

COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT & NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 13

PLANNING APPLICATIONS COMMITTEE: 7 February 2018

Ward: Redlands

App No.: 171954/FUL

Site Address: 3-5 Craven Road, Reading, RG1 5LF

Proposal: Demolition of existing buildings and redevelopment to form 25 Retirement Living units (C3 use) for older persons with communal facilities, parking and associated landscaping.

Applicant: McCarthy & Stone

Date valid: 13 November 2017

13 Week Date: 12 February 2018

26 Week Date: 14 May 2018

RECOMMENDATION

REFUSE Full Planning Permission for the following reasons:

1. The proposed development would result in the complete demolition of a non-designated heritage asset at 3 Craven Road with consequent substantial harm to the asset itself, and harm to the character of the adjacent streets and to the wider Redlands area to the south and east. As such the proposed development is contrary to Policies CS33 and CS7 of the Reading Borough LDF Core Strategy 2008 (altered 2015), the National Planning Policy Framework and associated Planning Practice Guidance.
2. The proposed development by reason of its excessive scale and expansive footprint would be overly prominent within its context and would appear as an inappropriate and unsympathetic development that would detract from the appearance of the street scene, and the character of the wider Redlands area to the south and east. The proposal would therefore be contrary to Policies CS7 and CS15 of the Reading Borough LDF Core Strategy 2008 (altered 2015), and guidance in the NPPF and PPG.
3. The proposed development by reason of its height, massing and proximity to the neighbouring dwelling at 7 Craven Road, would result in harm to the amenity of this neighbour due to overlooking and loss of privacy. As such the proposal would be contrary to Policy DM4 of the Sites and Detailed Policies Document 2012 (altered 2015) and Policy CS15 of the Reading Borough LDF Core Strategy 2008 (altered 2015).
4. The proposed development would result in the removal of a good quality street tree with consequent harm to the visual amenity, biodiversity and environmental quality of the area. As such the development would be contrary to Policies CS7 and CS38 of the Reading Borough LDF Core Strategy 2008 (altered 2015) and Policies DM1 and DM18 of the Reading Borough Sites and Detailed Policies Document 2012 (altered 2015).
5. In the absence of a completed legal agreement to secure an acceptable amount of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough and the need to provide sustainable and inclusive mixed and balanced communities. As such the proposal is contrary to Policy CS16 of the Reading Borough LDF Core Strategy 2008 (altered 2015) and Affordable Housing Supplementary Planning Document 2013.

6. In the absence of a completed legal agreement to secure a suitable Employment, Skills and Training Plan, or appropriate alternative financial contribution to allow for employment, skills and training provision, the proposal fails to contribute adequately to the employment skills and training needs of Reading Borough. As such the proposal is contrary Policy CS3 and CS9 of the Reading Borough LDF Core Strategy 2008 (altered 2015), Policy DM3 of the Sites and Detailed Policies Document 2012 (altered 2015) and the Employment Skills and Training Supplementary Planning Document 2013.

7. In the absence of a completed legal agreement to secure necessary off-site highway works, the proposal fails to mitigate its impact on adjacent highway infrastructure. As such the proposal is contrary to Policies CS20, CS22 and CS23 of the Reading Borough LDF Core Strategy 2008 (altered 2015) and Policy DM12 of the Sites and Detailed Policies Document 2015 (altered 2015).

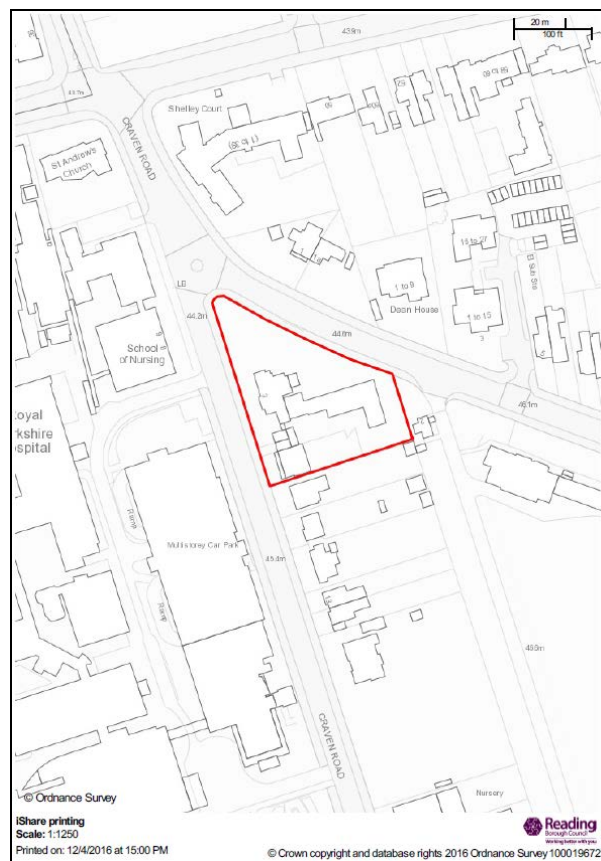
Informatives

1. Positive and Proactive Approach
2. Refused drawings

1. INTRODUCTION

- 1.1 The site is located at the roundabout junction of Craven Road and Erleigh Road to the south east of the town centre and opposite the Royal Berkshire Hospital site.
- 1.2 The site is currently occupied by two community facilities, the Dingley Health development centre - run by Royal Berkshire Hospital. This is a service for children with moderate to significant disabilities and serves children across Reading, Wokingham and West Berkshire LA areas; the second being the Children and Adolescent Mental Health service for 0 - 19 years (serving Reading) , which is run by Berkshire Healthcare NHS Foundation Trust. Section 14 of the submitted application form suggests that the use ended on 1 September 2017. However, based on a site visit on 14 December 2017, it appears that both occupiers are still in place. The proposal involves the demolition of all of the the current buildings on the site.
- 1.3 The current buildings include 3 Craven Road, which was recently added to Reading Borough's List of Locally Important Buildings and Structures in recognition of its local heritage significance. It is therefore a 'non-designated heritage asset'. The building is two storey mid-Victorian house in a Gothic style. The plan form is L-shaped with slate roof and ogee turret roof at the rear angle. It was built primarily in red brick with yellow brick detailing forming the plinth, dentillated string course, quoins and levelling courses. It has a gabled roof with decorative fretted timberwork at the eaves, timber corbelling exposed at the eaves. Dressed stone exists around the windows heads and cills with keystones and yellow stock brick detailing around the windows. Windows are generally intact as eight pane sash windows. A decorative chimney with polychromatic brickwork exists to the southern wing.
- 1.4 Apart from a number of unsympathetic extensions to the rear and side including a wooden single storey extension, separate flat roof modular building and access ramp, the Victorian building at No. 3 Craven Road is relatively intact. The 1879 OS mapping shows the building within its own extensive grounds.

- 1.5 The building makes use of brickwork which, although Victorian, is distinctively from Berkshire, using clays found in the area, possibly at local kilns from areas such as Tilehurst.
- 1.6 The building retains virtuoso yellow stock brickwork forming the plinth, dentillated string course, quoins and levelling courses and forming the chimney stack. The decorative fretted timberwork at the gables is particularly impressive. Dressed stone around the windows heads and cills with keystones shows particular quality.
- 1.7 The building also has group value being associated with a number of large villas along Craven Road and the Berkshire Hospital.
- 1.8 Number 5 is also a good quality building which although not considered to be a heritage asset, does reflect the prevailing scale and character of buildings on the east side of Craven Road, a character which continues eastwards into the Redlands residential area and which contrasts sharply with the larger scale of buildings within the hospital and beyond towards the town centre.



Site location plan - not to scale



Site Photograph

2. RELEVANT PLANNING HISTORY

- 2.1 041338/FUL - Temporary relocation of existing portable building from Battle Hospital and extension to house Dingley Childrens Development Centre - Approved.
- 2.2 151886/PRE - Erection of a new part two storey / part three storey building to comprise 39 retirement living apartments (use class C3) with associated parking, landscaping and communal facilities, following demolition of the existing buildings. - Observations sent
- 2.3 1 December 2015 - 3 Craven Road locally listed. This decision was reviewed by the Head of Planning and Lead Councillor for Strategic Environment, Planning and Transport on the request of the landowner and in accordance with the Council's local listing procedure. Their decision, given on 2 February 2016, was that the building remains worthy of local listing.
- 2.4 160355/FUL - Erection of a part 4 storey/part 3 storey building to accommodate 39 Retirement Living units (C3 use) for older persons with communal facilities, parking and associated landscaping following the demolition of existing buildings. Withdrawn by the applicant - recommended for refusal on the agenda for 27 April 2016 Planning Applications Committee.
- 2.5 170166/DEM - Application for prior notification of proposed demolition. All buildings at 3 to 5 Craven Road. Notification given that Prior Approval Required. Application withdrawn.
- 2.6 170484/DEM - Application for prior notification of proposed demolition. All buildings at 3 to 5 Craven Road. Notification given that Prior Approval Required. Superseded by Article 4 Direction (see below).
- 2.7 Article 4 Direction dated 20 July 2017 removing permitted development rights under Part 11 (demolition) of the GPDO.

3. PROPOSALS

- 3.1 Full planning permission is sought for the demolition of all buildings within the site and the erection of a single building with a broadly L-shaped footprint. This would comprise two storey buildings with a third storey of accommodation within the roof at the southern end, rising to a three-storey scale with an additional fourth storey of accommodation within the roof at the northern end, close to the roundabout.
- 3.2 The proposed building would contain 25 flats (Class C3) with 6 being one-bedroom and 19 two-bedroom. The applicant proposes that these flats be occupied only by persons over 55 years of age.
- 3.3 The existing access to 3 Craven Road would be closed and a new single vehicular access be provided, from Craven Road, serving a large car parking area towards the southern end of the site.
- 3.4 Information Submitted with the Application:

Drawings

SE-2372-03-AC-001 - Site Location Plan, dated 6 February 2017

SE-2372-03-AC-012 Demolition Site Plan, dated 30 October 2017

SE-2372-03-AC-028 Proposed Ground Floor Plan, dated 30 October 2017

SE-2372-03-AC-029 Proposed First Floor Plan, dated 30 October 2017

SE-2372-03-AC-030 Proposed Second Floor Plan, dated 30 October 2017

SE-2372-03-AC-037 Proposed Elevations 01 (Coloured) - North and East, dated 1 November 2017

SE-2372-03-AC-038 Proposed Elevations 02 (Coloured) South and West, dated 1 November 2017

SE-2372-03-AC-039 Proposed Street Elevations 01 dated 21 November 2017

SE-2372-03-AC-040 Proposed Street Elevations 02 dated 21 November 2017

SE-2188-03-LA-MCS604/Drg 01 Rev.B, Landscape Proposals, dated 18 January 2018.

047.0050.012 Revision B, Amended Relocation of Bus Stop and Post Box, Visibility Splays and Emergency Vehicle Tracking, dated 4 January 2018

IDL/892/07/01, Drainage Layout, dated October 2017

8901/02 Rev.B Tree Protection Plan, dated 7 November 2017

Documents -

Financial Viability Assessment dated 31 October 2017

Housing Needs Assessment Report, dated September 2017

CIL - Planning Application Additional Information Requirement form

Arboricultural Report JTK/8901/JK dated January 2018.

Tree Constraints Plan 8901/01 dated July 2015

Transport Statement, 047.0050/TS/2 (rev.2) dated 26 October 2017 and associated appendices.

Planning Statement (undated), received 6 November 2017

Statement of Community Involvement dated October 2017

Foul & Surface Water Drainage Assessment, Third Issue, dated 9 October 2017

Cellular Storage Proposal

Noise Assessment R6072-1 Rev.1 dated 26 October 2017

Letter of Support, Berkshire Healthcare NHS Foundation Trust dated 26 October 2017

Bat Survey Report 17_1368_Report_MF_AR, dated 10 October 2017

Design and Access Statement SE-2372-03-AC-066 dated October 2017

Heritage Statement (Undated), received 2 November 2017

Visually Verified Montages NPA 10858 050 MCS October 2017

4. CONSULTATIONS

RBC Transport

- 4.1 The application site is located outside the town centre area, but is within close proximity to bus routes 3, 9 and 19 (a, b and c). The site is therefore accessible to good public transport links to and from the town centre area.
- 4.2 A Transport Statement has been submitted to accompany the application. Trip rate data has been submitted comparing the trip generation between the existing and proposed uses. Transport are satisfied that the proposed use would generate fewer trips on the network.
- 4.3 Vehicular access to the site is to be relocated 35m further south than its current position. This proposed location is acceptable in principle given that it will reduce conflicting movements with the entrance to the hospital.
- 4.4 The site is currently accessed by a right turn lane, which although substandard, would remain acceptable as the proposal would generate fewer vehicle movements. The dropped crossing arrangement is also acceptable on this basis. The existing dropped crossing will need to be abandoned with the footway reinstated.
- 4.5 It is agreed that the visibility splay of 2.4m x 28.9m in the primary direction and 2.4m x 56.2m in the secondary direction is acceptable.
- 4.6 At present, a bus stop and a post box are situated directly to the north of the proposed access, it is proposed to relocate these to achieve the visibility.
- 4.7 A tracking diagram has been provided to show that vehicles up to the size of a fire appliance could pass a bus waiting at the stop.
- 4.8 An updated plan has been submitted that demonstrates that the bus stop sign post would be sited so that it does not result in an obstruction to pedestrians.
- 4.9 The above Highway works would need to form part of a s278 Agreement and undertaken prior to commencement of the development to ensure that the necessary access arrangements and visibility splays can be achieved.
- 4.10 The maximum car parking provision for the site would be 28 spaces and this is the number proposed. The spaces are also provided within an acceptable layout. The proposal therefore complies with Policy in terms of parking in accordance with the Council's adopted Parking Standards and Design SPD.
- 4.11 Cycle parking is also required for the proposal and this should be at a ratio of 1 per 3 staff located within the form of a covered and conveniently located store equipped with Sheffield type stands. The Transport Statement states that a shared buggy / cycle store will be provided at the ground floor but it is apparent that the submitted plans do not illustrate any cycle parking within the buggy store. However, Sheffield type stands are proposed adjacent to the main entrance and

this is acceptable in principle, these cycle spaces should be covered to comply with the required standard. This can be dealt with by condition.

- 4.12 It has been stated that servicing has previously been undertaken from Craven Road and this is to be retained, this is deemed acceptable given that the refuse collection point is to be within 10m of where the collection vehicle can access.
- 4.13 In the circumstances there are no transport objections to the proposal subject to the conditions to secure vehicle parking, bicycle parking, bin storage, and construction of the access with visibility splays and closure of existing access.

RBC Historic Buildings Consultant

- 4.14 The proposals for the re-development of the site consist of a new development which would range across the site between Craven Road and Erleigh Road, adjacent to the Entrance Lodge to Reading School. The Lodge, is a pre-1948 building which is functionally related, and subsidiary to, the main Grade II Listed school and in the same ownership and is therefore considered to be curtilage listed. The Entrance Lodge and the adjacent Grade II Listed Reading School building have settings which would potentially be affected by the proposed scheme.
- 4.15 The proposed design consists of two-and-a-half storey and three-and-a-half storey ranges between Craven Road and Erleigh Road. The proposed buildings would be built in red/buff brick with bands of diaper work and quoin details in grey brick. The proposed roofs are shown as slate with dormer windows and chimneys. The elevations, particularly along Craven Road, are broken up through the use of projecting gables. However, overall the sized and mass of the buildings will still be prominent in the streetscene. The design provides some separation from the setting of the curtilage listed school Entrance Lodge; a car-park is proposed to abut the rear of the Entrance Lodge, with a three-and-a-half storey building, c.20m from the lodge. The largely open setting to the rear of the Entrance Lodge would largely remain and the poor quality, low, single storey temporary buildings would be removed.
- 4.16 The Erleigh Road elevations of the proposed development, which would abut the grounds of the Grade II Reading School and the Entrance Lodge, extend to three and a half storeys with projecting gables and balconies. Whilst the scale and mass of this development is considered to be out-of-character with the built form in the surrounding area, the separation of the proposal from the adjacent curtilage listed Entrance Lodge and Reading School is not considered to cause substantial harm to their settings and significance as listed buildings.
- 4.17 The loss of the locally listed No. 3 Craven Road is considered to result in substantial harm to the significance of this Locally Listed building. Under paragraph 135 of the NPPF, the effect of the application on the value of a non-designated heritage asset should be taken into account in determining the application, making a balanced judgement with regard to the scale of any harm or loss and the value of the heritage asset (DCLG et al, 2012, paras. 135).
- 4.18 Under paragraph 137 local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

- 4.19 The design has incorporated some architectural detailing from the surrounding late Victorian and Edwardian buildings so that it better harmonises with the surrounding built environment than the previous, withdrawn, application proposal. The amended design has partly broken-up the mass and scale of the development through variations in the building form and footprint so that it is less dominant in the streetscene and is more sympathetic to the settings of the Listed School and curtilage Listed Entrance Lodge than previously. The prospect of a heritage-led design incorporated into the proposals is however, not examined within the heritage statement provided, and no justification is provided for not examining this option.
- 4.20 The Reading Borough Council Core Strategy *CS33: Protection and Enhancement of the Historic Environment* requires that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced including features with local or national designation and that planning permission will only be granted where development has no adverse impact on historic assets and their settings.
- 4.21 Overall the proposed design is considered to better address the settings of the curtilage listed Entrance Lodge, Grade II Listed School and the Alexandra Road Conservation Area than previously. However, due to the required demolition of No. 3 Craven Road, the proposed development would result in substantial harm to the locally listed building. The effect of this harm should be taken into account in determining the application, making a balanced judgement with regard to the scale of the loss and the value of the heritage asset (DCLG et al, 2012, paras. 135).

Lead Flood Authority (RBC Highways)

- 4.22 Confirmed no objection subject to conditions to secure completion of the sustainable drainage scheme and to secure submission of details of the future maintenance and management of the drainage system.

RBC Natural Environment (Trees and Ecology) (NE)

- 4.23 The up-dated tree survey and Arboricultural Impact Assessment (AIA) are acceptable.
- 4.24 The submitted Tree Protection Plan is acceptable in respect of existing trees to be retained.
- 4.25 Natural Environment were approached prior to submission to ask whether the removal of the street Lime tree (T4 of the survey) would be acceptable and the applicant was advised that the removal of a healthy, established, defect-free, 'A' category Council street tree to allow for development would not be acceptable, particularly as replanting locations in this road are unlikely to be feasible due to site constraints.
- 4.26 The revised landscaping proposal is acceptable, with the exception of the proposed loss of the street tree.
- 4.27 In conclusion, whilst the proposal is acceptable in respect of on-site tree and landscaping proposals the proposal is not acceptable due to the loss of a healthy Council street tree

RBC Environmental Protection

- 4.28 The submitted noise assessment shows that the recommended standard for internal noise can be met, provided that the recommendations from the

assessment are incorporated into the design. It is recommended that a condition be attached to any permission granted to ensure that the glazing (and ventilation) recommendations of the noise assessment (and air quality assessment, where relevant) will be followed, or that alternative but equally or more effective glazing and ventilation will be used.

- 4.29 It is recommended that noise, dust, hours of working and bonfires during construction are controlled by CMS and hours of work conditions.

RBC Ecologist

- 4.30 In 2015, a bat survey (Innovation Group Environmental Services, Ref: E2107151217, October 2015; associated with withdrawn application 160355) recorded a single common pipistrelle re-entering to roost at 3 Craven Road and the council's ecology officer confirmed that a bat licence would be required. The updated bat survey report (Green Link Ecology Ltd, Ref: 17_1368_Report_MF_AR, October 2017), however, concludes that following 3 bat activity surveys, the buildings onsite are not currently used by roosting bats. To minimise the risk of harm to bats, the mitigation strategy outlined in the report will need to be implemented and a condition requiring development to be in accordance with the mitigation measures in the bat survey should be set.

- 4.31 The works will involve the removal of at least one tree (as per the tree constraints plan) and potentially shrubs and other garden plantings. As such, any vegetation clearance should be timed to avoid the bird nesting season. To be controlled by condition.

- 4.32 In conclusion, there are no ecology related objections to this application.

Berkshire Archaeology

- 4.33 The existing buildings on the site will have already significantly impacted any archaeological deposits that may have been present. The proposals would only create a small area of new impact and in light of this it is not felt that archaeological investigations are merited in this instance. Our advice relates only to below ground archaeological deposits and any recommendations regarding the existing Locally Listed building should be sought from the conservation officer.

RBC Emergency Planner

- 4.34 No comment received. Any comments received prior to Committee will be reported in an Update report.

RBC Valuation Department

- 4.35 No comment received. Any comments received prior to Committee will be reported in an Update report.

Berkshire Fire and Rescue Service

- 4.36 No comment received. Any comments received prior to Committee will be reported in an Update report.

Ambulance Service

- 4.37 No comment received. Any comments received prior to Committee will be reported in an Update report.

Thames Valley Police

- 4.38 No comment received. Any comments received prior to Committee will be reported in an Update report.

RBC Disabled Access Group

- 4.39 No comment received. Any comments received prior to Committee will be reported in an Update report.

RBC Director of Children, Education & Early Help Services

- 4.40 Confirmed that any Council services have been moved or relocated from the site and have no further comment to make at this time.

Public Consultation

- 4.41 Neighbours adjoining the site were consulted by letter.
- 4.42 Two site notices were displayed. One on Craven Road adjacent to the entrance to no.3 and one on the Erleigh Road frontage.
- 4.43 Representations have been received from five addresses as follows:

- Craven Rd is busy already and a development of this size is disproportionate. The site needs developing but 25 seems a huge number of retirement homes with attendant noise and disruption.
- The proposal is a significant improvement in relation to 1 Erleigh Road compared with the previous application. Request that the trees close to the boundary with Erleigh Road are preserved.
- Direct overlooking of family living room and garden of 7 Craven Road.
- The main access to this proposed development for 25 retirement living units, both by foot and by vehicle runs along the full length of the boundary of 7 Craven Road resulting in noise pollution and disturbance with residents visitors using this access both day and night.
- Craven Road is already a busy and congested road; this additional concentration of traffic will cause traffic problems and create a safety hazard for other motorists.
- Concerns about the construction traffic to this site, the roads around this site are already busy and at rush hour often gridlocked, as a local resident this is a major concern.
- 3 Craven Road was the home of the important Reading architect, Joseph Morris and No 5 also designed by his firm. Although these are not in my view among the best of the firm's buildings No 3 was where Morris, a wee bit batty by this time, proclaimed the Second Coming of Christ in 1903 and therefore has some historical importance. The new development should perhaps incorporate some sort of plaque recognising the historical importance of the site.

5. LEGAL AND PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 5.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 5.3 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990

requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

5.4 National

National Planning Policy Framework
National Planning Practice Guidance

5.5 Reading Borough Local Development Framework: Core Strategy (2008) (Altered 2015)

CS1 Sustainable Construction and Design
CS2 Waste Minimisation
CS3 Social Inclusion and Diversity
CS4 Accessibility and Intensity of Development
CS5 Inclusive Access
CS7 Design and the Public Realm
CS9 Infrastructure, Services, Resources and Amenities
CS14 Provision of Housing
CS15 Location, Accessibility, Density and Housing Mix
CS16 Affordable Housing
CS20 Implementation of Reading Transport Strategy
CS22 Transport Assessments
CS23 Sustainable Travel and Travel Plans
CS24 Car/Cycle Parking
CS29 Provision of Open Space
CS30 Access to Open Space
CS31 Community Facilities
CS33 Protection and Enhancement of the Historic Environment
CS34 Pollution and Water Resources
CS35 Flooding
CS36 Biodiversity and Geology
CS38 Trees, Hedges and Woodlands

5.6 Sites and Detailed Policies Document (2012) (Altered 2015)

SD1 Presumption in Favour of Sustainable Development
DM1 Adaption to Climate Change
DM2 Decentralised Energy
DM3 Infrastructure Planning
DM4 Safeguarding Amenity
DM5 Housing Mix
DM10 Private and Communal Outdoor Space
DM12 Access, Traffic and Highway-related Matters
DM18 Tree Planting
DM19 Air Quality

5.7 Supplementary Planning Documents

Sustainable Design and Construction (2011)
Revised Parking Standards and Design (2011)
Employment Skills and Training (2013)
Affordable Housing (2013)

Other documents

Berkshire (including South Bucks) Strategic Housing Market Assessment (2016)
(http://beta.reading.gov.uk/media/2959/Housing-Market-Assessment/pdf/Berkshire_SHMA_Full_Report_May_07.pdf)

Historic England Advice Note 7 Local Heritage Listing (2016)
(<https://content.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heaq018-local-heritage-listing.pdf/>)

Reading Borough Council Annual Monitoring Report 2016-2017 (December 2017)
(http://www.reading.gov.uk/media/8135/Annual-Monitoring--Report-2017/pdf/Annual_Monitoring_Report_2016-17.pdf)

6. APPRAISAL

i) Heritage and Character

6.1 The adjacent Victorian and Edwardian villas to the south on both Craven Road and Erleigh Road are of two and two-and-half storeys (two storeys with roof attics). This more domestic scale and Victorian/Edwardian character continues across much of the Redlands area to the south and to the east of the site (broadly defined by London Road to the north, Upper Redlands Road to the south, the east side of Craven Road to the west and Eastern Avenue to the east), including the Alexandra Road Conservation Area. It is considered that the application site is much more closely associated with this 'character area' than the character of the hospital opposite, which necessarily consists of larger buildings often with a quite functional appearance. It is apparent that the hospital is also more closely associated to the larger scale character of the town centre to the west rather than the older residential buildings of the Redlands area to the east and south, the centre of Craven Road is therefore the boundary of these two distinct character areas.

6.2 The proposed design would replace the existing historic buildings with a much larger building. Along Craven Road the proposed development would result in a more-or-less continuous elevation of two and half storeys, rising to three and a half storeys at the junction between Craven and Erleigh Road. The building would also extend to a substantial depth towards the rear of the site. The height and massing of the building, i.e. its three dimensional bulk and its arrangement, is a key matter to be assessed and is fundamental to the acceptability of the proposal.

Setting of Adjacent Heritage Assets

6.3 As stated in the submitted heritage statement, the proposals would affect the settings of the school lodge, (curtilage listed) and to a lesser extent the curtilage listed Reading School terrace buildings.

6.4 It is accepted that the removal of the temporary single storey buildings currently on site would improve the setting to some extent, as referred to in the submitted heritage statement. The Council's Historic Buildings Consultant considers that sufficient separation has been achieved between the curtilage listed Reading School Gatehouse (it's setting as an ancillary building is relatively small and capable of accommodating new development). There would be some change to the setting of the main school building due to the effect on the setting of the main avenue approach. However this is currently viewed within the context of surrounding development and the change it is not considered to be harmful to the setting in this instance.

Demolition of the Locally Listed Building (No.3 Craven Road)

6.5 3 Craven Road was added to Reading's List of Locally important Buildings and Structures 'Local List' on 1 December 2015 based on the advice of the Council's

Historic Buildings Consultant and in accordance with the criteria set out on page 62 of the Sites and Detailed Policies Document 2012 (altered 2015).

- 6.6 The summary to Historic England Advice Note 7 Local Heritage Listing (2016) states:

“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment, as part of the wider range of designation. They enable the significance of any building or site on the list (in its own right and as a contributor to the local planning authority’s wider strategic planning objectives), to be better taken into account in planning applications affecting the building or site or its setting.”

- 6.7 The Advice Note continues in paragraph 11:

“In deciding applications for planning permission that affect a locally listed heritage asset or its setting, the NPPF requires, amongst other things, both that local planning authorities should take into account the desirability of sustaining and enhancing the significance of such heritage assets and of putting them to viable uses consistent with their conservation and the consideration of the positive contribution that conserving such heritage assets can make to sustainable communities including their economic vitality (NPPF paragraphs 126 and 121). Whilst local listing provides no additional planning controls, the fact that a building or site is on a local list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration when determining the outcome of a planning application (NPPF, paragraph 17).”

- 6.8 National Planning Practice Guidance advises that in most cases the assessment of the significance of the heritage asset by the local planning authority is likely to need expert advice in addition to the information provided by the historic environment record, similar sources of information and inspection of the asset itself. Advice may be sought from appropriately qualified staff and experienced in-house experts or professional consultants, complemented as appropriate by consultation with National Amenity Societies and other statutory consultees. (NPPG Paragraph: 010 Reference ID: 18a-010-20140306)

- 6.9 In line with this advice, the following assessment is based closely on the advice of the Council’s Historic Buildings Consultant (HBC), as well as all other material considerations.

- 6.10 The proposals would include the demolition of the locally listed building, No. 3 Craven Road. As agreed by the applicant in their submitted heritage statement the building certainly meets the RBC’s criteria for local listing (para 4.13 p.18), although the applicant disagrees with the Council over the degree of historic importance.

- 6.11 The reasons given by the Council for locally listing 3 Craven Road, in reference to the SDPD criteria and on the advice of the Council’s Historic Buildings Consultant are as follows:

“In summary 3 Craven Road:

- Is representative of a style that is characteristic of Reading;*

- *The building or structure has a noteworthy quality of workmanship and materials;*
- *The building or structure is the work of a notable local/national architect/engineer/builder;*
- *The building or structure shows innovation in materials, technique, architectural style or engineering;*
- *Has social importance being associated with the Royal Berkshire Hospital.*

The building is two storey mid-Victorian in a Gothic style. The plan form is L-shaped with slate roof and ogee turret roof at the rear angle. It was built primarily in red brick with yellow brick detailing forming the plinth, dentillated string course, quoins and levelling courses. It has a gabled roof with decorative fretted timberwork at the eaves, timber corbelling exposed at the eaves. Dressed stone exists around the windows heads and cills with keystones and yellow stock brick detailing around the windows. Windows are generally intact as eight pane sash windows. A decorative chimney with polychromatic brickwork exists to the southern wing.

Apart from a number of unsympathetic extensions to the rear and side including a wooden singles storey extension, separate flat roof port a cabin and access ramp, the Victorian building at No. 3 Craven Road is relatively intact. The 1879 OS mapping shows the building within its own extensive grounds.

The building makes use of brickwork which, although Victorian, is distinctively from Berkshire using clays found in the area, possibly at local kilns from areas such as Tilehurst.

The building retains virtuoso yellow stock brickwork forming the plinth, dentillated string course, quoins and levelling courses and forming the chimney stack. The decorative fretted timberwork at the gables is particularly impressive. Dressed stone around the windows heads and cills with keystones shows particular quality.

The building also has group value being associated with a number of large villas along Craven Road and the Berkshire Hospital."

- 6.12 It is relevant that paragraph 017 of the Conserving and Enhancing the Historic Environment section of the National Planning Practice Guidance states that the complete demolition of the building would result in "obvious" substantial harm to a non-designated heritage asset (para 017).
- 6.13 The demolition of a locally listed building, which must be interpreted as substantial harm to a non-designated heritage asset, is considered to be contrary to Core Strategy Policy CS33 as well as national policy in the NPPF, subject to the necessary planning balance. The applicant's heritage statement (para 2.02) states that "[Policy CS33]... predates the Framework [the NPPF] and includes the phrase "Planning permission will only be granted where development has no adverse impact on historic assets" which is clearly contrary to the 'balanced' approach introduced by paragraph 134 of the Framework and reinforced by the recent (December 2015) Court of Appeal decision referred to in paragraph 1.05 above. Accordingly the provisions of the Framework will take precedence over this part of the adopted Core Strategy". This point is not accepted by officers and is considered to be an overly simplistic reading of the policy. The policy remains subject to the usual planning balance under s38(6) of the Act. Furthermore, the NPPF and NPPG, together with other national heritage guidance, help to inform an

assessment of when “adverse impact” might occur, thereby maintaining an appropriate balance inherent within the development plan policy. This development plan policy therefore remains relevant to this application and does not conflict with national policy. It should therefore be afforded full weight.

6.14 Assessing the merits of a proposal to replace the locally listed building triggers a policy approach as follows:

- Paragraph 9.1.25 of the Sites and Detailed Policies Document 2012 (altered 2015) states that:

“The LPA will establish a list of ‘Locally important Buildings and Structures’. Where a building or structure merits designation as a locally important heritage asset, it would be recorded as such by adding it to this list, which will form part of Reading’s Historic Environment Record. The asset would then be conserved and where appropriate enhanced in accordance with Policy CS33 of the Core Strategy and national planning policy...”

- Policy CS33 of the Core Strategy states that:

“Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include... Other features with local or national designation... Planning permission will only be granted where development has no adverse impact on historic assets and their settings...”

- Paragraph 135 of the NPPF states:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

6.15 The Sites and Detailed Policies Document states that following local listing, the asset should be conserved in accordance with CS33 and national policy.

6.16 In accordance with national policy and s.38(6) of the Act, it is necessary to weigh the overall significance of the heritage asset against the wider social, economic and environmental benefits arising from the proposal and any other relevant material considerations.

6.17 At the start of this weighing exercise, it is considered appropriate to afford the local listing status greater weight than if the building were not locally listed, as suggested by:

- Historic England guidance (Advice Note 7),
- the approach set out in the SDPD - Paragraph 9.1.25 which means that Policy CS33 applies, and therefore the approach to development plan policy set out in s.38(6) of the Planning and Compulsory Purchase Act.
- the specific references to local listing as a distinct approach to identifying locally important heritage assets within national planning guidance.

6.18 National Planning Practice Guidance states

"Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework.... It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed... While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all."
(Paragraph: 017 Reference ID: 18a-017-20140306).

- 6.19 It is concluded, based on the available evidence, including the submitted heritage statement and associated supplementary documents, together with the advice of the Council's Historic Buildings Consultant, and national and local planning policy and guidance, that the proposed demolition of locally listed Pearson's Court would result in 'obvious' substantial harm to the heritage significance of the locally listed heritage asset. This would be contrary to Policy CS33 and national policy and guidance within the NPPF.
- 6.20 Other material considerations to be weighed against this harm are considered below. The wider benefits in terms of supporting the provision of housing in general and the need for older persons' accommodation in particular, meeting housing need, supporting economic vitality are material considerations and relevant to the wider socioeconomic elements of 'sustainable development' as outlined in the NPPF.

Housing Need

- 6.21 The proposal would contribute towards meeting identified housing need in general terms, as identified in the Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 (SHMA).
- 6.22 In general terms the Council's 2017 Annual Monitoring Report 2016-2017 (AMR) confirms that numbers of new housing completions have continued to recover from the recession with 717 homes completed in 2016-17. Reading has a greater than five year supply of housing when measured against both Core Strategy targets and objectively assessed need. The AMR reports that "*delivery of affordable housing is some way below Reading's needs, however.*"
- 6.23 The AMR confirms that whilst the amount of affordable housing completions 2016-17 represents a small increase on 2015-16, it is significantly below recent historic levels, and is a long way below the assessed need for new affordable housing within the SHMA (para 7.11).
- 6.24 There is a continued very substantial need to secure additional affordable housing - the results of the Berkshire Strategic Housing Market Assessment show that there is a need for 406 affordable dwellings per year.
- 6.25 With regard to specialist accommodation for older persons, nationally there is a critical need for older persons' accommodation as described in National Planning Practice Guidance (Paragraph: 021 Reference ID: 2a-021-20160401). Locally, the SHMA supports the future provision of Older Person's Accommodation, as does Policy DM7 of the Sites and Detailed Policies Document, which supports provision of sheltered housing as a means of providing opportunities for more independent living for vulnerable persons. The SHMA identifies a need for 997 owner occupied homes for older persons by the year 2036.

- 6.26 In the case of Reading, the need for older persons' accommodation is tempered to some extent by the "notably younger population" identified by the SHMA (para. 4.12), and the very high demand for Affordable Housing, these being relevant when considering the relative importance of the type of accommodation proposed. Also relevant to this case is para 9.16 of the SHMA which indicates that there will be a notable demand for Affordable Housing from the ageing population, something which is downplayed by the applicant in para. 1.14 of the submitted housing needs assessment.
- 6.27 The submitted housing needs assessment refers to the Council's Market Position Statement on Care for Older People 2016-2019 which states that the five Extra Care Housing schemes recently completed and a sixth to be completed in 2018 will meet the demand for extra care provision in the Borough. The submitted statement comments that this does not address the role of sheltered accommodation for sale.
- 6.28 It is accepted therefore that there is a clear demand for older persons' accommodation in Reading Borough as part of the general housing need. The proposed private, owner-occupied, tenure scheme would certainly contribute towards meeting this need. However it is not a pressing need to the degree that Affordable Housing is currently. If the need for older persons' accommodation is to be given greater weight, this would need to take the form of Affordable Housing. The current offer, based on the applicant's 'surplus profit' set out in the submitted Viability Assessment is £168,480. This would be towards off-site provision of Affordable Housing and equates to an equivalent provision of 3.5% Affordable Housing. This falls far short of the 30% requirement in Policy CS16 and does not provide any Affordable Housing on site. This minimal contribution towards the pressing need for Affordable Housing in the Borough diminishes the contribution made by the scheme towards identified local housing need and weighs against any benefits that may arise from the proposal.
- 6.29 Importantly, if an overriding need for housing, including Older Persons' Accommodation could be demonstrated, this would not in itself justify the demolition of the locally listed building. The building was originally constructed as a dwelling and the possibility of conversion back to residential use is a reasonable assumption. An imaginative architectural solution that retains the historically significant parts of the locally listed building, with suitable new wings or extensions to provide additional accommodation appears possible, without the need for an overly contrived design. Indeed this approach is formally proposed in Policy ER1b (Dingley House, 3-5 Craven Road) of the Pre-Submission Draft Reading Borough Local Plan (2017). This draft policy proposes "*retention and change of use of locally listed building for residential with limited additional development*". A guideline figure of 15-22 dwellings is indicated. Whilst this draft policy carries little weight at this stage of its adoption, it remains a clear indicator of the appropriate use of the site and the future direction of travel in policy terms

Job Creation

- 6.30 The applicant rightly refers to the jobs created through the construction of the scheme as being a material benefit and refers to local work for around 120 people. Ongoing employment would also be secured for a few members of staff and those involved in servicing the building.
- 6.31 However these benefits are not unique to a scheme involving complete demolition and are common to most construction projects. A scheme that retains and extends the existing structure would also create a significant number of jobs and could

involve a wider range of skills in conserving the significance of the historic building.

Improved Quality of Life for Future Occupiers

- 6.32 The proposal would undeniably provide a high quality, safe, living environment for future occupiers that would also assist in dealing with problems of loneliness experienced by older persons. The health benefits referred to in paragraphs 7.9 to 7.12 of the submitted planning statement are also acknowledged. It is agreed that the provision of high quality accommodation for older persons would comply with national and local planning policy in respect of housing older and/or vulnerable persons. However it is important to note that these benefits do not necessarily override other policy aims in respect of heritage and it is considered that high quality accommodation could also be achieved through a well-designed scheme which integrates the existing heritage asset within the proposals.

Freeing up under-occupied housing

- 6.33 The submitted planning statement notes that "McCarthy & Stone find on average around 60% of occupants move into a McCarthy & Stone scheme from within a five mile radius of the site." (para. 7.2). This suggests that a significant proportion would be attracted to the scheme from further afield, which would dilute any benefits to the local housing market in terms of freeing up family housing.
- 6.34 It is considered that this benefit is quite general and based on unqualified assumptions that could not be reasonably secured or controlled through the planning system i.e. future occupiers may equally move to the scheme from smaller accommodation, or from areas of lower housing demand further afield where the benefits would be less (see above). Importantly any benefits that would occur in terms of freeing up larger housing could also be achieved through an alternative scheme which sought to retain and extend the existing locally listed building.

Environmental Benefit

- 6.35 The applicant explains that the proposal would provide environmental benefits through making effective and efficient use of a valuable land resource and reducing development pressure on greenfield land. The proposal would certainly have this benefit, however it is considered that a scheme involving retaining the locally listed building would also achieve the same outcome.
- 6.36 Complete demolition has the disadvantage of wasting embodied energy within the existing structure and is less favourable than re-use in this respect. A new building would probably achieve a higher environmental standard once constructed and in use, although it is likely that environmental improvements could be retrofitted to the existing building and any new build elements (extensions or new wings) could be built to current environmental standards. On balance the environmental difference between the two potential approaches may be minimal and unlikely, in itself to outweigh the substantial harm to the heritage asset.

Other Economic Benefits

- 6.37 The submitted planning statement suggests that, the development once fully occupied would be likely to accommodate between 39 - 72 residents who given their age are likely to use the shopping and other facilities of the nearby local shops on a regular basis. In terms of the specifics of this application site, the site is not located particularly close to 'local shops' and future occupiers could reasonably be expected to rely on the nearby town centre for their shopping needs in much the same way as other residents. In this instance there is unlikely to be a material difference in shopping pattern compared to younger, or family occupiers.

- 6.38 As with many of the other benefits described above, the benefits of older occupiers could also be realised in much the same way with a heritage-led scheme which seeks to retain the locally listed building and provide new accommodation around it.

Building Design

- 6.39 The proposed new building is an improvement on that previously proposed under application reference 160355/FUL. The elevation to Craven Road is improved with deep recesses between sections of building giving the impression of separate buildings to some extent. This better reflects the distinctive older buildings which continue along the eastern side of Craven Road as it continues uphill to the south. The architectural treatment of the facades is also improved, with window design and patterned brickwork that better reflects the character of Craven Road, Erleigh Road, and the wider Redlands area.
- 6.40 The architectural devices employed in an attempt to disguise the mass of building only go a limited way towards mitigating its visual impact. Whilst a degree of attention appears to have been paid to the design of the Craven Road frontage, the 'rear' elevations to Erleigh Road are relatively weak in design terms and reveal the bulkiness of the proposal and display this prominently to the adjacent street. It is acknowledged that some attempt has been made to reflect some of the locally distinctive brickwork with the use of patterned bricks proposed on the main facades of the new building. However it is considered that this cosmetic treatment would do little to overcome the more fundamental shortcomings of the scheme in terms of its excessive scale and visual prominence and would do little to compensate for the loss of the existing historic buildings within the site.
- 6.41 The submitted Computer Generated Images (Visually Verified Montages ref. NPA 10858 050 MCS) are considered to demonstrate the excessive scale and unsympathetic relationship to the street quite effectively. The bulk of the northern side of the building viewed from Erleigh Road and also that of the southern side (apparent when travelling northwards towards the site along Craven Road) are key areas of concern.
- 6.42 A scheme which retained the historic building and provided suitably designed new wings of accommodation (designed to reflect and respond to the character of the retained building) would be likely to integrate more effectively within the existing streetscene and wider Redlands area. Therefore, whilst the proposal makes an attempt at integrating the bulk of the building as far as is possible for the amount of development sought, it remains oversized and does not achieve the degree of character exhibited by the existing locally listed building. The quality of design should therefore be afforded some weight, but is not considered sufficient to outweigh the harm arising from the loss of the heritage asset. This weight is diminished further by the alternative that exists in retaining and re-using the existing locally-listed building within a heritage-led scheme which better responds to the existing local distinctiveness (the existing building currently contributes positively to this distinctiveness).
- 6.43 The excessive scale of the building in relation to the plot and the character of the surrounding area is also considered to be harmful in its own right, separate from any heritage concerns, and the proposal is recommended for refusal on this basis as set out in the recommendation at the head of this report.

Heritage Conclusion

- 6.44 Although the current proposals would result in socioeconomic and environmental benefits, in the most part these are not inherently reliant on the demolition of the locally listed building and could be achieved through a more sensitive heritage-led approach which converted the existing building and integrated it within a scheme with new accommodation arranged around it.
- 6.45 The benefits in terms of housing need are significantly lessened by the significant shortfall in the provision of Affordable Housing within and through the scheme, measured against Development Plan policy. Affordable Housing, based on evidence referenced within the SHMA and AMR, is considered to be the pressing housing need locally.
- 6.46 It is apparent that the proposal would result in substantial harm to the heritage significance of the locally listed building due to its complete demolition.
- 6.47 On balance, and based on the available evidence, including the submitted heritage statement and associated supplementary documents and the advice of the Council's Historic Buildings Consultant, it is concluded that the proposed demolition of locally listed 3 Craven Road would result in substantial harm to the heritage significance of the locally listed heritage asset and would be contrary to Policy CS33, national planning policy and guidance within the NPPF and NPPG, together with Historic England published advice. In the view of officers, this harm would not be outweighed by other material considerations.

ii) Existing Community Use

- 6.48 Policy CS31 states that *"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."* The application states that *"The NHS have confirmed that the existing facilities on the site will be relocated to other local areas so that there will be no loss of the actual facilities provided."*
- 6.49 The Council's Children's Commissioning team, has confirmed that alternative provision has been made for existing children's services within the building and no longer object to the proposal.
- 6.50 Although not yet adopted, it is relevant to note that draft policy ER1b of the Pre-submission Draft Reading allows for residential use of the site and does not require the existing community use to be retained.
- 6.51 Taking these factors into account it is considered that the loss of the existing community use would not be harmful to the provision of the community facilities for children and young people in the Borough and is in accordance with Policy CS31.

iii) Neighbouring Amenity

- 6.52 The Committee report for withdrawn application 160355 referred to the impact on 7 Craven Road. At that time it was understood to be used as a small HMO, with the rear garden used as an informal car parking area. The previous proposals were angled away from this neighbour and less direct overlooking was proposed. The current proposal presents a continuous block of accommodation with three storeys of windows (the third in the roof) facing this neighbour. The proposal would be approximately 18 metres from the garden boundary and 20 metres from the house at number 7. Number 7 is now in use as a single C3 dwellinghouse and the garden

is now used as an amenity area with a large formal decked patio. It is considered that the height, mass and orientation of the proposed building would result in direct and harmful overlooking of the neighbouring garden, especially from second floor level windows and first floor balconies. It is considered that the main windows of the neighbouring house are arranged perpendicular to the new development and would be less affected.

- 6.53 The proposal would rise to 4 storeys opposite and to the south of 1 and 1A Erleigh Road. The front gardens of these properties are unusual in that they provide the main areas of amenity space for these large houses, which have minimal land to the rear. The previous proposal was considered to be overbearing on these gardens and front facing windows and result in overshadowing to a harmful extent height, mass and proximity. The current proposals are better arranged in relation to these neighbouring properties and it is considered that the proposals would no longer be harmful in this regard. Neighbour comments asking for existing taller trees to be retained are noted. The trees between the new building and 1 and 1A Erleigh Road (a Hazel and a Laurel) are shown as being retained on the submitted drawings.
- 6.54 The proposed car park would run the length of the boundary with number 7. The submitted landscape plan shows that the existing boundary wall would remain with buffer planting between the parking spaces and boundary. It is considered that, whilst some increased disturbance would occur the layout and buffer planting would be sufficient to prevent harm to the amenity of the neighbour, indeed the any disturbance would be likely to affect occupiers of the retirement flats before it became harmful to the neighbour as the degree of separation and buffer planting would be less.
- 6.55 It is considered that the proposal would be contrary to Policy DM4 of the Sites and Detailed Policies Document 2012 (altered 2015) and Policy CS15 of the Reading Borough LDF Core Strategy 2008 (altered 2015) due to the harm identified in respect of 7 Craven Road.

iv) Affordable Housing

- 6.56 The site is proposed to contain 25 dwellings. The developer may choose to restrict occupancy to older occupiers as this fits their business model, but the development would remain within Use Class C3, dwellings, in Planning terms.
- 6.57 Policy CS16 requires all developments of 15 dwellings and above to provide 30% of the total number of dwellings in the form of Affordable Housing to meet the needs of the area, as defined in a housing needs assessment.
- 6.58 In accordance national policy, the financial viability of the scheme is a consideration when assessing the appropriate amount of Affordable Housing within a scheme. Policy CS16 reflects this by stating:
"In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution."
The supporting text to the policy explains that *"the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement."*

6.59 As referred to above, the applicant has submitted a viability assessment suggesting that the scheme is not capable of providing any Affordable Housing on site, but would provide the sum of £168,480 towards off-site provision of Affordable Housing. This equates to a provision of 3.5% Affordable Housing.

6.60 The proposed amount falls far short of policy requirements. The extent to which this is justified by financial viability considerations is currently the subject of ongoing negotiations between the applicant and the Council's Valuer. Based on an initial assessment of the submitted viability appraisal, the current figure is not accepted by the Council's Valuer and is therefore considered to be an inadequate contribution towards meeting the housing needs of the Borough and the policy aims of achieving sustainable and inclusive mixed and balanced communities. The Council's Valuer continues to negotiate on this matter. Comments are awaited and will be reported to Committee in an Update Report. The S106 agreement required to secure Affordable Housing has not been progressed due to the other concerns with the scheme. The absence of the agreement means that this should form a reason for refusal, whether or not the amount of Affordable Housing is finally agreed by officers prior to the Committee meeting.

v) Transport

6.61 The comments of the Council's Transport section are set out in detail in section 4 above. It is considered that this is an appropriate assessment and the parking and access aspects of the proposals are in accordance with Policies CS20, CS24, DM12 and the Revised Parking Standards and Design SPD (2011).

vi) Dwelling Type and Mix

6.62 Policy DM5 requires that on new developments for 10 or more dwellings outside the central area and defined district and local centres (which this site is), over 50% of dwellings will be of 3 bedrooms or more, and the majority of dwellings will be in the form of houses rather than flats, having regard to all other material considerations. The current proposal is for 6 one-bed and 19 two-bed flats and therefore does not comply with the main aim of the policy.

6.63 Policy DM7 supports the provision of accommodation for vulnerable persons, including elderly persons, especially where located close to healthcare facilities and bus routes, which this site is. Based on this, it is considered that the site is suitable for this type of low level care accommodation in general terms. It is also acknowledged that the type of accommodation sought typically takes the form of flats and as such it is considered that this is a 'material consideration' that allows for a different approach to that sought by Policy DM5 in this instance.

vii) Amenity of Future Occupiers

6.64 The Council's Environmental Protection team have confirmed that the proposal would be acceptable from a noise perspective, provided that the recommendations in the submitted noise assessment are carried out. This can be secured by condition.

6.65 The proposed flats would be of a reasonable size and would all have a reasonable outlook and receive adequate daylight.

6.66 The proposed outdoor spaces are relatively small, close to roads and overshadowed by the proposed building. On the basis that these spaces would be serving retirement flats, rather than family housing it is considered that this would not be sufficiently harmful to warrant refusal, although it is indicative of a general overdevelopment of the site.

6.67 The proposals are therefore considered to be in accordance with Policies DM4, and CS34 in respect of the amenity of future occupiers. The proposal does not comply fully with Policy DM10 in respect of outdoor space.

viii) Ecology

6.68 The comments of the Council's Ecologist are set out in section 4 above. It is considered that the proposal would be acceptable in respect of protected species on this basis.

6.69 It is considered that appropriate 'wildlife-friendly' planting could be secured within the site by condition.

6.70 The proposals are therefore considered to be capable of being in accordance with Policy CS36.

ix) Trees and Landscaping

6.71 The detailed comments of the Council's Natural Environment Officer are set out in Section 4 above. It is considered that the loss of the street tree would be harmful, as described and the tree protection and landscaping proposals are insufficient. As such the proposals are considered to be contrary to Policies CS7, CS38 and DM18 and recommended for refusal on that basis.

x) Environmental Sustainability

6.72 Policy CS1 requires 50% of the development to meet the Code for Sustainable Homes (CfSH) Level 4 with the remainder Level 3. The CfSH has now been superseded by Building Regulations and as such it is considered that this can no longer be sought. A requirement for an improvement of 19% in energy efficiency over the Target Emission Rate remains in place as a remnant of the Code Level 4 policy requirement (this element has not been superseded by the Building Regulations). It is considered that this standard could be reasonably secured by condition.

6.73 Policy DM1 requires the design of the building to incorporate measures to adapt to climate change. Section 5.4 of the Design and Access Statement addresses this to some extent, although more could be done by reducing the loss of embodied energy through demolition and reducing the built up plot coverage. This would allow more space for planting, with associated shading and cooling benefits, and the potential for a green roof should also be explored further, in accordance with Policy DM1. Whilst this may not be sufficient to warrant refusal, it should be a consideration for any future revised scheme.

xi) Drainage

6.74 The applicant has submitted a Drainage Strategy to address sustainable drainage requirements. This proposes underground surface water attenuation tanks beneath the car park area and a flow control valve, both designed to limit the rate of surface water discharge to the public sewer network.

6.75 The strategy is in accordance with general SuDS principles albeit towards the lower end of the drainage hierarchy set out in the NPPG. The provision of infiltration measures within the site, including permeable paving, green roofs, attenuation ponds etc, would be preferable to the heavily engineered below ground tanks, which ultimately discharge into the public sewer.

6.76 The Lead Flood Authority does not object to the proposals and on balance it is considered that the scheme is acceptable in respect of surface water and groundwater flooding and water quality impacts. As such it is considered that the

proposals comply with national policy and policies CS1 and CS35 of the Core Strategy and Policy DM1 of the Sites and Detailed Policy Document.

xii) Employment Skills and Training

6.77 The proposal is classified as a Major development and as such the requirements of the Employment Skills and Training SPD (2013) apply.

6.78 A detailed plan, or any appropriate financial contribution in lieu of a plan, are required for the Construction Phase based on the SPD requirements and would need to be secured by S106 agreement. The proposals are for Class C3 dwellings and therefore an 'End User Phase' plan is not appropriate.

6.79 The financial contribution sought would be £6,780 based on the proposed floorspace of approximately 2712sqm, in accordance with the SPD formula $\text{£2,500} \times \text{Gross internal floor area of scheme (m}^2\text{)} / 1000\text{m}^2$

6.80 Whilst it is accepted that the applicant is likely to agree to this being secured by S106 agreement, this should form a reason for refusal as a S106 agreement has not been completed at this stage.

xiii) Equality

6.81 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, or sexual orientation. It is considered that there is no indication or evidence (including from consultation on the current application) that the protected groups would have different needs, experiences, issues and priorities in relation to this particular planning application.

7. CONCLUSION

7.1 It is considered that the development would result in substantial harm to the locally listed building within the site and this harm is not outweighed by the benefits of the scheme for the reasons set out above. The proposal would also be harmful to the amenity of neighbours due overlooking. It would also result in harm to the amenity of the area due to the removal of an established street tree.

7.2 The adequacy of the Affordable Housing contribution is to be confirmed by the Council's Valuer. Other S106 requirements, including Employment Skills and Training and Highway works require a completed S106 legal agreement in order to be acceptable. The proposals are therefore recommended for refusal as set out in the recommendation at the head of this report.

Case Officer: Steve Vigar

DRAWINGS

Selection only. Full details available to view at:
http://planning.reading.gov.uk/fastweb_PL/welcome.asp

Proposed Site Plan



Proposed Site Layout Plan



East Elevation



North Elevation

Proposed North Elevation (to Erleigh Road/Roundabout)
 Proposed East Elevation (to Erleigh Road/Reading School)



South Elevation



West Elevation - Craven Road

SCALE: 1:100 @A3 (1:1250 @A1)
www.nsdgreen.co.uk

South Elevation (Facing towards side boundary of 7 Craven Road)
West Elevation (Fronting Craven Road)

Computer Generated Images - Existing and Proposed - View North from Craven Road



Computer Generated Images - Existing and Proposed - View South from roundabout



Existing View 5



Verified View 1 - Morrison 5

Computer Generated Images - Existing and Proposed - View west from Erleigh Road



Existing View 2



Verified Visual Montage 2

Site Photographs



View west on Erleigh Rd



3 Craven Rd



View north towards site from Craven Rd



View south from London Road at junction with Craven Road