



PLANNING APPLICATIONS COMMITTEE

17 JULY 2019

ADDITIONAL INFORMATION

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Reading Borough Council

Applications for Committee Determination since previous Committee Report

Printed: 17 July 2019

Ward: Peppard

Application reference: 190835

Application type: Full Planning Approval

Site address: 199-203 Henley Road and land to the Rear of 205-207 Henley Road, Caversham, Reading, RG4 6LJ

Proposal: Demolition of 199-203 Henley Road and erection of part four, part three and part two storey 82 unit residential care home building (C2 use class) with associated external structures, access from Henley Road, car parking and landscaping

Reason for Committee item: Major Development

Ward: Whitley

Application reference: 190705

Application type: Regulation 3 Planning Approval

Site address: Land Adjacent, 4 Camelford Close, Reading, RG2 8AW

Proposal: Erection of detached 3 storey 4 bed dwelling

Reason for Committee item: RBC application

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UPDATE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 17th July 2019	ITEM NO. 10 Page: 57
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Ward: Abbey

Application No.: 181930/FUL

Address: 29-35 Station Road, Reading, RG1 1LG

Proposal: Demolition of the existing vacant 6-storey retail and office building and erection of a replacement basement and part 4, part 22 (with rooftop plant above) storey building to provide flexible retail (Class A1, A2 or A3) use at part ground floor level, a 135-bedroom hotel (Class C1) at 1st to 16th floors and offices (Class B1a) at 17th to 21st floors, associated servicing from Garrard Street and other associated works (amended description).

Recommendation:

As in main report, but with the following additional condition:

33. Pre-commencement (including demolition) implementation of a programme of archaeological work in accordance with a written scheme of investigation.

1. Archaeology condition

1.1 As outlined at paragraphs 4.66 - 4.69 and 6.56 of the main report, a programme of archaeological work will be secured via condition. This was inadvertently omitted from the main report recommendation; accordingly, it is now included.

2. Other clarifications

2.1 In respect of condition 3 (materials - as discussed primarily at paragraph 6.24 of the main report), for the avoidance of doubt this also includes public realm hard landscaping materials within the red line of the application site. It is intended that this will build on the principles indicated at page 83 of the Design and Access Statement.

Case Officer: Jonathan Markwell

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UPDATE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 17th July 2019

ITEM NO. 11

Ward: Abbey

Application No.: 182054/FUL

Address: 20 Hosier Street, Reading, RG1 7JL

Proposal: Demolition of all existing structures, erection of a part 7, part 8 storey building for use as 101 bed Hotel (Class C1 Use) at Ground - 8th Floor and Restaurant with ancillary Bar (Class A3/A4 Use) at ground floor, with means of access, servicing and associated works

Applicant: Inception (Reading) Sarl (c/o Moorgarth Group Ltd)

Date Valid: 15/1/2019

Application target decision date: Originally 16/4/19, extension of time agreed 9/9/2019

RECOMMENDATION

As main report with following amendments / additions :

Amended description of development to read :

Demolition of all existing structures, erection of a part 7, part 8 storey building for use as 101 bed Hotel (Class C1 Use) at Ground - 8th Floor and Restaurant with ancillary Bar (Class A3/A4 Use) at ground floor, with means of access, servicing and associated works

Legal Agreement to secure the following :

3. A financial contribution of £97,000 to fund a Feasibility Study for Public Realm improvements to Hosier Street in the form tree planting and resurfacing works; and implementation of these works

Conditions:

Amended

22. Hours of compliance condition: The Class A3/A4 premises shall not be used by members of the public outside the hours of 06:00 - 24:00 (last food order 23:00) Monday to Sunday

Additional

25. That the A4 use class within the permitted ground floor restaurant/bar remains ancillary to the A3 use class.
26. Pre occupation the measures set out in the submitted "20 HOSIER STREET, READING, RG1 7JL - DRAFT CRIME PREVENTION STANDARDS" document dated July 2019 received by the Local Planning Authority 16th July 2019 shall be implemented and thereafter retained.
27. Pre-occupation the measures set out in the submitted 'Fire Strategy' dated 3rd July

2019 shall be implemented and thereafter retained.
28. Pre- commencement Standard building floor levels details required

1. Further information submitted

- 1.1 The applicant has formally agreed the financial sum of £97,000 for Public Realm improvements to Hosier Street to be secured via the S106 Legal Agreement.
- 1.2 The applicant has submitted a document entitled “20 HOSIER STREET, READING, RG1 7JL - DRAFT CRIME PREVENTION STANDARDS” dated July 2019 received by the Local Planning Authority 16th July 2019.
- 1.3 The applicant has agreed an amendment to the description of development to confirm that within the restaurant (A3)/bar(A4) use sought, the A4 use is ancillary. Also in relation to the proposed opening hours the applicant is seeking that this unit be open to the public until 24.00 with the last food order at 23.00.

2. Officer Assessment

- 2.1 The S106 sum agreed was as sought by officers and is therefore considered to be acceptable.
- 2.2 It is noted that the content of the submitted ‘Draft Crime Prevention Standards’ document submitted by the applicant for this Premier Inn Hotel does not meet all the criteria to achieve a Secured by Design accreditation as requested by the Police CPDA. However it is considered that the measures set out can sufficiently safeguard the future guests/customers of the proposed hotel development. It is therefore considered this matter can be dealt with by condition to secure the measures set out within the submitted document.
- 2.3 In relation to the hours of use the agreed amended description of development states that the A4 (bar use) will be ancillary to the A3 (restaurant use) of this ground floor element of the scheme. This is to seek to ensure that this unit is not used solely for A4 Bar use. The hours have also been agreed as no use by members of the public outside the hours of 06:00 - 24:00 (last food order 23:00) Monday to Sunday. Therefore in line with comments from Licencing officers, subject to the above condition the specified opening hours, within the Cumulative Impact Area, are considered to be acceptable.

Correction to Submitted Plans -

Proposed Ground Floor Plan 18370 0310 P05 dated 2/7/2018

UPDATE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 17 th July 2019	ITEM NO. 12
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Ward: Abbey

App No: 190650/FUL

Address: Greyfriars Church, Friar Street, Reading, RG1 1EH

Proposal: Demolition of the existing western foyer, and replacement with a larger glazed foyer area and other internal works; and single storey rear extension to no's 2 and 4 Sackville Street to link the church to these buildings, and the change of use of the premises from Sui Generis (Counselling services offices) to Class D1 use (non-residential institution - public worship or religious instruction), and changes to external parking and landscaping.

Applicant: Greyfriars Church

Date validated: 2/5/2019

Application: 8 week target decision date: 24/6/2019

Extension of time: 26/7/2019

RECOMMENDATION AS PER MAIN AGENDA

1. Reading Civic Society response

- 1.1 Paragraph 4.4 of the main report advises that a response from the Reading Civic Society will be provided prior to your meeting.
- 1.2 In response to the consultation on the application, the Civic Society commented that they were pleased with the input from Historic England (HE) and substantial work that has been undertaken thus far. As such, the Civic Society has no objections and supports the application.

2. RBC Heritage Consultant

- 2.1 For clarity, although not specifically identified in the main report, the Council's Heritage Consultant has been involved extensively at pre-application and application stages and his points have been covered in the officer appraisal in the main agenda report. He has no objections to the proposal subject to appropriately worded conditions.

3. CONCLUSION

- 3.1 This update report provides a response from the Reading Civic Society, and clarification that the Reading Borough Council heritage advisor has been consulted in this application process. No changes have been proposed as part of this update report.

Case Officer: Anthony Scholes

UPDATE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 17th July 2019	ITEM NO. 13
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Ward: Abbey

Application Nos.: 190441/VAR, 190442/VAR, 190465/REM, 190466/REM

Address: Station Hill, Reading

Proposals:

190441/VAR:

Application under s.73 for amendments to Outline Planning Permission ref. 151427, including alterations to the wording of Conditions 3, 5, 7, 8, 17, 19, 54 and 57. [Plot F 'Station Hill']

190442/VAR:

Application under s.73 for amendments to Outline Planning Permission ref. 151426, including alterations to the wording of Conditions 3, 5, 6, 7, 8, 16, 17, 21, 37 and 50.

190465/REM:

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot E within the development site known as Station Hill submitted pursuant to Outline Planning Permission ref. 190442, and submission of details for approval pursuant to Conditions attached to that permission. The proposals comprise the construction of a 12 storey building (plus basement storey) containing 370 Build to Rent residential units (Use Class C3), 1,151sqm (GEA) of flexible retail floorspace (Use Classes A1, A2, A3, A4, A5), cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works (amended description).

190466/REM:

Application for approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot F within the development site known as Station Hill submitted pursuant to Outline Planning Permission ref. 190441, and submission of details for approval pursuant to Conditions attached to that permission. The proposals comprise construction of a 12 storey (plus basement storey) building containing 168 Build to Rent residential units (Use Class C3), 390sqm (GEA) of flexible retail floorspace (Use Classes A1, A2, A3, A4, A5, D2), 656sqm (GEA) of leisure floorspace (Use Class D1 or D2), cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works (amended description).

Applicant: SH Reading Master LLP

Dates received (valid): 20 March 2019

13 Week target decision dates: 19 June 2019

26 Week dates: 18 September 2019

PPA: Agreed target: 2 August 2019 (agreed EOT)

Amendments to Recommendation:

Additional S106 Head of Terms (190441/VAR and 190442/VAR):

For the owner and building operator to ensure all dwellings within the scheme and all associated residential areas of the building draw all their electricity from 'Green Supply Tariffs' with all power coming from renewable sources.

The owner and building operator to submit annual reports to the local planning authority demonstrating that all dwellings within the scheme and all associated residential areas of the building have drawn all their electricity from 'Green Supply Tariffs' with all power coming from renewable sources for the preceding year.

Amended conditions:

190441/VAR

4. The development hereby permitted shall be commenced before either (a) 9 January 2020 or (b) the expiration of three years from the date of approval of the last reserved matter (whichever is the later).

19. Notwithstanding the submitted Energy Strategy dated 14 March 2019 no development shall be commenced on any Plot (excepting demolition) until details of the sustainability/environmental performance measures for that Plot have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate that: i) for the residential element of the Plot (through a Design Stage Standard Assessment Procedure (SAP) Assessment), all approved dwellings within the Plot shall achieve a minimum of a 35% improvement in the dwelling emission rate over the target emission rate, as defined in The Building Regulations for England Approved Document L1A: Conservation of Fuel and Power in New Dwellings (2013 edition) when using "SAP10" carbon factors (0.233kg/kwh); and ii) all non-residential floorspace within each Plot shall achieve a BREEAM Very Good rating with a minimum of 62.5 points. Where feasible, the office use within each Plot shall achieve a BREEAM Excellent rating. ii) The development of each Plot shall thereafter be carried out and retained in accordance with the approved details of the sustainability/environmental performance.

190442/VAR

19. Notwithstanding the submitted Energy Strategy dated 14 March 2019 no development shall be commenced within the site (excepting demolition) until details of the sustainability/environmental performance measures have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate that: i) for the residential element of the site (through a Design Stage Standard Assessment Procedure (SAP) Assessment), all approved dwellings within the site shall achieve a minimum of a 35% improvement in the dwelling emission rate over the target emission rate, as defined in The Building Regulations for England Approved Document L1A: Conservation of Fuel and Power in New Dwellings (2013 edition) when using "SAP10" carbon factors (0.233kg/kwh); and ii) all non-residential floorspace within the Site shall achieve a BREEAM Very Good rating with a minimum of 62.5 points. ii) The development of each Plot shall thereafter be carried out and retained in accordance with the approved details of the sustainability/environmental performance.

Amend Recommendations 190465/REM and 190466/REM, as follows:

Delegate to the Head of Planning, Development and Regulatory Services to GRANT reserved matters approval following the GRANT of s73 outline planning permission for applications 190441/VAR and 190442/VAR. Subject to the following conditions ...

ALL OTHER RECOMMENDATIONS AS PER THE MAIN AGENDA

1. ENERGY

- 1.1 Paragraph 6.98 of the main report states the following:
“The Council’s Sustainability Manager objects to the use of SAP10 calculations in the context of Reading Borough as these would not result in a comparable energy improvement for the proposed buildings under current policy requirements. It is understood that the draft SAP10 carbon emission figures are now being applied in Greater London but within the context of more stringent Zero Carbon policy targets. Emerging policy CC2 in the Reading Borough Draft Local Plan will also require a residential scheme of the scale of Station Hill to meet Zero Carbon standards, but this is not yet adopted and the Applicant and Officers are working to the less stringent requirements of Policy CS1. As things stand currently the Council’s standard approach requiring 19% improvement DER/TER on the SAP 2012 (Building Regulations, 2013) is recommended to be secured by condition in order to secure the minimum policy requirement and make an otherwise unacceptable development acceptable. Officers will continue to work with the applicant on this point and any alternative (but equivalent) option that may be agreed will be reported to Committee in an Update Report.”
- 1.2 Officers have continued to discuss this matter with the applicant since publication of the agenda. The applicant has submitted *their* assessment of the energy credentials of the scheme and this is appended to this Update at Appendix 1.
- 1.3 The applicant is adamant that SAP10 is the appropriate measure for carbon intensity on the basis that the national grid is on a trajectory to reduce carbon emissions within the context of the legal requirement for the UK to achieve zero carbon by 2050. It is accepted that this is the direction of travel and Officers agree that the national grid has decarbonised to a level somewhat lower than the 0.519 kg CO₂/kWh which current Building Regulations (SAP2012) assume to be the case.
- 1.4 The SAP10 carbon intensity figure of 0.233 kg CO₂/kWh promoted by the applicant is considered to be overly lenient at the current time as the national grid appears to be operating at an average carbon intensity closer to 0.300 kg CO₂/kWh. i.e. somewhere between the current SAP2012 standard and the emerging SAP10 standard (as currently drafted). The average for 2018 quoted at <http://electricityinfo.org/forecast-carbon-intensity/> is 0.270kg CO₂/kWh. Furthermore there appears to be a lack of certainty nationally over the amount, speed and method of further decarbonisation.
- 1.5 There is an expectation that there will be some form of revision to the current Part L Building Regulations to reflect the decarbonising trend in electricity supply and there is a good deal of speculation in the industry press that SAP10 will be adopted as the new Building Regulations standard.

- 1.6 What is clear is that the current proposal, to build the scheme to current Building Regulations (based on SAP2012 energy use calculations) but to use the carbon factors from draft SAP10, does not comply with current, or emerging Development Plan policy.
- 1.7 The applicant proposes that the current design using SAP10 carbon factors (0.233kg) would achieve a 35% improvement in emissions over the Building Regulations target across the residential parts of the scheme. The difficulty is determining the degree of equivalence between this and the 19% improvement for half the dwellings required under current policy due to the differences in methodology between SAP2012 and SAP10 and the complex set of variables that both comprise.
- 1.8 The applicant also proposes to source a 100% renewable energy supply (green supply tariff) for all dwellings and residential parts of the building. Again this is not a solution referred to in existing or emerging development plan policy. At face value it appears that the green supply tariff could offer some compensation for the lack of policy compliance. It is considered that the Build-to-Rent model would allow this to be secured through tenancy agreements and managed long term by the single building owner and operator in a way which would not be possible for individual flats with multiple owners or landlords. (This is a benefit of the Build to Rent approach and further justification for securing the buildings as such for the maximum 20 year period.)
- 1.9 There is some debate nationally over whether green supply tariffs are genuinely zero carbon, although they are marketed as such and that is clearly the intention. Perhaps a more fundamental question exists over the long term sustainability of this approach if demand for *renewable* electricity were to exceed availability of supply through the National Grid, resulting in supply reverting to fossil fuel in order to meet demand. Despite significant improvements, the Grid remains largely powered by natural gas. This is a view adopted by National Grid which sees the future of domestic heating being powered more by decentralised provision (heat pumps, CHP, hydrogen etc) if the 2050 national carbon targets are to be achieved - (see: <http://fes.nationalgrid.com/media/1363/fes-interactive-version-final.pdf>). This is one reason why local policy supports a decentralised (on-site generation) approach to domestic heating rather than 'using up' grid capacity which might be otherwise better used; for example to power the predicted increase in electric vehicles. It is not desirable for significant numbers of new dwellings in the Borough to be drawing power from the national grid for domestic heating.
- 1.10 The proposed approach does not comply with policy and uncertainty remains over the degree of equivalence between SAP2012 and SAP10. In this particular case this is mitigated to an extent by the proposed legal obligation to source all electricity from renewable sources, which is intended to achieve a zero carbon electricity supply. This is made possible by the institutional nature of the Build to Rent model where a single electricity supplier can be maintained long term. It is important to note that Officers are entertaining the proposed approach as a one-off solution to the problems encountered on this site. It is not something which should be encouraged, or accepted as a precedent for future schemes (including the remainder of the Station Hill site) where the normal expectation is that decentralised energy will be 'designed in' from the outset and energy calculations will be based on existing and emerging development plan policy.

2. WIND

- 2.1 Paragraph 6.95 of the main report refers to wind and microclimate matters being subject to BRE advice as follows. “ *...[BRE] findings are awaited and will be reported to Committee in an Update. Failing that, officers request delegated authority to finalise assessment and issue permission once the wind and microclimate matter is resolved. Such an approach would be consistent with the approach approved under 170326/FUL at Land between Weldale Street and Chatham Street*”.
- 2.2 At the time of writing BRE require further clarification from the applicant on some points of detail and will need to undertake further assessment once these are received. It is therefore recommended that this is resolved under delegated authority. The matter will be reported back to Committee for determination in the event that BRE have unresolved substantive objections to the scheme, or if material changes are required to the scheme design.

3. ECOLOGY

- 3.1 In response to para 4.55 of the main report, the applicant has pointed out that the February version of the Ecological Management Plan has been superseded by the revised *Ecological Management Plan WIE14788-100-R-7-3-3-EMP Third Issue, dated May 2019* (correctly referenced in recommended Condition 1 of 190465 and 190466 at Appendix 1 of the main agenda). Appendix A to this revised report *does* confirm the location of 6 no. bat boxes on Plots E and F.

4. DRAWINGS

- 4.1 A full list of submitted drawings for approval is included at Appendix 2 of this Update.

5. RECOMMENDATION WORDING and CONDITIONS

- 5.1 Recommendations 3 and 4 need to be reworded as the Reserved Matters approval can only be granted after the s73 permissions (decision notices) are issued. It is not sufficient to grant the RMAs subject to a *resolution* to grant on the s73 permissions.
- 5.2 Condition 4 of 190441 and 190442 should set the same date limits as the extant permissions (5 years from 9 January 2015) as it is not possible to extend the time limit for commencement under s.73. Amended wording is provided in the recommendation above.

6. CONCLUSION

- 6.1 The energy characteristics of the proposal form the main focus of this Update. Officers note the uncertainty in terms of the national context, the difficulties comparing SAP2012 and SAP10 and the lack of direct policy compliance. However Officers also remain mindful of the strategic importance of the proposed development and the desirability of securing the regeneration benefits identified in the conclusion to the main report as well as the need to determine applications in a positive and proactive manner. It is considered that the conclusion at para 6.119 of the main report remains valid; that in this particular case the considerable benefits of the scheme outweigh the less favourable aspects and it is recommended that Planning Permissions 190441 and 190442, followed by Reserved Matters approvals 190465 and 190466, be granted (subject to further Wind and

Microclimate assessment and completion of the S106 legal agreement) as set out in the recommendation in the main report as amended by the recommended changes set out at the head of this Update report.

Station Hill – Energy. Response to the Planning Committee Report.

The all electric strategy put forward is exemplary in terms of energy performance. It avoids using out of date and superseded data on carbon generation (from 2013) and makes a legal obligation/commitment to sourcing green energy. It is future proofed for the ongoing decarbonisation of the electricity grid and should be recognised as such.

Summary - all electric strategy:

- **Zero carbon green energy;**
- **Zero tonnes CO2 Emission per annum;**
- **100% improvement over Part L 2013 (policy target requires 35%);**
- **Zero impact on Air Quality in the area;**
- **Zero impact on overheating of the residential units that would subsequently need more energy to cool;**
- **Significantly reduced materials and waste (circa 16,000m of pipework alone) and associated construction activities ie deliveries, with all electric strategy;**
- **Thousands of litres of water saved through not having to flush and clean pipework systems; and**
- **Other technologies such as Combined Heat and Power (CHP) plant, Biomass Boilers and GSHP are not suitable for this development.**

	All Electric			CHP + Boilers (60/40)			GSHP + Boilers (30/70)		
	SAP 2012	SAP 10	Green Energy	SAP 2012	SAP 10	Green Energy	SAP 2012	SAP 10	Green Energy
Baseline Emissions (tonnes CO ₂ per Annum)	559	355	0	387	345	319	423	520	482
Achieved Emissions (tonnes CO ₂ per Annum)	553	231	0	261	341	415	361	275	210
Improvement over Part L 2013	1%	35%	100%	32%	1%	+30%	15%	47%	56%

The results clearly demonstrate that our proposed option of All-Electric is compliant with the emerging RBC policy of zero-carbon and when using realistic carbon factors, even without our legal commitment to use only green energy, generates the least number of tonnes of Carbon Dioxide per year of all the options considered. It also achieves the minimum carbon reduction required by the emerging policy without the additional

commitment to green energy. Lincoln Property Company has prided itself and been recognised globally with the highest awards for their commitment to prioritising green initiatives for their communities and residents.

1. Introduction.

This note has been prepared to outline Lincoln Property Company's approach to achieving a **zero-carbon** development for Phase 1 of the Station Hill development. Lincoln Property Company has prided itself and been recognised globally with the highest awards for their commitment to prioritising green initiatives for their communities and residents. For example, in the US to earn certification to the National Green Building Standard (during construction), a multifamily/BTR building must meet rigorous criteria in six categories -- Lot and Site Development; Resource Efficiency; Energy Efficiency; Water Efficiency; Indoor Environmental Quality; and Homeowner Education. In addition, once operational a 'green guide' for residents/staff/communities - encouraging and advising residents on sustainable matters - will be issued to anyone involved in the Reading scheme.

This approach includes a legal commitment to sourcing green energy on bulk for the rental community that ensures the zero-carbon approach is achieved in the long term and residents also benefit from the bulk rates. This also reflects Lincoln's approach to build to rent as an owner / operator with a long-term approach to sustainability and operation in use.

This note also addresses the points made in the planning report around 'decentralised' energy, the use of the 'SAP 10' carbon factors and why Ground Source Heat Pumps (GSHP) are not feasible for this site.

Even without the commitment to green energy it is evident that when using realistic carbon factors for electricity and gas, the all-electric approach generates less kg of CO₂ than any other feasible approach to meeting the proposed planning condition. Alongside this there are a number of wider sustainability benefits including;

- No impact on Air Quality in the area;
- No impact on overheating of the residential units that would subsequently need more energy to cool;
- Reduced materials and waste (circa 16,000m of pipework alone) and associated construction activities ie deliveries
- Thousands of litres of water saved through not having to flush and clean pipework systems.
- Simpler and easier to build and operate meaning housing and affordable housing gets delivered quicker

The strategy put forward is exemplary in terms of energy performance and reflects actual performance rather than adopting an approach that may have been correct 5 years ago but does not reflect the fast-moving world of green energy production and the move towards low carbon environment. It avoids using input figures for the energy calculations that are inaccurate, and out of date, and hence distort the final analysis. Our approach is future proofed for the ongoing decarbonisation of the electricity grid and should be recognised as such.

2. Decarbonising of the Electricity Grid.

Grid electricity has significantly decarbonised since the last update of Part L in April 2014. The UK government announced that it will implement the closure of all coal-fired power stations by 2025. This is in line with the increase in renewable power generation.

2017 saw times where low-carbon generation, such as wind, solar and nuclear, generated more energy than coal and gas combined; showing very real progress towards a low-carbon future. In April 2018, Britain went for more than 3 days without the need for coal power and in May 2019 passed a week without the need for this fossil fuel; the first time since 1882. It is clear that the grid in 2019 is much cleaner than in past years and so it is therefore a hindrance that our new buildings still utilise the emissions rates of 2014 that give a false position of gas being less green than electricity.

What is a Carbon Factor?

A carbon emission factor (carbon factor) is the average emission rate of a given greenhouse gas for a given source, relative to units of activity.

SAP 10 Carbon Factors

In July 2018 the Government published updated carbon emission factors (SAP 10), demonstrating how the grid is decarbonising. The table below details the carbon factors for electricity under SAP 2012, SAP 10, Actual (last 3 months), Actual (last year) and a source of green energy. They reflect the general decarbonisation of the grid.

	Emissions kg CO ₂ e per kWh				
	SAP 2012 (2014)	SAP 10 (July 2018)	Actual (last 3 months)	Actual Last Year (2018)	Green Energy (Bulb)
Electricity	0.519 ¹	0.233 ²	0.191 ³	0.225 ⁴	0 ⁵

1: SAP 2012: <https://www.bregroup.com/sap/standard-assessment-procedure-sap-2012/>

2: SAP 10 (please note this is just the carbon factors not the SAP 10 methodology itself): <https://www.bregroup.com/sap/sap10/>

3: Britain's Electricity Demand: <https://electricityinsights.co.uk/#/dashboard?period=3-months&start=2019-04-09&k=kn712c>

4. Attached SSE's fuel mix for last year that confirms the national average of 0.225 for 2017-2018

5. Bulb's Fuel Mix: <https://bulb.co.uk/fuelmix/>

This clearly demonstrates the use of SAP 10 carbon factors is appropriate for current day energy modelling. As section 6.98 of the committee report notes the GLA has mandated this approach since the 1st January 2019 to all energy strategies across London. It is also noted in the committee report that this is in the context of more stringent zero carbon requirements and we assume RBC will want to embrace this current and more proactive approach to reducing carbon and overall sustainability to support its climate emergency.

3. Site Wide Carbon Reduction.

The table below shows the tonnes of carbon produced for the various energy strategy options investigated for the proposed scheme. It includes a theoretical GSHP system that may be achievable with the site constraints. The results have been provided using the SAP 2012, SAP 10 and Green Energy carbon factors

	All Electric			CHP + Boilers (60/40)			GSHP + Boilers (30/70)		
	SAP 2012	SAP 10	Green Energy	SAP 2012	SAP 10	Green Energy	SAP 2012	SAP 10	Green Energy
Baseline Emissions (tonnes CO ₂ per Annum)	559	355	0	387	345	319	423	520	482
Achieved Emissions (tonnes CO ₂ per Annum)	553	231	0	261	341	415	361	275	210
Improvement over Part L 2013	1%	35%	100%	32%	1%	+30%	15%	47%	56%

The results clearly demonstrate that our proposed option of All-Electric is compliant with the emerging RBC policy of zero-carbon and when using realistic carbon factors, even without our legal commitment to only use green energy, generates the least number of tonnes of Carbon Dioxide per year. It also achieves the minimum carbon reduction required by the emerging policy without the additional commitment to green energy.

4. Decentralised Energy.

Although the name can be misleading the term decentralised energy actually means the provision of a centralised system for energy production across the site. The committee report refers to Combined Heat and Power (CHP) plant, Biomass Boilers and GSHP have briefly summarised below why none of these technologies are suitable for this development.

It should be noted that all of these systems will introduce hot pipes to be distributed around the building that will impact the overheating of the apartments and the floor to ceiling heights which will require redesign of the scheme. We note the committee report states that GSHP could provide cooling to address the overheating, but it seems counter intuitive to introduce additional cooling units and energy to address a problem caused by a system that is supposed to be more sustainable.

Biomass Boilers

Large biomass systems are not suitable for city centre locations due to the impact on air quality both from burning the wood and the vehicles needed to deliver wood to site. These deliveries will also impact traffic flow in the city centre.

CHP

CHP used in conjunction with gas fired boilers has been the standard way of providing decentralised energy for large residential schemes over recent years. When this technology is assessed against current policy and SAP 2012 it will be possible to meet the proposed planning condition. However, when considered against realistic carbon factors (SAP10 of 2018) the system barely achieves compliance with the Building Regulations (due to the increased amount of fuel that a CHP uses to produce heat, compared with a gas fired boiler). As the building regulations are due to change in 2020 using the SAP 10 carbon factors means the building could be out of date as soon as it's built. Alongside this the gas fired CHP and boilers will have a negative impact on the surrounding air quality.

GSHP

In order to provide a system capable of serving all of the Phase 1 heating load approximately 250 boreholes would be required alongside around 8,000m² space to maintain suitable spacing between boreholes and avoid impact on ground conditions. This is based on the heating load, but in order to work effectively a balanced cooling load will be needed. As noted in a previous report submitted to RBC there is insufficient space to accommodate a system of this size, and piling drawings showing all of the existing piles being retained alongside new ones needed have been provided to illustrate this. It is worth noting that this system runs at lower heating temperatures, so gas fired boilers will also be required to generate hot water at suitable temperatures which will impact on air quality.

It is quite clear from the above and the detailed work undertaken that none of the decentralised systems are feasible for Phase 1 of the Station Hill development. However, all technologies including air source heat pumps will be reviewed for suitability for Phases 2 and 3 of the development to ensure that consideration of the impact of design proposals and measures on the sustainable credentials of the development are made throughout the design development and the construction process. We would expect to assess all technologies against realistic carbon factors.

5. Summary.

Lincoln Property Company have proposed an all-electric solution for Phase 1 of Station Hill and in conjunction with their legal commitment to green energy are achieving a zero-carbon development. They are proposing to use up to date carbon factors to assess the energy performance reflecting the current state of energy

generation in the UK. We would urge RBC to embrace this and take it on board as part of their drive towards zero carbon.

Alongside exemplary energy performance the all-electric proposal has a number of other wider sustainability benefits as follows;

- No impact on Air Quality in the area;
- No impact on overheating of the residential units that would subsequently need more energy to cool;
- Reduced materials and waste (circa 16,000m of pipework alone) and associated construction activities i.e. deliveries;
- Thousands of litres of water saved through not having to flush and clean pipework systems; and
- Simpler and easier to build and operate meaning housing and affordable housing gets delivered quicker.

These benefits can be coupled with a number of other sustainable aspects of the scheme including;

- Optimised façade and window design, including solar control glazing to limit energy demand;
- A substantial Photo Voltaic array at roof level to generate electricity; and
- Mechanical ventilation with full heat recovery in every retail unit.

APPENDIX 2 - DRAWINGS

SUBMITTED DRAWINGS - FOR APPROVAL

To be referred to in all relevant conditions under 190441/190442/190465/190466.

190441 and 190442 (OUTLINE)		
<u>Drawing Title</u>	<u>Drawing No.</u>	<u>Revision Date or Number</u>
Site - Location Plan	SHR-CRL-SB-ZZ-PL-A-100-001	14/3/19
Site - Plot E - Location Plan	SHR-CRL-SB-ZZ-PL-A-100-002	P11 - 28/6/19
Site - Plot F - Location Plan	SHR-CRL-SB-ZZ-PL-A-100-003	P11 - 28/6/19
Site - Plot E Existing Site Plan	SHR-CRL-SB-ZZ-PL-A-100-004	P11 - 28/6/19
Site - Plot F Existing Site Plan	SHR-CRL-SB-ZZ-PL-A-100-005	P11 - 28/6/19
Site - Plot E Proposed Site Plan	SHR-CRL-SB-ZZ-PL-A-100-006	P11 - 28/6/19
Site - Plot F Proposed Site Plan	SHR-CRL-SB-ZZ-PL-A-100-007	P11 - 28/6/19
Site - Plot E Topography	SHR-CRL-SB-ZZ-PL-A-100-008	P11 - 28/6/19
Site - Plot F Topography	SHR-CRL-SB-ZZ-PL-A-100-009	P11 - 28/6/19
Existing - Plot E Typical Floor Plan	SHR-CRL-SB-ZZ-PL-A-100-010	
Existing - Plot F Typical Floor Plan	SHR-CRL-SB-ZZ-PL-A-100-011	P11 - 28/6/19
Existing Elevation - Friars Street & Garrard Street	SHR-CRL-SB-ZZ-PL-A-100-012	14/3/19
Existing Elevation - Merchants Place	SHR-CRL-SB-ZZ-PL-A-100-013	14/3/19
Building Parameters - Indicative Sequence	SHR-CRL-SB-ZZ-PL-A-100-100	P10
Building Parameters - Application Boundary	SHR-CRL-SB-ZZ-PL-A-100-101	P10
Building Parameters - Demolition and Retained Buildings	SHR-CRL-SB-ZZ-PL-A-100-102	P11
Building Parameters - Building Plots	SHR-CRL-SB-ZZ-PL-A-100-102	P11
Building Parameters - Public Realm	SHR-CRL-SB-ZZ-PL-A-100-103	P10
Building Parameters - Access Routes	SHR-CRL-SB-ZZ-PL-A-100-104	P11
Building Parameters - Ground Floor Uses	SHR-CRL-SB-ZZ-PL-A-100-105	P10
Building Parameters - Upper Floor Uses	SHR-CRL-SB-ZZ-PL-A-100-106	P10
Building Parameters - Plot E - Application Boundary	SHR-CRL-SB-ZZ-PL-A-100-003	P10
Building Parameters - Plot E - Demolition and Retained Buildings	SHR-CRL-SB-ZZ-PL-A-100-111	P10

APPENDIX 2 - DRAWINGS

Building Parameters - Plot E - Building Plots	SHR-CRL-SB-ZZ-PL-A-100-110	P10
Building Parameters - Plot E - Public Realm	SHR-CRL-SB-ZZ-PL-A-100-111	P10
Building Parameters - Plot E - Access Routes	SHR-CRL-SB-ZZ-PL-A-100-112	P11
Building Parameters - Plot E - Ground Floor Uses	SHR-CRL-SB-ZZ-PL-A-100-113	P10
Building Parameters - Plot E - Upper Floor Uses	SHR-CRL-SB-ZZ-PL-A-100-114	P10
<u>190465 and 190466 (RESERVED MATTERS PLOTS E and F)</u>		
<u>Floorplans</u>		
Plot E - Lower Ground Floor Level (39 AOD)	SHR-CRL-SB-LG-PL-A-130-001	P12
Plot E - Mezzanine Floor Level (41.3 - 42.1 AOD)	SHR-CRL-SB-MZ-PL-A-130-002	P11
Plot E - Ground Floor Level (45.7 AOD)	SHR-CRL-SB-GF-PL-A-130-003	P12
Plot E - Floor Level 01-02	SHR-CRL-SB-ZZ-PL-A-130-004	P10
Plot E - Floor Level 03-04	SHR-CRL-SB-ZZ-PL-A-130-005	P10
Plot E - Floor Level 05-06	SHR-CRL-SB-ZZ-PL-A-130-006	P11
Plot E - Floor Level 07-08	SHR-CRL-SB-ZZ-PL-A-130-007	P10
Plot E - Floor Level 09-10	SHR-CRL-SB-ZZ-PL-A-130-008	P10
Plot E - Floor Level 11-Roof Level	SHR-CRL-SB-ZZ-PL-A-130-009	P10
Plot F - Lower Ground Floor Level (39 AOD)	SHR-CRL-SB-ZZ-PL-A-130-101	P13 - 4/7/19
Plot F - Mezzanine Floor Level (41.3 - 42.1 AOD)	SHR-CRL-SB-ZZ-PL-A-130-102	P13 - 4/7/19
Plot F - Ground Floor Level (45.7 AOD)	SHR-CRL-SB-ZZ-PL-A-130-103	P10
Plot F - Floor Levels 01-04	SHR-CRL-SB-ZZ-PL-A-130-104	P10
Plot F - Floor Levels 05-08	SHR-CRL-SB-ZZ-PL-A-130-105	P10
Plot F - Floor Levels 09-11 and Roof Plan	SHR-CRL-SB-ZZ-PL-A-130-106	P10
<u>Elevations</u>		
Site - Garrard Street Elevation Blocks E and F	SHR-CRL-SB-ZZ-PL-A-200-001	P10
Site - Friar Street Elevation Block E	SHR-CRL-SB-ZZ-PL-A-200-002	P10
Site - Friars Walk East Elevation Block E	SHR-CRL-SB-ZZ-PL-A-200-003	P10
Site - Friars Walk West Elevation Block F	SHR-CRL-SB-ZZ-PL-A-200-004	P10
Site - Greyfriars Road West Elevation Block E	SHR-CRL-SB-ZZ-PL-A-200-005	P10

APPENDIX 2 - DRAWINGS

Site - Merchants Place East Elevation Block F	SHR-CRL-SB-ZZ-PL-A-200-006	P10
Block E Elevations - South and North	SHR-CRL-SB-ZZ-PL-A-200-101	P10
Block E Elevations - East and West	SHR-CRL-SB-ZZ-PL-A-200-102	P10
Block E Elevations - South and North Courtyard	SHR-CRL-SB-ZZ-PL-A-200-103	P10
Block F Elevations	SHR-CRL-SB-ZZ-PL-A-200-201	P10
<u>Sections</u>		
Plot E Section AA & Section B-B	SHR-CRL-SB-ZZ-PL-A-300-001	P10
Plot E Section CC	SHR-CRL-SB-ZZ-PL-A-300-002	P10
Plot E & F Section DD & Section EE	SHR-CRL-SB-ZZ-PL-A-300-003	P10
Plot F Section AA & Section BB	SHR-CRL-SB-ZZ-PL-A-300-100	P10
<u>Large Scale Plan Sections And Elevations</u>		
Block E - Friar St. - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-001	14/3/19
Block E - Friar St. - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-002	14/3/19
Block E - Friar St. - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-003	14/3/19
Block E - Friars Walk - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-004	14/3/19
Block E - North Courtyard - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-005	14/3/19
Block E - South Courtyard - Bay Elevation	SHR-CRL-BE-ZZ-DR-P-400-006	14/3/19
Block E - Garrard St. - Bay Elevation	SHR-CRL-BF-ZZ-DR-P-400-101	14/3/19
Block E - Garrard St. - Bay Elevation	SHR-CRL-BF-ZZ-DR-P-400-102	14/3/19
<u>Landscaping General Arrangement</u>		
WILDLIFE INSTALLATION PLAN	SHR-LDA-SB-ZZ-DR-L-100-110	P04
TREE PLANTING PLAN (SUPERSEDED BY DETAILED SOFTWARES PLANS)	SHR-LDA-SB-ZZ-DR-L-100-120	
GREEN ROOF AREA PLAN	SHR-LDA-SB-ZZ-DR-L-100-130	P04

APPENDIX 2 - DRAWINGS

HERBACEOUS PLANTING PLAN (SUPERSEDED BY DETAILED SOFTWARES PLANS)	SHR-LDA-SB-ZZ-DR-L-100-140	
<u>Hard Landscaping</u>		
PLOT E&F LOWER GROUND FLOOR GENERAL ARRANGEMENT GARRARD STREET	SHR-LDA-SB-LG-DR-L-110-101	P06
PLOT E&F GROUND FLOOR GENERAL ARRANGEMENT FRIARS WALK & COURTYARD	SHR-LDA-SB-GF-DR-L-110-102	P07
PLOT E&F LEVEL 01 GENERAL ARRANGEMENT PODIUM TERRACES	SHR-LDA-SB-01-DR-L-110-103	
PLOT E&F LEVEL 06 GENERAL ARRANGEMENT ROOF TERRACE AND GREEN ROOF	SHR-LDA-SB-06-DR-L-110-104	
PLOT E&F LEVEL 10 GENERAL ARRANGEMENT GREEN ROOF	SHR-LDA-SB-10-DR-L-110-105	P04
PLOT E&F LEVEL 11 GENERAL ARRANGEMENT ROOF TERRACE AND GREEN ROOF	SHR-LDA-SB-11-DR-L-110-106	P04
PLOT E&F LEVEL 12 GENERAL ARRANGEMENT GREEN ROOF	SHR-LDA-SB-12-DR-L-110-107	P04
<u>Soft Landscaping</u>		
BLOCK E&F LOWER GROUND FLOOR DETAIL SOFTWARES GA GARRARD STREET SHEET 1 OF 3	SHR-LDA-SB-LG-DR-L-320-101	P02
BLOCK E&F LOWER GROUND FLOOR DETAIL SOFTWARES GA GARRARD STREET SHEET 2 OF 3	SHR-LDA-SB-LG-DR-L-320-102	P02
BLOCK E&F LOWER GROUND FLOOR DETAIL SOFTWARES GA GARRARD STREET SHEET 3 OF 3	SHR-LDA-SB-LG-DR-L-320-103	P02
BLOCK E&F GROUND FLOOR COURTYARD LEVEL 00 DETAIL SOFTWARES GA	SHR-LDA-SB-GF-DR-L-320-104	P01
BLOCK E&F GROUND FLOOR DETAIL SOFTWARES GA FRAR'S WALK & FRIAR'S STREET SHEET 1 OF 3	SHR-LDA-SB-GF-DR-L-320-105	P02
BLOCK E&F GROUND FLOOR DETAIL SOFTWARES GA FRAR'S	SHR-LDA-SB-GF-DR-L-320-106	P03

APPENDIX 2 - DRAWINGS

WALK & FRIAR'S STREET SHEET 2 OF 3		
BLOCK E&F GROUND FLOOR DETAIL SOFTWARES GA FRAR'S WALK & FRIAR'S STREET SHEET 3 OF 3	SHR-LDA-SB-GF-DR-L-320-107	P02
BLOCK E LEVEL 01 DETAIL SOFTWARES GA -NORTHERN TERRACE	SHR-LDA-SB-01-DR-L-320-108	P01
BLOCK E LEVEL 01 DETAIL SOFTWARES GA -SOUTHERN TERRACE	SHR-LDA-SB-01-DR-L-320-109	P01
BLOCK E LEVEL 06 DETAIL SOFTWARES GA - ROOF TERRACE	SHR-LDA-SB-01-DR-L-320-110	P01
BLOCK F LEVEL 11 DETAIL SOFTWARES GA - ROOF TERRACE	SHR-LDA-SB-01-DR-L-320-111	P01
<u>Landscaping Sections</u>		
BLOCK E&F SITE SECTION FRIARS WALK LOOKING EAST	SHR-LDA-SB-ZZ-DR-L-400-101	P04
BLOCK E&F SITE SECTION THROUGH BLOCK E AND FRIARS WALK LOOKING NORTH	SHR-LDA-SB-ZZ-DR-L-400-102	P04
BLOCK E&F SITE SECTION THROUGH BLOCK E, FRIARS WALK AND BLOCK F LOOKING NORTH	SHR-LDA-SB-ZZ-DR-L-400-103	P04
BLOCK E&F SITE SECTION THROUGH GARRARD STREET LOOKING SOUTH	SHR-LDA-SB-ZZ-DR-L-400-104	P04
BLOCK E&F SITE SECTION THROUGH BLOCK E LOOKING WEST	SHR-LDA-SB-ZZ-DR-L-400-105	P03
<u>Landscaping Details</u>		
PODIUM EDGE TYPE DETAILS FRIAR'S WALK SHEET 1 OF 2	SHR-LDA-SB-GF-DR-L-500-231	P05
BLOCK E LEVEL 00 COURTYARD EDGE TYPE DETAILS	SHR-LDA-SB-01-DR-L-500-241	P03
BLOCK E LEVEL 01 TERRACE EDGE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-251	P02
BLOCK E AND F LEVEL 06 AND 10 TERRACE EDGE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-261	P02
PUBLIC REALM FURNITURE TYPE DETAILS GARRARD STREET SHEET 1 OF 2	SHR-LDA-SB-LG-DR-L-500-311	P04
PUBLIC REALM FURNITURE TYPE DETAILS GARRARD STREET	SHR-LDA-SB-LG-DR-L-500-312	P02

APPENDIX 2 - DRAWINGS

SHEET 2 OF 2		
PUBLIC REALM FURNITURE TYPE DETAILS FRIAR STREET	SHR-LDA-SB-GF-DR-L-500-321	P03
PODIUM FURNITURE TYPE DETAILS FRIAR'S WALK	SHR-LDA-SB-GF-DR-L-500-331	P04

LANDSCAPE AND PUBLIC REALM ILLUSTRATIVE SITE PLAN	SHR-LDA-SB-ZZ-DR-L-100-100	P01
<u>Soft Landscaping</u>		
Softworks Typologies - Sheet 1 of 8	SHR-LDA-SB-ZZ-DR-L-100-141	P01
Softworks Typologies - Sheet 2 of 8	SHR-LDA-SB-ZZ-DR-L-100-142	P01
Softworks Typologies - Sheet 3 of 8	SHR-LDA-SB-ZZ-DR-L-100-143	P01
Softworks Typologies - Sheet 4 of 8	SHR-LDA-SB-ZZ-DR-L-100-144	P01
Softworks Typologies - Sheet 5 of 8	SHR-LDA-SB-ZZ-DR-L-100-145	P01
Softworks Typologies - Sheet 6 of 8	SHR-LDA-SB-ZZ-DR-L-100-146	P01
Softworks Typologies - Sheet 7 of 8	SHR-LDA-SB-ZZ-DR-L-100-147	P01
Softworks Typologies - Sheet 8 of 8	SHR-LDA-SB-ZZ-DR-L-100-148	P01
<u>Landscaping Details</u>		
<u>Paving</u>		
PUBLIC REALM PAVING DETAILS GARRARD STREET	SHR-LDA-SB-LG-DR-L-500-111	P01
PUBLIC REALM PAVING DETAILS FRIAR STREET	SHR-LDA-SB-GF-DR-L-500-121	P01
PODIUM PAVING DETAILS FRIAR'S WALK	SHR-LDA-SB-GF-DR-L-500-131	P01
BLOCK E LEVEL 00 COURTYARD PAVING DETAILS	SHR-LDA-BE-GF-DR-L-500-141	P01
BLOCK E LEVEL 01 TERRACE PAVING DETAILS	SHR-LDA-BE-01-DR-L-500-151	P01
BLOCK E AND F LEVEL 06 AND 10 TERRACE PAVING DETAILS	SHR-LDA-SB-ZZ-DR-L-500-161	P01
BLOCK E AND F LEVEL 06, 10, 11, 12 GREEN ROOF DETAILS	SHR-LDA-SB-ZZ-DR-L-500-171	P01
<u>Edging</u>		
PUBLIC REALM EDGE TYPE DETAILS GARRARD STREET	SHR-LDA-SB-LG-DR-L-500-211	P01
PUBLIC REALM EDGE TYPE DETAILS FRIAR STREET	SHR-LDA-SB-GF-DR-L-500-221	P01
PODIUM EDGE TYPE DETAILS FRIAR'S WALK	SHR-LDA-SB-GF-DR-L-500-231	P01
BLOCK E LEVEL 00 COURTYARD EDGE TYPE DETAILS	SHR-LDA-SB-01-DR-L-500-241	P01

APPENDIX 2 - DRAWINGS

BLOCK E LEVEL 01 TERRACE EDGE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-251	P01
BLOCK E AND F LEVEL 06 AND 10 TERRACE EDGE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-261	P01
Furniture		
PUBLIC REALM FURNITURE TYPE DETAILS GARRARD STREET	SHR-LDA-SB-LG-DR-L-500-311	P01
PUBLIC REALM FURNITURE TYPE DETAILS FRIAR STREET	SHR-LDA-SB-GF-DR-L-500-321	P01
PODIUM FURNITURE TYPE DETAILS FRIAR'S WALK	SHR-LDA-SB-GF-DR-L-500-331	P01
BLOCK E LEVEL 00 COURTYARD FURNITURE TYPE DETAILS	SHR-LDA-SB-01-DR-L-500-341	P01
BLOCK E LEVEL 01 TERRACE FURNITURE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-351	P01
BLOCK E AND F LEVEL 06 AND 10 TERRACE FURNITURE TYPE DETAILS	SHR-LDA-SB-ZZ-DR-L-500-361	P01
Steps		
STEPS DETAILS TO PUBLIC REALM	SHR-LDA-SB-ZZ-DR-L-500-411	P01
FRIAR ST - HIGHWAY ALTERATIONS	44470/5501/010	27/6/19
GARRARD ST - HIGHWAY ALTERATIONS	44470/5501/011	27/6/19

... and all drawings originally approved under 151427 and documents relating to the Plots A, B, C, D, and G only (the North Site) including:

- 698_PP_07_001 Parameter Plan 1: application boundary P3
- 698_PP_07_002 Parameter Plan 2: demolition and retained buildings P5
- 698_PP_07_003 Parameter Plan 3: building plot (including heights) P5
- 698_PP_07_004 Parameter Plan 4: public realm P4
- 698_PP_07_005 Parameter Plan 5: vehicle and pedestrian access routes P6
- 698_PP_07_006 Parameter Plan 6: ground floor uses P5
- 698_PP_07_007 Parameter Plan 7: upper floor uses P5

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UPDATE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 29 th May 2019	ITEM NO.	Page:
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Ward: Battle

App No.: 190522

Address: 39 Brunswick Hill

Proposal: Erection of new building containing 9 no. apartments with parking at rear following demolition of existing buildings

Applicant: Mr Eric Benjamin

Date received: 27 March (valid 27 March 2019)

8 week target decision date: 19 July 2019

RECOMMENDATION:

GRANT, as per main agenda report with two additional legal agreement obligations.

Recommendation (amended):

Delegate to Head of Planning, Development and Regulatory Services to (i) GRANT Full Planning Permission with appropriate conditions and informatives, subject to the satisfactory completion of a S106 legal agreement by 19th July 2019, or;
(ii) to REFUSE permission should the legal agreement not be completed by the 19th July 2019 (unless officers on behalf of the Head of Planning, Development and Regulatory Services agree to a later date for completion of the legal agreement).

The legal agreement to secure the following:

- **Provision of a deferred affordable housing contribution mechanism;**
- **Should the building subsequently be extended / altered (to create further units) or units subdivided then contributions to affordable housing would apply on a cumulative basis;**
- a Traffic Regulation Order (TRO) amount £5,000

1. Consultations

- 1.1 Additional consultation responses have been received from Reading Conservation Area Advisory Committee and Reading Civic Society. Their comments are enclosed below in full:

Reading Conservation Area Advisory Committee

“Reading Conservation Area Advisory Committee (CAAC) object to the current application to demolish 39 Brunswick Hill and build 9 flats on the site. We objected to application 171719 which was refused on appeal.

1. LOCAL LISTING

1.1 Although the building was refused local listing we urge that Reading Borough Council (RBC) reconsider this decision.

2. HERITAGE VALUE OF THE PROPERTY

2.1 We note that the planning inspector spoke strongly against the demolition of the 39 Brunswick Hill the decision letter on the appeal by the developer against RBC's refusal to grant application 171719. In para 6: *"In my view, its heritage interest has more than sufficient architectural significance to be a material consideration in determining the appeal. The Framework requires a balanced judgement to be made, having regard to the scale of any harm or loss and the significance of the heritage asset. In these circumstances, the total loss of the heritage asset would conflict with policy CS33 of the Reading Borough Local Development Framework Core Strategy adopted 2008 (CS) which protects the historic environment and seeks its enhancement. This weighs against the proposal. I turn now to its replacement"*.

2.2 And in para 11: *"Allowing the proposed development would conflict with its advice that decisions should ensure that developments are sympathetic to local character and history, are visually attractive as a result of good architecture and layout, and create distinctive places to live"*.

2.3 Reading CAAC feel that a sympathetic extension and expansion of accommodation units in the property would be a more appropriate solution than demolition. The property retains many original features which are worthy of a continued useful life.

2.4 As well as retaining a heritage asset, this would also be a more environmentally sustainable solution.

3. DESIGN

3.1 The current design while of 'traditional' appearance, mocks the house built by George Parsons with the attempt at a replacement for the oriel window which was one of the most unique features of the house.

4. CONCLUSION

4.1 Whilst this application may address many of the reasons for refusal of application 171719 it still results in the loss of a heritage asset which could be sympathetically extended and retained in use."

Reading Civic Society

We wish to restate very firmly the position we took with regard to the planning application in 2017 (no 171719) that the planned demolition of this building is totally inappropriate and un-necessary. Our key points are:

1. The Planning Inspector, in October 2018, gave great weight to the value of the building even though he said there was nothing remarkable about it. There were 4 reasons the appeal was rejected, of which 2 related to the impact of the loss of the heritage asset. These would still apply with the current application.

2. The building is in good condition and well maintained internally and externally.

3. Whilst we understand that it is a large home, and that the owner, Mr Cataline, wishes to move on as the majority of his family have left, we argue that demolition is not the answer.

4. The property has not been marketed to test interest in it as a family home. Given its proximity to the station and with a good west facing garden we believe it would find a market as a home. We are aware of distinguished large properties in other parts of Reading which have been bought as family homes by people coming out of London, rather than for HMOs.

5. Since the 1920s part of the house has been rented out whilst still remaining in single ownership and this continued under the existing owner (a very early HMO).

6. We believe the building should be added to the Local List. Whilst there are many Edwardian houses in Reading this one seems far more impressive and distinguished and unusual in Reading, in its form and presence on the street scape. It also has a local history which we provided in our comments on the last planning application (see attachment to this letter).

7. We note also comments from neighbouring property, 29 Brunswick Hill, about the degree of overlooking of their property and garden. The degree of overlooking of the garden of a neighbouring property was one of the five reasons the Planning Inspector rejected the Appeal re 3-5 Craven Road in 16 November 2018.

The Planning Inspector in the decision in November 2018 re no 39 said *"Whilst there is nothing remarkable about the house... it has an interesting composition of well-detailed architectural elements including a distinctive, curved oriel window, a four-centred arch over the entrance, stone dressings around openings and a background of crisp, red brick in which diapering and bands are picked out in blue headers. Its materials and architectural language make a passing reference to the Victorian houses further down the street but the idiosyncratic arrangement of the architectural elements , and the exuberance of its scale distinguish it from them. "... its heritage interest has more than sufficient architectural significance to be a material consideration in determining the appeal.....the total loss of the heritage asset would conflict with policy CS33 of RBC Local Development Framework Core Strategy (RBCLDF) which protects the heritage environment and seeks its enhancement. This weighs against this proposal"*

The inspector concluded about the proposal *"....However, this is outweighed by 1. the loss of the heritage asset, 2. the harm to the character and appearance of the area, 3. the inappropriate mix of dwelling size and type, 4. and its lack of provision for an employment and skills plan or alternative contribution, which is in clear conflict with the policies of the development plan. For the*

reasons given above, and taking account of all matters raised, I conclude that the appeal should be dismissed.

This building is exactly the type of building which the Victorian Society, which champions Victorian and Edwardian buildings (to 1914), seeks to encourage local authorities to conserve. It is asking groups to identify Victorian and Edwardian buildings under threat.

To quote the Victorian Society “Victorian and Edwardian buildings are irreplaceable, cherished, diverse, beautiful, familiar and part of our everyday life. They contribute overwhelmingly to the character of places people love and places where people live. They belong to all of us. Their owners are really only custodians for future generations.”

During the site visit re 171719 we were invited to view the inside of the property by the existing owner, Mr Cataline, who has lived there with his family since 1998. We noted that not only has he maintained the outside of the building well but that the same applies to the inside of the house and the garden. This is NOT a building which is suffering from neglect. Mr Cataline has been a good custodian.

The demolition which would follow approval of the application therefore is even more inappropriate.

We ask that the PAC resists the advance of the bulldozer, which is part of this application, and demands a more appropriate solution which will retain the building, we accept this may include use as an HMO. In addition we ask for full consideration be given for Local Listing.

Additional objections

1.2 8 Additional letters of representation received from the following addresses: 10, 18, 21, 25, 29 and 41 Brunswick Hill, and 2 Deepdene Close. The content of these letters have been summarised as follows:

- The flats will invade privacy and overlook neighbouring gardens.
- Vehicle movements down the side of the property will generate additional noise and fumes and increase risk of accident;
- This development devalue adjoining properties;
- There are enough flats on Brunswick Hill already;
- Brunswick Hill is a one way road which does not need more traffic flowing through;
- Permitting a large development of many flats would not help the sense of community in Brunswick Hill;
- Insufficient infrastructure exists to support the increased number of residents in the area;
- Neighbour notification has been insufficient;
- The property is a stately family home which should be lived in by a family who can become part of this community. Not converted a series of 9 small flats.
- The house itself is full of history and character with many interesting features.

- In recent years a significant number of large older houses have been turned into flats.
- Some conversions have been good but several have been of very poor quality providing low quality accommodation;
- Why such a lot of green space in the town centre is being covered over for car parking.
- Concern raised about the over population with more people living in this area;
- Disagree that the new plans have done enough to outweigh the “harm” to the character of the area.
- Development is also in breach of a registered covenant dated 1904;
- The Conservation Area Advisory Committee expressed the opinion that it considered that Brunswick Hill was worthy of some level of heritage protection due to the considerable level of historical buildings and street furniture in the road.
- New building will have a much wider frontage than the current building and will extend much deeper on the plot than the current property;
- New building would not be visually attractive, it will be modern and featureless building and will be extremely prominent on the street because of its positioning near the top of the hill;
- The planned development does not provide for a mix of housing;
- There has been no provision for school places or medical provision required by these extra residents;
- Reading needs flats and affordable housing but not at the detriment of the existing buildings;
- Number 39 is an architectural jewel on Brunswick Hill;

Officers advise that these issues are all covered in the Appraisal to the main agenda report and no further response is required.

2. Affordable Housing

- 2.1 Further to paragraph 7.28 of the main report and in line with the Council’s independent viability review, Officers consider it relevant and necessary (in light of established planning policies and housing objectives in the Borough) to seek the provision of a deferred affordable housing contribution mechanism to be secured as part of any recommendation to approve. Residual valuations are highly sensitive to changes in costs and values over time, therefore a deferred contributions mechanism would ensure that any improvements in viability that result in a profit surplus being generated, would trigger the payment of affordable housing contributions.
- 2.3 A deferred payment mechanism has been agreed between the developer and your officers, pending formalisation. The incorporation of such a mechanism will enable the Council to share in any subsequent uplift in the site’s value and is considered a proactive approach. Based on the inputs agreed during the viability appraisal, an affordable housing review would trigger when a profit point of 17.5% is reached. With such a mechanism as part of any legal agreement, Officers remain content that the proposals are policy compliant in this respect.

- 2.4 In order to prevent any change in the unit mix or increase in the number of units hereby proposed, it is also recommended that a condition is secured preventing any such change without express planning permission from the Local Planning Authority. This is to safeguard the mix altering to potentially unacceptable mixes in the future, while also having a dual benefit of not altering the sales values of units (which could improve scheme viability) without this being managed and assessed by the Local Planning Authority. Separately to any planning condition is the need to capture through the legal agreement any affordable housing liability through the uplift in site value as a result of any such change.
- 2.5 In order to incorporate the above matters in any legal agreement, the officer recommendation is amended and an additional condition (Condition 19) is attached (See below):

3. *Additional condition*

19. Notwithstanding the provisions of the GPDO 2015 no change to the unit mix (4 x 1-bed and 5 x 2-bed units) shall be made to the development hereby permitted without express planning permission from the Local Planning Authority.

Case Officer: Brian Conlon

UPDATE REPORT

BY THE DIRECTORATE FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 17th July 2019

ITEM NO. 17

Ward: Park

Application No.: 190160

Address: "Alexander House", 205-207 Kings Road, Reading, RG1 4LW

Proposal: Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking and amenity space.

Applicant: P.J. Alexander Estates Ltd

Date Valid: 29 January 2019

Application target decision date: 19th July 2019 Extension of time agreed by the applicant - original target decision date was 2nd May 2019.

26 week date: 14th August 2019

RECOMMENDATION:

REFUSE, as per main agenda report, with minor addition to reason for refusal 1 and deletion of reason for refusal 3.

Reasons:

1. It has not been clearly demonstrated how this proposal for purpose-built student accommodation (PBSA) meets an identified need that cannot be met on those identified sites within the Emerging Local Plan allocated for student accommodation or on those sequentially preferable sites. Alexander House is a specifically allocated housing site within the Emerging Local Plan required to meet the Borough's identified housing needs. Its loss to an alternative use has not been justified and would further reduce the Council's ability to meet its **general and affordable** housing need within its own boundaries. The proposal therefore does not comply with Policy H12 and Policy ER1g of the Emerging Local Plan and conflicts with the aims of the NPPF.
2. In the absence of a completed legal agreement to secure a construction phase Employment and Skills Plan and use of the living accommodation to be occupied as student accommodation (Sui Generis) only, the proposal will not mitigate its impact on the social and economic infrastructure of the Borough, contrary to Policies CS3 and CS9 of the Reading Borough LDF Core Strategy 2008 (Altered 2015), Policy DM3 of the Reading Borough LDF Sites and Detailed Policies Document 2012 (Altered 2015) and the Council's Adopted Supplementary Planning Documents on Employment, Skills & Training (2013) and Planning Obligations under Section 106 (2015).

Informatives:

1. Plans and documents refused.
2. Positive and proactive working.
3. Reason for refusal ~~2&3~~ could be overcome by a satisfactory Section 106 Legal Agreement or unilateral undertaking

4. Refused scheme CIL (Community Infrastructure Levy) liable development.

1. Consultations update

- 1.1 The applicant has submitted via email a document containing 22 additional letters of support from local businesses and 12 letters of support from local residents in a standard template. Officers can confirm that 32 separate letters of support have been received, broadly supporting the proposal for the reasons previously set out in the main agenda report.
- 1.2 A duplicate letter of support from Activate Learning (an umbrella organisation for apprenticeships and courses for the Thames Valley Colleges) on behalf of Reading College has also been received, the contents of which has been summarised below. The points of support raised are as follows:
- The development will help Reading College, as part of Activate Learning, achieve their vision of offering modern, professionally managed student accommodation next to the Reading College campus.
 - The site is ideally located to provide purpose built student accommodation given its proximity to both Reading College and also the nearby University of Reading campuses.
 - The proposed design is a significant improvement from the existing building.
 - The new development is BREEAM level 'Excellent'.
 - Activate Learning are supportive of PJ Alexander Estates' commitment to engaging with the local community, including the Public Exhibition held at Reading College.
 - Activate Learning have agreed that the college will benefit from 'Experience of Work' and 'Work Experience' opportunity for students in construction phase.
 - The development will enhance the character of the local area and provide much needed accommodation.

2. Affordable Housing

- 2.1 Refusal reason 3 in the main agenda report referred to failure to provide affordable housing, contrary to affordable housing policies CS16 and H4 as supplemented by the Affordable Housing SPD (2013). The references to securing affordable housing from student accommodation proposals in the SPD pre-dated the more comprehensive and strategic, evidence-led approach to student accommodation that is now provided by Policy H12 in the emerging Local Plan. Following further consideration and engagement with the Council's Planning Policy Team, Officers consider that, as policy H12 in the emerging Local Plan now carries significant weight, it is prudent to determine the application in accordance with the more comprehensive approach to student accommodation in that document, rather than through the requirements of the Affordable Housing SPD (2013). Officers can therefore confirm that Refusal Reason 3 is no longer maintained and withdrawn from the Recommendation above.
- 2.2 Refusal Reason 1 is amended to refer to 'general and affordable' housing need. The reason for this is because of the failure to deliver this as a housing site in accordance with the emerging allocation ER1g also means

that there is a failure to supply the affordable housing associated with such a development. For information, it should be noted that planning permission 162057 provided 17 on-site affordable housing units. The Recommendation is amended as above with the amended wording highlighted.

Case Officer: Brian Conlon

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UPDATE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 17th July 2019

ITEM NO. 18

Ward: Redlands

Application No.: 182214/FUL

Address: 45 Upper Redlands Road

Proposals: Erection of 4 dwellinghouses and accesses with associated landscaping and parking

Date Application Valid: 17th December 2018

Application target decision date: Extension of time to 24th July 2019

RECOMMENDATION

As per 26th June 2019 committee report (Appendix A to the main agenda report) but to adjust the date for completion of the s106 agreement to 24th July 2019.

Conditions:

Alter Condition 3 to ensure samples are provided for all brickwork, render and roof materials.

1. INTRODUCTION

1.1 This application was deferred at the 26th June 2019 Planning Applications Committee to enable a member site visit to take place. The site visit took place on 11th July 2019.

1.2 The Council's Conservation and Heritage Consultant has reviewed the most up-to-date plans and retains an objection to the application on the basis that the loss of areas of brick wall in the street scene and loss of the garden areas around the existing Victorian villas would diminish the character of the Conservation Area. However, in his opinion the level of harm is considered to be "less than substantial" and the application should be considered against paragraph 196 which states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

1.3 The Consultant has advised that physical material samples are required, should planning permission be granted, to would ensure samples of the brickwork, render and roof materials are provided for approval before the relevant parts of the building work are begun. As such condition 3 is proposed to be altered accordingly.

1.4 Officers further advise that in terms of paragraph 196 of the NPPF above, it should be noted that the public benefits of the scheme are in the form of four new family homes, and an off-site affordable housing contribution of £158,333.33.

Case Officer: James Overall

UPDATE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 17th July 2019

ITEM NO. 20

Ward: Thames

App No: 190627/FUL

Address: Land to the rear of 27-43 Blenheim Road Caversham

Proposal: Erection of 3 dwellings with parking, landscaping and access from Blenheim Road

Applicant: First Avenue Estates Ltd

Date validated: 25/03/2019

Application target decision date: 20/05/2019 **Extension of time:** 07/08/2019

RECOMMENDATION:

As per the main agenda report but with the section 106 heads of terms updated in respect of the affordable housing contribution to secure a contribution of seventy five thousand two hundred and fifty thousand pounds (£75,250).

1. Affordable Housing

- 1.1 The main agenda report set out that the applicant was proposing to make a policy compliant contribution towards off-site affordable housing within the Borough. This contribution has now been confirmed as seventy five thousand two hundred and fifty thousand pounds (£75,250) to be secured by way of a section 106 legal agreement and payable prior to first occupation of the dwellings. The Recommendation has been updated accordingly.

2. Transport

- 2.1 Further clarification is also provided in respect of the visibility and vehicular access arrangements onto Blenheim Road. The swept path analysis drawings for access to the site are attached at the end of this update report. Although the main agenda report (paragraphs 6.37-9 on page 401) states that there would be no reduction in parking spaces, Transport Strategy has now confirmed that there would be the loss of an area equivalent to one on-street space to the north of the access in front of no. 31 Blenheim Road. This would be required in order to accommodate the widened vehicular access to the site and to provide the necessary tracking clearance for a fire engine or large removals/delivery vehicle to enter and leave the proposed widened vehicular access to the site. Parking for the proposed three dwellings would be provided off-street within the development site and as such, the development itself would not increase demand

for on-street parking on Blenheim Road. Overall, the loss of one on-street space on a road where parking is unrestricted and where the development would use an existing point of access and provide its own parking, is considered to be acceptable, in order to secure the provision of three additional family dwellings.

3. Other matters

3.1 The applicant circulated a letter to members of the Committee yesterday (16th July 2019) via email setting out reasons as to why the applications should be supported. This letter is not considered to raise any new issues that are not covered either within the main agenda report or this update report.

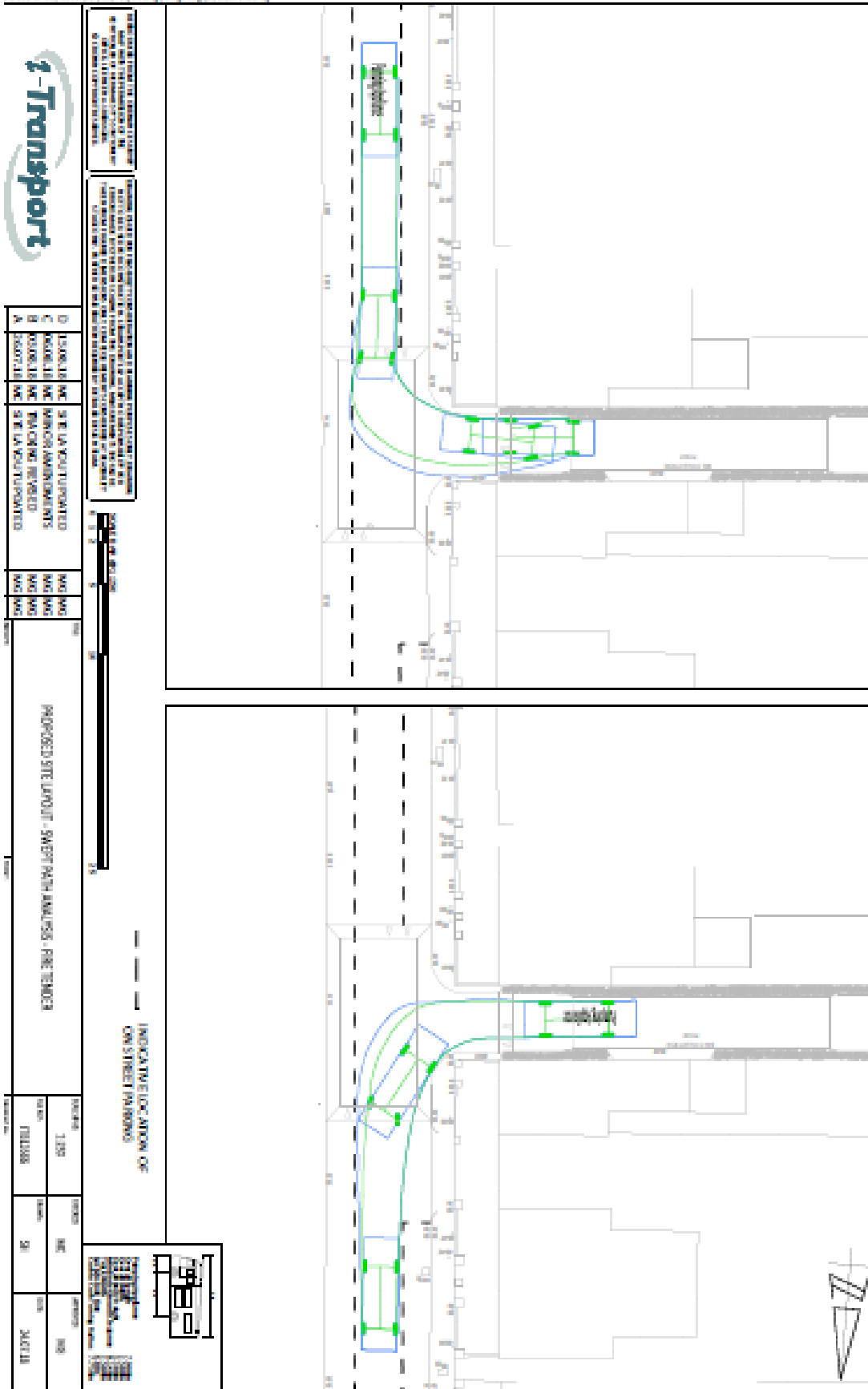
3.2 There is a typographical error in paragraph 2.2 of the main agenda report which is corrected as follows:

'The proposals are for a two storey semi-detached pair of 4 ~~four~~ bedroom dwellings with integral garages and driveway parking and a single two storey 3 bedroom detached dwelling with driveway parking'

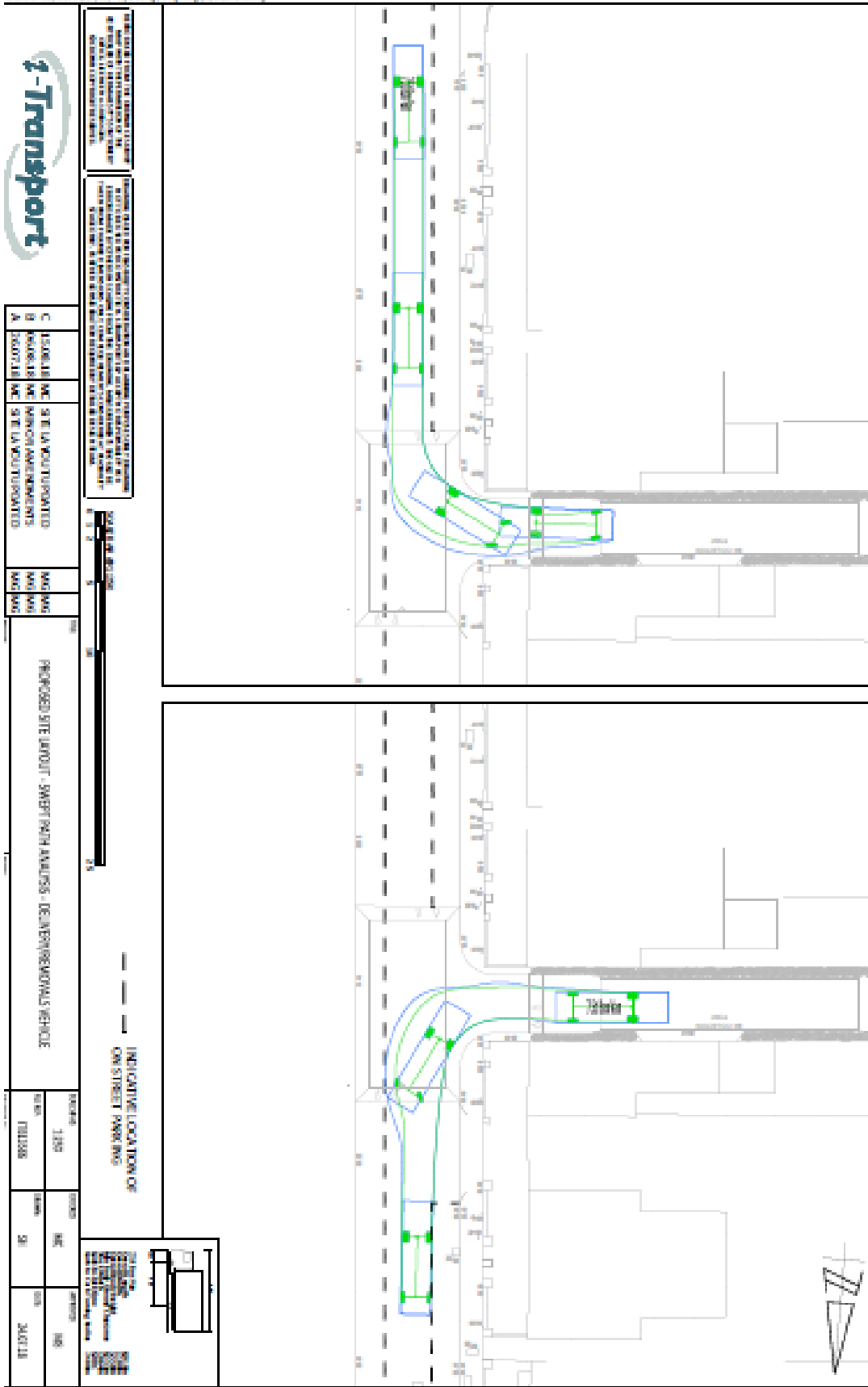
3.3 There is also a typographical error in paragraph 6.15 of the main agenda report which is corrected as follows:

'The Council's Ecological Consultant has reviewed the Ecological Appraisal and notes the loss of habitat and onsite mitigation/enhancement measures but does not consider that this would adequately compensate for the loss of the woodland, given the variety of habitats it currently provides. The consultant therefore advises that in accordance with Policy CS36 (Biodiversity and Geology) further biodiversity mitigation compensation would be required to ensure that there would be no net loss of biodiversity within the Borough and that in this instance this would need to be secured off-site. Policy CS36 (which is also reflected in emerging Policy EN12 of the Councils New Local Plan) states that:'

Officer: Matt Burns



Swept path analysis - Fire Truck



Swept path analysis - delivery/removals vehicles