

The Heights Primary School
Mapledurham Playing Fields
129 Woodcote Road
Caversham
RG4 7LH



Planning Statement

tp bennett

for

Education Funding Agency

April 2017



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1. INTRODUCTION

1.1 This Planning Statement is submitted in support of a planning application made by the **Education Funding Agency** [EFA] for the following proposal:

Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking and servicing.

1.2 The application is being made to Reading Borough Council [RBC] as Local Planning Authority [LPA].

1.3 In 2012, RBC identified a shortage of primary school places in the Caversham and Mapledurham area of the Borough. It called for a proposer group to secure Central Government funding to establish a new Free School – and The Heights Primary Free School [THPS] was approved in principle in 2013.

1.4 The EFA carried out an extensive site search exercise, and, in early 2014, initially purchased a site at High Ridge, Upper Warren Avenue to accommodate the new school. This proved contentious, however, and a further review of sites was undertaken. RBC led a wide-ranging public consultation on a shortlist of five potential sites that served the school catchment. The Mapledurham Playing Fields site emerged from this process as the most suitable and potentially available site. It also commanded greatest public support, albeit there remained a significant level of local opposition.

1.5 The Mapledurham Playing Fields (MPF) is owned by a Charitable Trust administered by RBC. The EFA is negotiating the purchase of a 0.5ha site from the MPF Charitable Trust to accommodate a permanent home for THPS.

1.6 In the meantime, THPS has opened in temporary accommodation outside the catchment area, on the site of a former children's nursery at 82 Gosbrook Road. The temporary planning permission on this site runs out on 31 August 2018.

1.7 This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations. The Statement is structured as follows:

- Section 2 – provides detail of the application proposals
- Section 3 – briefly describes the site and surrounding area
- Section 4 – outlines the site's planning history, including pre-application discussions with the LPA
- Section 5 – provides an overview of the principal planning policy and guidance relevant to the assessment of the proposed development

- Section 6 – provides an assessment of the proposal against the provisions of the Development Plan and other material considerations
- Section 7 – sets out the likely approach to planning obligations
- Section 8 – conclusions

1.8 This Planning Statement should be read in conjunction with the following documents which form part of the planning application:

- Application form (on-line)
- CIL questionnaire
- Application Drawings (David Miller Architects), including landscaping proposals (Ryder Landscape Consultants)
- Design and Access Statement (David Miller Architects)
- Sports Pitches Agronomic Assessment (Tom O'Hare)
- Transport Assessment (MLM)
- Framework School Travel Plan (MLM)
- Energy Statement (BSD)
- Sustainability Statement (BSD)
- BREEAM Pre-Assessment Report (ZED)
- Flood Risk Assessment (CampbellReith)
- Surface Water Management Plan (CampbellReith)
- Archaeological Desktop Study (Oxford Archaeology)
- Contamination Desktop Study (RPS)
- Noise Assessment (Accon UK for CampbellReith)
- Air Quality Assessment (Accon UK for CampbellReith)
- Arboricultural Planning Statement, incorporating Arboricultural Impact Assessment (ADAS)
- Preliminary Ecological Appraisal (CampbellReith)
- Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report (RPS)
- Utilities Statement (BSD)
- Statement of Community Involvement (tp bennett)

1.9 The proposal has a gross external floor space of 2,176m². The requisite planning application fee of £11,550 has been paid by bank transfer directly by the applicant.

2. PROPOSED DEVELOPMENT

2.1 The proposal is to erect of 2FE primary school for 350 pupils, with associated landscaping, multi-use games area (MUGA), car and cycle parking and servicing.

2.2 As set out in detail in the accompanying Design and Access Statement and scheme drawings (by DMA), the development includes:

- a new school building of 2,176m² (GEA), containing a full suite of new teaching facilities: multi-purpose hall, library, classrooms, kitchen and staff accommodation
- new external landscaping, including informal social play areas, new perimeter fencing, replacement tree planting, and a floodlit multi-use games area (MUGA)
- cycle/scooter and car parking, improved access from Upper Woodcote Road, with drop-off, service access and turning in a resurfaced car park adjoining the pavilion

2.3 THPS has a standard class size of 25 pupils. The following table sets out how the school roll will increase over the coming years, from the 168 pupils currently at the school's Gosbrook Road site, to the full complement of 350 pupils from September 2020.

<i>Year (Sept)</i> <i>Class</i>	2016	2017	2018	2019	2020
YR	50	50	50	50	50
Y1	50	50	50	50	50
Y2	50	50	50	50	50
Y3	18	50	50	50	50
Y4		18	50	50	50
Y5			18	50	50
Y6				18	50
Total	168	218	268	318	350

2.4 It should be noted that the submitted Transport assessment assumes a class size of 30 (and a total school roll of 420). This is solely for the purpose of providing a robust assessment of potential transport impacts (ie a worst case scenario). THPS's class size policy is not under review.

3. SITE AND SURROUNDING AREA

3.1 The site

- 3.1.1 A detailed analysis of the site and surrounding area is provided in the submitted Design and Access Statement (DMA).
- 3.1.2 The application site (see Fig 1 below) comprises the north-western corner of the Mapledurham Playing Fields, together with the access road from Upper Woodcote Road and the informal car park adjoining the MPF pavilion.

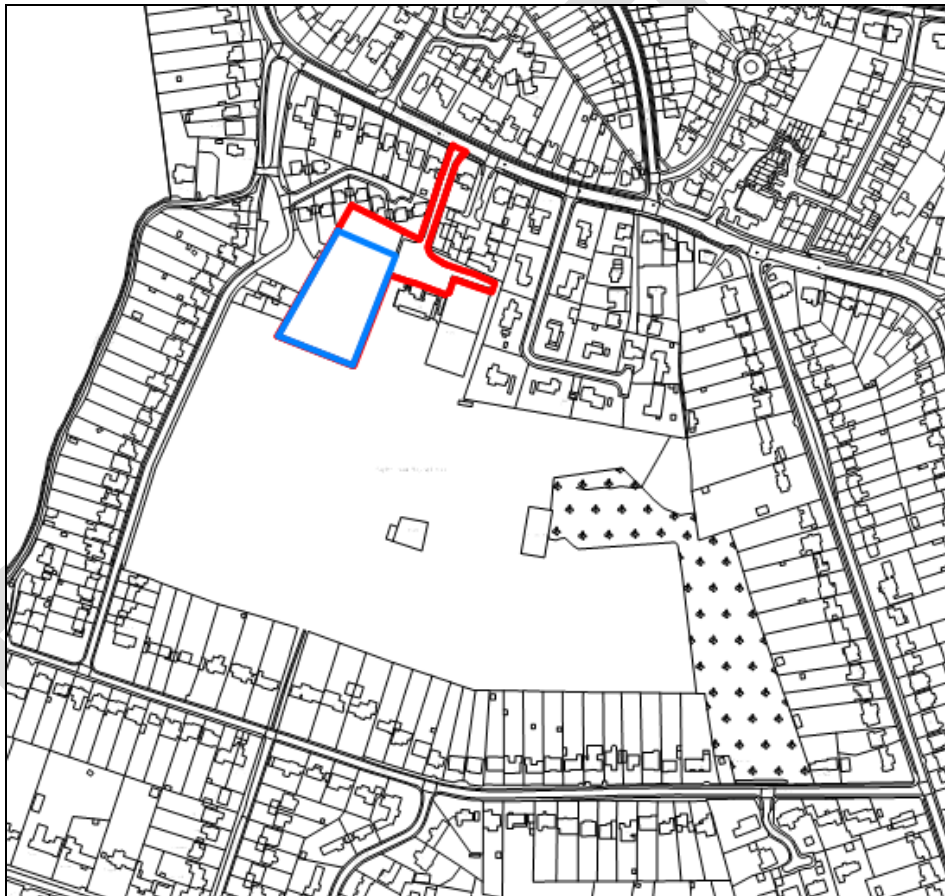


Figure 1: Site location plan

- 3.1.3 The MPF site was gifted in 1938 by Charles Hewett to the National Playing Fields Association, for use as a recreation ground. It is held in trust by RBC. The charitable purpose of MPF is “the provision and maintenance of a recreation ground for the benefit of the inhabitants of the Parish of Mapledurham and the Borough of Reading without distinction of political, religious or other opinions.”

- 3.1.4 The EFA is in negotiation with the Trust to purchase the land for the school (0.5ha), shown blue in Fig 1.
- 3.1.5 The MPF is some 11ha in size. Its facilities include a car park, pavilion (currently largely closed), four floodlit tennis courts with fencing, a children’s play area in the centre of the site, a hard-surfaced ball court, and community orchard. At the eastern end of the site is a protected dry valley and a local wildlife site. There are wooded boundaries and stands of trees.
- 3.1.6 The site’s main vehicular access is from Upper Woodcote Road. There is a secondary gated entrance off Chazey Road in the south east corner of the site. There are numerous informal entrances used by visitors on foot as the boundary fence is missing in many locations – including in the northwestern corner of the site where the new school is proposed to be sited.
- 3.1.7 The sports use of MPF is mainly by local football clubs – Caversham Trents FC, Soulball (coaching for Caversham Trents U8s) and Volunteer FC. A bridge club and a toddler group used to use the pavilion.

Group	No of participants	Facilities used	Frequency/ timing	Notes
Caversham Trents FC	>100	Pitches, changing rooms	M-Th eves training Sa-Su 9am-1pm matches Sa Summer training	Also use Emmer Green Recreation Ground and Highdown astroturf
Volunteer FC	20-30	Pitches	>2x/week	Also use other parks
Soulball	20-30	Pavilion	1x/week	Pavilion not now available; also use Emmer Green Primary School
Mapledurham Bridge Club	30-40	Pavilion	1x/week	Pavilion not now available; now meets elsewhere
Escape Toddler Group	30-40	Pavilion	>2x/week	Pavilion not now available; now use 1st Reading YMCA Sea Scouts HQ, The Warren RG4 7TH

[Sources: Ryder Landscape Consultants Landscape Review March 2016 and pre-application response from RBC Leisure and Recreation received 10.1.17]

- 3.1.8 There is considerable informal use of the recreation ground, particularly by dog walkers. The children’s playground tends to be used more in the summer; there is no footpath access to it.

3.2 The Surrounding Area

3.2.1 The site and its surroundings are shown in the aerial photograph below (Fig 2).



Fig 2: Aerial photograph of application site

3.2.2 The MPF is bordered to the north, east and south by residential gardens. On the western side is Hewett Avenue.

3.2.3 The proposed school site lies to the south of Hewett Close and to the east of 92 and 82 Hewett Avenue. Between these there is an open area of grass that allows for informal access into MPF.

4. PLANNING HISTORY

4.1 Planning history

4.1.1 The Mapledurham Playing Fields site has a limited planning history relating to the pavilion and the tennis courts, the most relevant of which is as follows:

<i>Reference</i>	<i>Description of development</i>	<i>Decision/date</i>
890904	Single storey flat roof extension to the pavilion's changing rooms.	Permitted 10.1.1990
930614	Creation of a tennis court.	Permitted 28.4.1994
940439	Erection of floodlighting to two tennis courts.	Refused 19.10.1995
981046	Provision of floodlighting to two tennis courts.	Allowed on appeal 8.4.1999
130613	Replacement and extension of roof, installation of new roof lights and construction of glazed veranda on east elevation	Permitted 1.7.2013

4.1.2 The 2013 permission for works to the pavilion has been started and is therefore extant; it has not been completed. The 1999 permission on appeal for floodlighting is pertinent as the school MUGA is proposed to be floodlit.

4.1.3 The existing Heights Primary School is located at 82 Gosbrook Rd, Reading RG4 8BH, the site of a former children's nursery. It initially received planning permission for a two-year period in July 2014. This was subsequently extended until 31 August 2018. A recent application for a standalone music building was withdrawn given concerns about noise breakout and impact on residential neighbours. The full planning history is as follows:

<i>Reference</i>	<i>Description of development</i>	<i>Decision/date</i>
140940	Demolition of existing nursery school buildings and construction of a temporary single storey modular unit and minor external works associated with the site's use as a non-residential institution (Class D1) for 2 years.	Permitted 25.7.2014
151283	Construction of a first floor classroom extension over existing single-storey classrooms to form enlarged temporary school, for an extended temporary period until 31 August 2018.	Permitted 10.3.2016
160676	Application for approval of details reserved by condition.	Discharged 15.6.2016
162290	Erection of a freestanding garden building for use as a music teaching room. The proposed structure is 3.1m x 3.7m x 2.4m high with a floor area of 11.47 sqm.	Withdrawn 3.3.2017

4.2 Pre-application advice

- 4.2.1 The EFA submitted a formal request for the receipt of pre-application advice from RBC and there has been a number of pre-application meetings. The outcome of these discussions was contained in a formal pre-application response from RBC dated 14 March 2017 (see Appendix 1). This letter refers to and briefly summarises consultation responses from RBC transport, leisure, tree, ecology and environmental protection officers, and Sport England.
- 4.2.2 A summary of the issues discussed and agreed in these meetings is as follows:
- 4.2.3 *Land use and impact on open space:* there is strong policy objection to the principle of the proposed school on this designated open space site. There are supportive policies in relation to community uses and sustainable travel, but there would need to be significant benefits to overcome this policy objection. Impacts on trees and ecology should be minimised.
- 4.2.4 *Design:* in the absence of detailed drawings at this stage, officer comments were limited to encouraging a material palette sympathetic to the playing field setting. Information on access, public realm and boundaries should be provided in the application.
- 4.2.5 *Parking, traffic and access:* the location is considered suitable in accessibility terms subject to improvements to crossing points on Upper Woodcote Road and upgrading of the existing access road. Co-location of the turning area with the pavilion is likely to be acceptable subject to appropriate management arrangements.
- 4.2.6 *Environmental considerations:* outlines the range of documentation relating to energy/sustainability, BREEAM pre-assessment, air quality and noise that would be required to support this application. Others to be submitted include archaeology and contamination, though not specifically required. Overlooking is unlikely to be an issue but lighting should be the minimum necessary.
- 4.2.7 *Planning obligations:* the areas where obligations were likely to be required including: package of measures to upgrade and provide enhanced leisure provision on the MPF in conjunction with operators and landowners; upgrading the pavilion car park; off-site highways works; and employment and skills plan. Schools attract a nil CIL charge.

4.3 Community engagement

- 4.3.1 The proposals have been the subject of several phases of both general and specific public consultation.
- 4.3.2 Having identified a shortfall in primary provision in the Borough, RBC undertook a series of "Let's Talk Education" events in 2012- 2013. This identified eight schemes for permanent school expansion schemes.

- 4.3.3 In the Caversham area the absence of a primary school meant that RBC needed to promote a new school – and THPS was the result, Free Schools being the Government’s preferred model for delivery of new schools. The EFA initially purchased High Ridge for the school, but this was controversial and ultimately unsuitable. RBC therefore undertook a consultation March-May 2015 on five possible school sites. That process also included a call for alternatives, though none was forthcoming.
- 4.3.4 The MPF site emerged from that process as the most suitable and potentially available site, as well as the one attracting widest public support (see Appendix 3). The EFA subsequently undertook local consultation early in 2016, before it had been established that the EFA purchase would include a sizeable sum for improvements to the MPF facilities.

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5. PLANNING POLICY CONTEXT

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan comprises the following Reading Borough Local Development Framework documents:

- Core Strategy (adopted January 2008; updated 27 January 2015) [CS]
- Sites and Detailed Policies Document (adopted October 2012; updated 27 January 2015) [SDPD]

5.1.2 Supplementary guidance material to the consideration of the application includes:

- Employment, Skills and Training SPD (April 2013)
- Planning Obligations SPD (April 2015)
- Revised Parking Standards and Design SPD (October 2011)
- Revised Sustainable Design and Construction SPD (July 2011)

5.1.3 The National Planning Policy Framework (2012) [NPPF] is also a material planning consideration in the determination of planning applications.

5.1.4 RBC is reviewing its main planning policies which will replace the CS and SDPD documents above (as well as the Reading Central Area Action Plan). Consultation took place on issues and options in early 2016 and a full draft Plan will be published during 2017. This will in due course be submitted to the government for public examination. Given the status of this emerging policy document, it is unlikely to be material in the determination of this planning application.

5.2 National Planning Policy

5.2.1 National planning policy is contained in the National Planning Policy Framework (NPPF, 2012). At the heart of the NPPF is a presumption in favour of sustainable development.

5.2.2 In making decisions on planning applications:

“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.” [NPPF para 187]

5.2.3 In relation to school provision, the NPPF states:

“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.” [NPPF para 72, emphasis added]*

5.2.4 This post-dates the earlier ‘*Policy Statement – planning for schools development*’ (August 2011) which sets out the government’s commitment to support the development of state-funded schools and their delivery through the planning system. The document states:

“The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect:

- *There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.*
- *Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.*
- *Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95. Planning conditions should only be those absolutely necessary to making the development acceptable in planning terms.*
- *Local authorities should ensure that the process for submitting and determining state-funded schools’ applications is as streamlined as possible, and in particular be proportionate in the information sought from applicants. For instance, in the case of free schools, authorities may choose to use the information already contained in the free school provider’s application to the Department for Education to help limit additional information requirements.*
- *A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.*

This statement applies to both change of use development and operational development necessary to the operational needs of the school.” [emphasis added]

5.3 Local Planning Policy

5.3.1 Local development plan policies for the area are contained within:

- Core Strategy (adopted January 2008; updated 27 January 2015) [CS]
- Sites and Detailed Policies Document (adopted October 2012; updated 27 January 2015) [SDPD]

5.3.2 The relevant policies from the CS, considered in detail in Section 6 of this document, comprise the following:

- CS1: Sustainable Construction and Design
- CS4: Accessibility and the Intensity of Development
- CS5: Inclusive Access
- CS7: Design and the Public Realm
- CS9: Infrastructure, Services, Resources and Amenities
- CS20: Implementation of the Reading Transport Strategy
- CS22: Transport Assessments
- CS23: Sustainable Travel and Travel Plans
- CS24: Car/Cycle Parking
- CS28: Loss of Open Space
- CS30: Access to Open Space
- CS31: Additional and Existing Community Facilities
- CS36: Biodiversity and Geology
- CS37: Major Landscape Features and Strategic Open Space
- CS38: Trees, Hedges and Woodlands

5.3.3 The relevant policies from the Development Policies, considered in detail in Section 6 of this document, comprise the following:

- SD1: Presumption in Favour of Sustainable Development
- DM1: Adaptation to Climate Change
- DM2: Decentralised Energy
- DM3: Infrastructure Planning
- DM4: Safeguarding Amenity
- DM12: Access, Traffic and Highway-Related Matters
- DM17: Green Network
- DM18: Tree Planting

- DM19: Air Quality
- SA16: Public and Strategic Open Space

5.3.4 The following plan (Fig 3) shows an extract from the Reading Proposals Map (adopted October 2012):

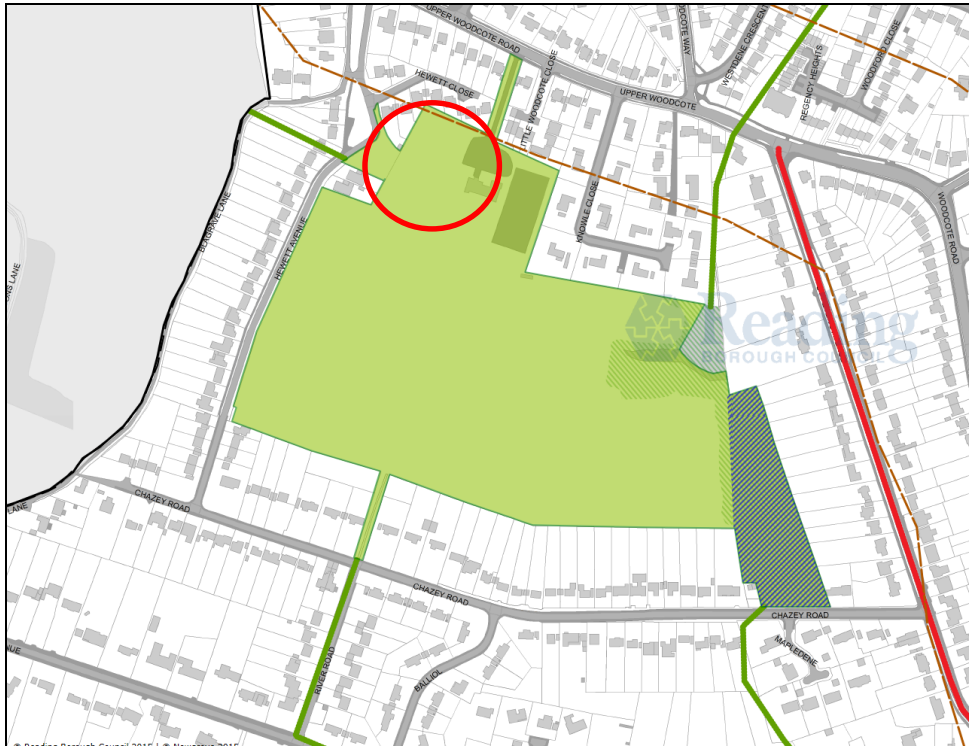


Fig 3: extract from Reading Proposals Map

5.3.5 The site is the subject to two designations:

- Public and Strategic Open Space (SDPD Policy SA16 refers)
- Air Quality Management Area along Upper Woodcote Road (SDPD Policy DM19)

5.3.6 Beyond the application site, the Proposals Map indicates proposed and existing green links (SDPD Policy DM17) and, at the eastern end of the MPF site, a major landscape feature (North Reading Dry Valleys, CS Policy CS37 and SDPD Policy SA17), and a local wildlife site (CS Policy CS36 and SDPD Policy DM17). The RBC ecologist states that these designations also relate to a lowland mixed deciduous woodland, a priority habitat.

6. ASSESSMENT OF THE PROPOSAL

6.1 Introduction

6.1.1 As outlined in Section 2, the application seeks planning permission for

Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking and servicing.

6.1.2 The main issues to be considered in respect of this application are:

- Principle of the proposed land use on the site (section 6.2):
 - Loss of open space
 - The need for additional primary school places
 - The lack of alternative available sites
 - Sport England policy
- Design (6.3)
- Ecology and trees (6.4)
- Sustainable design and energy (6.5)
- Transport, highways and parking (6.6)
- Flood risk and surface water drainage (6.7)
- Noise (6.8)
- Air quality (6.9)
- Contamination (6.10)

6.2 Land Use

6.2.1 As noted in section 5.2 above, national planning policy is highly-supportive of school development proposals. NPPF para 72 states that the Government “attaches great importance to ensuring a sufficient choice of school places is available to meet the need of existing and new communities” and that LPAs “should take a proactive, positive and collaborative approach in meeting this requirement” (note that detailed pre-application discussions have taken place). Similarly, the August 2011 Policy Statement on schools sets out a presumption in favour of the development of state-funded schools and the enabling role of LPAs.

Loss of open space

6.2.2 Notwithstanding this context, the fact is that the application site is a designated open space site. CS Policy CS28 therefore applies, and it reads as follows:

Development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted. In exceptional circumstances, development may be permitted where it is clearly demonstrated that replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land. [emphasis added]

6.2.3 The first part of this policy is restated in SPDP Policy SA16:

Important areas of Public and Strategic Open Space, as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted.

6.2.4 The policies effectively set a presumption against the development of open space sites. At the same time, however, Policy CS28 allows for exceptions to this where improvements to recreational facilities can be provided to off-set the loss of open space. This test is emphasised in the pre-application advice received (see Appendix 1).

6.2.5 The proposed EFA purchase of 0.5ha would take 4.5% of the overall site.

6.2.6 As noted in para 3.1.7 above, the MPF are currently used principally by the Caversham Trent Football Club, together with a coaching social enterprise and a voluntary club. There are currently six full-size football pitches and three five-a-side pitches marked out. Tim O’Hare Associates carried out an agronomic assessment of the site in February 2016. Three full-sized pitches were marked out and assessed in relation to soil and turf quality, and drainage.

The overall condition of the pitches was assessed as “reasonable” but requiring intervention to maintain usage levels. The pitches are currently undrained and higher usage could be sustained if this were introduced alongside periodic sand amelioration and/or top-dressing. The report also sets out a recommended maintenance regime involving decompaction, aeration, top-dressing, overseeding, fertilizing, lime application, weed control, scarification and mowing – alongside management of usage.

6.2.7 The EFA’s proposed purchase price for the school site (£1.36m) includes a substantial premium (over £1m) above the land value that is specifically intended to compensate for the loss of this part of the MPF. The Trust’s charitable purposes mean that this sum must be directed towards enhancement of the MPF’s facilities.

6.2.8 In pre-application discussions, officers suggested that there should be a detailed scheme of enhancements to the recreational facilities on the site to demonstrate compliance with Policy CS28. The detail of any such scheme is necessarily a matter for the Trust and its beneficiaries to determine, but the mitigation and enhancements are likely to include the following:

- Improvements to sports pitch surfaces and drainage (as recommended by the Agronomic Assessment)
- Additional tree planting
- Contribution to the permitted pavilion scheme
- Improved children’s play area
- Resurfacing of the car park
- Repairs to boundary fencing

6.2.9 Nevertheless, it is recognised that any grant of planning permission would be subject to a planning obligation to link the school development with these measures, even if the detail is left for the Trust and beneficiaries to decide.

6.2.10 In addition, it is proposed that the school hall and MUGA would be made available for community use. The building has been designed specifically to allow for such use, with separate direct entrances and the ability to access the hall and related facilities while preventing access to the rest of the school accommodation. It is anticipated this would be managed through a formal community use plan, secured by way of planning obligation or condition.

The need for additional primary school places

6.2.11 CS Policy CS31 supports the provision of additional community facilities in accessible locations. At the same time, CS Policy CS4 promotes a balance between the scale and density of development and its accessibility.

- 6.2.12 RBC has a statutory duty to ensure there is a school place available for every resident Reading child who requests one between the ages of 5 and 17. There is an identified and documented need for additional primary school places in this part of Reading. In October 2012, RBC Cabinet received a report (School Places Forecast) which outlined a national shortage of school places in the primary phase. In Reading, to meet this demand on a permanent basis, some 2,520 additional places in Primary schools were required – including 1-2FE in the North Planning Area (which includes Caversham). Cabinet received further reports in January and April 2013.
- 6.2.13 In the short-term, RBC met this demand for additional places through the provision of *bulge classes* on existing school sites. And, through a series of “Let’s Talk Education” events in 2012-2013, RBC identified eight schemes for *permanent school expansion* that were considered the most appropriate in terms of locations, school and parental support.
- 6.2.14 In the Caversham Heights area of the Borough, the overall shortage of places is coupled with a geographical imbalance of existing schools. The lack of a primary school in the western part of Caversham area is clearly illustrated in the map below (Fig 4). Primary age children have to travel east across Caversham to school and often do not obtain their first choice of school given the distance they live away. The shortfall in places cannot be addressed by the expansion of an existing school without exacerbating this situation.

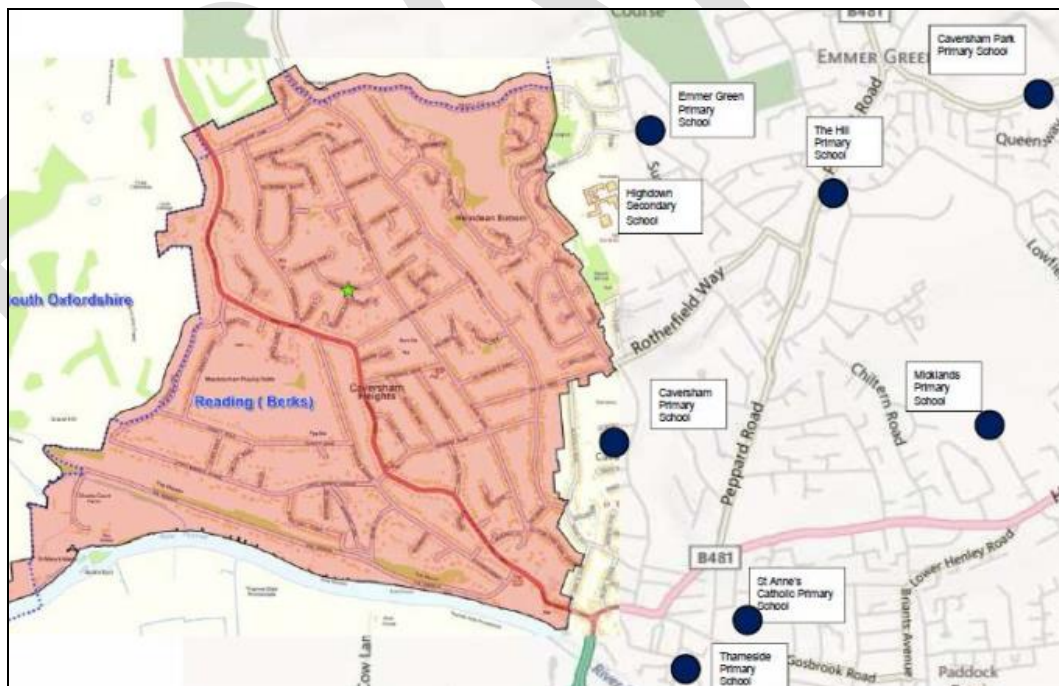


Fig 4: Map of Primary Schools in Caversham and TPHS Catchment Area

- 6.2.15 For new school provision, the Department for Education [DfE] prefers these to be provided through the Free Schools programme. Such schemes receive capital funding directly from central Government. The local authority can seek to open a new Academy with DfE support

but the Council would be responsible for capital funding. Only if no Free School or Academy comes forward can the local authority consider a community school and then only with Secretary of State approval.

6.2.16 The creation of THPS emerged from a specific call by RBC as Education Authority to meet the need for additional primary school places in the Caversham Heights area.

The lack of alternative available sites

6.2.17 As noted in the introduction, the EFA, having carried out an extensive site search exercise, in early 2014 purchased a site at High Ridge, Upper Warren Avenue to accommodate the new school. This proved contentious, however, given its location in a residential road, its small size and steeply-sloping topography; a further review of sites was therefore undertaken. Between March and May 2015, RBC led a wide-ranging public consultation on a shortlist of five sites that potentially served the school catchment. The consultation involved both a public survey and a public meeting which took place on 25 March 2015 at Rivermead Leisure Centre, Richfield Avenue, Reading.

6.2.18 The five shortlisted sites are shown in Fig 5 below and comprised:

- Albert Road Recreation Ground (1)
- Bugs Bottom (2)
- The Mapledurham Playing Fields (3)
- High Ridge, Upper Warren Avenue (4)
- Land at Shepherds Lane and Kidmore Road (5)

6.2.19 The key criteria for considering sites were as follows:

- Location within THPS catchment area
- Within walking distance of the majority of pupils (ie reasonably centrally located within the catchment)
- Of sufficient size to accommodate a school based on the guidance contained in Building Bulletin 103 (building footprint ~900m², school site including playgrounds, car park and drop-off ~4100m², including all sports fields ~1.4ha)

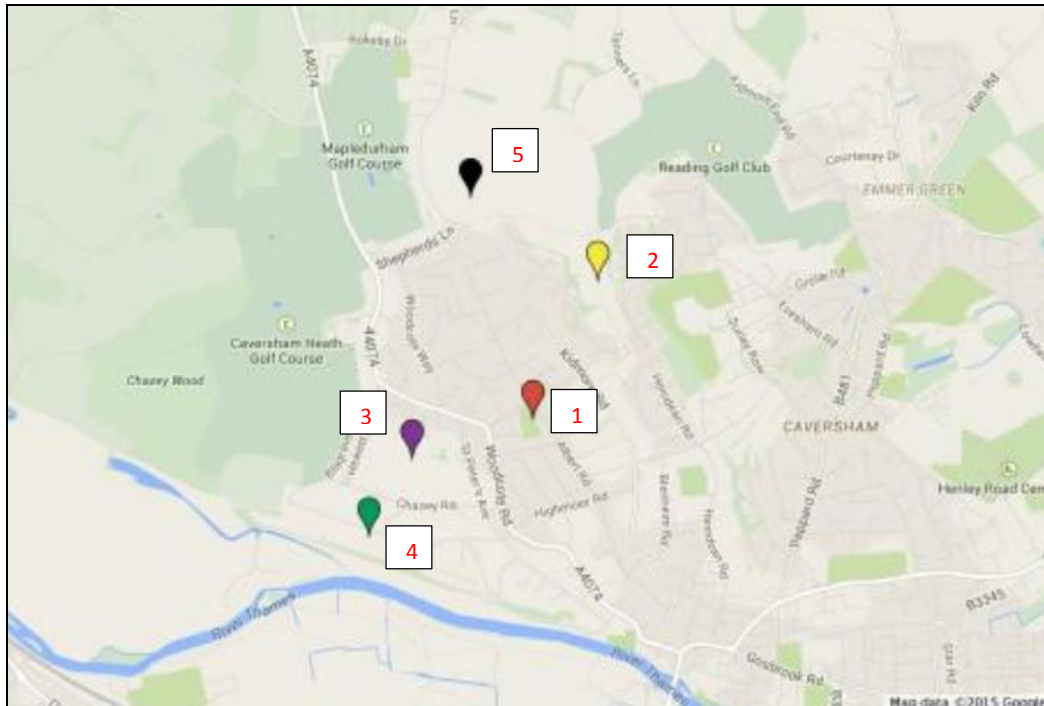


Fig 5: Potential alternative school sites considered in 2015 public consultation

6.2.20 The attributes of these sites are summarised in the table below:

Site	Area	Ownership	Comments
1. Albert Road Recreation Ground	1.2ha	RBC in trust	Centrally located within catchment. Well-used recreation ground with children’s play area, tennis courts and bowling green. School would require removal of many of these facilities.
2. Bugs Bottom	xx	RBC	Eastern edge of catchment close to Caversham and Emmer Green Primary Schools. Meadow grassland and woodland. Nature conservation designations. Steep access via residential roads.
3. The Mapledurham Playing Fields	11ha	RBC in trust	Centre of catchment. Sufficient size to accommodate school. Open space designation.
4. High Ridge, Upper Warren Avenue	xx	EFA	Southern edge of catchment. Residential plot, steeply sloping. Poor access. Too small to accommodate school building satisfactorily. Reliant on access to MPF for sports provision.
5. Land at Shepherds Lane and Kidmore Road	xx	Private	Outside catchment in South Oxfordshire. Risk of being needed for SODC educational needs. Outside urban area.

- 6.2.21 The consultation exercise also requested details of any other potential sites: none was forthcoming.
- 6.2.22 The Mapledurham Playing Fields site emerged from this process as the most suitable and potentially available site. Some 4,376 responses were received to the consultation, with all but a handful coming from within the area of RBC and some 2,935 from within THPS catchment area. Overall MPF commanded the greatest public support with 3,042 (70%) support; within the catchment this figure is 1,985 (68%). The full statistical summary of THPS survey is included in Appendix 3.

Sport England policy

- 6.2.23 Sport England is a statutory consultee on planning applications affecting playing fields under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Sport England considers proposals affecting playing fields in the light of the NPPF (in particular para 74), and its Playing Fields Policy: ‘A Sporting Future for the Playing Fields of England’. Its policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply:

Summary of Exceptions	
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

- 6.2.24 Sport England was consulted informally as part of the pre-application process and stated that it would likely object to any forthcoming planning application. It would, however, reconsider this position if replacement playing fields were provided and a solution to ensure that the needs of the community use groups using the MPF would not be adversely affected.
- 6.2.25 Sport England also called on RBC to demonstrate that it has thoroughly considered alternative locations for the proposed school. Such evidence is set out above (paras 6.2.17-6.2.22).
- 6.2.26 SE Policy Exception E3 is relevant since the land proposed to be taken by THPS is used only informally for warming up. There are some pitch markings on this part of the site, apparently

for five-a-side pitches, though they were not present at the time of the February 2016 agronomic assessment. There is ample space in other parts of the MPF site to accommodate such requirements.

- 6.2.27 SE Policy Exemption E4 also applies as it is clear that the EFA purchase will enable significant improvements to the recreational facilities on the MPF site to be provided. Improved pitch drainage and surfacing will enable more intensive use of the site to off-set the loss of warm up pitches (as set out in para 6.2.8 above).

Land use – summary

- 6.2.28 In summary, the provision of new school facilities on this site would meet an established need for additional primary school places in the Caversham Heights area. At present THPS is located outside its catchment and its temporary home is too small to accommodate its ultimate capacity.
- 6.2.29 The EFA and RBC have carried out an extensive site search exercise and consulted on a shortlist of five potential sites within THPS catchment area. The MPF site is the only suitable site that could satisfactorily accommodate the school – subject of course to relevant processes to obtain the agreement of MPF charity’s trustees (RBC) and its beneficiaries (local people). It is noted that, while a majority of local people within THPS catchment support the site’s release for the school’s permanent home, a sizeable minority (26.5%) do not.
- 6.2.30 The site’s open space designation would normally preclude built development not directly associated with its recreational use. CS Policy CS28, however, allows for exceptions where improvements to recreational facilities can be provided to off-set the loss of open space. The EFA’s purchase of the site will allow for a range of such improvements to be undertaken: while the detail will be for the Trust and beneficiaries to agree, it is anticipated that this will be secured through a planning obligation attached to any grant of planning permission.

6.3 Design

6.3.1 The application is supported by a Design and Access Statement prepared by the architects DMA.

6.3.2 There is a wide range of local policy that encourages good design, principally CS Policy CS7. This reflects current national policy on good design:

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”

[NPPF para 56]

6.3.3 The Free Schools programme through which the school will be procured is a highly cost-driven exercise. Prospective contractors will be required to deliver the required learning environment (set out in the Facilities Output Specification, FOS **check** and informed by Building Bulletin 103) in a cost-effective manner. This places limitations around the design flexibility of the school proposals such as this, whatever the context.

6.3.4 The Design and Access Statement sets out the process undertaken to design a building of a size required to accommodate a 2FE school with 350 pupils and 35 FTE staff. The key aspects of the design are as follows:

- A two-storey building with multi-use hall
- Green roof and PV panels
- External KS1 play/external learning area
- Soft and hard informal play/learning areas
- Fenced and floodlit MUGA
- Boundary fencing
- Comprehensive soft landscaping scheme
- Scope for out of hours community use of hall and MUGA with appropriate, secure segregation
- 20 on-site car parking spaces (including two for disabled users), 34 cycle spaces, 24 scooter spaces
- Use of improved MPF car park and access road for drop-off and pick-up

6.3.5 The design seeks to respond to the site context by being contained within the northwestern corner of MPF and with minimum landtake. This, combined with the need to maintain access to the west of the pavilion, necessarily means the school encroaches into the group of trees along this boundary. As set out in section 6.4 below, however, these trees are of poor quality with limited life expectancy, and a comprehensive tree-planting scheme along this boundary and elsewhere within the MPF site would be provided by way of compensation.

- 6.3.6 The elevational treatment is designed to meet appropriate daylighting and natural ventilation of teaching and other spaces. A mix of yellow multi-stock bricks reflective of the local area, combined with white render, is proposed. The choice is informed by a desire to limit the visual impact of the school on the wider open space.
- 6.3.7 The accommodation is fully accessible throughout, with flush thresholds and a lift – in accordance with the requirements of CS Policy CS5.
- 6.3.8 The nearest residential property to the school building is 29 Hewett Avenue, a bungalow: its rear elevation will be 17m from the closest part of the school building, 6m beyond its rear garden boundary. The separation distance to 28 Hewett Avenue is 24m. The closest property in Hewett Close (no 3) is some 27m away and most of the remaining houses on the south side of Hewett Close (nos 4-9) are more than 35m from the school building. The closest property to the north-east (7 Little Woodcote Close) is 42m away; it has a high hedge on its southern and western boundary. To the east, 4 Knowle Close is some 70m away, beyond the floodlit tennis courts.
- 6.3.9 The closest part of the western elevation of the school building is blank. The central part of the elevation has three windows at first floor level, two serving a Y5 classroom, one a staff room. The separation distance, together with replacement boundary planting and the oblique views, mean that this relationship is unlikely to lead to any issue of overlooking of the residential properties at 28 and 29 Hewett Avenue. Nor would this be likely to give rise to issues of sunlight or daylight, visual dominance or sense of overbearing effect. The proposal therefore accords with these aspects of SDPD Policy DM4.
- 6.3.10 It is proposed that the MUGA and car park will be floodlit. The proposed floodlights will be 10m and 8m tall respectively and directed/shielded in line with good practice to avoid light spillage. This is set out in detail in Exterior Lighting (BSD, 15.3.17) and on drawing no E207A. No exterior lighting is proposed on the western side of the school building closest to residential properties.
- 6.3.11 The existing tennis courts on the MPF site are floodlit. Planning permission for some of the floodlights was allowed on appeal in 1999. In allowing the appeal, the Inspector noted that there would be no significant light spillage into back gardens and that the boundaries were in any case heavily-vegetated. The same issues apply here, notwithstanding concerns raised in pre-application advice in this regard. The potential ecological impacts of floodlighting is addressed in section 6.4 below. It is anticipated that a planning condition would ensure compliance with the lighting specification proposed.
- 6.3.12 Noise and vibration issues are addressed in section 6.8 below. The access road from Upper Woodcote Road will be widened within its existing boundaries. There will be more comings and goings arising from the school use, principally on foot with some increase in vehicular

movements (see section 6.6). This activity is likely to impact adversely on the residential amenities of 127 and 131 Upper Woodcote Road, 8 and 9 Hewett Close, and 7 Little Woodcote Close, notwithstanding the strong existing boundary conditions. But these impacts represent intensification of an existing access to MPF which is already heavily used on occasion. On balance, such impacts are considered acceptable when set against the need for the school and the mitigation of car use through the School Travel Plan.

- 6.3.13 Construction impacts (eg dust, vibration, hours of working etc) will be addressed through a construction management plan, as required by condition.
- 6.3.14 The kitchen and plant are located in the south east corner of the proposed school building, at the furthest point from residential properties. They would be most unlikely to give rise to any adverse impacts on residential amenity.
- 6.3.15 Currently there is unfettered access into the MPFs through the eastern boundary of the site from Hewett Avenue. The new school will bring a greater level of passive surveillance to this part of the MPF. New and replacement boundary fencing will be provided, securing the boundary for the first time for many years. The proposal is likely therefore to reduce the potential for crime and safety issues to arise.
- 6.3.16 In summary, the design of the new school, its external spaces and its relationship with the wider MPF site, is the product of detailed consideration by the design team. It is a product of both the design brief/EFA requirements and an appropriate response to the site and its context. It will have very little direct impacts on adjoining residents. The design thereby meets the requirements of CS Policy CS7 and SDPD Policy DM4.

6.4 Ecology and trees

- 6.4.1 The application is supported by a Preliminary Ecological Appraisal carried out by CampbellReith and by an Arboricultural Planning Statement (incorporating an Arboricultural Impact Assessment (ADAS).
- 6.4.2 CS Policy CS36 seeks to protect features of biodiversity interest. Development which would have a direct or indirect impact on the site will not be permitted unless the need for the development outweighs that interest or if appropriate mitigation is incorporated. SDPD Policy DM18 promotes tree planting as part of development proposals. CS Policy CS38 protects trees, hedges and woodland.
- 6.4.3 A Phase 1 habitat survey was undertaken in March 2017. The majority of the site is amenity grassland with an area of broad-leaved woodland to the west. The latter has potential for nesting birds, but the trees within the site boundary were found to have negligible potential for roosting bats. There were no signs of badger or fox activity.
- 6.4.4 The development would result in the loss of amenity grassland and broad-laved woodland. This is not considered significant in ecological terms given these habitats are common locally and occur elsewhere on this site. Their removal can also be mitigated in the landscape design. The Preliminary Ecological Appraisal sets out a range of mitigations measures to mitigate habitat loss and disturbance of wildlife, including: bird and bat boxes, native species planting, replacement woodland planting, green roof, removal of vegetation outside the nesting season, and sensitive lighting to avoid spillage onto surrounding ecological features (see para 6.3.10 above).
- 6.4.5 In line with the requirements of 'BS5837:2012 Trees in Relation to Construction: Recommendations' (BS5837:2012), ADAS provided arboricultural advice in relation to the proposed development. An ADAS Arboricultural Consultant carried out a full Arboricultural survey of the site on 19th and 20th January 2016, and as a result of this survey have provided on-going advice in order to guide the proposed development layout. The tree survey identified a total of 141 individual trees, 23 groups of trees, 13 hedgerows and 4 woodlands which have the potential to be impacted by the development proposals. In line with the recommendations contained within Table 1 of BS5837:2012, of these trees and groups of trees, 130 were awarded a low C grade, 47 were awarded a moderate B grade and one tree was awarded a high A grade (T50). Three trees were awarded a very low U grade (T80, T81, T154) and should be removed for reasons of sound arboricultural management irrespective of any development proposals. Of the 130 trees, groups of trees, woodlands and hedgerows on site, seven will need to be removed in full or in part,

in order to facilitate the development proposals, in particular the access road. The application scheme would involve removal of 6 individual trees and 54% of tree group G147. The remaining trees will be reserved and protected.

- 6.4.6 RBC have confirmed that third party trees T13, T34, T35, and T37 growing outside the site boundary are protected by Tree Preservation Orders (see Appendix 8). These trees will be unaffected by the development proposals. The site is not within a Conservation Area.
- 6.4.7 In order to ensure the successful integration of retained trees into the proposed development, various tree protection measures will be incorporated into the design which are intended to maintain the trees in a safe and healthy condition.
- 6.4.8 The application proposal's main impact is on the group of trees in the northwest corner of the site. This, however, contains many trees in poor condition and has only limited ecological value. Appropriate mitigation through landscaping, replacement tree planting and the incorporation of bird/bat boxes and a green roof, will off-set these impacts. In ecological terms, the scheme will accord with CS Policy CS36. Tree planting and tree protection measures will be carried out in line with SDPD Policy DM18.

6.5 Sustainable design and energy

6.5.1 The application is supported by the following documents:

- Sustainable Design and Construction Statement (BSD) (incorporating BREEAM pre-assessment prepared by ZED)
- Energy Statement (BSD)
- Utilities Statement (BSD)

6.5.2 CS Policy CS1 promotes sustainable design and construction. SPDP Policy DM2 promotes the use of decentralised energy. SPDP Policy DM1 promotes adaptation to climate change. **SPD**

6.5.3 The submitted Energy Statement shows how, by adopting passive design measures and on-site renewable energy production in the form of photovoltaic panels, the scheme will achieve a reduction of 20.4% in regulated CO2 emissions over the Building Regulations Part L (2013) baseline.

6.5.4 The Sustainable Design and Construction Statement sets out the process by which the application scheme has sought to incorporate sustainable features throughout the design process. The key features of the proposal are:

- Energy efficiency and carbons savings (see para 6.5.3)
- Water efficiency measures and devices will be installed to reduce the maximum daily water usage
- Recycling facilities will be provided
- The use of sustainable transport modes will be encouraged
- The building will be designed to meet applicable Building Regulation Part M requirements
- The proposed development includes the provision of dedicated cycle and scooter storage areas
- A green roof is incorporated into the design to benefit biodiversity
- The existing ecology of the site and environs will be protected and enhanced through careful landscape planning and design
- Sound insulation values are to be improved on Building Regulations Part E
- Where practical, building materials will be sourced locally to reduce transport pollution and support the local economy. All timber will be purchased from responsible forest sources. Materials will be selected based on their environmental impact, with preference given to high rated materials from the BRE Green Guide wherever possible
- Construction impacts will be minimised and monitored

- 6.5.5 On the basis of these measures, the scheme is targeting a BREEAM “excellent” rating, with an indicative score at this design stage of 71.9%.
- 6.5.6 The Utilities Statement indicates that the school development can be adequately serviced and supplied for energy, water and sewerage requirements.
- 6.5.7 Overall the application scheme exceeds CS Policy CS1 policy requirements. It also accords with the general advice set out in the Revised Sustainable Design and Construction SPD.

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6.6 Transport, Highways and Parking

- 6.6.1 The application is supported by a Transport Statement prepared by MLM. There is also a draft School Travel Plan prepared by MLM for the School.
- 6.6.2 There is a range of local policy relating to transport: CS Policy CS20 on Reading's Transport Strategy; Policy CS22 on transport assessments; Policy CS23 on travel plans; policy CS24 on car and cycle parking; SDPD Policy DM12 on access and traffic.
- 6.6.3 The TA notes that the existing THPS school site currently has 168 pupils; it will continue to grow organically with 2FE with a class size of 50 pupils a year. It is notable that one of the key issues arising from RBC's Let's Talk Education consultation process was local concern about transport impacts. In this context, therefore, the TA is based on a more typical class size of 30 pupils, ie an annual intake of 60 not 50 pupils. THPS, however, will continue to operate with the smaller class size.
- 6.6.4 The TA looks at existing road conditions, on-street parking capacity, public transport services, accident records, and existing transport use by THPS pupils and staff at its Gosbrook Road site.
- 6.6.5 It is proposed to widen the existing access from Upper Woodcote Road from 3.9m to 4.8m to allow for two-way working and rearrange the MPF car park to improve vehicular and pedestrian circulation. There would need to be minor improvements to the junction of the access road with Upper Woodcote Road and improvements to signage, road markings and a new pedestrian refuge. The car park would provide appropriate drop-off and pick-up space for the school, as well as improved facilities for MPF recreational users at evenings and weekends. There will be a dedicated footpath to the school gates.
- 6.6.6 The provision of 20 staff car parking spaces (including 2 disabled) accords with RBC parking standards and is based on predicted requirements of the school. There will be managed drop-off in the mornings in this car park, supervised by staff. Experience elsewhere shows how this can make for efficient vehicle movements through the site, avoiding the need for parents to park and walk. This arrangement would not be practical for the afternoon pick-up; rather, this would take place within the MPF car park. There will be no need for parents to park in the MPF car park other than at these times. At all other times the car park will be available for MPF users. Indeed, its improved surface, layout and capacity will enhance the parking facilities for the MPF. There will be on-going dialogue between THPS and MPF to ensure that there is no disruption to MPF use and that appropriate coordination and management measures are in place both generally and for school events.
- 6.6.7 Cycle parking will comprise three covered cycle/scooter pods with a total 48 spaces, and five stands (10 spaces) for staff.

- 6.6.8 The staff car park will be available for community use of the school facilities outside the school day.
- 6.6.9 Currently some 76.5% of pupil trips to the Gosbrook Road site are by car. At MPF this would be reduced to 23.4% - 99 pupils if the school were occupied at a class size of 30 (which it will not be). The TA shows that these numbers can easily be accommodated on the local road network and with the proposed access arrangements. In any case, there will be a school travel plan to promote walking and cycling to school. The school will operate below capacity when it moves to MPF and will monitor the access and travel arrangements to ensure they can operate effectively and safely without undue impact on adjoining occupiers or road users.
- 6.6.10 As noted above, there will need to be some off-site highways works and these would be secured through a s278 agreement by way of planning obligation.
- 6.6.11 Overall, the Transport Assessment demonstrates that there are no transport or highways reasons to prevent THPS relocating to the MPF site. Relevant assessment has been made in line with CS Policy C22, a school travel plan will mitigate transport impacts in line with CS Policy CS23, and car and cycle parking is provided in accordance with CS Policy CS24. Overall the scheme accords also with SDPD Policy DM12. There are, therefore, no transport related reasons for resisting the development: NPPF para 32 states that development should only be prevented or refused on transport grounds where there are severe impacts, which is not the case here.

6.7 Flood Risk and Surface Water Drainage

- 6.7.1 The application is accompanied by a Flood Risk Assessment [FRA] and Surface Water Management Plan [SWMP] prepared by CampbellReith.
- 6.7.2 Relevant policy on flood risk is set out in the NPPF and NPPF Technical Guidance. CS Policy CS1 promotes the use of sustainable urban drainage systems.
- 6.7.3 The FRA is submitted as the application proposal is a major development. But the site is Flood Zone 1 and is at a low risk of fluvial flooding. A school is considered a “more vulnerable” use in terms of flood risk and is an appropriate use in Flood Zone 1. There is similarly low risk of surface water or groundwater flooding – though the eastern part of the MPF (well outside the application site) is at high risk of surface water flooding.
- 6.7.4 The SWMP sets out how the scheme will use SUDS to contain surface water runoff within the site through a combination of permeable surfacing and cellular storage. Further investigation of the ground is required fully to assess the means of infiltration to be used.
- 6.7.5 The overall flood risk to the site is low and the development proposals incorporate appropriate surface water management measures to maintain greenfield run off rates.

6.8 Noise

- 6.8.1 The application is supported by a Noise Assessment prepared by Accon Ltd for CampbellReith.
- 6.8.2 SDPD Policy DM4 seeks to safeguard residential amenity, including in relation to noise.
- 6.8.3 External noise levels on-site are generated mainly by aircraft, MPF and tennis court, users and traffic on Hewett Avenue. Based on the worst case scenario transport assessment (which considers the impacts of a conventional primary school with 420 pupils) the additional traffic movements will have only negligible increase in noise levels for existing properties on the nearby road network. The same applies to the houses adjoining the access road, though this would rise to a medium increase during peak hours.
- 6.8.4 While difficult to estimate, the likely noise generation from the proposed play areas has been assessed. During school break times there would be an increase in ambient noise levels of 8dB in some adjoining gardens, within the guideline criteria. Internal noise criteria would be very slightly exceeded (assuming windows are open) but this would occur only twice a day and at times of least noise sensitivity. There are unlikely to result in any significant noise impacts for existing noise sensitive receptors and there is no risk of significant adverse impacts on health.
- 6.8.5 The noise survey shows that the school proposal can be pursued without undue noise impacts in line with SDPD Policy DM4.

6.9 Air Quality

- 6.9.1 The application is supported by an Air Quality Assessment prepared by Accon Ltd for CampbellReith.
- 6.9.2 The northern part of the site falls just within the designated Air Quality Management Area [AQMA] along Upper Woodcote Road. SDPD Policy DM19 promotes improvements in air quality and appropriate mitigation of air quality impacts.
- 6.9.3 The Air Quality Assessment has modelled NO₂, PM₁₀ and PM_{2.5} concentrations both in the opening year (2018) and in 2023 when the school would reach maximum capacity (under the worst case scenario considered by the Transport Assessment with class sizes of 30 not 25). The study concludes that there would be negligible impact on all existing receptors in the area, HAQOs would not be exceeded, and no mitigation is required. This is on the basis that the school travel plan mitigates traffic impacts.
- 6.9.4 The same applies to the construction phase, which would in any case be controlled through a Construction Management Plan secured by planning condition.
- 6.9.5 The application thereby accords with SDPD Policy DM19.

6.10 Contamination

- 6.10.1 Notwithstanding the pre-application advice that no such assessment was required to support a planning application, a Phase 1 Preliminary Risk Assessment and a Phase 2 Environmental and Geotechnical Site Investigation Report prepared by RPS, has been prepared.
- 6.10.2 CS Policy CS34 resists development that would be damaging to the environment in terms of air, land, noise or light pollution or affects ground and surface water quality, or water resources.
- 6.10.3 A site investigation was carried out, comprising two cable percussion boreholes to a depth of 10.00m below ground level (bgl), six window sample boreholes to depths of up to 5.00m bgl and the installation of monitoring wells within three boreholes. The Phase 1 Preliminary Risk Assessment for the site identified a number of potential pollutant linkages to human health receptors and controlled water receptors associated with the site. A Phase 2 Environmental and Geotechnical Site Investigation was therefore undertaken to determine whether these linkages were active and to inform preliminary foundation and floor slab design.
- 6.10.4 Contaminants of concern were not recorded within soil samples analysed from beneath the site at concentrations in excess of adopted assessment criteria (AC). The potential risk to human health receptors from these concentrations of contaminants of concern is therefore considered to be LOW.
- 6.10.5 Groundwater was not encountered within monitoring wells installed as part of the intrusive works, screened across the Boyn Hill Gravel Member and White Chalk Subgroup to depths of up to 10.00m bgl and an assessment of the contamination status of groundwater beneath the site could not be made. However, contaminants of concern were not recorded within soils sampled from beneath the site at concentrations considered to represent a significant risk to groundwater receptors. The significant thickness of variably permeable unsaturated zone beneath the site is also considered to offer a significant degree of protection against the downward migration of potential contaminants of concern toward groundwater receptors.
- 6.10.6 Based on the available information, the potential risk to groundwater receptors from concentrations of contaminants of concern detected beneath the site is considered to be LOW. Based on ground gas monitoring undertaken on site as part of the current investigation CIRIA Characteristic Situation 1 (CS1) is applicable to the site, whereby ground gas protection measures are not required for new buildings. The risk posed by ground gas to human health receptors and infrastructure is therefore considered to be LOW.
- 6.10.7 The scheme therefore accords with the requirements of CS Policy CS34.

- 6.10.8 An Archaeological Desktop study has also been undertaken (by Oxford Archaeology). While recent archaeological investigations within 200m of the site have not identified any archaeological features or finds, there is high potential for significant archaeological remains dating from the prehistoric period (at the time of stone tool production) and perhaps for Roman activity. It is anticipated that there would be a planning condition requiring appropriate archaeological investigation early in the construction period.

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7. PLANNING OBLIGATIONS

7.1 Para 204 of the NPPF states that:

Planning obligations should only be sought where they meet all of the following tests:

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.*

7.2 The EFA's proposed purchase price for the school site (£1.36m) includes a substantial premium (over £1m) above the land value that is specifically intended to compensate for the loss of this part of the MPF. The Trust's charitable purposes mean that this sum must be directed towards enhancements to the MPF's facilities.

7.3 In pre-application discussions, officers suggested that there should be a detailed scheme of enhancements to the recreational facilities on the site to demonstrate compliance with Policy CS28. While the detail of any such scheme is a matter for the Trust and its beneficiaries to determine, the mitigation and enhancements are likely to include the following:

- Improvements to sports pitch surfaces and drainage (as recommended by the Agronomic Assessment)
- Additional tree planting
- Contribution to the permitted pavilion scheme (or an alternative)
- Improved children's play area
- Resurfacing of the car park
- Repairs to boundary fencing

7.4 Nevertheless, it is recognised that any grant of planning permission would be subject to a planning obligation to link the school development with these measures, even if the detail is left for the Trust and beneficiaries to decide.

7.5 Pre-application discussions have touched briefly also on the matter of planning conditions: the ambition of both applicant and officers is to avoid pre-commencement conditions wherever possible, apart from provision of a construction management plan.

8. CONCLUSION

8.1 This Planning Statement is submitted in support of a planning application made by the Education Funding Agency for the following proposal:

Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking and servicing.

8.2 In 2012, RBC identified a shortage of primary school places across the Borough, including a need for an additional 1-2FE in the Northern Planning Area including Caversham and Mapledurham. Following consultation, a group proposed to secure Central Government funding to establish a new Free School to serve the Caversham Heights area; The Heights Primary Free School [THPS] was approved in principle in 2013. Having carried out an extensive site search exercise, the EFA, in early 2014, initially purchased a site at High Ridge, Upper Warren Avenue to accommodate the new school. This proved contentious, however, and a further review of sites was undertaken. RBC led a wide-ranging public consultation on a shortlist of five potential sites that served the school catchment. The Mapledurham Playing Fields site emerged from this process as the most suitable and potentially available site. It also commanded greatest public support, albeit there remained a significant level of local opposition.

8.3 THPS opened in temporary accommodation outside the catchment area, on the site of a former children's nursery at 82 Gosbrook Road. The temporary planning permission on this site runs out on 31 August 2018.

8.4 The MPF site is a designated open space site as well as being held in trust for the provision of recreational facilities to the benefit of local people. CS Policy CS28 allows for exceptions to the development of open space sites where there is compensatory enhancement sufficient to outweigh the loss of open space. In this case, the EFA purchase will provide a sizeable cash sum that will be directed to a range of improvements to the site (as set out in para 7.3 above). While the detail of these enhancements will be for the Trust and its beneficiaries to determine, it is anticipated that a planning obligation will be required to link this directly to the school proposal.

8.5 In addition, it is important to note that national planning guidance establishes a presumption in favour of the development of state-funded schools (NPPF para 72 and the 2011 Policy Statement).

8.6 The design of the school responds positively to the site context while necessarily meeting the EFA brief for a new school, informed by Building Bulletin 103 guidance. The building is modest in size and sits in the northwestern corner of the MPF site to minimise impact on openness while allowing access past the pavilion to the main body of the site. Materials are

designed to make the building relatively unobtrusive in this context with yellow multi-stock bricks and white render.

- 8.7 The siting of the school will require removal of a large part of the tree group in this part of the site. These trees are assessed as being of limited quality and there will be a comprehensive scheme of replacement planting and landscaping in mitigation.
- 8.8 There will be limited impact on residential amenity from the school in this location, other than at the beginning and end of the school day. The main external space is located beyond the nearest houses in Hewett Close.
- 8.9 The building will achieve a BREEAM rating of excellent. The scheme adopts a “fabric first” approach to designing for energy efficiency. Energy demand is minimised through natural ventilation with heat recovery, high levels of natural daylight, an efficient building envelope and high thermal mass. It incorporates a green roof and PV panels to off-set 20% of carbon emissions from energy.
- 8.10 The application site is located at the centre of THPS catchment. It is anticipated therefore that a very large proportion of pupils will walk (or scoot or cycle) to school. The Transport Assessment (which is based on a worst case scenario of a school with 30 in a class, not the 25 that THPS has) predicts that nearly 70% of pupils would walk to school, compared with 64% who travel by car to the existing THPS site; there will be a marked reduction in the number of car-based pupil trips even if the school were to operate with a class size of 30 (as opposed to THPS 25). Nearly half the staff would continue to travel by car to the MPF site, but 29% would walk and 23% would use public transport. A school travel plan, based on the one already in place at the school, would further impact on these travel mode choices.
- 8.11 On this basis the amount of car and cycle parking provided is sufficient. The access road from Upper Woodcote Road, widened to accommodate two-way car movements, is suitable for the numbers of predicted movements. There would need to be some off-site highway works to improve crossing points on Upper Woodcote Road, secured through the S106 agreement.
- 8.12 The site is at low risk of flooding and the scheme incorporates a SuDS scheme to manage surface water runoff at greenfield run-off rates. The site is assessed as being suitable for its proposed use in terms of air quality and can be largely naturally-ventilated, underpinning its energy performance and providing an appropriate learning environment. Ambient noise levels are acceptable for the proposed use. New plant will be specified to avoid impacts on adjoining residents. The site is not contaminated.
- 8.13 In summary, the scheme is an appropriate form of development on this site. The proposed use of an open space site is justified in policy terms given the need for additional primary school places in this part of Reading, the lack of alternative suitable sites, and a package of

enhancements to the recreational facilities on the site. It accords with all other provisions of the development plan and any adverse impacts can be satisfactorily mitigated.

- 8.14 On balance, therefore, the application proposal is considered sustainable development for which there is a presumption in favour of permission being granted.

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Appendices

Appendix 1:	Pre-application advice (letter from RBC 14.3.2017)
Appendix 2:	Policy extracts from Core Strategy and Site and Detailed Policies Document
Appendix 3:	Statistical Summary of THPS Survey 30 March – 1 May 2015

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APPENDIX 2:
CORE STRATEGY AND SITES AND DETAILED POLICIES DOCUMENT
POLICY EXTRACTS

NB to be formatted

Policy CS1: Sustainable Construction and Design

Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

To meet these requirements: -

- All new housing is required to meet the most up to date Eco-Homes 'Very Good' as a minimum standard, and all new commercial developments are required to meet the most up to date BREEAM 'Very Good' as a minimum standard;
- On larger developments of more than 10 dwellings or 1,000 m2 of floorspace, ensure that 50% of the provision meets the most up to date Eco-Homes and BREEAM 'Excellent' standards;
- All new developments maximise the use of energy efficiency and energy conservation measures in their design, layout and orientation to reduce overall energy demand;
- All developments of more than 10 dwellings or 1000m2 floorspace incorporate on-site generation of energy from renewable sources and energy efficient design measures (including the use of CHP where appropriate) to off-set at least 20% of predicted carbon dioxide emissions from the estimated energy usage of the completed and occupied development;
- All developments reduce mains water use and demonstrate that water conservation measures are incorporated so that predicted per capita consumption does not exceed the appropriate levels set out in the Code for Sustainable Homes or BREEAM Standards
- Developments incorporate sustainable urban drainage facilities and techniques as part of the layout of a development as appropriate and as advised by the Environment Agency, including minimising the size of impermeable areas so that peak run-off and annual water run-off is reduced where possible and in any case is no greater than the original conditions of the site. Particular care will be needed in areas of flood risk where different solutions may be required.

Policy CS4: Accessibility and the Intensity of Development

The scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service.

Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility as set out in other policies in this document, other Development Plan Documents or Supplementary Planning Documents.

Policy CS5: Inclusive Access

All buildings should be located, sited and designed to provide suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.

Policy CS7: Design and the Public Realm

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. 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.

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
- 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.

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; 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.

Applications for major and minor developments should be accompanied by a design and access statement that deal with all the above matters.

Policy CS9: Infrastructure, Services, Resources and Amenities

Proposals for development will not be permitted unless the local planning authority is satisfied that infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided or re-provided at the appropriate time, in order to ensure that the development is both sustainable and contributes to the proper planning of an area in accordance with relevant planning policies. Such contributions may be pooled, in order to allow necessary infrastructure to be secured in a fair and equitable way. The local planning authority will require planning obligations entered into by agreement or other means to secure the replacement and enhancement of additional physical and social infrastructure, services, resources, amenities or other assets. A Supplementary Planning

Document will be prepared that will detail: -

- The scale and form of obligation;
- The financial contribution sought;
- The role of pooled payments;
- Maintenance payments; and
- Charges for preparing agreements.

Policy CS20: Implementation of The Reading Transport Strategy (Local Transport Plan 2006-2011)

Planning permission will not be granted unless the proposed development contributes appropriately to the provision of a balanced transport network as outlined in the Reading Transport Strategy, including the implementation of the core transport infrastructure projects and area action plans.

Such projects and plans will include the provision of measures that make alternatives to the use of private cars (such as walking, cycling and the use of public transport) more attractive, and contribute to improved accessibility and transport safety in accordance with Policy CS4.

Policy CS22: Transport Assessments

Planning permission will not be granted unless development proposals 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 an agreed transport assessment submitted as part of the application.

Policy CS23: Sustainable Travel and Travel 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 schools, safe routes to parks and similar measures.

Policy CS24: Car/ Cycle Parking

Maximum car parking standards and cycle parking requirements will be applied in relation

to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Policy CS28: Loss of Open Space

Development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted. In exceptional circumstances, development may be permitted where it is clearly demonstrated that replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land.

CS30: Access to Open Space

In areas with relatively poor access to open space facilities (possibly as a result of severance lines), new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/ or facilitate the creation or linking of safe off-road routes to parks.

Policy CS31: Additional and Existing Community Facilities

Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.

Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.

Policy CS34: Pollution and Water Resources

Development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution; where it would preserve or ideally enhance ground and surface water quality; and where existing water resources, sewerage and wastewater treatment infrastructure are adequate to support the proposed development.

Proposals for development that are sensitive to the effects of air, noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution. Development will be permitted on land affected by contamination where it can be demonstrated, to the satisfaction of the LPA, that the contamination can be satisfactorily remediated so that it is suitable for the proposed end use.

CS36: Biodiversity and Geology

a) Development should retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes.

On sites with recognised biodiversity or geological value, development will not be permitted where there would be a direct or indirect adverse impact on the site, unless it can be clearly demonstrated that:

- i. The need for development clearly outweighs the need to protect the value of the site; and
- ii. Appropriate compensation, impact minimisation, mitigation and compensation are provided.

b) Local Nature Reserves and Wildlife

Heritage Sites will be safeguarded and where possible, enhanced. Permission will not be granted for any development that would adversely affect a designated nature reserve or Wildlife Heritage Site.

c) Any development that would sever or threaten the integrity of an established wildlife link, as indicated on an adopted proposals map, will not be permitted. Where applicable, developments should be designed to protect, consolidate, extend and enhance the network of wildlife links and corridors in and adjoining the Borough, working with neighbouring authorities where appropriate.

CS37: Major Landscape Features and Strategic Open Space

Planning permission will not be granted for any development that would detract from the character or appearance of areas designated as a Major Landscape Feature. The designated areas are: -

- The Thames Valley;
- The Kennet and Holy Brook Meadows;
- The West Reading wooded ridgeline;
- The East Reading wooded ridgeline; and
- The North Reading dry valleys.

CS38: Trees, Hedges and Woodlands

Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal, and the Borough's vegetation cover will be extended.

SD1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. 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. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise – taking into account whether:

- ☐ Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- ☐ Specific policies in that Framework indicate that development should be restricted.

DM1: ADAPTATION TO CLIMATE CHANGE

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- ☐ New buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;
- ☐ Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, etc;
- ☐ Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets, designed with plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and
- ☐ All development shall minimise the impact of surface water runoff from the development in the design of the drainage system.

DM2: DECENTRALISED ENERGY

In meeting the most up to date Ecohomes (including Code for Sustainable Homes for new build residential) or BREEAM standard, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source, including CHP.

Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of a CHP plant, or biomass-fuelled heating scheme, or other form of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable or feasible for this form of energy provision.

Where there is existing decentralised energy provision, including a CHP plant or a district energy network present within the vicinity of an application site, further developments of over 10 dwellings or non-residential development of 1,000 sq m will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.

DM3: INFRASTRUCTURE PLANNING

Proposals for development will make appropriate provision for the following infrastructure, services, resources and amenities. Such provision will be secured through planning obligations and/or the Community Infrastructure Levy as relevant.

In determining appropriate provision or contributions, the highest priority will be given to the following:

- ☐ Transport infrastructure including major cross boundary or sub-regional infrastructure projects;
- ☐ Open space, green infrastructure and other measures to improve or enhance biodiversity;
- ☐ Education including cross boundary facilities;
- ☐ Economic development services and infrastructure, including employment, skills and training development initiatives and childcare provision.

Where relevant a high priority will also be given to the appropriate provision of the following:

- Energy infrastructure, including decentralised energy projects;
- Health provision; and
- Police Service infrastructure.

Other measures, as follows, may also be considered, where a specific need is identified and justified: -

- ☐ Community facilities;
- ☐ Leisure and cultural infrastructure, including public art, library and archive services;

- ☒ Reading Central Area infrastructure and amenities, including public realm and street care enhancements;
- ☒ Environmental improvements outside the Central Area, such as within local centres, including off site street tree and other tree planting;
- ☒ Measures to tackle poor air quality or for on-going air quality monitoring; and
- ☒ Flood mitigation and prevention measures.

Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.

DM4: SAFEGUARDING AMENITY

Development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of:

- ☒ Privacy and overlooking;
- ☒ Access to sunlight and daylight;
- ☒ Visual dominance and overbearing effects of a development;
- ☒ Noise and disturbance;
- ☒ Artificial lighting;
- ☒ Vibration;
- ☒ Dust and fumes;
- ☒ Smell; or
- ☒ Crime and safety.

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.

As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable.

Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to restrict such changes.

DM12: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

In determining proposals involving a new or altered access onto the transport network,

improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.

Development will only be permitted where:-

- ☐ Accesses and works to the highway comply with the adopted standards of the Transport Authority;
- ☐ The development would not have a material detrimental impact on the functioning of the transport network;
- ☐ The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- ☐ 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
- ☐ For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.

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.

DM17: GREEN NETWORK

The identified Green Network comprises Local Wildlife Sites, Local Nature Reserves, Areas of Biodiversity Action Plan (BAP) habitats and designated open space plus both existing and potential Green Links, all of which are shown on the Proposals Map. It also includes Biodiversity Opportunity Areas, shown in Figure 4. These Green Links shall be maintained, protected, consolidated, extended and enhanced.

New development shall demonstrate how the location and type of open 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.

DM18: TREE PLANTING

New development shall make provision for tree planting within the application site, 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.

DM19: AIR QUALITY

Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

i. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:

☐ Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would significantly reduce air quality;

☐ Whether the development is within, or accessed via, an Air Quality Management Area; and

☐ Whether it can be demonstrated that a local reduction in air quality would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.

ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application.

iii. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.

SA16: PUBLIC AND STRATEGIC OPEN SPACE

Important areas of Public and Strategic Open Space, as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted.

SA17: MAJOR LANDSCAPE FEATURES

The following areas, as shown on the Proposals Map, are defined as Major Landscape Features:

☐ The Thames Valley;

☐ The Kennet and Holy Brook Meadows;

- ☒ The West Reading wooded ridgeline;
- ☒ The East Reading wooded ridgeline; and
- ☒ The North Reading dry valleys.

Where the urban area meets the Chilterns Area of Outstanding Natural Beauty (AONB), as shown on the Proposals Map, there should be no development which would have a detrimental impact on the AONB in terms of scale, design, layout or location.

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Appendix 3:
Statistical Summary of THPS Survey 30 March – 1 May 2015

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