conditions relating to the provision of a management and maintenance plan of surface water drainage, and a sustainable drainage scheme, were included with approval.
- 5.119 The revised Flood Risk Assessment and Drainage Strategy for the revised proposals aligns with the principles of the previously accepted strategy, as detailed below.
- 5.120 The Site is located within Flood Zone 1, which indicates that there is a low probability of flooding as the Site from rivers and the sea. As such, it is within a zone assessed as having a <0.1% (1 in 1000 year) annual probability of tidal and fluvial flooding. However, in accordance with Environment Agency Guidance, as the Site is greater than 1 hectare and in Flood Zone 1, a Flood Risk Assessment ('FRA') has been submitted in support of the application for planning permission.
- 5.121 The FRA has undertaken a comprehensive review of all sources of flooding relating to the Site, including fluvial and tidal flooding, pluvial flooding, flooding from reservoirs, ground water flooding, flooding from sewers, flooding from water mains and has also considered the predicted effects of climate change in relation to increased rainfall intensities, river levels and increased sea levels.

- 5.122 In summary, the FRA concludes that the Site has a 'low' to 'very low' risk of flooding from all sources. Furthermore, the impact of the Proposed Development on the surrounding area will reduce the risk of flooding with surface water being discharged at a reduced rate from the existing discharge rates. Therefore, the Proposed Development accords with Local Plan Policy EN18.
- 5.123 The application is also supported by a Drainage Strategy Report which sets out the drainage strategy for the Proposed Development including the suitability of SuDS on the Site. The strategy confirms that the maximum surface water discharge run off rate will not exceed 5.8 l/s in accordance with the relevant greenfield run off rate targets.
- 5.124 In relation to foul water discharge, the previous drainage strategy confirmed that the peak flows for the residential blocks and from the commercial elements was confirmed as acceptable by Thames Water, who confirmed that capacity exists within the system to accommodate the calculated discharge rates. The previous capacity was undertaken for 820 units and 5,500 sqm of commercial floorspace, now reduced to 700 units and 3,000 sqm of commercial floorspace. Therefore, it is highly likely that Thames Water will be able to accommodate the reduced number of units and floorspace proposed.
- 5.125 Both surface and foul water drainage systems can be achieved via a gravity network, with both systems discharging at acceptable rates in accordance with the relevant national guidance, as well as reducing the risk of flooding elsewhere and including SUDS techniques (with the exact type and extent to be determined during detailed design). Therefore, the Proposed Development is acceptable in drainage terms.

ENERGY AND SUSTAINABILITY

- 5.126 Energy and sustainability is scoped out of the ES and is assessed in a separate report produced by Method LLP.
- 5.127 In developing the energy and sustainability strategy for the Site, regard has been had to Local Plan Policy CC2 (Sustainable Design and Construction), which supports new development where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care, and that also take account of the effects of climate change. Regard is also had for Local Plan Policy H5, relating to CO2 emissions and energy demand, and emerging Policy H5 which requires net-zero development as well as further energy related criteria.
- 5.128 As established in the Energy and Sustainability Statement, prepared by Method Consulting, the development proposes to achieve a 48% reduction in regulated CO2 emissions on Site, which far exceeds the 35% reduction required as per Local Plan Policy H5. An average of approximately 1,112 tonnes of regulated CO2 per annum requires offsetting after all on-site measures, calculated based on average carbon factors over a 30-year period, starting in 2026. This equates to an indicative Carbon Offset Payment of £66,710 at this stage of the design, which is likely to change once a reserved matters are submitted for approval.
- 5.129 As the application submitted for planning permission is for outline consent, the extract details of the heating and domestic hot water system, as well as the potential for renewable energy technologies on the site, have not been finalised. However, as set out in the Energy and Sustainability Statement, it is anticipated that the development will incorporate a heating scheme that is fed by electric heat pumps, with suitable sized photovoltaic ('PV') panels spread across the roof tops of the residential blocks, where space is not already required for other plant.
- 5.130 Based on representative SAP calculations under Part L 20 2021, we are anticipating at least a 50% reduction in regulated CO2 emissions on site. This will be achieved through a combination of energy efficiency measures, and low and zero carbon technologies.
- 5.131 Energy efficiency is to be improved via passive design measures such as optimising natural lighting, incorporating thermal mass, and maximising potential for solar gains in the winter months; all of which will act to help reduce overall energy demand. Combining these measures with the use of heat pumps for domestic hot water and space heating should allow a 50% improvement over the target emission rate of Part L 2021. Further improvements may also be achieved once the PV array is taken into consideration, but an estimate on this percentage improvement

has not yet been established and will be determined as the detailed design of the development progresses and as reserved matters applications are submitted.

- 5.132 It is considered that these measures exceed the requirements of the Local Plan to achieve at least a 35% reduction in CO2 emissions on the Site. It is proposed that any remaining CO2 emissions will be discussed and agreed with Reading Borough Council via a carbon offset scheme.

CONTAMINATION

- 5.133 The effective protection of the environment is a key aspect of sustainable development, and reducing pollution is one of the core planning principles in the NPPF. **Policy EN16** (Pollution and Water Resources) states that development will only be permitted on land affected by contamination where it is demonstrated that contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use. This policy wording remains unchanged in emerging Policy EN16.
- 5.134 A 'Phase 1 Environmental (Desk Study) Technical Note' was submitted in support of the original application for planning permission. The revised proposals will not have an impact on the level of contamination identified within the Phase 1 Study, and is therefore submitted in support of this application.
- 5.135 The study assesses the likely geo environmental conditions and potential for contamination predominantly through the use of historical land use records, investigative records and results, and the findings on nearby development sites. Based on the historical and background geo-environmental information the report concludes that there is a high potential for contamination at the Site. With the following factors identified as the principal risk drivers:
- Made Ground
 - Contamination from previous use as railway buildings and tracks (metals and hydrocarbons)
 - Contamination from previous use as a biscuit factory.
 - PCB contamination from previous use as electrical substation.
 - Hydrocarbons from previous site use as a car park
 - Sulphates within the ground
 - Asbestos from previous railway sidings use (brakes & maintenance), former buildings and possibly existing buildings on the site
 - Unexploded Ordnance
- 5.136 However, the assessment sets out relevant next steps to ensure that the contamination risk factors are mitigated and development can proceed safely without risk of further contamination or degradation of surrounding amenity. Principally the report concludes that a comprehensive site intrusive investigation is required, whilst also carrying out environmental sampling and trial pits, which can be secured by and appropriately worded condition.
- 5.137 A phase 2 assessment will also be undertaken, and can be secured via condition, and the report identifies that it should also consider the further assessments that may be required, depending on the results of the phase 2 assessment.
- 5.138 The Environment Agency consultation response, published 22 January 2024, established that the Proposed Development will be acceptable if certain conditions are included within the decision notice. These conditions relate to the provision of a remediation strategy and a verification strategy, to ensure the development is suitable for its end use.
- 5.139 In summary, despite the site having a high potential for contamination the Phase 1 Environmental (Desk Study) Technical Note identifies a clear strategy for assessing and mitigating contamination found on the Site. Therefore, provided such measures are incorporated and secured via appropriately worded conditions the Proposed Development will be acceptable with regard to contamination. The applicant is willing to accept this condition.

ARCHAEOLOGY

- 5.140 **Policy EN2** (Areas of Archaeological Significance) requires applicants to identify and evaluate sites of archaeological significance and assess the archaeological impacts of the development proposals. The Policy wording remains unchanged within Emerging Policy EN2.
- 5.141 Given that the Site is located within an area of archaeological interest, the original application was supported by an Archaeological Desk Based assessment, prepared by Orion consulting. The revised application will not have any impact on the findings of this assessment, so this assessment is submitted in support of this application.
- 5.142 The assessment includes the results of a site survey, an examination of published and unpublished records, and charts historic land-use through a map regression exercise. In summary the assessment identifies that remains of significance that would require preservation in situ are not expected – On the basis that the Site contains no designated archaeological assets and the Site has the following potential for non designated archaeological assets:
- A high potential for buried geoarchaeological deposits associated with the paleo-channel / Plummary Ditch. Such remains are considered likely to be of local significance.
 - A low potential for historic (early medieval, medieval or post-medieval) in situ archaeological evidence associated with the Plummary Ditch. Such remains are likely to be fragmentary and considered likely to be of local – regional significance.
 - A low potential to contain finds or features from the Roman-post medieval periods. Such remains are considered likely to be fragmentary and of local to regional significance
- 5.143 Furthermore, modern development appears to have heavily truncated the upper levels of earth likely to contain the above, therefore the groundworks for construction are not anticipated to have a high level of physical impact on the non-designated heritage assets. Notwithstanding the above, mitigation is proposed in order to ensure any significant archaeological finds can be recorded, in the form of geoarchaeological deposit modelling and geoarchaeological evaluation which can be secured via an appropriately worded condition.
- 5.144 The assessment also considered the potential for impact on surrounding designated archaeological assets within the surrounding study area of 300m. The study identifies that the Site makes a slight contribution to the significance of the abbey precinct, however that the assessment concludes that the Proposed Development will not result in a significant change to the significance of the scheduled monument or how the monument is appreciated/experienced. As such the Proposed Development accords with the relevant national and local archaeological policies and guidance and is acceptable in this regard.
- 5.145 Berkshire Archaeology provided consultation comments on the original submission on 28 September 2023, recommending a condition to require a programme of archaeological works, including a Written Scheme of Investigation (WSI) to be submitted to the council. This is a standard condition, and within the consultation it is acknowledged that there is low likelihood of potential geoarchaeology. The applicant is willing to accept this condition.

NOISE AND VIBRATION

- 5.146 Policy EN16 (Pollution and Water Resources) supports development proposals that are sensitive to the effects of noise. In addition, Local Plan Policy CC8 (Safeguarding Amenity) supports development proposals that protect the living environments of existing residential properties, as well provide acceptable living conditions for new residential properties, including in relation to noise and disturbance.
- 5.147 On 20 September 2023, Environmental Health consultation of the previous scheme confirmed no objection to the original proposal, subject to the inclusion of a condition requiring the submission of a noise assessment in order to protect the residential dwellings from both the external noise environment and from noise emissions from the commercial use.
- 5.148 Accordingly, noise and vibration assessment has been scoped into the ES and it is considered that the Proposed Development is in accordance with Policies EN16 and CC8. The assessment considers the likely effects at all

surrounding potentially receptors, including both residential and commercial land uses, for the demolition construction and operation of the Proposed Development.

- 5.149 The baseline was appraised during September 2021 through a combination of long-term unattended noise monitoring and sample measurements taken around the Site. Survey data has been supplemented by noise data from the Defra Extrinsic noise database (Defra, 2019).
- 5.150 The existing conditions are unlikely to evolve significantly from those surveys, given that the dominant noise sources are road traffic and railway events and no significant changes to these networks are envisaged.
- 5.151 The noise and vibration assessments have been based primarily on principles and guidance included in British Standards and relevant Industry Guidance. The magnitude of impact for construction plant noise is based on the 'ABC' methodology set out in BS 5228-1, which aligns thresholds of significant construction noise with respect to the existing ambient noise levels.
- 5.152 All assessments have been based on determining whether the Significant Observed Adverse Effect Level (SOAEL) is expected to be exceeded, i.e. where significant effects occur.
- 5.153 Significant temporary effects are expected at the Kenavon Drive residences during the demolition and construction phases of the Proposed Development. All permanent operational effects are expected to be negligible (not significant).
- 5.154 Likely temporary effects during the period of demolition and construction works will be moderately adverse at the Kenavon Drive residences (construction of Phase 3 superstructure), Phase 1 (construction of Phase 2), and Phase 2 (construction of Phase 3). The likely effects during the period of demolition and construction works for all other receptors and periods are either negligible or minor adverse (not significant).
- 5.155 These predictions are based on reasonable worst-case assumptions in terms of plant/activity locations relative to the receptors, so there will be extended periods in the demolition works when the noise levels will be inherently lower than those predicted.
- 5.156 The significant demolition and construction noise effects have been assessed to occur at the Kenavon Drive residences, Phase 1, and Phase 2, with all permanent operational effects expected to be negligible (not significant). The mitigation measures include the contractor adopting Best Practicable Means (BPM), which will be outlined within a Construction Environmental Management Plan (CEMP).
- 5.157 In relation to construction vibration, residential receptors at Kenavon Drive, located 20-100 metres from piling activities, are expected to experience vibration levels at or below 1 mm/s, representing a low magnitude of impact and assessed as minor adverse (not significant). Non-residential receptors within this range are assessed as negligible. For receptors within 20 metres of piling, vibration levels are predicted between 1 – 3 mm/s, corresponding to a medium magnitude of impact. The effects on receptors located at Phase 1 and Phase 2 during the piling of subsequent phases upon occupation of the preceding phases are assessed to be moderate adverse.
- 5.158 In accordance with local policy, during operation, the building services plants will be designed to achieve the limits established within the Noise Assessment, and it is expected that the magnitude of impact will be very low and the effect will not be significant.
- 5.159 The CEMP will be secured by an appropriately worded planning condition. The Site Suitability assessment indicates that appropriate conditions can be achieved for residential dwellings, though it would be necessary to rely on façade sound insulation. This is typical for most residential developments within urban areas. Control of maximum noise events will need to be considered as part of a detailed assessment as the building design progresses, including consideration of the overheating scenario.
- 5.160 Appropriately worded planning conditions relating to building services plant noise emissions, amplified music emissions and indoor ambient noise levels within dwellings are required.

- 5.161 Therefore, provided the limits are adhered to as set out in the noise assessment the noise levels within and around the Proposed Development will be acceptable in all regards, and these limits can be secured by an appropriately worded condition.

ECOLOGY AND BIODIVERSITY

- 5.162 The NPPF supports development that minimises impacts on, and provides net gains for biodiversity, including through establishing coherent ecological networks that are more resilient to current and future pressures. Local Plan Policy EN12 (Biodiversity and the Green Network) states that on all sites development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.
- 5.163 Emerging Policy EN12 expands on this, setting a requirement for 10% BNG, as well as outlining further requirements, relating to new tree planting, provision of bird and bat boxes where possible, and wildlife-friendly landscaping.
- 5.164 The mandatory requirement for development to deliver 10% Biodiversity Net Gain (BNG) came into effect on 12th February 2024. Therefore a Biodiversity Net Gain calculation has been undertaken by Stantec and is submitted alongside this application, demonstrating that the Proposed Development will achieve the minimum requirement for 10%. Further assessment of the development will be carried out at reserved matters stages to clarify the delivery of the minimum biodiversity requirements.
- 5.165 In order to demonstrate the improvements to ecology and biodiversity the Proposed Development provides in relation to the existing context, an ecological assessment of the proposals has been undertaken, as well as an extended Phase 1 Habitat Survey, which both form part of the Ecology Chapter of the Environmental Impact Assessment. As set out within this Chapter, the Site is comprised predominantly of hardstanding and buildings with small areas of amenity grass, scattered trees and ornamental planting.
- 5.166 The Site is not adjacent to or otherwise connected to any statutory designated areas, although the rail line directly north of the Site is designated as an 'Area of Identified Biodiversity Interest' as shown on the Reading Borough Council Local Plan Proposals Map and includes open green spaces and wildlife corridors that are said to contribute to Reading's Green Network. However, the Proposed Development will not affect the integrity of this identified area of biodiversity interest; the landscape design will add to and strengthen the ecological function of this area, as well as contribute to the wider green network.
- 5.167 The Site currently supports habitats of limited intrinsic ecological value but nevertheless there may still potentially support limited numbers of legally protected species, including nesting birds and foraging/ community bats. The Ecology Chapter therefore sets out measures to avoid contravention of the legal protection afforded to birds, as well as recommendations for the implementation of industry standard pollution control measures, which will be implemented by the Applicant. These measures will also be further detailed within a Construction Environment Management Plan, which we understand is likely to be added as a planning condition.
- 5.168 The landscape design for the Site seeks to retain existing trees, as well as provide significant enhancements for biodiversity in comparison with the baseline position identified, including through the planting of a native species hedgerow along the northern boundary, the inclusion of biodiverse roofs on residential buildings and the provision of bird and bat boxes. These measures will provide additional habitats for invertebrates and foraging resources, as well as roosting and nesting habitats for bats and birds.
- 5.169 Given the limited ecological value of the Site at present, the landscape measures that form part of the Proposed Development will significantly enhance the Site, in accordance with the NPPF and Local Plan Policy EN12.
- 5.170 Within consultation of the original application, RBC Ecology confirmed that subject to demonstration that the Proposed Development will result in a Biodiversity Net Gain and the inclusion of conditions relating to provision of details of soft and hard landscaping, they confirmed that there were no objections to the original scheme on ecology grounds, which the Applicant is willing to accept. The amended scheme exceeds the minimum BNG of 10%, and will provide a similar quantum of landscaping and ecological benefit, as well as a reduced density of development, and is therefore considered acceptable in ecological terms as demonstrated by the Ecological Assessment Report

TREES

- 5.171 Policy EN14 (Trees, Hedges and Woodlands) seeks to protect against the removal of trees and secure appropriate mitigation measures, within development proposals. Accordingly, the statement demonstrates the acceptability of the proposed tree strategy through the conclusions of an Arboricultural Statement which is enclosed in support of this Application. The Proposed Development has made provision for the retention of trees where possible; this principally includes the retention of the seven category B trees on the south boundary of the Site along Kenavon Drive amongst others.
- 5.172 During consultation on the original application, the RBC Natural Environment Officer raised several concerns and recommendations regarding the proposed landscaping and tree strategy. This includes noting that Prunus species were overrepresented in the borough and should be reconsidered. The consultation response also highlighted uncertainty regarding retaining vegetation due to the proposed service road and concerns about the proximity of east block 3 to TPO trees.
- 5.173 The amended proposals have resulted in reduced block footprints and reorientation of the residential blocks, which includes east block 3, and reorientation of spaces within the development. As a result, this will provide greater protection of the TPO trees located on the south east border of the Site by incorporating a larger area of public open amenity space between the south elevation of east block 3 and the TPO trees.
- 5.174 It should be noted that RBC Natural Environment emphasised that the proposals for an increased width to the eastern access may impact the TPO trees and would need clarification. Due to the concern about highway safety, it has been decided that there is no alternative other than having to remove one TPO tree. This is also necessary to facilitate the delivery of indicative cycle route that was requested by RBC Highways during consultation of the previous scheme. Ultimately it is a legacy of the original construction of the retail park.
- 5.175 The proposals also includes substantial planting of trees and other landscaping measures as part of the open space and public realm. This is guided by the design codes which provide rules to ensure the quality of the landscape and planting strategy is maintained throughout. As such it is considered that these measures are in full compliance with the requirements of Local Plan Policy EN14 will assist in improving the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area. In addition, the landscaping measures proposed provide for biodiversity and contribute to reducing carbon, directly assisting with addressing climate change.
- 5.176 A Landscape Management Plan will also be secured via condition to ensure the management and maintenance of the extensive planting at the Site to maximise the quality of all of the planting, including the retained trees and the proposed.

AIR QUALITY

- 5.177 In line with the requirements of Local Plan Policy EN15 (Air Quality) the Proposed Development has had regard to the need to improve air quality within the Borough and reduce the effects of poor air quality. Accordingly an Air Quality Assessment is scoped into the Environmental Impact Assessment. The air quality chapter confirms that due to the lack of ecological receptors within the threshold defined by the IAQM, these can be screened out. However, that the assessment in respect of human receptors is screened in, in accordance with the guidance.
- 5.178 The Environmental Health consultation on the original application from 20 September 2023 highlights that the submitted Environmental Statement concludes that there will not be a negative impact on air quality as a result of the development due to the low number of car parking spaces and as it replaces a large amount of the commercial space. They state that if this is supported by a transport assessment, then no further assessment or mitigation is required regarding this issue.
- 5.179 Following this, an updated Transport Assessment is submitted as part of this application, and the amended scheme proposed reduces the number of car parking spaces proposed. Therefore, this conclusion should still be valid. Never, the less, an Air Quality Assessment is scoped into the EIA.

- 5.180 The assessment identifies that the Site falls partially within an Air Quality Management Area (AQMA), and therefore air quality has been carefully considered as part of the development proposals. The assessment identifies that the operational road traffic emissions will be lower than the existing road traffic emissions, this is a result of the reduced trip generation as identified in the transport assessment prepared by Stantec. Therefore, the Proposed Development is considered to give rise to beneficial impact on local air quality, improving the quality of the AQMA for the operational phase of development.
- 5.181 In the construction phase of development, the assessment identifies a potential risk of adverse effects. However it is noted that these can be mitigated through appropriate methods secured via a Dust Management Plan (DMP) and Construction Environment Management Plan (CEMP) which can be secured via appropriately worded conditions. The CEMP and DMP will include measures as set out in the Air Quality Assessment such as regular monitoring and inspections, wheel washing, screening and covering, dust suppression techniques (for specific cutting and grinding works), amongst others.
- 5.182 Accordingly, the Proposed Development accords with Local Plan Policy EN15 and emerging Policy EN15 as it improves air quality in the long term in respect of the operational impacts, and is also in accordance with the relevant national air quality guidance. Furthermore, the risk of potential adverse impacts of the construction phase can be mitigated via a CEMP and DMP, therefore ensuring that no phases of development in the short, medium and long term give rise to any unacceptable impacts on air quality.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 The Proposed Development submitted for outline planning permission has been guided by national and local planning policy, planning guidance and other material considerations. The Applicant has also engaged extensively with Reading Borough Council and other key stakeholders, including with members of the public, throughout the pre-application stage, which began in December 2019. As well as throughout the determination period of the previous application. As demonstrated in this Planning Statement, and throughout the suite of information that has been submitted in support of the outline Application for planning permission, the Proposed Development is in accordance with the Development Plan for the Site, and in particular, its Site Allocation in the Reading Borough Local Plan (Policy ref: CR13b) and the emerging Site allocation which proposes an increased density of dwellings per hectare on the Site.
- 6.2 Since the submission of previous outline application ref. 230822 on 8th June 2023 (validated 14th September 2023), consultation comments have been received and reviewed including requests for conditions as well as comments that request amendments to the application.
- 6.3 A number of meetings have also been held with the case officer in relation to the design of the outline scheme. As a result of responding to the consultation comments and discussion with Reading Borough Council a design review has been undertaken by the project team. This has led to a number of key changes.
- 6.4 On 3 November 2025, Reading Borough Council formally confirmed that Outline Planning Application reference PL/23/0822 had been disposed of. In order to build upon the progress made in relation to the previous application and engagement with the Local Planning Authority, this application is submitted as a new Outline Planning Application.
- 6.5 The proposed amendments within this new Application remain broadly within the scope of the previous scheme's description of development, and again seeks all matters reserved, save for highway access. The main amendments can be summarised as follows:
- Reduction in maximum building heights adjacent to the railway and facing Kings Meadow
 - Improved variation in heights of the blocks
 - Reduction of block footprints, reorientation of the spaces within the development and increased sense enclosure
 - Reduction in the size of the basement car park and therefore removal of the podium to the east allowing seamless integration of the site with surrounding areas
 - Reduction in commercial floorspace and acceptance of an appropriately worded condition to control the range of class E uses permissible at the Site.
- 6.6 These amendments represent a significant design development of the scheme that responds to engagement with officers and consultees, resulting in a scheme that performs very strongly against the adopted and emerging Site allocation for the Site whilst also addressing officer comments in relation to design. The adopted allocation CR13b allocates 615-920¹ residential units to the application Site area and the emerging allocation proposes an increase to 644-962 dwellings for the application Site. Therefore the proposals for up to 700 dwellings comfortably meets the policy aspirations for the Site that does not push the boundaries of density that could be appropriate at the Site.

¹ When calculated on a pro rata basis relative to the wider site allocation.

- 6.7 A set of Parameter Plans and Design Codes have been submitted for approval which define the development zones and plot boundaries on the Site, together with the land uses; site levels; amenity play space and publicly accessible open spaces; vehicular access and circulation; and maximum building heights and minimum separation distances. In addition, a Development Specification Document is also submitted for approval, which covers matters that cannot be captured in the Parameter Plans, such as the maximum floorspace, accessibility and parking.
- 6.8 An illustrative scheme for the Proposed Development of the Site, which accords with the Parameter Plans, Design Codes and Development Specification Document, has been submitted to Reading Borough Council as part of the Design and Access Statement. This illustrative scheme does not represent the only way that the development of the Site could come forward, but rather demonstrates a form of high quality, high density development that could enable the further realisation of the CR13b Site allocation and the delivery of a new residential community in the east of Reading town centre.
- 6.9 The Design Codes submitted for approval provide a comprehensive set of 'rules' that will ensure that any future submissions for the approval of reserved matters at the Site will achieve a consistent quality of design. Additionally, the Parameter Plans will ensure that any residential or commercial development will make efficient use of the previously developed, brownfield Site, and maximise its development potential.
- 6.10 Together the Design Codes, Parameter Plans and Development Specification Document submitted for approval will ensure that future development at the Site responds positively to its local context, and creates and reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm. The illustrative scheme positively and effectively relates to the Site's wider context, including in respect of key views, and creates high-quality open spaces whilst improving the Site's connectivity.
- 6.11 The amended Application proposals have the potential to up to 700 homes out of the indicative potential of 1230 to 1840 dwellings that form part of the wider CR13b allocation. The introduction of new residential, commercial and flexible uses at the Site is in keeping with, and complementary to the Site's context and policy allocation and will contribute to the ongoing regeneration and revitalisation of this part of the local townscape.
- 6.12 The proposed commercial floorspace (up to 3,000 sqm) is of a scale that will serve the proposed development itself and the local Kenavon Drive area (including the adjacent Huntley Wharf). The proposals seek to demolish and redevelop the existing retail warehousing on Site and will result in a net reduction in retail floorspace of approximately 6,000 sqm. This aligns well with the adopted and emerging site allocation CR13b which allows for the provision of retail provided there is no net gain in retail floor area.
- 6.13 The Environmental Impact Assessment has assessed the maximum Parameters of the Proposed Development. In terms of scale, the submitted proposals are cognisant of the fact that the Site falls outside of the area supported for Tall Buildings in Reading, defined as being above 10 storeys of commercial or 12 storeys of residential use (36m tall), as per Policy CR10. The height of the buildings when measured from the lowest point of the Site (+39.0m AOD) is a maximum of 34.5m and therefore does not reach the tall building threshold of 36m when measured from any point of the Site. Furthermore as set out above the built form has been manipulated through design development to ensure it responds well to the surrounding context particularly to the south of Forbury Road and to the south east to Huntley Wharf through the incorporation of stepping set, backs and variation in heights.
- 6.14 The ES has tested the Application proposals and has concluded that:

Socio-Economics

- 6.15 Both primary and secondary school provision is expected to be able to absorb the expected number of school children generated from the Proposed Development. Whilst there is expected to be some effect on nurseries of approximately 11 places in excess of capacity, the proposals generate a substantial CIL contribution which provides appropriate mitigating funding for education and GP services as set out in Reading's Infrastructure Funding Statement.

Noise and Vibration

- 6.16 With the implementation of a CEMP and the contractor adopting best practice the assessment indicates that at the construction stage there will be a temporary minor adverse effect on the majority of the assessed receptors during demolition and construction. Operational noise levels associated with road traffic and rail noise have been assessed. Through employing appropriate mitigation measures such as incorporating façade sound insulation, all operational effects are expected to be Negligible and therefore Not Significant.

Air Quality

- 6.17 As the Site is currently a retail park, construction vehicle movements are expected to be lower than the current use of the Site. A CEMP and a Dust Management Plan will be implemented to mitigate the impacts of construction vehicle movements on human health receptors in the local area. There is to be a maximum of 130 basement car parking spaces to serve the residential element and 53 ground level spaces serving the class E element of the Proposed Development, therefore comprising a low-car development. As overall operational vehicle movements are expected to decrease as a result of the Proposed Development, the potential for adverse impacts from operational road traffic is considered Not Significant. As the Proposed Development is expected to lead to a decrease in road traffic emissions compared to the existing Site, any in-combination effects will be less than those assessed in isolation through individual planning applications. The overall cumulative effect at operational stage is considered Not Significant.

Heritage

- 6.18 No significant effects have been identified in respect of heritage during the demolition and construction stage and would be temporary. On balance, the Proposed Development is judged to have a beneficial or neutral impact upon the setting of heritage receptors and therefore their heritage value is not harmed and the ability to appreciate their interest is preserved.

Townscape and Visual Impact

- 6.19 The height, overall mass and profile of the maximum parameters of development proposed for the Site have been considered from a number of viewpoints as set out in the Townscape and Visual chapter of the ES. The Proposed Development will make a positive visual contribution to the city skyline and realise the potential of an allocated, brownfield site. It is considered that the high quality design of the Proposed Development, which will have differing characteristics as per the submitted Design Codes, will help to provide variety and interest in visual terms in Central Reading, as well as assist in creating a distinctive character for CR13b allocated site. The provision of taller buildings on the Site aligns with the character of the wider area, which will further create a strong reference point for the Central Area of Reading, allowing for greater urban legibility in the Borough.
- 6.20 The character of the Site is an established, urban retail park of large block and large mass structures with ground surface dominated by hard materials. The Site is located within an area of evolving change and major regeneration. This context is important in the overall assessment of the Proposed Development. The Proposed Development

was assessed from 19 key views to illustrate the scale, massing and height of the Proposed Development within its townscape setting.

Daylight, Sunlight and Solar Glare

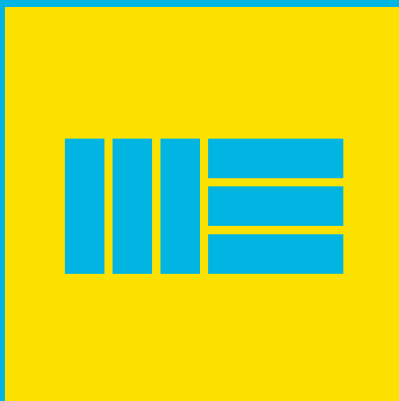
- 6.21 The operational effects present a worst-case scenario where massing will be at its greatest extent. Therefore the effects for the demolition and construction phase would be the same or less than those arising from the operational stage. Any effects will be Not Significant for daylight, sunlight and solar glare during demolition and construction of the Proposed Development. The detailed design of the Proposed Development will ensure effects are mitigated through the design.

Wind and Microclimate

- 6.22 No mitigation measures are required during the construction phase as the residual effects in respect of wind and microclimate would be temporary and negligible in the long-term. During detailed design, mitigation measures will be implemented as required to improve wind conditions at the Proposed Development.
- 6.23 The proposals will also bring significant environmental, social and economic benefits, including:
- Reading has a need for new residential dwellings. The Proposed Development could contribute up to 700 residential units, which would equate to nearly 5% of Reading Borough's housing requirement across the Local Plan period, which would also have a beneficial impact on the regional housing market.
 - The Proposed Development is likely to result in create approximately 18 FTE (185 net additional per year equivalent jobs) in Reading and 59 FTE (591 net additional per year equivalent jobs) in the UK over the construction period and there is estimated to be 123 full-time equivalent jobs created within the commercial elements during the operational phase of the Proposed Development.
- 6.24 In the light of the above, we consider that the Proposed Development is acceptable and therefore respectfully request that Reading Borough Council approve the application for outline planning permission.

MONTAGU EVANS

**70 ST MARY AXE
LONDON
EC3A 8BE**



WWW.MONTAGU-EVANS.CO.UK

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WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.