

To: Councillor McKenna (Chair)
Councillors Sokale, Duveen, Ennis,
Lovelock, Page, Robinson, Rowland,
Stanford-Beale and J Williams

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4 August 2020

Your contact is: **Simon Hill - Committee Services (simon.hill@reading.gov.uk)**

NOTICE OF MEETING - PLANNING APPLICATIONS COMMITTEE 12 AUGUST 2020

An online meeting of the Planning Applications Committee will be held on Wednesday, 12 August 2020 at 6.30 pm in via Microsoft Teams. The Agenda for the meeting is set out below.

AGENDA	ACTION	WARDS AFFECTED	PAGE NO
1. MINUTES	-		7 - 10
2. DECLARATIONS OF INTEREST	-		
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7. CHANGES TO THE GDPO AND UCO (SI 2020 755, 756 & 757)	Information	BOROUGHWIDE	23 - 34

This report advises the Committee of further important changes to the General Permitted Development Order (GPDO) and the Use Classes Order (UCO) as announced recently by Government.

PLANNING APPLICATION TO BE DETERMINED

8. 200122/REG3 - WENSLEY ROAD Decision MINSTER 35 - 138

Proposal

Demolition of 29 garages and development of 46 new dwelling units, including the provision of affordable homes, provided in a mixture of houses and apartments (1 bed / 2 bed / 3 bed / 4 bed) in blocks of between 2.5 to 4 storeys, and the provision of bicycle parking spaces, car parking spaces and public realm works.

Recommendation

Permitted subject to Legal Agreement

1. There are many different types of applications processed by the Planning Service and the following codes are used to abbreviate the more common types of permission sought:
 - FUL - Full detailed planning permission for development or change of use
 - OUT - Principal of developing a site or changing a use
 - REM - Detailed matters "reserved matters" - for permission following approval of an outline planning application.
 - HOU - Applications for works to domestic houses
 - ADV - Advertisement consent
 - APC - Approval of details required by planning conditions
 - VAR - Significant change to a planning permission previously granted
 - NMA - Insignificant change to a planning permission previously granted
 - ADJ - Consultation from neighbouring authority on application in their area
 - LBC - Works to or around a Listed Building
 - CLE - A certificate to confirm what the existing use of a property is
 - CLP - A certificate to confirm that a proposed use or development does not require planning permission to be applied for.
 - REG3 - Indicates that the application has been submitted by the Local Authority.

2. Officer reports often refer to a matter or situation as being "a material consideration". The following list tries to explain what these might include:

Material planning considerations can include (but are not limited to):

- Overlooking/loss of privacy
- Loss of daylight/sunlight or overshadowing
- Scale and dominance
- Layout and density of buildings
- Appearance and design of development and materials proposed
- Disabled persons' access
- Highway safety
- Traffic and parking issues
- Drainage and flood risk
- Noise, dust, fumes etc
- Impact on character or appearance of area
- Effect on listed buildings and conservation areas
- Effect on trees and wildlife/nature conservation
- Impact on the community and other services
- Economic impact and sustainability
- Government policy
- Proposals in the Local Plan
- Previous planning decisions (including appeal decisions)
- Archaeology

There are also concerns that regulations or case law has established cannot be taken into account. These include:

- Who the applicant is/the applicant's background
- Loss of views
- Loss of property value
- Loss of trade or increased competition
- Strength or volume of local opposition
- Construction noise/disturbance during development
- Fears of damage to property
- Maintenance of property
- Boundary disputes, covenants or other property rights
- Rights of way and ownerships disputes over rights of way
- Personal circumstances

Glossary of usual terms

Affordable housing - Housing provided below market price to meet identified needs.

Air Quality Management Area (AQMA) - Area where air quality levels need to be managed.

Apartment-hotel - A use providing basic facilities for self-sufficient living with the amenities of a hotel. Generally classed as C1 (hotels) for planning purposes.

Article 4 Direction - A direction which can be made by the Council to remove normal permitted development rights.

BREEAM - A widely used means of reviewing and improving the environmental performance of generally commercial developments (industrial, retail etc).

Brownfield Land - previously developed land.

Brown roof - A roof surfaced with a broken substrate, e.g. broken bricks.

Building line - The general line along a street beyond which no buildings project.

Bulky goods - Large products requiring shopping trips to be made by car: e.g. DIY or furniture.

CIL - Community Infrastructure Levy. Local authorities in England and Wales levy a charge on new development to be spent on infrastructure to support the development of the area.

Classified Highway Network - The network of main roads, consisting of A, B and C roads.

Conservation Area - areas of special architectural or historic interest designated by the local authority. As designated heritage assets the preservation and enhancement of the area carries great weight in planning permission decisions.

Control of Major Accident Hazards (COMAH) Competent Authority - The Control of Major Accident Hazards Regulations 1999 (COMAH) and their amendments 2005, are the enforcing regulations within the United Kingdom. They are applicable to any establishment storing or otherwise handling large quantities of industrial chemicals of a hazardous nature. Types of establishments include chemical warehousing, chemical production facilities and some distributors.

Dormer Window - Located in the roof of a building, it projects or extends out through the roof, often providing space internally.

Dwelling - A single housing unit - a house, flat, maisonette etc.

Evening Economy A term for the business activities, particularly those used by the public, which take place in the evening such as pubs, clubs, restaurants and arts/cultural uses.

Flood Risk Assessment - A requirement at planning application stage to demonstrate how flood risk will be managed.

Flood Zones - The Environment Agency designates flood zones to reflect the differing risks of flooding. Flood Zone 1 is low probability, Flood Zone 2 is medium probability, Flood Zone 3a is high probability and Flood Zone 3b is functional floodplain.

Granny annexe - A self-contained area within a dwelling house/ the curtilage of a dwelling house but without all the facilities to be self contained and is therefore dependent on the main house for some functions. It will usually be occupied by a relative.

Green roof - A roof with vegetation on top of an impermeable membrane.

Gross floor area - Total floor area of the house, including all floors and garage, measured externally.

Hazardous Substances Consent - Consent required for the presence on, over, or under land of any hazardous substance in excess of controlled quantity.

Historic Parks and Gardens - Parks and gardens of special historic interest, designated by English Heritage.

Housing Association - An independent not-for-profit body that provides low-cost "affordable housing" to meet specific housing needs.

Infrastructure - The basic services and facilities needed for the smooth running of a community.

Lifetime Home - A home which is sufficiently adaptable to allow people to remain in the home despite changing circumstances such as age or disability.

Listed building - Buildings of special architectural or historic interest. Consent is required before works that might affect their character or appearance can be undertaken. They are divided into Grades I, II and II*, with I being of exceptional interest.

Local Plan - The main planning document for a District or Borough.

Luminance - A measure of the luminous intensity of light, usually measured in candelas per square metre.

Major Landscape Feature - these are identified and protected in the Local Plan for being of local significance for their visual and amenity value

Public realm - the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces whether publicly or privately owned.

Scheduled Ancient Monument - Specified nationally important archaeological sites.

Section 106 agreement - A legally binding agreement or obligation entered into by the local authority and a land developer over an issue related to a planning application, under Section 106 of the Town and Country Planning Act 1990.

Sequential approach A method of considering and ranking the suitability of sites for development, so that one type of site is considered before another. Different sequential approaches are applied to different uses.

Sui Generis - A use not specifically defined in the use classes order (2004) - planning permission is always needed to change from a sui generis use.

Sustainable development - Development to improve quality of life and protect the environment in balance with the local economy, for now and future generations.

Sustainable Drainage Systems (SUDS) - This term is taken to cover the whole range of sustainable approaches to surface water drainage management.

Tree Preservation Order (TPO) - An order made by a local planning authority in respect of trees and woodlands. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage or wilful destruction of trees without the LPA's consent.

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- Present:** Councillor McKenna (Chair);
Councillors Duveen, Ennis, Lovelock, McEwan (In place of Page), Robinson, Rowland, Stanford-Beale, J Williams and R Williams (In place of Sokale)
- Apologies:** Councillors Sokale and Page

RESOLVED ITEMS

20. MINUTES

The Minutes of the meeting held on 24 June 2020 were agreed as a correct record.

21. DECLARATIONS OF INTEREST

Councillor Ennis declared a prejudicial interest in applications 200742/VAR and 200757/REG3 on the grounds of predetermination. The applications had been submitted by the Council's Housing department and as Lead Councillor for Housing he had been involved in the development of the schemes.

22. APPLICATIONS DETERMINED UNDER NEW DELEGATED AUTHORITY

The Executive Director of Economic Growth and Neighbourhood Resources submitted a report informing the Committee that, since the previous report, no planning applications had been decided by officers under the extended delegated authority to determine applications and manage 'called-in' applications during the Coronavirus crisis.

An update report was tabled at the meeting which informed the Committee of a decision made by officers since publication of the original report to refuse planning permission for an application that had been 'called-in'.

Resolved - That the report and update report be noted.

23. PLANNING APPEALS

(i) New Appeals

The Executive Director for Economic Growth and Neighbourhood Services submitted a schedule giving details of notification received from the Planning Inspectorate regarding two planning appeals, the method of determination for which she had already expressed a preference in accordance with delegated powers, which was attached as Appendix 1 to the report.

(ii) Appeals Recently Determined

There were no appeals that had been determined since the previous report.

(iii) Reports on Appeal Decisions

There were no reports on appeal decisions.

Resolved - That the new appeals, as set out in Appendix 1, be noted.

24. APPLICATIONS FOR PRIOR APPROVAL

The Executive Director for Economic Growth and Neighbourhood Services submitted a report giving details in Table 1 of 11 prior approval applications received, and in Table 2 of five applications for prior approval decided, since 11 June 2020.

Resolved - That the report be noted.

25. TOWN & COUNTRY PLANNING (PERMITTED DEVELOPMENT AND MISCELLANEOUS AMENDMENTS) (ENGLAND)(CORONAVIRUS) REGULATIONS 2020 (SI 2020 NO. 632)

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the Town & Country Planning (Permitted Development and Miscellaneous Amendments) (England)(Coronavirus) Regulations 2020 (SI 2020 No. 632) (the regulations).

The report explained that the regulations introduced Regulations 20 and 21 to amend Parts 4 and 12 of the GPDO relating to temporary use of open spaces, which had come into force on 25 June 2020. They also amended some of the changes of use permitted development criteria in Part 3 of the GPDO to require that residential units were provided with access to natural light. A new part to the GPDO had also been introduced (Part 20) to allow existing blocks of flats to be extended upwards for residential purposes, which would come into force on 1 August 2020. This report set out detail on these changes and a commentary on how officers viewed them.

Resolved - That the report be noted.

26. 200512/FUL - WESTFIELD ROAD RECREATION GROUND, WESTFIELD ROAD, CAVERSHAM

Retention of fenced off area of the Westfield Park Recreation Ground for educational use during school hours for use by the Heights Primary School until 31st August 2021

The Executive Director for Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which corrected and clarified a number of points in the original report, and summarised a letter received from the Heights School Chair of Governors and an additional objection received. The update report also had appended written representations from an objector and a representative of the applicant who had requested to speak at the meeting.

Comments and objections were received and considered.

Objector Alex Vugler, and Tom Lamshead representing the applicant, addressed the Committee on this application. Karen Edwards, Sharon McHale, and Chris Watson, also representing the applicant, were in attendance and answered questions from the Committee.

Resolved -

That planning permission for application 200512/FUL be granted, subject to the conditions and informatives as recommended in the original report, with amendment of proposed Condition 1 to specify that the site be left in a condition consistent with the reinstatement scheme referred to in proposed Condition 6.

27. 200564/FUL - THE HEIGHTS PRIMARY SCHOOL, 82 GOSBROOK ROAD, CAVERSHAM

Retention of two modular school accommodation blocks (Use Class D1) and associated facilities for use by the Heights Primary School until 31st August 2021

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which explained that outstanding flooding matters had been resolved, and that the Environment Agency had therefore withdrawn their objection, subject to two additional recommended conditions regarding retention of the floor levels, and the void area beneath the buildings. The report also made several clarifications to the original report.

Comments and objections were received and considered.

Resolved -

That temporary planning permission for application 200564/FUL be granted, subject to the conditions and informatives as recommended in the original report, with the two additional conditions as recommended in the update report.

28. 200742/VAR - LAND ADJACENT 5 IAN MIKARDO WAY, CAVERSHAM

Application for removal or variation of condition 2 following grant of planning permission (182031)

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which had attached amended plans to reflect the previously agreed parking layout and manoeuvring area.

Comments were received and considered.

Resolved -

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That permission be granted to vary condition 2 (approved plans) of planning permission 182031, subject to the conditions and informatives as recommended.

(Councillor Ennis declared a prejudicial interest in the above application on the grounds of predetermination. He made a statement to the Committee and then took no further part in the debate or decision. Nature of interest: Councillor Ennis had been involved in the development of the scheme as Lead Councillor for Housing.)

29. 200757/REG3 - 67 LYNDHURST ROAD, TILEHURST

Single storey side extension to provide a single bedroom.

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application.

Comments were received and considered.

Resolved -

That, pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992, the carrying out of the development 1200757/REG3 be authorised, subject to the conditions and informatives as recommended.

(Councillor Ennis declared a prejudicial interest in the above application on the grounds of predetermination. He made a statement to the Committee and then took no further part in the debate or decision. Nature of interest: Councillor Ennis had been involved in the development of the scheme as Lead Councillor for Housing.)

(The meeting started at 6.33 pm and closed at 8.51 pm)

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	12 AUGUST 2020		
TITLE:	OUTCOME FOR APPLICATIONS THAT PREVIOUSLY MIGHT HAVE COME TO COMMITTEE BUT WERE DETERMINED BY OFFICERS UNDER NEW DELEGATED AUTHORITY		
AUTHOR:	JULIE WILLIAMS & RICHARD EATOUGH		
JOB TITLE:	PLANNING MANAGER (ACTING) & TEAM LEADER	E-MAIL:	Julie.williams@reading.gov.uk Richard.eatough@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To advise Committee of the outcome for those applications that, following the agreement at Policy Committee on 27 April to extend the delegated authority to the Deputy Director of Planning, Transport & Regulatory Services to determine applications and to manage “called in” applications, have now been decided by officers.
- 1.2 The tables appended to this report lists the applications where decisions have been made.

2. RECOMMENDED ACTION

- 2.1 That you note the report and endorse the decisions made shown on tables 1 & 2

3. BACKGROUND

- 3.1 A report was presented at Policy Committee held on 27 April to explain that Section 78 of the Coronavirus Act 2020 and ‘The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020’ enables Council meetings to take place online during the current Covid-19 pandemic. The report provided revised protocols for running meetings to help manage online events and included a proposal to extend the delegated authority for making decisions on planning applications and confirming Tree Preservation Orders to reduce the work handled by Planning Applications Committee.
- 3.2 Policy Committee agreed that the Deputy Director of Planning, Transport and Regulatory Services delegated authority to determine planning applications and Tree Preservation Orders should be extended to help reduce the number of reports coming to the meeting.
- 3.3 Councillors can ask for an application that is delegated to officers to determine to be considered by Planning Applications Committee instead - known as “calling in” an application. This ability remains but councillors are now requested to seek advice from the Planning Manager and Chair of Planning when considering a “call in” so that a judgement can be made on the merits of bringing the application to Committee. For example; if an application fails to comply with a number of policies and having a debate about it at committee is not going to change that it

would be more efficient for the officer to determine the application within the target timescale than to delay the decision by having to bring a committee report to this meeting.

- 3.4 It was agreed at Policy Committee that a schedule of those applications affected by the change in delegations be presented to each Planning Applications Committee for information. Officer will also include in the list those applications that had been called in but then agreed by the relevant councillors could be decided by officers.

4. CONTRIBUTION TO STRATEGIC AIMS

- 4.1 The Planning Service contributes to the Council's strategic aims in terms of:
- Seeking to meet the 2019 Corporate Plan objectives for "Keeping the town clean, safe, green and active."
 - Seeking to meet the 2019 Corporate Plan objectives for "Providing homes for those in most need."
 - Seeking to meet the 2019 Corporate Plan objectives for "Providing infrastructure to support the economy."

5. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 5.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).

- 5.2 The Planning Service uses policies to encourage developers to build and use properties responsibly by making efficient use of land and using sustainable materials and building methods. As a team we work hard to reduce the amount of resources (paper and printing) we use to carry out our work so reducing the number of committee reports produced will also help.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 The changes to delegations do not change the need for statutory and non-statutory consultation on all planning applications.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 Where appropriate the Council must have regard to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 7.2 There are no direct implications arising from the proposals.

8. LEGAL IMPLICATIONS

- 8.1 None arising from this Report.

9. FINANCIAL IMPLICATIONS

- 9.1 There are no financial implications as a result of adopting these arrangements for determining applications.

10. BACKGROUND PAPERS

27th April 2020 Policy Committee Minutes

Table 1 - Planning Applications decided since 15th July 2020

Application reference	Date Validated	Case Officer	Called in by	Address	Ward	Proposal	Date decided	Decision	Taken by
191986	16/12/2019	JS	Cllr Carnell	26 Highdown Avenue	Thames	Proposed two storey rear extension and single storey side extension.	30/7/2020	Granted	Officer
200219	10/02/2020	EH	Cllrs Page & Rowland	2 Tilehurst Road	Abbey	Proposed change of use from C1 use (Guest House of 18No bedrooms) to Sui Generis HMO use 18 bedrooms	29/07/2020	Refused	Officer
200220/LBC	10/02/2020	EH	Cllrs Page & Rowland	2 Tilehurst Road	Abbey	Proposed change of use from C1 use (Guest House of 18No bedrooms) to Sui Generis HMO use 18 bedrooms	29/07/2020	Refused	Officer
200571	16/04/2020	EH	Cllr Emberson	4 Downshire Square	Minster	Demolition of existing dwelling house and large detached garage and	17/07/2020	Refused	Officer

Table 2 - Tree Preservation Orders confirmed

TPO Ref	Address	Ward	Date TPO served	Date Objection received	Description of TPO	Decision	Date of decision
3/20	Abbey School, 17 Kendrick Road	Redlands	10/03/2020	09/04/2020	One group of 4 Scots Pine	Confirm	21/07/2020
6/20	21 & 23 Kentwood Close and Land between Kentwood Close, Hornsea Close and Wealden Way	Kentwood	03/06/2020	05/06/2020	One Woodland and one individually specified tree	Confirm	29/07/2020

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND
NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	12 AUGUST 2020		
TITLE:	PLANNING APPEALS		
AUTHOR:	Julie Williams	TEL:	0118 9372461
JOB TITLE:	Planning Manager	E-MAIL:	Julie.Williams@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To report notifications received from the Planning Inspectorate on the status of various planning appeals.

2. RECOMMENDED ACTION

- 2.1 That you note the appeals received and the method of determination as listed in Appendix 1 of this report.
- 2.2 That you note the appeals decided as listed in Appendix 2 of this report.
- 2.3 That you note the Planning Officers reports on appeal decisions provided in Appendix 3 of this report.

3. INFORMATION PROVIDED

- 3.1 Please see Appendix 1 of this report for new appeals lodged since the last committee.
- 3.2 Please see Appendix 2 of this report for new appeals decided since the last committee.
- 3.3 Please see Appendix 3 of this report for new Planning Officers reports on appeal decisions since the last committee.

4. CONTRIBUTION TO STRATEGIC AIMS

- 4.1 Defending planning appeals made against planning decisions contributes to producing a sustainable environment and economy within the Borough and to meeting the 2018-21 Corporate Plan objective for “Keeping Reading’s environment clean, green and safe”.

5. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 5.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).
- 5.2 The Planning Service uses policies to encourage developers to build and use properties responsibly by making efficient use of land and using sustainable materials and building methods. As a team we have also reduced the amount of resources (paper and printing) we use to carry out our work.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 Planning decisions are made in accordance with adopted local development plan policies, which have been adopted by the Council following public consultation. Statutory consultation also takes place on planning applications and appeals and this can have bearing on the decision reached by the Secretary of State and his Inspectors. Copies of appeal decisions are held on the public Planning Register.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 Where appropriate the Council will refer in its appeal case to matters connected to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8. LEGAL IMPLICATIONS

- 8.1 Public Inquiries are normally the only types of appeal that involve the use of legal representation. Only applicants have the right to appeal against refusal or non-determination and there is no right for a third party to appeal a planning decision.

9. FINANCIAL IMPLICATIONS

- 9.1 Public Inquiries and Informal Hearings are more expensive in terms of officer and appellant time than the Written Representations method. Either party can be liable to awards of costs. Guidance is provided in Circular 03/2009 “Cost Awards in Appeals and other Planning Proceedings”.

10. BACKGROUND PAPERS

- 10.1 Planning Appeal Forms and letters from the Planning Inspectorate.

APPENDIX 1

Appeals Lodged:

WARD: Battle
APPEAL NO: APP/E0345/W/20/3254293
CASE NO: 191915
ADDRESS: 39 Brunswick Hill
PROPOSAL: 2-storey side and 3-storey rear extension and conversion of dwelling to contain 8 flats (6 x 1-bed, 2 x 2-bed) parking, demolition of existing garage and associated works.
CASE OFFICER: Matt Burns
METHOD: Written Representation
APPEAL TYPE: Refusal of Planning Permission
APPEAL LODGED: 17.07.2020

WARD: Redlands
APPEAL NO: APP/E0345/W/20/3251307
CASE NO: 190471
ADDRESS: 88 Blenheim Road
PROPOSAL: Retrospective Planning Permission for C4 use
CASE OFFICER: Brian Conlon
METHOD: Written Representation
APPEAL TYPE: Refusal of Planning Permission
APPEAL LODGED: 28.07.2020

WARD: NORCOT
APPEAL NO: APP/E0345/W/20/3253870
CASE NO: 182114
ADDRESS: "Thorpe House", Colliers Way, Reading
PROPOSAL: Outline application for proposed residential redevelopment to provide 6 no. 3-bedroom dwellinghouses
CASE OFFICER: Ethne Humphreys
METHOD: Written Representation
APPEAL TYPE: Refusal of Planning Permission
APPEAL LODGED: 22.07.2020

APPENDIX 2

Appeals Decided: None

APPENDIX 3

Address Index of Planning Officers reports on appeal decisions.

No reports this time.

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REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	12 AUGUST 2020		
TITLE:	APPLICATIONS FOR PRIOR APPROVAL		
AUTHOR:	Julie Williams & Richard Eatough		
JOB TITLE:	PLANNING MANAGER (acting) & Team Leader	E-MAIL:	Julie.williams@reading.gov.uk Richard.eatough@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To advise Committee of new applications and decisions relating to applications for prior-approval under the Town and Country Planning (General Permitted Development) Order (GPDO 2015) as amended.

2. RECOMMENDED ACTION

- 2.1 That you note the report.

3. BACKGROUND

- 3.1 At your meeting on 29 May 2013 a report was presented which introduced new permitted development rights and additional requirements for prior approval from the local planning authority for certain categories of permitted development. It was agreed then that a report be brought to future meetings for information and to include details of applications received for prior approval, those pending a decision and those applications which have been decided since the last Committee date.

4 TYPES OF PRIOR APPROVAL APPLICATIONS

- 4.1 The categories of development requiring prior approval under the Town and Country Planning (General Permitted Development)(England) Order 2015, or amended by the Town and Country Planning (General Permitted Development)(England)(Amendment) Order 2016 that are of most relevance to Reading Borough are summarised as follows:
- **Householder development - single storey rear extensions.** GPDO Part 1, Class A1.
 - **Householder development - upwards extensions.** GPDO Part 1, Class AA.
 - **General upwards extensions for flats.** GPDO Part 20, Class AA
 - **Change of use from A1 shops or A2 financial & professional, betting office, pay day loan shop or casino to A3 restaurants and cafes.** GPDO Part 3 Class C.
 - **Change of use from A1 shops or A2 financial & professional, betting office or pay day loan shop to Class D2 assembly & leisure.** GPDO Part 3 Class J.
 - **Change of use from A1 shops or A2 financial and professional or a mixed use of A1 or A2 with dwellinghouse to Class C3 dwellinghouse.** GPDO Part 3 Class M*
 - **Change of use from an amusement arcade or a casino to C3 dwellinghouse & necessary works.** GPDO Part 3 Class N
 - **Change of use from B1 office to C3 dwellinghouse** GPDO Part 3, Class O*.

- Change of use from B8 storage or distribution to C3 dwellinghouse GPDO Part 3, Class P
- Change of use from B1(c) light industrial use to C3 dwellinghouse GPDO Part 3, Class PA*
- Change of use from agricultural buildings and land to Class C3 dwellinghouses and building operations reasonably necessary to convert the building to the C3 use. GPDO Part 3 Class Q.
- Change of use of 150 sq m or more of an agricultural building (and any land within its curtilage) to flexible use within classes A1, A2, A3, B1, B8, C1 and D2. GPDO Part 3 Class R.
- Change of use from Agricultural buildings and land to state funded school or registered nursery D1. GPDO Part 3 Class S.
- Change of use from B1 (business), C1 (hotels), C2 (residential institutions), C2A (secure residential institutions and D2 (assembly and leisure) to state funded school D1. GPDO Part 3 Class T.
- Temporary use of buildings for film making for up to 9 months in any 27 month period. GPDO Part 4 Class E
- Development under local or private Acts and Orders (e.g. Railways Clauses Consolidation Act 1845). GPDO Part 18.
- Development by telecommunications code system operators. GPDO Part 16.
- Demolition of buildings. GPDO Part 11.

4.2 Those applications for Prior Approval received and yet to be decided are set out in the appended Table 1 and those applications which have been decided are set out in the appended Table 2. The applications are grouped by type of prior approval application. Information on what the estimated equivalent planning application fees would be is provided.

4.3 It should be borne in mind that the planning considerations to be taken into account in deciding each of these types of application are specified in more detail in the GPDO. In some cases the LPA will first need to confirm whether or not prior approval is required before going on to decide the application on its planning merits where prior approval is required.

4.4 Details of any appeals on prior-approval decision will be included elsewhere in the agenda.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 Changes of use brought about through the prior approval process are beyond the control or influence of the Council's adopted policies and Supplementary Planning Documents. Therefore, it is not possible to confirm how or if these schemes will contribute to the strategic aims of the Council.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).

6.2 The Planning Service uses policies to encourage developers to build and use properties responsibly by making efficient use of land and using sustainable materials and building methods. As a team we have also reduced the amount of resources (paper and printing) we use to carry out our work.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 Statutory consultation takes place in connection with applications for prior-approval as specified in the Order discussed above.

8 EQUALITY IMPACT ASSESSMENT

- 8.1 Where appropriate the Council must have regard to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.2 There are no direct implications arising from the proposals.

9. LEGAL IMPLICATIONS

- 9.1 None arising from this Report.

10. FINANCIAL IMPLICATIONS

- 10.1 Since the additional prior notifications were introduced in May 2013 in place of applications for full planning permission, the loss in fee income is estimated to be £1,347,950

(Office Prior Approvals - £1,224,929: Householder Prior Approvals - £77,372: Retail Prior Approvals - £12,622: Demolition Prior Approval - £3233: Storage Prior Approvals - £5716: Shop to Restaurant Prior Approval - £5404: Shop to Leisure Prior Approval - £305: Light Industrial to Residential - £18,270)

Figures since last report

Office Prior Approvals - £36,768: Householder Prior Approvals - £440

- 10.2 However it should be borne in mind that the prior notification application assessment process is simpler than would have been the case for full planning permission and the cost to the Council of determining applications for prior approval is therefore proportionately lower. It should also be noted that the fee for full planning applications varies by type and scale of development and does not necessarily equate to the cost of determining them.

11. BACKGROUND PAPERS

- The Town and Country Planning (General Permitted Development) (England) Order 2015
- The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016.

Table 1 - Applications received since 2nd July 2020

Type:	How many received since last report:	Loss in possible fee income:
Householder Prior Approvals	4	£440
Office Prior Approvals	2	£36768
Shop to Restaurant Prior Approval	1	£366
Retail Prior Approvals	0	0
Demolition Prior Approval	0	0
Solar Equipment Prior Approval	0	0
Light Industrial to Residential Prior Approval	0	0
Prior Notification	0	0
Shop to Assembly & Leisure Prior Approval	0	0
Telecommunications Prior Approval	4	N/A
TOTAL	11	£37,574

Table 2 - Applications decided since 2nd July 2020

Type:	Approved	Refused	Not Required	Withdrawn
Householder Prior Approvals	0	0	1	1
Office Prior Approvals	0	0	0	0
Shop to Restaurant Prior Approval	1	0	0	0
Retail Prior Approvals	0	0	0	0
Demolition Prior Approval	0	0	0	0
Solar Equipment Prior Approval	0	0	0	0
Light Industrial to Residential Prior Approval	0	0	0	0
Prior Notification/ Other	0	0	0	0
Shop to Assembly & Leisure Prior Approval	0	0	0	0
Telecommunications Prior Approval	1	1	0	0
TOTAL	2	1	1	1

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	12 AUGUST 2020		
TITLE:	CHANGES TO THE GPDO AND GDMO (SI 2020 755, 756 & 757)		
AUTHOR:	JULIE WILLIAMS		
JOB TITLE:	PLANNING MANAGER (ACTING)	E-MAIL:	Julie.williams@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To advise Committee of further important changes to the General Permitted Development Order (the GPDO) and the Use Classes Order (the UCO) as announced recently by Government:

The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020 (SI 2020 No. 755);
The Town and Country Planning (General Permitted Development) (England) (Amendment) (No3) Order 2020 (SI 2020 No.756), and
The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757);

- 1.2 Committee is also asked to support officers investigating the implications of these changes on our ability to apply our recently adopted local plan policies.

2. RECOMMENDED ACTION

- 2.1 That you note the report;
- 2.2 That you support officers investigating how the local planning authority should respond to the changes described.

2. BACKGROUND

- 2.1 The current General Permitted Development Order 2015 (as amended) grants planning permission to many different types of development or uses of land set out in Schedules broken up in to different parts to categorise the types of development, such as for changes to dwellings (Part 1) or changes of use (Part 3) or development by local authorities (Part 12) an so on.

- 2.2 The Use Classes Order puts uses of land and buildings into categories or “Use Classes” and generally, within those classes, new development or changes of use can occur without needing planning permission subject to conditions being satisfied. In some cases, prior approval is needed to confirm that the new building works or change can take place. The current Use Classes Order is the Town and Country Planning (Use Classes) Order 1997 (as amended). Appendix A provides a summary of the current Use Classes.

2.3 Changes to the Use Classes Order and the General Permitted Development Order used to happen very rarely but already this year, partly due to responding to economic pressure associated with the Covid-19 outbreak and ongoing situation, we are seeing more changes and those changes are more radical. There follows a review of the latest changes.

3. NEW PERMITTED DEVELOPMENT - UPWARD EXTENSIONS

3.1 Members will recall it being reported that new permitted development rights are being introduced to allow upward extensions to qualifying buildings in order to create new homes and living spaces. Those regulations, introduced on 24 June 2020, allow purpose-built freestanding blocks of flats of three storeys or more to extend upwards by up to two additional storeys to create new homes, up to a height of 30m. This right came into force on 1 August 2020.

3.2 A second phase of new permitted development rights has been announced to build upwards on existing dwellings in the release of The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020 (SI 2020 No.755). They permit such extensions on buildings in a terrace (of two or more buildings) in certain commercial uses. They also allow up to two additional storeys on existing houses, detached or in a terrace, to create new self-contained homes or additional living space up to a height of 18 metres. Bungalows will be able to add one additional storey. There are conditions to these allowances and a number of prior approval submissions are required, for instance external appearance of the proposed development and its impact on the amenity of neighbours to be assessed. These regulations come into force on 31 August 2020.

3.3 Schedule 2 Part 1 is to be amended with a new Class AA to allow dwelling houses to be extended upwards to provide more accommodation. This will be different to changes to the roof shape or adding dormer extensions (Class B) as will involve the eaves of the main house being extended upward. The new permitted development rights will allow the construction of up to two additional storeys to dwelling houses consisting of at least two storeys, and one additional storey to bungalows. The new storeys must be 'immediately above' the topmost storey.

3.4 There is a long list for definitions and criteria confirming that the permitted development right does not apply if - such as:

- The existing dwelling gained permission via a prior approval change of use;
- The dwelling lies in Article 2(3) land (includes Conservation Areas, AONB, the Broads; National Parks; and World Heritage Sites);
- the dwelling was constructed before 1st July 1948 or after 28th October 2018;
- the dwellinghouse has already been enlarged by the addition of one or more storeys above the original dwellinghouse;

3.5 There are other limits on height depending on whether detached or in a terrace, which will require guidance and interpretation. *Interestingly being a listed building is not included in the criteria for when this right will not apply to a householder. It might be an unintended omission as it is in the criteria for other upward extensions but in either case the usual requirement for Listed Building Consent remains.*

3.6 It is welcomed that the right does not apply if the development would rely on visible support structures on or attached to the exterior of the dwellinghouse or would include any engineering operations other than works within the curtilage of the dwellinghouse to strengthen its existing walls or existing foundations. It is also welcomed that Class B (alterations to a roof) is to be amended to make clear that

the right to make changes to the roof will not extend to a dwellinghouse that has been enlarged using the new Class AA.

3.7 Prior Approval is required to confirm that the extension can proceed and will allow neighbours to comment on the proposal and a construction methods statement required.

3.8 Schedule 2 Part 20, only introduced last month, is to be amended to add four new classes and these are:

- Class AA - permits construction of up to two new storeys of flats on top of detached buildings in commercial or mixed-use
- Class AB - permits the construction of new flats on top of terraced or semi-detached buildings in commercial or mixed-use
- Class AC - permits the construction of new flats on top of terraced dwellinghouses
- Class AD - permits the construction of new flats on top of detached dwellinghouses.

3.9 As with the earlier phase of permitted development rights affecting blocks of flats, approval is not automatic and such works require the “prior approval” of the LPA in relation to overlooking and light levels to adjoining premise, external appearance, and air traffic and defence asset impacts and certain protected views. A construction management plan is also required allowing the LPA to consider the hours of operation and how adverse impacts of noise, dust, vibration and traffic will be mitigated. Neighbour notifications and consultation of certain third parties are required, giving the opportunity for representations to be made which must be taken into account. The development cannot begin until prior approval is received (which may be conditional) and with these provisions, there is no deemed approval provision and prior approval can be refused if the LPA thinks that the proposal does not comply with the Regulations or insufficient information has been provided.

3.10 There are restrictions that apply, including:

- The existing building must have been constructed after 1st July 1948 and before 5th March 2018;
- The rights do not apply to buildings already converted to residential under permitted development rights;
- The additional dwellinghouses created must be flats;
- The additional storeys must be constructed on the principal part of the building.
- There is a maximum roof height of 18 metres
- The rights do not apply to listed buildings or scheduled monuments or buildings in conservation areas (article 2(3) land).

4. NEW PD RIGHT - demolition of buildings to construct new dwellinghouses

4.1 Another PD right introduced by the Government allows for vacant commercial and residential buildings to be demolished to redevelop the site for new housing. This change will come into effect on 31st August 2020. Planning permission will not be needed to demolish and rebuild vacant and redundant commercial or residential buildings if they are re-built as homes. The limitations are that the building must:

- have a footprint of no larger than 1,000m² and be no higher than 18m;
- have been either been in office, research and development or light industrial use or a free-standing purpose built residential block of flats;

- have been built before 1990;
 - not be within a conservation area, national park, area of outstanding natural beauty or a site of special scientific interest; and
 - have been vacant for at least 6 months before the date of the application for prior approval.
- 4.2 The right provides consent for works for the construction of a new building that can be up to two storeys higher than the old building with a maximum overall height of 18 metres.
- 4.3 The developer must apply for the Council's prior approval of certain aspects of the proposed development. These include transport and highways impacts, contamination and flooding risks, the design and external appearance, the provision of natural light and impact of noise, business and local amenity. The position and dimensions of windows, doors and walls and the dimensions of each room must also be submitted to the Council. This is a further safeguard to ensure that the dwellings provided are of a high quality.
- 4.4 The demolition and subsequent construction must be completed within three years of the date of the grant of prior approval and a report for the management and construction of the development must also be provided to the Council before beginning the development. This is to include the method of demolition, proposed hours of operation and how any adverse impact of noise, dust, vibration and traffic is to be mitigated.

5. NEW USE CLASSES

- 5.1 The changes that have been announced are intended simplify the existing UCO to make it easier for premises to change use without the need for a planning application. The new UCO will create a new broader category of '**commercial, business and service**' uses to allow commercial, business/light industrial, retail and the majority of leisure uses greater freedom to adapt to changing circumstances and respond to the needs of the local community in which they are based.
- 5.2 A new '**community and learning**' class will cover community facilities and infrastructure. Uses such as pubs, theatres, takeaways and betting shops will be classified as *sui generis* (unique uses) and thus protected from any change of use without the required planning permission.
- 5.3 The changes in effect divide the present Use Class Order (UCO) into Schedule 1 (those original uses still retained) and Schedule 2 (the new use classes created).
- 5.4 Class A (broadly retail uses) and D (non-residential institutions and assembly and leisure) of the original UCO have been deleted. These are to be replaced by new Use Classes in Schedule 2 of the regulations, except for those uses listed below that have now become Sui-Generis uses. Class B1 (business: a, b & c) is also abolished and is to be subsumed within a new Use Class E in Schedule 2. Use Classes B2 and B8 (General Industrial, and Storage and Distribution) however, will remain. Appendix B provides a summary of the new Use Classes.

6. OFFICER COMMENTARY ON THE CHANGES

Phase 2 of upward extensions

- 6.1 The construction of up to two additional storeys to dwelling houses will not apply to large parts of the town centre or any terrace row built pre-1948. There will of course be examples of qualifying buildings within which these rights are applicable. But as with other classes within the GDPO, the prior approval process allows the LPA to consider the impact of various aspects which would originally have formed part of a full planning application. These include the amenity of any adjoining premises and the external appearance of the dwelling house (including the design and architectural features). Officers will continue to consider such matters in accordance with material planning considerations, including the Local Plan, bearing in mind that the PA process accepts the principle of the development.
- 6.2 As with the new right to build on top flats the LPA will not be able to seek S106 contributions towards affordable housing or other infrastructure improvements not covered by CIL, however the new dwellings will be CIL liable.
- 6.3 We have not listed all the restrictions or conditions here that are set out on the regulations but there will be a need for some early guidance and examples of when a property would qualify to make use of the new permitted rights to go upwards. This ambiguity was one of the key objections when the upwards extensions were being consulted on. There is a mantra for approving planning permission which is that each proposal to develop on a site must be considered against the merits of that site. Set against these changes to allow householder extensions and other properties to extend upwards by so much will have a radical impact on neighbouring properties and our streetscapes with only limited intervention, if neighbours object, by officers applying adopted local plan policies.

New right to demolish to redevelop for housing

- 6.4 We have carefully considered the documents and while many restrictions apply it does not appear to be a restriction in the case of vacant employment buildings for the property to lie in an identified employment area. This could potentially undermine our local plan policies that seek to protect our core employment areas. Officers are considering what steps might be needed to protect these areas from these random incursions of residential use, which could lead to other vulnerable employment uses to seek to turn their property to residential use. You are asked to support officers undertaking further analysis of options available.

Use class reform

- 6.5 The most significant effect of this reform to the Use Classes is the larger range of uses encompassed in the use classes, meaning that changes of use within the classes will not amount to development which requires a planning application submission. In theory, this should reduce the need for businesses to have to apply for planning permission, reducing investment uncertainty and hopefully maintaining a wide and flexible range of uses in places such as retail streets. However, there may be confusion as to where some uses sit within these broad classes and also where there may previously have been controls to protect neighbour amenity - and in some cases, contained within an extant planning permission - it needs to be clarified if these will still be controllable via planning conditions.

7. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 7.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).

7.2 The reform of the use classes order will allow flexibility of land use. This will not affect the physical construction of buildings or their environmental performance although where a planning application may have sought to control intensification of use or energy aspects of a development, this will no longer be possible. Similarly, in terms of the additional upward extensions, it remains to be seen if the intensification of use achieves environmental protection and improvement objectives, particularly as planning policies, for instance those requiring energy standards, cannot be applied. However, it is noted that these relaxations seek to maximise development potential in urban areas which are inherently accessible, thereby potentially diverting development pressure from less accessible, greenfield sites.

8. CONTRIBUTION TO STRATEGIC AIMS

8.1 The reforms to the UCO will contribute to the following strategic aims:

- Provide support and flexibility to existing businesses on the high street, within the town centre and within economic areas of the town;
- Reduce the level of vacancy within such areas;
- It will also complement the Council's approach to the recovery from the Covid Pandemic (as reported to Policy Committee 22 June 2020).

8.2 Additional upward extensions to buildings through the prior approval process described above will not be subject to the Council's adopted policies and Supplementary Planning Documents. Whilst likely to result is the submission of some prior approvals on qualifying buildings, the pre-1948 nature of much of Reading's existing housing stock means that the contribution such development would make to meeting the borough's housing need is unknown at this stage. It is therefore not possible to confirm the extent to which these changes will contribute to the strategic aims of the Council.

9. COMMUNITY ENGAGEMENT AND INFORMATION

9.1 There is no requirement or facility for community engagement or public consultation for any change of use. The Statutory consultation takes place in connection with applications for prior-approval as specified in the Order and as discussed above.

10. EQUALITY IMPACT ASSESSMENT

10.1 Where appropriate the Council must have regard to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

10.2 There are no direct implications arising from the topics in this report.

11. LEGAL IMPLICATIONS

- 11.1 No direct legal implications. However, there may be other restrictions on the use of land (such as charters or covenants) so interested parties will need to seek their own legal advice before exercising any change of use or implementing changes which affect the roof of a building. For prior approval applications legal advice is sometimes needed to verify that a property meets the criteria for benefitting from the approval being applied for.
- 11.2 More guidance is needed on the implications for extant planning permissions where changes of use have been restricted.
- 12. FINANCIAL IMPLICATIONS**
- 12.1 It is not known at this stage what the financial implications will be for the Council arising from the reform to the UCO, but a reduction in planning fees through fewer change of use applications is likely.
- 12.2 Prior approval applications for new development were introduced in May 2013 in place of applications for full planning permission. Since then, officers have been providing an estimate of the loss of fee income and affordable housing contributions assuming that full planning applications might have been submitted if the prior approval regime did not exist, through your regular Part 1 reports.
- 12.3 We have now been advised in a letter from the interim Chief Planner that they are amending the fees regulations to provide for a prior approval fee for homes constructed under the rights to build upwards to create new homes, and to the right for demolition and rebuild. The prior approval fee is set at £334 per new dwelling up to 50 units, and a fixed fee of £16,525 plus £100 for each dwelling in excess of 50. However, these amendments are subject to Parliamentary approval.

Background papers:

- SI 2020 No. 757 - The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 <https://www.legislation.gov.uk/uksi/2020/757/made>
- SI 2020 No. 755 - The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020 <https://www.legislation.gov.uk/uksi/2020/755/made>
- Business & Planning Bill - <https://services.parliament.uk/Bills/2019-21/businessandplanning.html>

USE CLASSES ORDER 2015 (As Amended) and Permitted Changes of Use

From	To
A1 (shops)	<p>A2</p> <p>A3 up to 150m² and subject to Prior Approval</p> <p>B1 up to 500m² and subject to Prior Approval</p> <p>C3 up to 150m² and subject to Prior Approval</p> <p>D2 up to 200m² and subject to Prior Approval and only if the premises was in A1 use on 5th December 2013</p> <p>A mixed use comprising an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions</p>
A2 (professional and financial services) when premises have a display window at ground level, but excluding betting offices or pay day loan shops	<p>A1</p> <p>A3 up to 150m² and subject to Prior Approval</p> <p>B1 up to 500m² and subject to Prior Approval</p> <p>C3 up to 150m² and subject to Prior Approval</p> <p>D2 subject to Prior Approval and only if the premises was in A2 use on 5th December 2013</p> <p>A mixed use comprising an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions</p>
A3 (restaurants and cafes)	A1 or A2
A4 (drinking establishments)	A4 drinking establishment with A3 (restaurants and cafes)
A4 (drinking establishment) with A3 (restaurants and cafes)	A4 (drinking establishments)
A5 (hot food takeaways)	<p>A1 or A2 or A3</p> <p>B1 up to 500m² and subject to Prior Approval</p> <p>C3</p>
B1 (business)	B8 up to 500m ²
B2 (general industrial)	<p>B1</p> <p>B8 up to 500m²</p>
B8 (storage and distribution)	<p>B1 up to 500m²</p> <p>C3 (subject to prior approval)</p>
C3 (dwellinghouses)	C4 (small houses in multiple occupation)
C4 (small houses in multiple occupation)	C3 (dwellinghouses)
Sui Generis (casinos)	D2

	<p>A3 only if existing building is under 150m² and subject to Prior Approval</p> <p>C3 up to 150m² and subject to Prior Approval.</p>
<p>Sui Generis (betting offices and pay day loan shops)</p>	<p>A1</p> <p>A2</p> <p>A3 up to 150m² and subject to Prior Approval</p> <p>B1 up to 500m² and subject to Prior Approval</p> <p>C3 up to 150m² and subject to Prior Approval</p> <p>A mixed use comprising a betting office or a pay day loan shop, or an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions.</p> <p>D2</p>

USE CLASSES ORDER As of September 2020 and Permitted Changes of Use**SCHEDULE 1 - Continues to contain the following Use Classes**

CLASS B: Class B2. General industrial and Class B8. Storage or distribution

CLASS C [*residential-related*]. This part is not affected by the amendment regulations, and so does not require any summary. Use Classes C1, C2, C2A, C3 and C4 therefore remain unchanged.

SCHEDULE 2

From	To use or part use as any of the following
<p>CLASS E - COMMERCIAL, BUSINESS AND SERVICE</p> <p>(a) <u>for the display or retail sale of goods</u>, other than hot food, principally to visiting members of the public [formerly A1],</p> <p>(b) <u>for the sale of food and drink</u> [formerly A3],</p> <p>(c) <u>financial and professional services:</u> [formerly within A2]</p> <p>(d) <u>for indoor sport, recreation or fitness</u> [formerly within D2(e)].</p> <p>(e) <u>for the provision of medical or health services</u> [formerly D1(a)],</p> <p>(f) <u>for a crèche, day nursery or day centre</u> [formerly D1(b)],</p> <p>(g) <u>an office</u> [formerly B1(a)], <u>R&D</u> [formerly B1 (b)], or <u>any [light] industrial process</u> [formerly B1(c)],</p>	<p>(a) <u>for the display or retail sale of goods</u>, other than hot food, principally to visiting members of the public [formerly A1],</p> <p>(b) <u>for the sale of food and drink</u> [formerly A3],</p> <p>(c) <u>financial and professional services:</u> [formerly within A2]</p> <p>(d) <u>for indoor sport, recreation or fitness</u> [formerly within D2(e)].</p> <p>(e) <u>for the provision of medical or health services</u> [formerly D1(a)],</p> <p>(f) <u>for a crèche, day nursery or day centre</u> [formerly D1(b)],</p> <p>(g) <u>an office</u> [formerly B1(a)], <u>R&D</u> [formerly B1 (b)], or <u>any [light] industrial process</u> [formerly B1(c)],</p>
<p>CLASS F.1 - LEARNING AND NON-RESIDENTIAL INSTITUTIONS</p> <p>Any use not including residential use—</p> <p>(a) for the provision of <u>education</u> [formerly D1(c)],</p> <p>(b) for the <u>display of works of art</u> (otherwise than for sale or hire) [formerly D1(d)],</p> <p>(c) as a <u>museum</u> [formerly D1(e)],</p> <p>(d) as a <u>public library</u> or public reading room [formerly D1(f)],</p> <p>(e) as a <u>public hall or exhibition hall</u> [formerly D1(g)],</p> <p>(f) for, or in connection with, <u>public worship or religious instruction</u> [formerly D1(h)],</p> <p>(g) as a <u>law court</u> [formerly D1(i)].</p>	<p>(a) for the provision of <u>education</u> [formerly D1(c)],</p> <p>(b) for the <u>display of works of art</u> (otherwise than for sale or hire) [formerly D1(d)],</p> <p>(c) as a <u>museum</u> [formerly D1(e)],</p> <p>(d) as a <u>public library</u> or public reading room [formerly D1(f)],</p> <p>(e) as a <u>public hall or exhibition hall</u> [formerly D1(g)],</p> <p>(f) for, or in connection with, <u>public worship or religious instruction</u> [formerly D1(h)],</p> <p>(g) as a <u>law court</u> [formerly D1(i)].</p>
<p>CLASS F.2 - LOCAL COMMUNITY</p>	<p>(a) <u>a shop mostly selling essential goods, including food,</u> to visiting members of the public in circumstances where—</p>

Use as–

(a) a shop mostly selling essential goods, including food, to visiting members of the public in circumstances where–

(i) the shop’s premises cover an area not more than 280 metres square, and

(ii) there is no other such facility within 1000 metre radius of the shop’s location,

(b) a hall or meeting place for the principal use of the local community,

(c) an area or place for outdoor sport or recreation, not involving motorised vehicles or firearms [formerly within D2(e)],

(d) an indoor or outdoor swimming pool or skating rink [also formerly within D2(e)]

(i) the shop’s premises cover an area not more than 280 metres square, and

(ii) there is no other such facility within 1000 metre radius of the shop’s location,

(b) a hall or meeting place for the principal use of the local community,

(c) an area or place for outdoor sport or recreation, not involving motorised vehicles or firearms [formerly within D2(e)],

(d) an indoor or outdoor swimming pool or skating rink [also formerly within D2(e)]

Sui Generis (drinking establishments previously A4)

Sui Generis (hot food takeaways previously A5)

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COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 12th August 2020

Ward: Minster

App No.: 200122

Address: Wensley Road, Reading

Proposal: Demolition of 29 garages and development of 46 new dwelling units, including the provision of affordable homes, provided in a mixture of houses and apartments (1 bed / 2 bed / 3 bed / 4 bed) in blocks of between 2.5 to 4 storeys, and the provision of bicycle parking spaces, car parking spaces and public realm works.

Applicant: Reading Borough Council

Deadline: Originally 29/04/2020, but an extension of time has been agreed until 25/09/2020

RECOMMENDATION:

Delegate to the Deputy Director of Planning, Transport and Regulatory Services to (i) GRANT full planning permission subject to completion of a unilateral undertaking legal agreement or (ii) to REFUSE permission should the unilateral undertaking legal agreement not be completed by the 25th September 2020 (unless officers on behalf of the Deputy Director of Planning, Transport and Regulatory Services agree to a later date for completion of the legal agreement). The unilateral undertaking legal agreement to secure the following:

- 39 of the 46 residential units (more specifically 8x1, 10x2 & 21x3-bed units, comprising 7x3-bed houses at Block B, 8x1-bed & 10x2-bed flats at Block B and 14x3-bed houses at Block C) as social rent affordable housing units, with rents set at Target (social) Rent, in perpetuity.
- An Employment Skills and Training Plan (construction phase only) financial contribution of £11,448
- An off-site financial contribution of £116,200 towards upgrading play facilities outside the site at Courage Park for older junior children and teenagers.
- The applicant will look to offer each household affected by the loss of a garage within the red line boundary of the site an alternative 1 garage/storage per household within the Coley area.
- A S278/38 Agreement will be required to facilitate the proposed Highway changes which includes, new roads and junctions, alterations and closures of existing junctions, pedestrian crossing facilities and alterations to existing footways and parking bays. The agreement should be signed within 6 months of commencement of the development with no residential unit occupied until practical completion of the highway works within that part of the site
- No development should commence until the applicant has completed the stopping up of the existing Public Highway.

And the following conditions to include:

1. Three years for implementation
2. Approved plans/documents
3. Pre-commencement (barring demolition) details of all external materials to be submitted to the LPA (and sample details to be provided on site) and approved in writing with the LPA. Approved details to be retained on site until the work has

- been completed.
4. Pre-commencement (barring demolition) finished floor levels
 5. Pre-commencement (including demolition) demolition and construction method statement, including transport, environmental protection (dust, dirt and other airborne pollutants; noise; pest control) and ecology based matters
 6. Vehicle parking spaces adjacent to the relevant new residential block ready for use prior to the first occupation of that block of residential accommodation (compliance condition)
 7. Pre-commencement (barring demolition) details of the vehicle access serving the refuse collection area to the west of Riversley Court to be submitted/approved. Provided prior to the first occupation of any residential unit and maintained thereafter.
 8. Pre-occupation provision of road(s) prior to first occupation of any unit within the relevant block served by the road(s)
 9. Pre-occupation provision of EV charging points (details of the design and specification to be submitted to and approved by the LPA) prior to first occupation of any unit within the relevant block served by the EV charging points
 10. Re-relocated bus stop shelter (from Wensley Road to north of Riversley Court) to be ready for use prior to the first occupation of any new residential unit (compliance condition)
 11. Cycle parking to be provided in accordance with the approved details (as submitted) prior to the first occupation of the relevant block (compliance condition)
 12. Replacement cycle parking facility (serving the relevant tower block) to be ready for use prior to the removal of the existing cycle parking facility of the relevant block
 13. Pre-occupation (of the relevant proposed residential unit) completion of refuse and recycling storage facility (compliance)
 14. Replacement refuse and recycling storage facility (serving the relevant tower block) to be ready for use prior to the removal of the existing refuse storage facility in the parking area of the relevant block
 15. Pre-occupation details to be submitted / approved for the dropped kerb serving the access point to the west of the proposed bus stop (adjacent to Riversley Court). Constructed prior to first occupation and retained/maintained thereafter.
 16. Pre-commencement (including demolition) contaminated land assessment
 17. Pre-commencement (including demolition) contaminated land remediation scheme
 18. Pre-construction contaminated land validation report (implementation and verification of remediation scheme)
 19. Reporting of unexpected contamination at any time
 20. Compliance condition relating to hours of demolition/construction works
 21. Compliance condition relating to no burning of materials or green waste on site
 22. Pre-occupation details of pest and vermin control measures to refuse and recycling bin stores; provision of approved measures prior to first occupation of any residential unit and maintenance thereafter
 23. Pre-commencement (barring demolition) hard and soft landscaping scheme to be submitted and approved. Implementation prior to occupation (or alternative timetable later agreed). Replacement of any planting which dies within 5 years.
 24. Pre-occupation approval of boundary treatment details (including mammal gaps)
 25. Pre-occupation landscape management plan to be submitted and approved
 26. Tree retention of all retained trees in accordance with the documents submitted (compliance condition)
 27. Pre-commencement submission of an Arboricultural Method Statement and Tree Protection Plan
 28. Pre-commencement (barring demolition) details of biodiversity enhancements to be submitted and approved.
 29. Pre-occupation play facilities details to be submitted / approved / implemented /

- and thereafter retained and maintained.
30. Pre-commencement (barring demolition) design stage SAP Assessment
 31. Pre-occupation as built stage SAP Assessment
 32. No change to the unit mix (8 x 1-bed, 10 x 2-bed, 26 x 3-bed and 2 x 4-bed) (compliance condition)
 33. 4 wheelchair user dwellings to be ready for occupation prior to the first occupation of any unit within the Block B flats. 4 units to remain wheelchair user dwellings thereafter (compliance condition)
 34. Removal of permitted development rights in relation to Part 1 Classes A-D and Part 2 Classes A-C) for single dwellinghouses hereby approved
 35. No fixing or installing of miscellaneous items to the external faces or roof of any building without the prior approval in writing of the local planning authority.
 36. Obscure glazing on upper floor north elevation windows of the Block B flats (compliance condition)
 37. Pre-occupation external lighting details (locations of the lights, design, specifications, height, luminance; lens shape/beam pattern and any hoods/shades)
 38. Pre-commencement (barring demolition) details as how the development will achieve the Secured by Design Award.
 39. Pre-commencement (including demolition) programme of archaeological field work
 40. Pre-commencement (barring demolition) Sustainable Drainage Strategy and associated detailed design, management and maintenance plan of surface water drainage to be submitted and approved. Approved scheme to be completed prior to first occupation and managed / maintained thereafter.

Informatives:

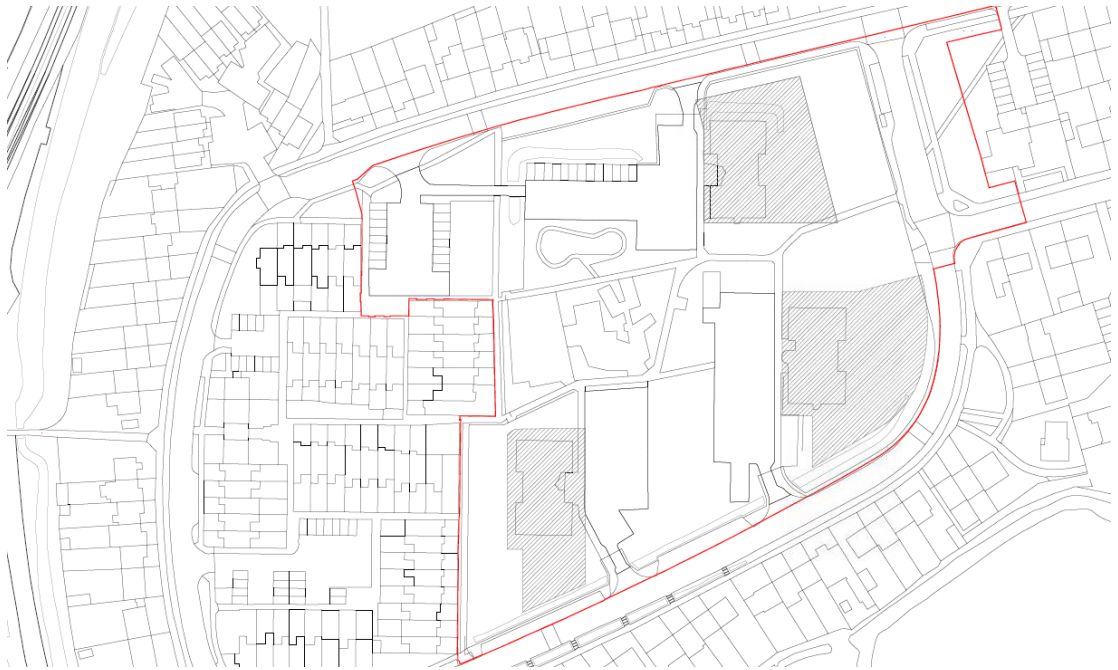
1. Positive and proactive working
2. Legal Agreement
3. Pre-commencement conditions
4. Highways works
5. Terms
6. Building Control
7. Complaints about construction
8. Encroachment
9. CIL
10. Sound insulation between dwellings should achieve Building Regulations Approved Document E.
11. Thames Water informatives

1. INTRODUCTION

- 1.1 The application site comprises land at the western end of Wensley Road in Coley. More specifically it includes the three existing residential tower blocks of Wensley Court (north part of the site), Riversley Court (south-east corner of the site) and Irving Court (south-west corner of the site). The towers date from the early 1960s and are each 15 storeys high. In total they comprise 267 flats and are arranged around open space and associated car parking and access. More specifically, each block contains courtyard car parking immediately adjacent, as accessed from Wensley Road, which runs in a loop at this point. To the west of Wensley Court are 13 existing garages. Further to the west, in the north-west corner of the site, are 16 further garages.

- 1.2 In the central space of the site is a play area, which includes a multi-use games area (MUGA), playground, pump track for bikes and seating spaces. There are also a variety of trees within the central green space, such as Category A Turkish Oak and London Plane. There are also significant open greenspaces adjacent to the three blocks, with tree coverage to the north and south boundaries of the site in particular around Wensley Road. There is also a noticeable fall in land levels across the site from north to south, generally of 5m. A substation and water tank building is also on site, to the west of Riversley Court and the south of Wensley Court.
- 1.3 No land at the site is allocated as either Local Green Spaces or Public Open Space (as per Policy EN7). Accordingly, the non-residential elements of the application site can be described as undesignated open space under Policy EN8. The application site is wholly within Flood Zone 1. There are no specific site allocations or specific planning constraints at the site.
- 1.4 The wider area outside the site is predominantly residential in character, with a series of two-storey short-terraces, semi-detached, some detached properties and the five-storey Lesford Road flats (to the east) surrounding the site. Wensley Road forms a loop which runs around the outside of the development (and wider) site, providing a link to Holybrook Road in the east and in turn to Berkeley Avenue. A bus route (Bronze number 11) runs around the loop, with bus stops to the north-east, west and east of the site. Wensley Road is subject to 20mph speed limit, due in part to the presence of St Mary & All Saints C of E Primary School on Wensley Road. Lit footways are provided on both sides of the carriageway and a formal pedestrian crossing is present in the form of a zebra crossing adjacent to the school.
- 1.5 There are a number of planning constraints outside of the red-line boundary of the application site, but in close vicinity. The northern side of Wensley Road is a designated cycle route (Route R6). The main railway line connecting Basingstoke and Newbury to Reading runs further to the west of the application site. The nearby railway line (also within an air quality management area (as per Policy EN15), which runs as far east as the north-western element of Wensley Road, but again is outside the application site), marks a Green Link and an area of identified biodiversity interest (Policy EN12). Another area of identified biodiversity interest is also located to the north of the residential properties located on the north side of Wensley Road. Also, at this point is the designated (Policy EN7) Courage Park Public Open Space, which can be accessed on foot via a public right of way off Wensley Road to the north-west of the application site. Other public right of ways are found to the south-east of the site (running to the south of Heron Way and Lesford Road) and to the west (connecting to Southcote).
- 1.6 To the south of the application site, beyond the residential properties on the southern side of Wensley Road, the land is within Flood Zones 2 and 3, with the Holy Brook River c. 110m to the south of the application site. The Kennet and Holy Brook Meadows as a whole are a Major Landscape Feature (Policy EN13), with this area also an area of archaeological importance (Policy EN2).
- 1.7 The application is referred to committee owing to it being a Council's own (regulation 3) development, as well as being a 'major' development and

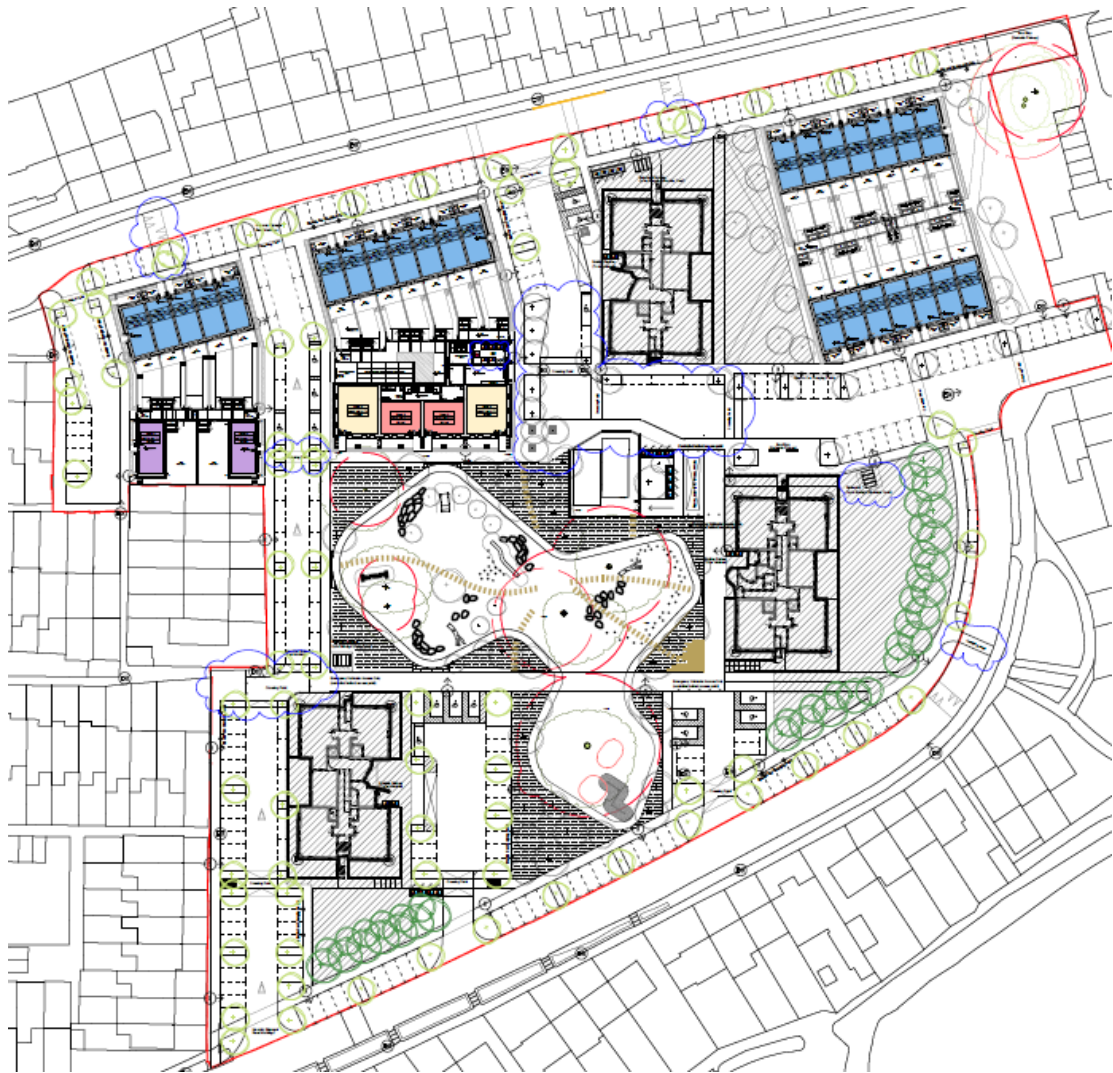
the site area being over 1 hectare (it is 2.36ha). The existing site in relation to the wider area is shown below.



Site Location Plan

2. PROPOSAL

- 2.1 The proposal is seeking full planning permission for a variety of works. First, the proposals involve the demolition of 29 garages, located in the north-west and north parts of the application site boundary.
- 2.2 Following this, it is proposed to erect a series of buildings that in total will create an additional 46 residential units at the site. This is through a combination of terraced houses, standalone single dwellinghouses and a single block of flats. All are located in the northern half of the site, with some fronting onto the southern side of the northern part of Wensley Road.
- 2.3 More specifically, Block A is located in the north-west corner of the application site. It comprises a terrace of 5 x 3-bed houses (2 storey with further accommodation within the roofspace - hence referred to as 2.5 storeys in the description of development, but effectively townhouses) fronting onto Wensley Road, each with its own private garden. To the south of the terrace are two detached houses, which front to the east and west with private gardens in-between. These are 3 storey dwellings, with the top floor partly within the roofscape and provide 4 bedroom houses.



Proposed site Plan Rev K, as received 28/07/2020

- 2.4 To the west of Wensley Court is Block B. Again, there is a terrace of houses fronting onto Wensley Road, totalling 7 x 3-bed units in this instance. Again, each dwelling has its own private rear amenity space. To the south of this terrace is the single block of flats within the proposal. This is predominantly four storeys in height (an element reduces to 3-storeys) and is 'L' shaped in form. It comprises 18 residential units in total, including 4 wheelchair accessible flats at ground floor level (2x1-bed and 2x2-bed units). There are 5 units at first and second floor level and 4 at third floor level (6x1 & 8x2-bed). Each unit will include its own balcony space.
- 2.5 Block C is located to the east of Wensley Court, in the north-east corner of the site. It comprises two terraces of 7 x 3-bed units, similar in form (2.5 storeys) and nature (individual rear gardens) to the other blocks fronting Wensley Road. In this instance, one block fronts onto Wensley Road, with the second backing onto it to the south.
- 2.6 A tenure and block-by-block breakdown of the proposed new-build residential development is provided below:

Tenure	Bedrooms per unit				Total units	Tenure %
	1	2	3	4		
Rented	8	10	26	2	46	100%

Shared Ownership	0	0	0	0	0	0%
Market	0	0	0	0	0	0%
Total	8	10	26	2	46	
Bedrooms per unit %	17.39%	21.74%	56.52%	4.35%		

Block	Number of bedrooms per residential unit				Total units
	1	2	3	4	
A (houses)			5	2	7
B (houses)			7		7
B (flats)	8	10			18
C (houses)			14		14
Total	8	10	26	2	46

- 2.7 In the context of the application site as a whole (i.e. also including Wensley Court, Riversley Court and Irving Court), the residential mix as existing and proposed is detailed below:

Number of bedrooms	1	2	3	4	Total
Existing number	87	112	68	0	267
Existing %	32.58%	41.95%	25.47%	0%	100%
Proposed number	95	122	94	2	313
Proposed %	30.35%	38.98%	30.03%	0.64%	100%
Change in number	+8	+10	+26	+2	+46
Change in %	-2.23%	-2.97%	+4.56%	+0.64%	0

- 2.8 The proposals also involve the reconfiguration and replacement of the on-site publicly accessible open space and play facilities. This will involve a new facility in the centre of the site, adjacent to proposed Block B flats, Riversley Court and Irving Court. In terms of play, the space is shown to include specific areas for under 5's, older children and an outdoor gym, with the space being enclosed by a 200m long exercise / play-trail around the perimeter of the space. The play facilities are incorporated within what is referenced as a central green space, with several of the mature trees retained, biodiverse planting added and seating areas (including the existing memorial benches) re-provided. The space also includes a walkway to improve non-vehicular east-west movement links at the site. The proposed works result in the removal of the existing MUGA and pump track. The applicant has detailed within the submission that the amenity space has been the central focus of the proposal with the housing/parking layouts chosen to maximise the amount of usable green space.
- 2.9 To allow the proposals to be brought forward, a series of works to trees across the site are proposed. In terms of raw numbers, a total of 275 trees will be felled (66 individual trees [34 C Category, 22 B Cat, 10 U Cat] and 209 trees from within 13 groups [169 C Cat, 40 B Cat]). A total of 184 new individual trees will be planted as part of the works. Hence, in terms of raw numbers, there will be a net loss of trees as part of these proposals.
- 2.10 To facilitate the proposed works a series of highways works are also proposed. First, the four existing vehicle access points (one serving each tower block and one in the north-west corner serving the existing garages) will be increased to seven. The accesses on the south side of the Wensley

Road loop (serving Riversley Court and Irving Court) will remain in the same position, but the courtyard parking areas will be reconfigured as part of the proposals. In the north-west corner of the site the existing access (serving the existing garages) will be realigned to provide parking spaces at this point.

- 2.11 Two new through routes (there are no routes through the site at present) are proposed. One, on the western side of the site, runs north-south (it will be one-way only) and is referenced by the applicant as creating a 'mews' at this point. The second new through route closes off the existing Wensley Road loop to the north of the existing junction with Lesford Road. Block C will be located through the stopped up section of Wensley Road. Instead, the new route runs into the site to the west (essentially continuing Lesford Road further to the west), to the south of Wensley Court and then turning north (to the east of proposed Block B and the west of Wensley Court) to form a slightly relocated access point off Wensley Road (in comparison with the existing access serving parking for Wensley Court). This new route will be two-way, and buses will be re-routed into the site (1 new bus stop to replace that to be lost). Separate permission (through different legislation) for the stopping up order and diversion will be sought. An emergency vehicle route within the site has also been indicated.
- 2.12 Partly as a result of the above works, the vehicle parking at the site is to be reorganised and rationalised in a number of areas. In total, the number of spaces will increase from 192 to 230, including 16 disabled spaces and 36 with the ability to access electric charging points. The new through routes, for example, includes on-street parking spaces on both sides of the road at most points.
- 2.13 In addition, cycle parking and refuse / servicing will be reconfigured at the site and provided for the proposed units. Furthermore, pedestrian access will alter as a result of the vehicular access points changing. In addition, a more direct east-west route linking the two existing public rights of way (outside the site as existing) is sought, with a pedestrian crossing proposed in the south-east corner of the site on Wensley Road to connect towards Fobney Meadow.
- 2.14 To clarify, no actual works are proposed to the three existing tower blocks at the site as part of this application, although the application has specified that the proposed works are phase 1 of 2 for the site as a whole. More specifically, the applicant has referenced tower improvements as a separate phase of works, stated in the Planning Statement that "A second phase is planned which includes changes to the exterior of the tower blocks to improve the thermal performance and visual appearance of the tower, the provision [of] bike stores, and bin storage which will address the issues that have been raised during residents' consultation in relation to refuse and pest control. This will form a second planning application". Furthermore, the Design and Access Statement also details "The site plan and visual appearance of Phase One has been designed to allow for the Phase Two works, but they will form two separate planning applications". Therefore, to be clear, such elements are not part of this application and would be separately considered / assessed as part of a different application at the site in the future.
- 2.15 Submitted Plans and Documentation:

HTA-A_DR_0001 Rev C - Site Location Plan, as received 27/01/2020
 HTA-A_DR_0002 Rev C - Existing Masterplan, as received 27/01/2020
 HTA-A_DR_0007 - Site Development Location Plan, as received 27/01/2020
 HTA-A_DR_0008 - Demolition Zone Plan, as received 13/02/2020
 HTA-A_DR_0100 Rev K - Proposed Site Plan, as received 28/07/2020
 HTA-A_DR_0109 Rev H - Proposed Plan - Level 00, as received 28/07/2020
 HTA-A_DR_0110 Rev G - Proposed Plan - Level 00, as received 27/07/2020
 HTA-A_DR_0111 Rev C - Proposed Plan - Level 01, as received 27/01/2020
 HTA-A_DR_0112 Rev C - Proposed Plan - Level 02, as received 27/01/2020
 HTA-A_DR_0113 Rev C - Proposed Plan - Level 03, as received 27/01/2020
 HTA-A_DR_0120 Rev C - Proposed Roof Plan, as received 27/01/2020

HTA-A_DR_0020 Rev A - Existing Sectional Elevation AA, as received 27/01/2020
 HTA-A_DR_0021 Rev A - Existing Sectional Elevation BB, as received 27/01/2020
 HTA-A_DR_0022 Rev A - Existing Sectional Elevation CC, as received 27/01/2020
 HTA-A_DR_0023 Rev A - Existing Sectional Elevation DD, as received 27/01/2020
 HTA-A_DR_0024 Rev A - Existing Sectional Elevation EE, as received 27/01/2020
 HTA-A_DR_0025 Rev A - Existing Sectional Elevation FF, as received 27/01/2020
 HTA-A_DR_0026 Rev A - Existing Sectional Elevation GG, as received 27/01/2020
 HTA-A_DR_0027 - Existing Sectional Elevation HH, as received 27/01/2020

HTA-A_DR_0030 - Existing Sectional Elevation AA (with trees), as received 27/01/2020
 HTA-A_DR_0031 - Existing Sectional Elevation BB (with trees), as received 27/01/2020
 HTA-A_DR_0032 - Existing Sectional Elevation CC (with trees), as received 27/01/2020
 HTA-A_DR_0033 - Existing Sectional Elevation DD (with trees), as received 27/01/2020
 HTA-A_DR_0034 - Existing Sectional Elevation EE (with trees), as received 27/01/2020
 HTA-A_DR_0035 - Existing Sectional Elevation FF (with trees), as received 27/01/2020
 HTA-A_DR_0036 - Existing Sectional Elevation GG (with trees), as received 27/01/2020
 HTA-A_DR_0037 - Existing Sectional Elevation HH (with trees), as received 27/01/2020

HTA-A_DR_0150 - Proposed Sectional Elevation AA, as received 27/01/2020
 HTA-A_DR_0151 - Proposed Sectional Elevation BB, as received 27/01/2020
 HTA-A_DR_0152 - Proposed Sectional Elevation CC, as received 27/01/2020
 HTA-A_DR_0153 - Proposed Sectional Elevation DD, as received 27/01/2020
 HTA-A_DR_0154 - Proposed Sectional Elevation EE, as received 27/01/2020
 HTA-A_DR_0155 - Proposed Sectional Elevation FF, as received 27/01/2020
 HTA-A_DR_0156 - Proposed Sectional Elevation GG, as received 27/01/2020
 HTA-A_DR_0157 - Proposed Sectional Elevation HH, as received 27/01/2020

HTA-A_DR_0160 - Proposed Sectional Elevation AA (with trees), as received 27/01/2020

HTA-A_DR_0161 - Proposed Sectional Elevation BB (with trees), as received 27/01/2020
HTA-A_DR_0162 - Proposed Sectional Elevation CC (with trees), as received 27/01/2020
HTA-A_DR_0163 - Proposed Sectional Elevation DD (with trees), as received 27/01/2020
HTA-A_DR_0164 - Proposed Sectional Elevation EE (with trees), as received 27/01/2020
HTA-A_DR_0165 - Proposed Sectional Elevation FF (with trees), as received 27/01/2020
HTA-A_DR_0166 - Proposed Sectional Elevation GG (with trees), as received 27/01/2020
HTA-A_DR_0167 - Proposed Sectional Elevation HH (with trees), as received 27/01/2020

HTA-A_DR_0200 Rev E - Block A Plan - Level 00, as received 28/07/2020
HTA-A_DR_0201 Rev C - Block A Plan - Level 01, as received 27/01/2020
HTA-A_DR_0202 Rev C - Block A Plan - Level 02, as received 27/01/2020
HTA-A_DR_0203 Rev C - Block A Plan - Roof Level, as received 27/01/2020
HTA-A_DR_0205 Rev B - Block A Elevations, as received 27/01/2020
HTA-A_DR_0206 Rev B - Block A Elevations, as received 27/01/2020
HTA-A_DR_0207 Rev B - Block A Side Elevations, as received 27/01/2020
HTA-A_DR_0208 Rev B - Block A - North-South Section, as received 27/01/2020
HTA-A_DR_0210 - Block A Elevations, as received 13/02/2020

HTA-A_DR_0220 Rev E - Block B Plan - Level 00, as received 23/07/2020
HTA-A_DR_0221 Rev C - Block B Plan - Level 01, as received 27/01/2020
HTA-A_DR_0222 Rev D - Block B Plan - Level 02, as received 23/07/2020
HTA-A_DR_0223 Rev D - Block B Plan - Level 03, as received 23/07/2020
HTA-A_DR_0224 Rev C - Block B Plan - Roof Level, as received 27/01/2020
HTA-A_DR_0226 Rev B - Block B Elevations, as received 27/01/2020
HTA-A_DR_0227 Rev C - Block B Elevations, as received 23/07/2020
HTA-A_DR_0228 Rev C - Block B Side Elevations, as received 23/07/2020
HTA-A_DR_0229 Rev C - Block B - North-South Section, as received 23/07/2020
HTA-A_DR_0230 - Block B Elevations, as received 13/02/2020
HTA-A_DR_0231 Rev A - Block B Elevations, as received 23/07/2020

HTA-A_DR_0240 Rev D - Block C Plan - Level 00, as received 27/07/2020
HTA-A_DR_0241 Rev C - Block C Plan - Level 01, as received 27/01/2020
HTA-A_DR_0242 Rev C - Block C Plan - Level 02, as received 27/01/2020
HTA-A_DR_0243 Rev C - Block C Plan - Roof Level, as received 27/01/2020
HTA-A_DR_0245 Rev B - Block C Elevations, as received 27/01/2020
HTA-A_DR_0246 Rev B - Block C Elevations, as received 27/01/2020
HTA-A_DR_0247 Rev B - Block C Side Elevations, as received 27/01/2020
HTA-A_DR_0248 Rev B - Block C - North-South Section, as received 27/01/2020
HTA-A_DR_0250 - Block C Elevations, as received 13/02/2020
HTA-A_DR_0251 - Block C Elevations, as received 13/02/2020

HTA-A_DR_0300 - 1B1P Flat - Type 1 (WCH), as received 27/01/2020
HTA-A_DR_0301 - 1B2P Flat - Type 1, as received 27/01/2020
HTA-A_DR_0305 - 2B3P Flat - Type 1, as received 27/01/2020
HTA-A_DR_0306 - 2B4P Flat - Type 1, as received 27/01/2020
HTA-A_DR_0310 - 3B6PH - Type 1, as received 27/01/2020

HTA-A_DR_0311 - 3B6PH - Type 1-A, as received 27/01/2020
HTA-A_DR_0315 - 4B7PH, as received 27/01/2020

RBC-WLR-HTA-L-XX-XX-DR-0900 Rev C - Landscape Illustrative Masterplan,
as received 28/07/2020
RBC-WLR-HTA-L-XX-XX-DR-0901 Rev B - Landscape Illustrative Masterplan,
as received 28/07/2020

HTA-A_DR_0003 Rev C - Site Constraints Plan, as received 27/01/2020
HTA-A_DR_0004 Rev C - Site Topographical Survey, as received 27/01/2020
HTA-A_DR_0005 Rev C - Site Tree Survey, as received 27/01/2020
HTA-A_DR_0006 Rev C - Existing Services Survey, as received 27/01/2020
PRI22568-03B Sheet 1 of 2 - Tree Protection Plan, as received 07/07/2020
PRI22568-03B Sheet 2 of 2 - Tree Protection Plan, as received 07/07/2020

07/10186-HL-XX-XX-GA-E-900-2001 Rev P2 - Electrical Services Street
Lighting 1 of 2, as received 27/01/2020
07/10186-HL-XX-XX-GA-E-900-2002 Rev P2 - Electrical Services Street
Lighting 2 of 2, as received 27/01/2020
A115865-SPA04 Proposed Parking Restrictions, as received 28/07/2020
A115865-SPA04 Rev C - Swept Path Analysis: Fire Platform, as received
27/07/2020
A115865-SPA08 Rev G - Swept Path Analysis: Bus, as received 28/07/2020
A115865-SPA07 Rev E - Swept Path Analysis - Refuse Vehicle, as received
28/07/2020
RBC-WLR-HTA-A-XX-NA_SC_0800 Rev C - Schedule of Accommodation,
dated 22/01/2020, as received 27/01/2020
RBC-WLR-HTA-A-XX-NA_SC_0801 Rev A - Unit Type Matrix, dated
22/01/2020, as received 27/01/2020

Planning Statement Wensley Road: New Build & Estate Improvements Phase
1 by HTA, Ref RBC-WLR, as received 27/01/2020.

Design and Access Statement by HTA, dated January 2020, as received
27/01/2020
Archaeological desk-based assessment by Compass Archaeology, dated
January 2020, as received 27/01/2020
Transport Statement by WYG Ref 20200115 A115865 TS Issue, Version I1,
dated January 2020, as received 27/01/2020.
Transport Statement Addendum by WYG - Technical Note 01 Rev A, as
received 28/07/2020
Response to RBC Transport Comments 200723, as received 28/07/2020
Sustainability Energy Report by Hoare Lea Rev 1, dated 13/12/19, as
received 27/01/2020;
Utilities Information by Hoare Lea Rev 01 dated 13/12/2019, as received
27/01/2020;
Flood Risk Assessment, SuDS Strategy and Drainage Strategy Ref 19195-
WFB-YY-XX-RP-C-0001 Rev P03 by WFBA, dated December 2019, as received
29/07/2020;
Arboricultural Impact Assessment & Method Statement by ACD
Environmental, Ref PRI22568aia_ams Rev B 07/07/2020, as received
27/01/2020
Tree Survey Statement by ACD Environmental, Ref PRI22568, dated
18/09/19, as received 27/01/2020

Sustainability Statement by HTA Issue 01 dated 01/2020, as received 27/01/2020;
 Daylight, Sunlight and Overshadowing Assessment by HTA Issue 2 dated 01/2020, as received 27/01/2020;
 Daylight, Sunlight and Overshadowing Assessment Additional Information by HTA Issue 1 dated 10/03/2020, as received 02/04/2020;
 Microclimate Assessment by Leonidas Tschritzis, dated 21/03/2020, as received 23/03/2020
 Statement of Community Involvement by HTA Ref RBC-WLR_HTA-A_, dated 16/01/2020, as received 27/01/2020
 Ecological Impact Assessment by ECOSA Ref 5388.D0, dated 27/01/2020, as received 31/01/2020
 Landscape Lighting Strategy by HTA, as received 13/02/2020
 RBC Transport Asset Management Plan Specification for Streetlighting Installations, as received 13/02/2020
 Photograph of existing cycle stores, as received 13/02/2020
 Amended p58 of the Design and Access Statement by HTA, as received 27/07/2020
 Amended p101 of the Design and Access Statement by HTA, as received 21/04/2020
 Amended p103 of the Design and Access Statement by HTA, as received 21/04/2020
 Response to Reading Borough Council: Leisure and Open Space by HTA, dated 31/03/20, as received 21/04/2020
 Responses to Reading Borough Council Access Officer comments by HTA, dated 21/04/2020, revised and received 27/07/2020
 Wensley Road - Energy Strategy Review. Hoare Lea Response, as received 22/04/2020
 Ground Appraisal Report by Geo Environmental dated 30/03/2020 Ref GE18760-GAR-MAR20 Version 1.0, as received 21/05/2020

2.16 During the course of the application a number of alterations to the originally submitted proposals have been made. Further information has also been received in a number of instances too. These include:

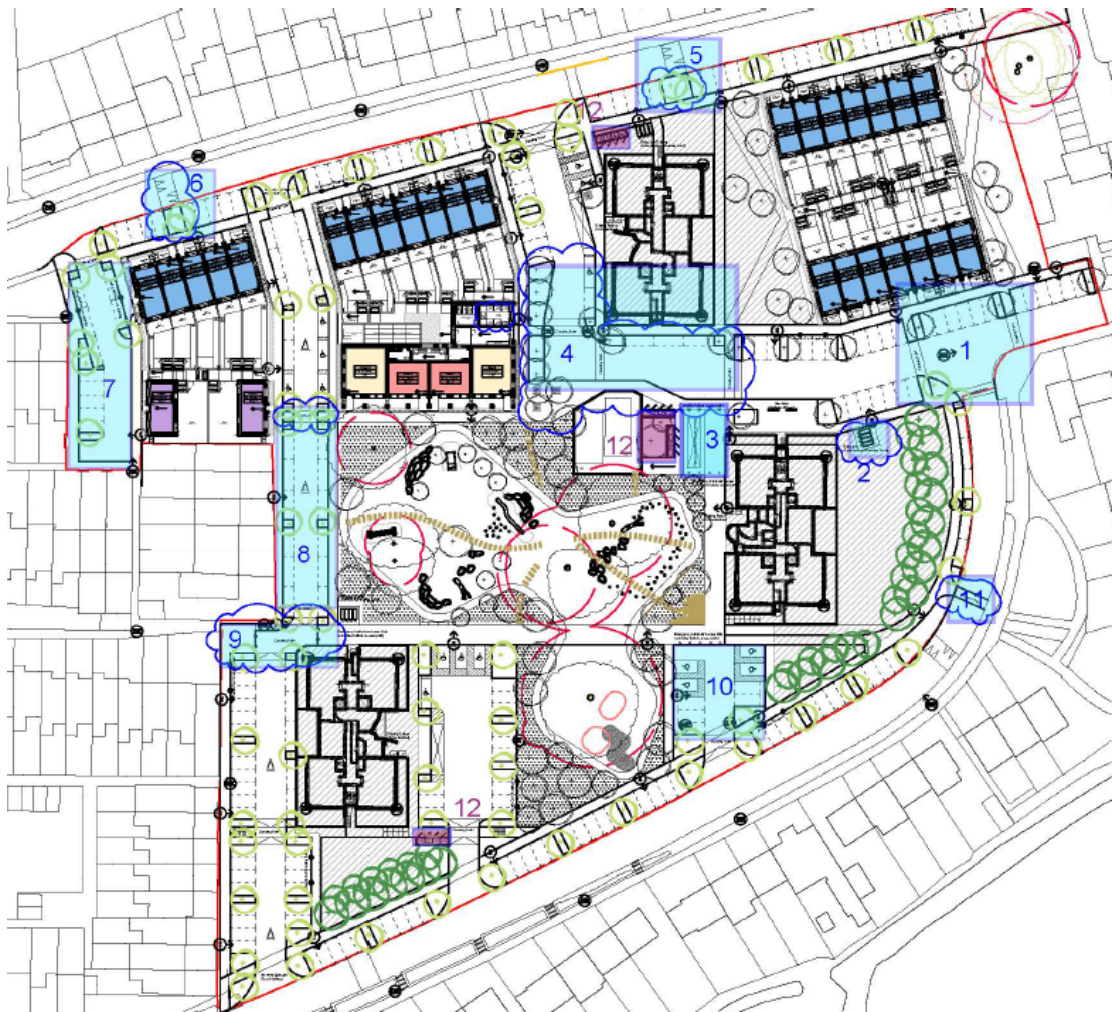
- Revised microclimate assessment
- Additional Daylight, Sunlight and Overshadowing Assessment information
- Additional Energy Strategy information
- Revised and additional SuDS based information
- Submission of a ground appraisal report
- Amended Arboricultural Impact Assessment & Method Statement and Tree Protection Plans
- Revisions to window / window positions and refuse/recycling provision in Block B flats

And various transport-based matters, as per the numbered points below, which correspond with the marked up plan showing the location of these changes below:

1. Lesford & Wensley Road junction, parking layout amended to include crossing points at all three sides. Raised table omitted.
2. Riversley Court existing cycle lockers relocated to east side of the block.
3. Emergency vehicle access to Riversley Court - crossing point relocated to avoid obstructing access
4. Central Space - Western kerb line of central area widened to allow bus to pass car more easily - swept path provided. Crossing adjusted to align with

footpaths. Net reduction of one disabled parking space, however it is still above the minimum policy requirement.

5. Parking reconfigured around north-east of site along Wensley Road frontage to avoid conflict with speed hump
6. Speed hump at north-western end relocated to west to avoid conflict with the western access road, and parking reconfigured to accommodate.
7. Proposed parking court west of Block A revised parking layout
8. North-South Mews changed to one-way. Extended raised table removed from western road
9. Pedestrian/Cycle Link raised crossing point reconfigured
10. Proposed parking court south of Riversley Court layout revised
11. Crossing to Fobney meadow: Relocated to avoid conflict with existing speed hump and driveways
12. Recycling - Proposed locations indicated for the repositioning of recycling bins for the each of the existing blocks and communal facility



2.17 To clarify, none of these changes or further information were of a nature whereby it was considered necessary (within the context of the nature of the original proposals) to require formal public re-consultation.

2.18 Community Infrastructure levy (CIL):
In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form with the submission. Based simply on the proposed floorspace proposed, the CIL liability would be £719,758.65 (£157.18 CIL rate x 4,579.2sqm floorspace). However, given the proposed

residential units are specified as being affordable housing, the applicant has stipulated that CIL relief will be sought (A 'Charitable and/or Social Housing Relief Claim'). If relief is able to be given, the CIL liability would then be £0. This would be confirmed following the planning application, as per the standard CIL procedure.

3. PLANNING HISTORY

3.1 Although there have been previous planning applications at the site since the construction of Riversley Court, Wensley Court and Irving Court (e.g. for telecoms equipment at roof level and replacement cladding in the 1990s), the only application considered to be of any specific relevance is:

3.2 181448 - Riversley Court 205 Wensley Road - Single storey detached prefabricated water storage and treatment plantroom. Granted 07/12/2018.

4. CONSULTATIONS

Internal

Transport Development Control

4.1 The application has been submitted with a Transport Statement and this has been commented on as follows:

Site Location

4.2 The site is situated within the Wensley Road Loop, with the vast majority of the surrounding area made up of semi-detached/terrace housing and blocks of flats. There are a number of single-story garage blocks in the area while a newly constructed bungalow and three houses are located at the south-eastern corner of Wensley Road. The site lies directly to the east of a main railway line into Reading. Meanwhile, the A33 is located approximately 2km east of the site.

4.3 Wensley Road forms a loop which runs around the outside of the majority of the development site, providing a link to Holybrook Road in the east and in turn to Berkeley Avenue. Wensley Road serves numerous residential properties and a number of commercial properties. Wensley Road is subject to 20mph speed limit due in part to the presence of St Mary & All Saints C of E Primary School on Wensley Road. Lit footways are provided on both sides of the carriageway and a formal pedestrian crossing is present in the form of a zebra crossing adjacent to the school.

Pedestrian and Vehicle Access and Internal Road Network

4.4 There are good pedestrian links throughout the site and there is a need to ensure that permeability is provided/improved and existing links are retained. However, as identified in pre-application discussions, the proposed east-west path to the north of Irving Court should be provided with a crossing facility to aid pedestrian movement. This east-west route is currently an adopted footway and therefore a suitable design must be achieved. It had been suggested previously that a more formal approach to the access design, similar to that illustrated below taken from the Sustrans

Handbook may be required. Although not a cycle way this would identify the route as having pedestrian priority.

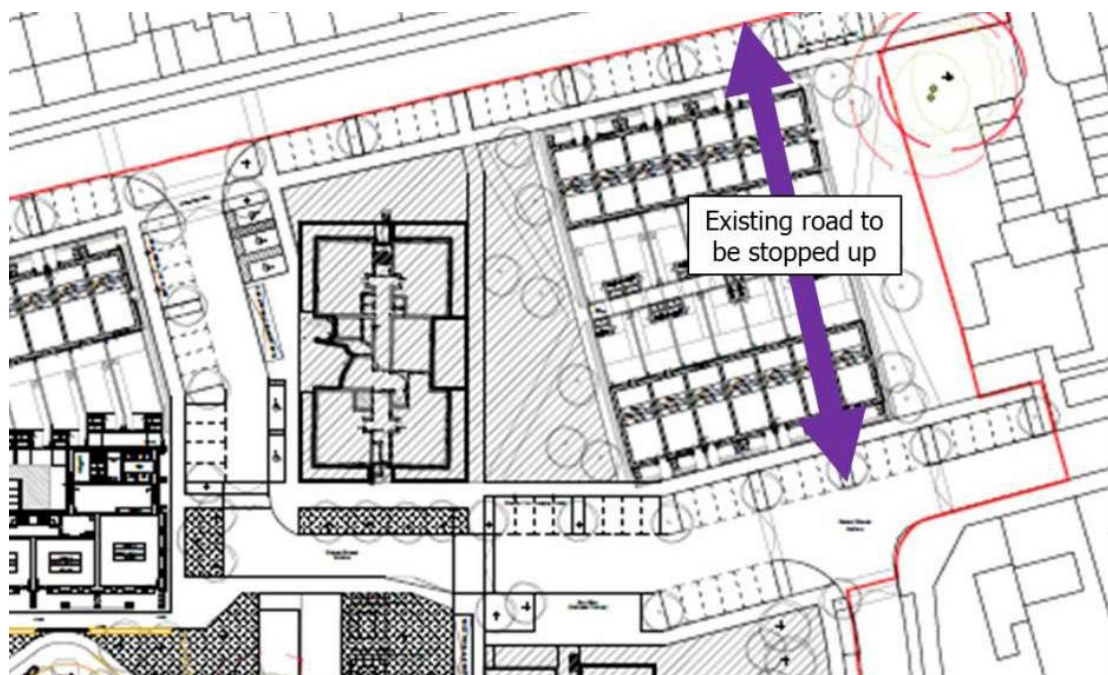


- 4.5 A revised layout has been provided during the course of the application that includes a similar design and is therefore deemed acceptable.
- 4.6 A pedestrian crossing facility on Wensley Road to the south-east of the site, providing a link to the Public Right of Way, is proposed. The crossing is slightly away from the desire line but this has been unavoidable due to existing dropped crossings. The Transport Development Control Manager is therefore happy that this crossing is the best achievable.
- 4.7 It had been discussed during the pre-app discussions that the originally proposed rumble strip crossing would be detrimental to pedestrians and that alternative measures should be provided. The initially submitted scheme introduced speed tables, which again was identified as an issue for buses. It is also noted that Reading Buses comments have raised concerns about the pedestrian crossing points stating that raised crossings and more speed bumps will not be welcome given the adverse effects on vertical deflection on buses, customers and drivers. The scheme has been revised during the course of the application to reduce the number of raised tables. The now proposed strategy is accepted, subject to detailed design to ensure that the raised tables do not detrimentally impact the bus route. This would however be at the S278/38 stage. To ensure this aligns with the planning application this should also be secured through the unilateral undertaking legal agreement.
- 4.8 The raised table / shared surface area has been removed from the new central space during the course of the application. Instead, the new route, which continues Lesford Road before joining back up with Wensley Road to the north, is to be informally traffic calmed through changes in surface. These arrangements are deemed acceptable. Dedicated crossing facilities are proposed on the desire lines to aid pedestrian movements throughout the site, thereby assisting in ensuring that the proposals would not be detrimental to the safety of users of the transport network at this point.
- 4.9 There are currently four vehicular access points at the site; one each for the parking courtyards for Irving Court, Riversley Court and Wensley Court, and one serving the garages and associated parking.
- 4.10 As part of the proposals, there will be five vehicular points of access to the site from Wensley Road. Please note that the most south-western junction

would be an exit only as the western link through the site (referred to as the mews by the applicant) will be one-way travelling north to south (as amended during the course of the application). In addition to this through route a further route will be provided running from north to east, emerging opposite Lesford Road. The other three access points will serve car parks for existing/proposed residential units. One each will serve Irving Court and Riversley Court, the southernmost tower blocks. Finally, an alteration to the north western junction which currently provides access to garages, will provide on street parking at this point west of proposed Block A. All of the access points are considered acceptable.

- 4.11 In addition, a significant change in the context of the site occurs in the north-east corner of the site. Wensley Road will be stopped up to the east of the site, to the north of Lesford Road. The bus stop located on this section of the road will be relocated into the site. Following the stopping up, the road network will be diverted through the development site, as illustrated on Figure 4.2 taken from the originally submitted Transport Statement below.

Extract of Figure 4.2 of the Transport Statement - Diversion of Wensley Rd



- 4.12 The 11 bronze bus route will be diverted along the new road alignment, with a new bus stop provided within the development. A swept path analysis of the new route is provided to which is commented on as follows:
- 4.13 Wensley Road / Lesford Road Junction - It has been stated that there would be a distance of 23.1m of carriageway length where a car would not be able to pass a bus. The Transport Development Control Manager is however satisfied that there is sufficient carriageway capacity and visibility at the junction for drivers to avoid each other and find suitable refuge while the other undertakes the required manoeuvre.
- 4.14 Bend in the Central space to the north of the amenity area - During the course of the application the kerb lines have been adjusted to allow for

unimpeded movement while undertaking the turning movement. This has been deemed acceptable.

- 4.15 Wensley Road Junction - The applicant has undertaken a review of where vehicles would be able to park to establish what space is available to allow a bus to manoeuvre. It has been identified that an area of double yellow lines will be required to aid movement and turning of the bus. It is evident that this is required from the tracking diagrams and also Google Map images, which identify that the vehicles are having to overrun the adjacent verge to the east of the existing Wensley Road junction, as detailed on the images below.

2012 Google Maps Image

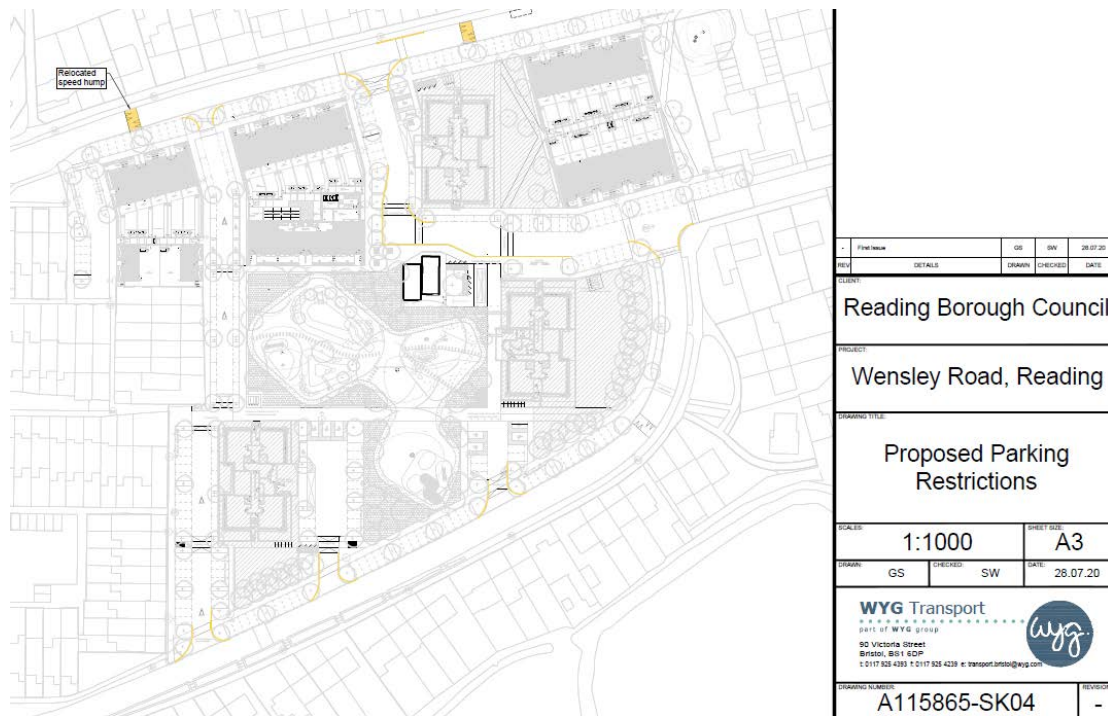


2019 Google Maps Image



- 4.16 The proposed parking restrictions will ensure sufficient movement can be undertaken within conflict and eradicate overrunning of adjacent verges from taking place further. As such, this is deemed acceptable.
- 4.17 A plan has also been submitted that identifies area where parking restrictions throughout the development could be provided to ensure

overspill parking does not occur allowing the movement of vehicles through the site. In principle this is deemed acceptable but would be progressed further during the S278/38 process, as secured as part of the unilateral undertaking legal agreement as part of the planning application.



- 4.18 It is noted that an existing speed hump will conflict with the new junction to the west of the site. A revised drawing has been submitted during the course of the application that relocates the speed hump further west, so that it does not conflict with any accesses or parking bays. This is therefore deemed acceptable.
- 4.19 It has been stated that the bus stops will provide adequate weather protection, have seating, integral light, integral information case, flag bracket and provision for the installation of a Real Time Information screen. It is essential for at least the current provision to be relocated / replaced in line with the Council's agreed bus shelter contract. The proposed layout shows the stop to the north of Riversley Court, with the plans submitted being acceptable in these regards. The shelter facilities will be secured via condition.
- 4.20 Permission for the stopping up order and diversion will be sought/required separately to this planning application, as this is covered by different (highways) legislation. However, as part of the planning application, given this element is fundamental to the whole development (Block C Houses would not be able to be built without the stopping up order in place) it is considered reasonable and necessary to secure via unilateral undertaking legal agreement the obligation for no development to commence until the applicant has completed the stopping up of the existing Public Highway. Although it is considered unlikely that RBC Highways would not have any overarching concerns with this element, other third parties will be involved in this process too. As such, it is considered necessary to ensure this is completed prior to works beginning; hence its inclusion within the unilateral undertaking legal agreement.

- 4.21 The proposed vehicular access strategy will be conducive towards the movements of emergency and service vehicles. A swept path assessment of the site has been undertaken for the refuse vehicle used to serve the area, as well as the fire appliance used by Royal Berkshire Fire and Rescue Service to access high-rise buildings. It should be noted that the vehicle used for tracking the high-rise fire appliance is a rigid truck which is of a comparable dimension than the standard fire appliance. It therefore represents a worst-case scenario.
- 4.22 It should also be noted that the proposed layout allows a fire appliance to gain improved access to different elevations of the high-rise flats due to the increased vehicular routes which includes the shared pedestrian / emergency link that surrounds the central green space area.
- 4.23 The bollarded access point to the west of the new bus stop adjacent to Riversley Court has been altered during the course of the application, and is now acceptable. However, a revised drawing is required illustrating the location of the dropped kerb at this point, which will be secured via condition.
- 4.24 In conclusion, the Transport Development Control Manager is satisfied with the latest design / layout, as submitted during the course of the application. More specifically, this allows for the sufficient and safe movement of pedestrians and vehicles, including buses, through the proposed development and fully complies with the requirements of both Local and National Policy.

Trip Rates and Generation

- 4.25 The vehicle trip rates for the Proposed Development have been taken from the Trip Rate Information Computer System (TRICS) database. TRICS is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process. It is a database system, which allows its users to establish potential levels of trip generation for a wide range of development and location scenarios. It is widely used as part of the planning application process by both developer consultants and local authorities and is accepted by Planning Inspectors as a valid way to ascertain likely trip generation.
- 4.26 The assessment undertaken has been deemed acceptable and Table 5.1 taken from the Transport Statement, provided below, identifies that the development will generate a total of 17 vehicle movements in the AM Peak and 21 in the PM Peak.

Table 5.1 Vehicle Trip Rates and Generation

	Trip Rate			Vehicle Trips		
	In	Out	Two-Way	In	Out	Two-Way
Network peak AM 0800-0900	0.13	0.256	0.386	6	11	17
Network Peak PM 1700-1800	0.242	0.231	0.473	11	10	21

- 4.27 In addition to the above, the applicant has undertaken a separate assessment to establish the multi-modal trip generation for the proposed development. This has been calculated using the 2011 Census 'Method of Travel to Work' for a representative area of Reading (E01016389 : Reading 013B) and has been accepted as a suitable comparison.
- 4.28 The result of the assessment can be found within the table below (Table 5.3, as extracted from the Transport Statement):

Table 5.3 Multi-Modal Trip Generation

Mode of Travel	AM Peak (0800-0900)			PM Peak (1700-1800)		
	Arrivals	Departures	Two Way	Arrivals	Departures	Two Way
Car Driver	6	15	21	15	4	19
Car Passenger	0	1	1	1	1	2
On foot	1	1	2	1	1	2
Bus	2	1	3	2	2	4
Motorcycle	0	0	0	0	0	0
Train	0	1	1	1	1	2
Bicycle	0	1	1	1	1	2
Taxi	0	0	0	0	0	0
Total	9	20	29	21	10	31

- 4.29 The above table identifies that the proposed development is forecast to generate 29 two-way person trips in the AM peak, with 9 arriving and 20 departing. In the PM peak, it is forecast that the proposed development will generate 31 two-way person trips, with 21 arriving and 10 departing.
- 4.30 A total of 21 vehicular trips are forecast in the AM peak hour and 19 in the PM peak hour; this is the equivalent to one movement every three minutes. It is acknowledged that some movements will be split between Wensley Road and Lesford Road; however, the total number of movements within the peak periods is not a material increase and is within the daily fluctuations on the network. Given paragraph 109 of the NPPF, which states proposals should only be refused on transport grounds if the residual cumulative impacts are severe, a refusal on traffic generation grounds would be hard to defend at an appeal.

Parking and Car Ownership

- 4.31 A total of 192 spaces are currently provided on site, comprising parking courtyards outside the three tower blocks, designated parking bays adjacent to Wensley Road in the vicinity of each tower block, and areas of garages and parking in the north-western corner of the site.
- 4.32 There are 267 flats across the three existing blocks, and so the provision equates to 0.72 spaces per dwelling. This has been evidenced through a parking survey to determine the existing use of the site. It was undertaken by the applicant during the daytime and nighttime in November 2019. The survey showed that there was ample parking capacity during the daytime,

and overnight there was spare capacity overall, principally on the roadside spaces, whilst double parking was observed in the parking courtyards.

- 4.33 The applicant has reviewed the 2011 Census data to determine car ownership in the Reading 013B output area, which covers the area around the western end of Wensley Road. Providing a car parking provision in line with car ownership data is in line with National Policy and is therefore deemed acceptable.
- 4.34 Within Reading 013B, car ownership has been calculated as 0.83 vehicles per dwelling. Consequently, parking for the additional dwellings will be provided at this rate. Given the existing mix of houses and flats within Reading 013B, this figure is considered representative of the likely car ownership of residents of the proposed development and is deemed acceptable.
- 4.35 Anecdotal evidence suggests the garages are rarely used for parking and serve predominantly as storage units. Therefore, they have not been included as spaces within the calculations, although the spaces in front of each garage have been counted. Additionally, in line with Policy H14 of the Reading Local Plan, it is not considered that the removal of the garages would have a material impact on the highway network. However, it should be noted that the loss of existing garages is to be off-set by re-provision in the wider area and is to be secured via the legal agreement.
- 4.36 The proposal includes the addition of 46 dwellings and, as a result of the context referenced above, an additional 38 unallocated spaces are to be provided for the development. Therefore, there will be a total of 230 parking spaces across the site (192 existing + 38 new spaces).
- 4.37 Within this provision 16 disabled parking will be provided in accordance with the Reading Borough Council parking standards.
- 4.38 The proposal also includes within the increased provision a total of 32 car parking spaces that would be able to access electric charging points. This is in excess of the Council's standards, with the details of the design/specification of the points secured via condition.
- 4.39 The existing 192 and additional 38 parking spaces will be re-organised and rationalised to provide a safer, more efficient layout. The current parking arrangements do not provide sufficient circulation space within the parking courtyards, with difficult manoeuvres often required to access and egress spaces.
- 4.40 The proposed layout provides spaces of 2.4 x 4.8m, with an aisle width of at least 6m provided adjacent to spaces to facilitate manoeuvring, in line with current design guidance. This is a significant betterment for users of the existing car parks, which are not currently to standard.
- 4.41 Further tracking diagrams have been provided illustrating cars accessing and egressing the parking bays that are not provided with the correct aisle width and these are deemed acceptable.

General Comments

- 4.42 Cycle parking is provided in accordance with Policy for the proposed flats and the houses. This will be secured via a compliance condition. During the course of the application the applicant has also indicated the relocation of existing cycle parking facilities for existing occupiers of the three tower blocks. A condition is recommended which ensures the replacement cycle parking facilities are ready for use prior to the removal of the existing cycle parking facility of the relevant block, to ensure there is no gap in provision.
- 4.43 The refuse collection areas are within 10m of where a refuse vehicle can access and therefore are deemed acceptable, as confirmed in the Waste Services observations. Similar to the cycle parking arrangements above, a condition will ensure the replacement refuse and recycling storage facility is ready for use prior to the removal of the existing refuse storage facility to maintain provision throughout.

Conclusion

4.44 In the circumstances there are no objections to the proposed development subject to the following unilateral undertaking legal agreement obligations and conditions:

4.45 Unilateral undertaking legal agreement obligations

- A S278/38 Agreement will be required to facilitate the proposed Highway changes which includes, new roads and junctions, alterations and closures of existing junctions, pedestrian crossing facilities and alterations to existing footways and parking bays. The agreement should be signed within 6 months of commencement of the development with no residential unit occupied until practical completion of the highway works within that part of the site
- No development should commence until the applicant has completed the stopping up of the existing Public Highway.

4.46 Planning conditions

- Pre-commencement (including demolition) demolition and construction method statement
- Vehicle parking spaces adjacent to the relevant new residential block ready for use prior to the first occupation of that block of residential accommodation (compliance condition)
- Pre-commencement (barring demolition) details of the vehicle access serving the refuse collection area to the west of Riversley Court to be submitted/approved. Provided prior to the first occupation of any residential unit and maintained thereafter.
- Pre-occupation provision of road(s) prior to first occupation of any unit within the relevant block served by the road(s)
- Pre-occupation provision of EV charging points (details of the design and specification to be submitted to and approved by the LPA) prior to first occupation of any unit within the relevant block served by the EV charging points
- Re-relocated bus stop shelter (from Wensley Road to north of Riversley Court) to be ready for use prior to the first occupation of any new residential unit (compliance condition)
- Cycle parking to be provided in accordance with the approved details (as submitted) prior to the first occupation of the relevant block (compliance condition)

- Replacement cycle parking facility (serving the relevant tower block) to be ready for use prior to the removal of the existing cycle parking facility of the relevant block
- Pre-occupation (of the relevant proposed residential unit) completion of refuse and recycling storage facility (compliance)
- Replacement refuse and recycling storage facility (serving the relevant tower block) to be ready for use prior to the removal of the existing refuse storage facility in the parking area of the relevant block
- Pre-occupation details to be submitted / approved for the dropped kerb serving the access point to the west of the proposed bus stop (adjacent to Riversley Court). Constructed prior to first occupation and retained/maintained thereafter.

Natural Environment

4.47 In the initial observations provided, a variety of initial queries and concerns were fed into the applicant, including:

- Clarity over the status of the 3 Turkey Oaks to be removed separate from this application.
- Clarity over how the number of trees to be felled/planted have been calculated. It would appear that 275 trees are to be felled and 184 new trees are to be planted, but the DAS indicates that there will be a net gain in tree number. Mindful of the climate emergency declaration, the forthcoming revised Tree Strategy, Biodiversity Action Plan and Climate Change Actions Plan, a net loss in tree number would be considered unacceptable by the Natural Environment officer.
- Concern about the loss of Category B trees, in particular an Oak (T4) and a line of London Planes (T61-76). Whilst it is accepted that where major redevelopment occurs, it is appropriate for this to be used as an opportunity to replace lower quality trees to ensure a longer term, healthy tree stock. However, where B Category trees are of good quality with no issues raised about their long-term future, they should be designed around, particularly given the total number of trees to be removed.
- Clarification over amount and nature of new hard surfacing within root protection areas of trees.
- Concern over pruning and pressure to future prune Category A Plane (T82) as a result of the proximity of Block B flats.
- Clarification relating to some land levels and whether an arboricultural method statement (AMS) can be approved without these being confirmed.
- Concern the AMS does not cover all ground works within the root protection areas of existing trees.
- Notwithstanding the net tree loss concern, in relation to the proposed landscaping approach, the proposed species approach (incorporating a variety of street trees, succession, comparison and woodland edge planting) is broadly welcomed and supported. Exact details will be secured via condition in the event of permission being granted.

4.48 In summary, the specialist Natural Environment officer has concerns about the number of trees proposed to be felled and the resultant net loss in tree numbers at the site. Notwithstanding that concern, the principles of the proposed landscaping species are broadly welcomed, although full details would be secured via condition.



4.49 Through correspondence the applicant has provided clarifications and further details in a number of respects. Ultimately however, the Natural Environment officer has concerns that the proposals do not accord with Policy EN14 and wider Council objectives, with continued concern relating to the loss of some Category B trees and an overall net loss. However, it has been advised by Planning officers that in the ultimate weighing up of the various competing issues in this proposal as a whole, the planning balance is considered to weigh in favour of supporting the proposals at officer level. In these circumstances, the Natural Environment officer has recommended a series of conditions to secure further details in the event of permission being granted:

- Pre-commencement (barring demolition) hard and soft landscaping scheme to be submitted and approved. Implementation prior to occupation (or alternative timetable later agreed). Replacement of any planting which dies within 5 years.
- Pre-occupation approval of boundary treatment details (including mammal gaps)
- Pre-occupation landscape management plan to be submitted and approved
- Tree retention of all retained trees in accordance with the documents submitted (compliance condition)
- Pre-commencement submission of an Arboricultural Method Statement (given the outstanding issues in relation to land levels and ground works in RPAs) and Tree Protection Plan

Ecology

4.50 The RBC Ecology consultant has confirmed that the ecological impact assessment submitted with the application (ECOSA - January 2020) has been undertaken to an appropriate standard and concludes that, subject to the implementation of a Construction Environmental Management Plan (CEMP), the proposals are unlikely to affect protected or priority species, priority habitats or local wildlife sites. The report is considered acceptable and the CEMP should be secured via a planning condition.

- 4.51 In terms of landscaping, initial landscaping details have been submitted, which appear appropriate (subject to separate observations from the Natural Environment officer). Further details, to include native and wildlife friendly species, should be secured via a planning condition, as should details of boundary fences to ensure mammal gaps are provided (for example through the use of hedgehog friendly gravel boards).
- 4.52 With regard to ecological enhancements, paragraph 175 of the NPPF states that “opportunities to incorporate biodiversity in and around developments should be encouraged”. This is complemented by Policy EN12. Accordingly, to ensure the development provides ecological enhancements, a condition should secure enhancements for wildlife are provided within the new development. This will include features such as bird and bat boxes, tiles or bricks on and around the new buildings.
- 4.53 In summary, subject the conditions above, there are no objections to this application on ecology grounds.

Leisure and Open Spaces

- 4.54 Concerns are raised in relation to the extent of the loss of recreational open space. At the outset, it is also warned that the increase in number of dwellings will place pressure on the new public open space within the centre of the development. Overall, the public open space is proposed to reduce from 11,275m² to 4,378m². Officers are mindful that Policy EN8 specifies that development should not result in the loss of or jeopardise use and enjoyment of undesignated open space. It is however also recognised that the Policy also states that development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.
- 4.55 Accordingly, whilst the loss of the MUGA and pump track are considered regrettable, it is acknowledged that the creation of the central area of public realm is welcomed in principle and provides opportunities not only for play and recreation, but relaxation as well. The better integration of the site into the surrounding neighbourhood is also welcomed. New high quality and robust facilities (equipment and surfacing) need to be provided to cater for both residents and non-residents.
- 4.56 Bearing in mind that the current play area is well-used and has varied equipment, particularly for juniors, it is essential that play value is enhanced not diminished. Officers concur with the applicant that a significantly better offer for under 5s should be achieved by the development to improve recreational facilities for residents both of the development and the surrounding community. Whilst the principles within the different spaces are indicated (under 5’s, older children and an outdoor gym, with the space being enclosed by a 200m long exercise / play-trail around the perimeter of the space), the exact detail and specification of the equipment and facilities is not yet shown in full. As such, in the event of permission being granted, full details of all on-site replacement play space facilities should be secured via pre-occupation (of any residential unit) condition, with the condition also detailing that the facilities shall be retained and maintained as such thereafter.

- 4.57 Despite the creation of the central play space, it is considered that the proposal would not adequately serve the needs of all residents within the red line boundary of the site. With the increase in the number of residential units proposed, it is considered that facilities at nearby Courage Park will need to be extended to cater for the increase in demand, and to assist in mitigating the overall quantitative loss of open space at the application site and loss of some existing facilities. Accordingly, in the event permission is minded to be granted, to make the development acceptable in planning terms from a Leisure and Open Space perspective it is considered necessary to secure an off-site financial contribution to provide additional facilities/infrastructure. More specifically, it shall assist the funding for the upgrade of play facilities at nearby Courage Park (to the north of the site) for older junior children and teenagers. Based on the contributions secured on other recent schemes in the Borough a financial contribution of £116,200 has been calculated as being required and considered necessary. The applicant has indicated an agreement and willingness to provide this financial contribution. This will be secured as part of the unilateral undertaking legal agreement.

Lead Local Flood Authority (Via RBC Transport, in conjunction with RBC Streetcare Services Manager - Highways)

- 4.58 Initial concerns were raised in relation to some specific details of the proposed SuDS strategy for the site. More specifically, this involved the existing brownfield run off rates not being specified and there being inconsistency in the submission as to whether permeable or impermeable paving would be utilised at the site.
- 4.59 Accordingly, the applicant updated the strategy and provided clarity in all regards, clearly demonstrating that permeable paving would be proposed across the site where new roads are created, downplaying surface water concerns with this acting as attenuation. More specifically, attenuated surface water will be discharged at a combination of greenfield and a reduction of brownfield rate. The proposed rate is less than the current brownfield rate for a 1 in 1 year 60-minute rainfall event.
- 4.60 Officers consider this to comply with Policy EN18, with a pre-commencement (barring demolition) condition requiring exact details of all elements of the proposed strategy (e.g. the exact form and location of the attenuation tank anticipated have not been detailed at this stage) to be approved. This condition will also specify that the subsequently approved full strategy shall be completed prior to first occupation of any residential unit and thereafter managed and maintained in accordance with an agreed plan. A combination of the information submitted at application stage and further details to be secured via condition will ensure the proposals are acceptable in this regard.

Environmental Protection

- 4.61 With regard to contaminated land, given that the proposed use is a sensitive one an initial study has been submitted during the course of the application. The submitted report itself identifies that further investigative work is needed. This is in relation to further ground gas monitoring and further investigation of asbestos around one of the sampling areas. As a consequence, the standard four-stage contaminated land based condition

(1. Site characterisation; 2. Remediation scheme; 3. Validation report; 4. Reporting of unexpected contamination) is recommended to be included, with the first two conditions being prior to the commencement of any development, including demolition.

- 4.62 Turning to the construction and demolition phases, environmental protection related matters are recommended to be included within the demolition and construction method statement condition to protect nearby occupiers. This is in relation to measures to control the emission of dust, dirt and other airborne pollutants; noise; pest control measures (including where necessary the capping of drains/sewers and baiting arrangements). Standard construction hours (8am-6pm Monday to Friday and 8am-1pm on Saturdays) are also recommended, together with a specific stipulation to prevent waste associated with the demolition/construction works being burnt on site.
- 4.63 It is also fully recognised, as demonstrated in the public consultation responses, that there is a widespread issue with rats in the area, with rats encouraged by poor waste storage (which provides them with a food source). Where developments involve shared bin storage areas, there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. Consequently, a pre-occupation condition is recommended to secure details of the measures to prevent pests and vermin accessing the bin stores. This will also require the provision of the approved measures prior to first occupation of any residential unit and maintenance thereafter.
- 4.64 Finally, in terms of possible noise transmission between dwellings issues, an informative is recommended to remind the applicant of the need to achieve Building Regulations Approved Document E standards.
- 4.65 As such, the Environmental Protection team has no objection to the proposals subject to the conditions recommended above.

Waste services

- 4.66 Initial observations raised a query as to whether the individual waste facilities for the houses would comply with future (from October 2020) bin storage requirements (i.e. a smaller general waste bin, but a separate 23litre outside food waste bin) as well as the existing standards. In terms of the bins for the proposed flats concerns were raised in relation to capacity (an under-provision was shown).
- 4.67 Most substantially, concerns were raised that the bin storage areas shown in the car parking areas of the three existing towers, had not been shown to be re-provided (in addition to the facilities at the base of each block, which are unchanged as part of this application). It was also specifically queried whether the Riversley Court facilities would be able to be within 10 metres of the block. It was advised that recycling facilities must be put in place as part of this application.
- 4.68 The applicant duly responded to the various initial observations made. This confirmed that the space allocated within the front amenity spaces of each

house would be sufficient to accommodate either the existing or future waste services standards. For the flats the waste storage area has been increased in size and the layout shown ensures bins are easily accessible and moveable. In terms of the existing tower blocks, the applicant explained that a future separate application (part of the Phase 2 works) will involve several improvements including new refuse, recycling and food waste facilities. For the purposes of this application the applicant has shown like-for-like levels of replacement facilities for the three existing blocks, together with a revised location (adjacent to the Riversley Court provision) for the communal recycling bins too, which are presently adjacent to Lesford Road.

- 4.69 In response to the clarifications provided by the applicant, Waste Services have confirmed contention with the information and revised plans submitted during the application. In practice, the proposed facilities for the new units will be secured via a pre-occupation compliance condition. In terms of the reconfigured facilities for the existing tower blocks, these will be secured via a separately worded compliance condition, with the trigger point for these being ready for use prior to the removal of the existing facilities (to ensure facilities are maintained throughout the development process).

Access Officer

- 4.70 Supportive of the four wheelchair accessible dwellings proposed, with this 8.7% provision exceeding the 5% required by Policy H5f. Some initial queries were raised in relation to whether baths or showers were provided, the intercom system, doors and parking arrangements.
- 4.71 In the initial observations some wider site queries were also raised, including:
- Approach to shared surfaces for disabled people
 - Clarification as to whether the play space and play equipment will be accessible for all
 - Confirmation regarding ensuring the hard landscaping is easily navigable by all (including land level changes through the site)
 - Comment that outdoor seating must be at different heights, should contrast visually from the paving and some should include arm rests / some not.
 - Clarification over the number of disabled parking spaces proposed
- 4.72 Further to these initial comments, clarifications were provided in all instances by the applicant, largely concurring and confirming the intended approach in all instances. For example, it was confirmed that the wheelchair accessible units are flexibly designed to allow for either a bath or shower, depending on the requirements of the future occupiers. Furthermore, an intercom system has been confirmed as being provided, all doors will meet building regulations part M and disabled parking bays are located adjacent to the wheelchair units, as well as a wider provision across the site. In terms of the wider site queries, many of these details will be confirmed via future conditions, with it being expected for the Access officer to be part of these discussions.
- 4.73 On reviewing the clarifications provided by the applicant, the Access officer confirmed all steps proposed were reasonable. Furthermore, there would

be a need to liaise further with the Access officer (and possibly involving discussions with the Council's Access and Disabilities Working Group) in the event of approval of details applications being submitted in relation to the hard landscaping and play facilities.

Reading Design Review Panel comments (November 2019 at pre-app stage)

- 4.74 The Reading DRP considered the proposals late in the pre-application process; the overarching feedback of the panel was that, in overall terms, this is a well-considered scheme. In particular, the Panel support the stronger and 'greener' approach in accordance with emerging UK policy. A number of detailed design points were raised, some positive and others relating to refinements rather than any fundamental design changes to the scheme, such as:
- Greater attention to ends of terrace houses, to address and turn the corner (e.g. additional end/corner house types).
 - Block A (north-west corner) needs further attention including where the blank elevation overlooks private land. The possible reorientation of block layout was discussed and should be tested thoroughly, whilst also noting that the quality of internal planning is crucial to quality of life (officer note: the southern elements of Block A were re-orientated in the application submission and windows/doors added to the east and west elevations)
 - It would be beneficial to consider widening the dormers to increase useable internal space.
 - Parapet option relates well to existing 2-storey houses opposite.
 - Red brick options work well, the variety is attractive and not too pale / austere.
- 4.75 The Panel queried the applicant's approach to phased works, with it important to ensure that the phasing of works is thoroughly considered to reduce the impact on existing residents. The relationship between new and existing is also important, with it suggested that the same architects are appointed for the further works too.
- 4.76 The landscaping, articulation of amenity spaces and edge treatments were specified as important, with these elements still being developed. In particular, the need to include fuller details of the i) parking and ii) central play spaces in the application was noted.
- 4.77 Sustainability has been well considered. The Applicants have confirmed that they intend to include: • High levels of PVs to south facing roofs (no dormers to these slopes to allow for increased PV provision) • Air source heat pumps. • Triple glazing throughout. • MVHR. • 600mm wall thicknesses. DRP expected the above to be included in the main application and additionally suggested consideration of the following: • Additional electric car charging provision (in excess of policy requirements / future proofing for future requirements); • Additional green landscaping / spaces / surfaces; • Consideration of trees and vegetation, absorbent green walls and soft shading throughout the scheme. • Soften shared surface as much as possible; Further, the Panel encourages low toxicity design, from simple strategies to materials wherever possible.

- 4.78 Planning officer note: Given only minor changes were made between the DRP meeting and the submission of the application, it was not considered necessary to engage DRP during the formal application process.

Reading UK CIC

- 4.79 Reading UK CIC, which acts as the Economic Development Company for Reading, advise that under the Council's Employment Skills and Training SPD the applicant is required to commit to a local Employment and Skills Plan (ESP), or financial contribution for employment and training projects in the borough. Whether this is a formal plan or a financial contribution, it shall be secured via legal agreement. This is in respect of the construction phase only, owing to the nature of the proposed scheme (residential only).
- 4.80 It is noted that the applicant has specified that a financial contribution will be secured in this instance. In line with the ESP SPD formula, this equates to £11,448 ($£2,500 \times \text{Gross internal floor area of scheme (4,579.2m}^2) / 1000\text{m}^2$).

Berkshire Archaeology

- 4.81 Compass Archaeology's report is a thorough assessment of the archaeological potential of this site and Berkshire Archaeology is in broad agreement with the report's conclusions. The application area is of reasonable size (2.36ha) and retains an archaeological potential, despite the 20th-century development within it. The application area does lie within an area of archaeological potential as evidenced by known monuments and finds spots, nearby. It should be noted that suburban Reading was largely developed in the 20th-century without any archaeological investigations and therefore the known archaeological resource is almost certainly under-representative of the real picture. Therefore, Berkshire Archaeology concurs with the report's conclusions that further archaeological investigation of the application area is merited but that this can be secured by condition should the scheme be permitted. This pre-commencement condition (including works of demolition) is in accordance with Paragraph 199 of the NPPF.

External consultants independently reviewing specific documents on behalf of the Local Planning Authority

- 4.82 BRE daylight, sunlight and overshadowing independent review - BRE's initial review concluded that there were a number of areas where the methodology was not robust (e.g. VSC calculations) and further information / assessment was required. Despite that, BRE was able to confirm, due to the simplicity of the surrounding built form (in day/sunlight terms), that it was clear that for most of the surrounding properties, there would be no impact on daylight and sunlight to neighbouring properties. The exception was the ground floor of the Lesford Road flats to the east of Block C, where the images are not clear enough to provide evidence of compliance.
- 4.83 BRE also detailed that most of the results for daylight provision to the proposed properties show good levels of interior daylight. However, the kitchen/living/diner analysed on the ground floor of the south section of Block B would be poorly daylit (based on ADF information). BRE did however outline that there appears to be some scope to increase the

amount of glazing to the windows, subject to other non-daylighting concerns such as privacy and overheating.

- 4.84 BRE also outlined that whilst some of the private gardens would be poorly sunlit, the development includes a large communal amenity area which would be well sunlit; this would be a mitigating factor.
- 4.85 On the basis of the BRE feedback the applicant consequently submitted additional information. This was reviewed again by BRE, who concluded:

Loss of daylight to neighbours - In our original report, reference P117416-1000, we commented that it was not possible to be confident of the VSC levels in a few areas due to the reporting method. This has been addressed and numerical VSC values provided for the areas we identified. The results indicate that loss of daylight would be within the BRE guidelines for these buildings and that loss of daylight would be within the BRE guidelines for all neighbouring residential buildings. The position of these areas relative to the proposed development suggests that there would not be significant impact on sunlight either.

Average daylight factor (ADF) calculation factors - We noted that the factors for glazing transmittance, maintenance factor and reflectance factor had not been provided, so that we could not comment on whether they were appropriate. The factors used in the ADF calculations have now been provided and are appropriate.

Rooms with lower levels of ADF - We noted that there were some rooms with lower values of ADF, and that there appeared to be the potential to increase the glazing area subject to other non-daylighting concerns. HTA have provided details of other issues in site design which were also considered, and which appear to suggest that the glazing area could not be increased without affecting these other issues. It would therefore appear that the current levels of daylighting are the best which can be afforded by this particular design. The vulnerability of Block B to disproportionate loss of daylight and sunlight should be borne in mind in the event of future development to the south.

- 4.86 As such, it was evident that BRE were now satisfied with the proposals in relation to daylight, sunlight and overshadowing matters, both in terms of the impact of the development on nearby occupiers and for future occupiers of the proposed residential units.
- 4.87 BRE wind/microclimate independent review - BRE's initial review concluded that the conclusions reached regarding the expected wind comfort effects around the proposed development are reasonable. Furthermore, BRE agree with the general findings presented within the report - that there should be no notable wind or pedestrian impacts arising around or from the proposed new development. However, BRE did not consider the initial assessment to be robust given a number of uncertainties in the assessment methodology. A number of recommendations and areas for further assessment were made by BRE.

4.88 BRE provided a follow up review subsequent to the submission of a revised and updated report by the applicant. This resulted in BRE's second review providing the following over-riding conclusions:

- The level and nature (including the methodology) of information submitted is sufficient and proportionate to the proposed level of development sought in this instance.
- With the caveat below, the analysis and conclusions reached by the microclimate report are reasonable and robust, and set within the adopted local policy context of relevant components of Policies CC3 (Adaption to Climate Change) and CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (Adopted November 2019).
- The caveat is the magnitude of the predicted wind speeds and the extent of the predicted areas of unsafe wind speeds are still both higher and larger than BRE would normally expect. In particular having unsafe wind speeds during the summer season is very unusual.

4.89 Given this potential uncertainty, BRE therefore provided the following final comments:

Based upon our experience, we have concerns about certain aspects of the CFD study undertaken, and about the proposed mitigation measures. These concerns are described in this report, and in the previous report we produced for RBC. However, we cannot state or demonstrate definitively that anything has been done incorrectly, and we cannot prove or disprove these reservations without having undertaken a wind tunnel study.

Taking into account that:

- i. apart from the caveat, the analysis and conclusions reached by the microclimate report are reasonable and robust,
- ii. our concerns relate to areas are mainly concentrated around the three tower blocks (away from the proposed scheme),
- iii. the predicted CFD findings appear to be overly conservative, and
- iv. the 4-storey heights of this proposed scheme are relatively low

it is our considered opinion that RBC* should recognise that whilst there remain concerns, that they nevertheless accept the updated wind comfort report and act accordingly upon its findings.

* Clarified in this instance that RBC refers to the local planning authority, rather than RBC as a single entity.

4.90 Element Energy Sustainability and Energy independent review - Element Energy's initial review confirmed that the energy strategy proposal is summarised as follows:

- All dwellings designed to Passivhaus standards, achieving a space heating consumption benchmark of less than 15 kWh/m²/a (a key requirement for Passivhaus design);
- A communal wet distribution heating network for space heating and hot water provision to dwellings in the apartment block, supplied from air source heat pumps (ASHP);
- Individual ASHPs serving space heating and hot water to each house;
- Solar PV panels on house and apartment block rooftops for renewable electricity supply;

- Intention to achieve the zero-carbon homes policy via on-site measures rather than relying on carbon offsetting payments to reduce emissions to zero.
- 4.91 Element Energy considers that the drive toward a passive approach to dwelling design on Wensley Road is to be highly encouraged, and overall complies with RBC's energy and carbon policies. It firstly aims to reduce energy demand to best practice standards, then implements high-efficiency thermal energy supply, and finally reduces on-site regulated carbon emissions to zero via renewable electricity generation.
- 4.92 Given the drive towards 100% emissions reductions on-site, the design of dwellings must be robust at the earliest stage to avoid undersized renewable generation, thus not achieving zero-carbon homes. Element Energy therefore initially recommended that the applicant undertook further work prior to the determination of the application, to ensure the strategy would work in practice. This was summarised as follows:
- Demonstrate the development achieves the energy consumption level of Passivhaus dwelling design by using the PHPP tool for building energy modelling in conjunction with the SAP calculation process;
 - Confirm temperatures of heat generated by the ASHPs and how the units will generate heat in peak heating season if no top-up electric heating generating equipment is in place;
 - Considering the above, revisit solar PV provision on rooftops to ensure the designs guarantee zero-carbon homes via on-site renewable generation;
 - Confirm strategy for individual ASHP heating provision to townhouses;
 - Provide detailed evidence that a shared ground loop array would not be deployable on the Wensley Road development as a replacement for lower efficiency ASHPs.
- 4.93 The applicant reviewed the Element Energy report and provided more information in response to the queries raised. This was further reviewed by Element Energy, who then provided a final addendum report, which concluded as follows:
- Following review of responses provided by Hoare Lea to our recommendations, it can be confirmed that the energy strategy complies with RBC's energy and carbon policies. The passive approach to dwelling design on Wensley Road in order to reduce space heating consumption, as well as the maximised deployment of renewable generation (i.e. solar PV panels) to achieve zero on-site emissions, are highly encouraged strategies for new residential developments in and around Reading. GSHP was demonstrated as not technically viable for the site due to ground temperature depletion (i.e. fully residential development, therefore no balanced annual heating/cooling loads to replenish ground temperatures possible). The benefit of GSHP in terms of heat price for residents is unclear due to the relatively small scale of development for such high-capex infrastructure, and the reduced potential for townhouses to benefit from solar PV generation for non-heating electricity demands.
- 4.94 As such, it was evident that Element Energy were fully supportive of the proposed energy approach in this instance.

External

- 4.95 The Crime Prevention Design Advisor at Thames Valley Police commends the applicant for including the points raised at pre-application stage within the submitted design. However, to ensure that the opportunity to create a safe and sustainable community is not missed it is requested that the following (or a similarly worded) condition be placed upon any approval for this application.

Prior to commencement of works above slab level, written details as to how the development will achieve the Secured by Design Award shall be submitted to, and approved by the authority. The development (and subsequent access control system) shall be carried out in accordance with the approved details, and shall not be occupied or used until confirmation of that said details has been received by the authority.

- 4.96 Such a condition will help to ensure that the development achieves the highest standards of design in terms of safety and security, safe guarding future residents. Creating 'Safe and accessible environments where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion'.
- 4.97 The Environment Agency advised that there was no requirement for them to be consulted on the application, with guidance instead provided on when the EA should be consulted.
- 4.98 Reading Buses raises a series of comments and concerns, chiefly relating to impacts on the highway network and bus route 11, summarised as follows:
- Concerns about the additional deviation required, and the distance to flats from the proposed set-down bus stop on the straight westbound longer section of Wensley Road;
 - Concerned that the width of the new section of road prior to re-joining the 'main section' to head east, leaves little room for manoeuvre. Suggestions for series parking, rather than parallel parking at this point to assist buses, also partly owing to recurring problems of inconsiderate parking in the area;
 - Trust that the Borough Council to encourage use of alternative modes for residents' travel (noting the increase in parking spaces);
 - Parking provision should also consider the need for vans and delivery vans (perhaps in time-restricted spaces);
 - Council should consider whether the whole of Wensley Road (west and south of the tower blocks and including the new section of road) can be made ONE WAY, in the anti-clockwise direction the bus takes.
 - Request that double yellow lines be applied and actively enforced, together with a loading ban at least on the bends of the new section of road;
 - Various comments regarding the detailed design of bus stops / facilities;
 - Clarity sought on crossing point proposals - raised crossings and more speed bumps will not be welcome given the adverse effects on vertical deflection on buses, customers and drivers.
- 4.99 Sport England - The proposed development does not fall within either Sport England's statutory or non-statutory remit. Therefore, Sport England has

not provided a detailed response, but provided the following general advice:

If the proposal involves the loss of any sports facility then full consideration should be given to whether the proposal meets Par. 97 of NPPF.

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities that the local authority may have in place. They should also be designed to be fit for purpose.

If the proposal involves the provision of additional housing, then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered.

In line with NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.

- 4.100 Thames Water (Developer Services) replied outlining that a separate pre-application would need to be arranged with the developer to discuss any potential sewer diversions.
- 4.101 Thames Water (Development Planning) provided waste and water comments, raising no objections and recommending a series of informatives. More specifically, in terms of surface water drainage, if the developer follows the sequential approach to the disposal of surface water Thames Water would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Informatives are recommended on any planning permission decision notice in this regard.
- 4.102 With regard to waste water network and sewage treatment works infrastructure capacity, water network and water treatment infrastructure capacity, Thames Water has no objection based on the information provided, subject to a series of informatives.

Public consultation responses

- 4.103 One observation has been received from a Riversley Court 205 Wensley Road address, commenting I like this planning apartment for our area.
- 4.104 A total of 336 objections from individual respondents, from the following 251 separate addresses have been received (all from RG1 postcodes unless where specified) (there were 82 instances of multiple responses being received from separate occupiers of the same address and 3 from unspecified addresses):
- 108 from Wensley Road addresses (not including the 3 high rise buildings), from 74 individual addresses (34 instances of multiple responses from different individuals at the same address were received)

- 80 from Wensley Court, 193 Wensley Road addresses from 52 individual addresses (27 instances of multiple responses from different individuals at the same address were received, and 1 response was received from an unspecified number within Wensley Court)
- 46 from Irving Court, 203 Wensley Rd addresses, from 39 individual addresses (7 instance of multiple responses from different individuals at the same address were received)
- 31 from Riversley Court, 205 Wensley Road addresses, from 28 individual addresses (1 instance of multiple responses from different individuals at the same address were received, and 2 response was received from unspecified numbers within Riversley Court).
- 18 from Lesford Road addresses, from 15 individual addresses (3 instances of multiple responses from different individuals at the same address were received).
- 11 from Heron Way addresses, from 8 individual addresses (3 instances of multiple responses from different individuals at the same address were received).
- 9 from North Lodge Mews addresses, from 7 individual addresses (2 instances of multiple responses from different individuals at the same address were received)
- 6 from Carsdale Close from 3 individual addresses (3 instances of multiple responses from the different individuals at the same address)
- 3 from Coley Avenue
- 2 from Flagstaff Road, RG2 addresses (from different occupiers at the same address)
- 2 from St Saviour's Road
- 2 from Shaw Road
- 2 from Trelleck Road (from different occupiers at the same address)
- 1 each from Arbour Close, Bucknell Court, Christchurch Road RG2, unspecified address in Coley Park, Coley Park Farm, Longships Way RG2, Northumberland Avenue RG2, Oxford Road, Rembrandt Way, Rose Kiln Lane, Rupert Street, Swallows Croft, Tintern Crescent, Vine Crescent RG30, Westcote Road RG30, Wokingham Road RG6.

4.105 It is also pertinent to note that during the course of the application The Coley Rise Residents' Group advised officers that they considered that responses had been sent from a number of further addresses not accounted for in the numbers above. All the responses were cross-referenced and re-checked, which enabled a number to be re-indexed and available to view via the website. However, there were 19 addresses where the local planning authority had no record of these being received (3 within Wensley Court, 3 within Irving Court, 8 within Riversley Court, 5 at Wensley Road addresses).

4.106 In respect of these 19 outstanding addresses, the local group was advised that it may have been the case that some of the addresses were logged differently to what they were in reality, in particular relating to Wensley Road and Wensley Court. A number of responses already specified Wensley Road on the master document completed; many respondents changed 'Road' to 'Court', but others may not have done so. Another explanation may be that the number of the address was not written clearly, so it has been logged with a different number to the records the local group has. Officers also received a small number of responses where the flat number of the property within Wensley Court (1 instance) and Riversley Court (2

instances) were not stated, which again may account for a number of the outstanding addresses.

4.107 There were also 4 other addresses provided by the local group whereby the local planning authority has no record of this being a valid address (e.g. 13 Irving Court) and one instance where only a generic 205 Wensley Road (which is Riversley Court) address was provided.

4.108 Given the above context, officers have logged the addresses stated by the local group, so that notification letters of the Planning Applications Committee meeting are sent to these addresses. Given that officers have not had sight of the responses from the 19 addresses referenced by the local group, these are not included in the overall 336 number above.

4.109 A summary of issues raised in the 336 individual objections are as follows:

4.110 Car parking (as part of transport based matters although matters have been grouped as far as possible, there is some inevitable overlap)

- Inadequate parking provision - proposals do not apply RBC Parking Standards - less parking is proposed than is needed. Concerned that either the 10 or 38 additional spaces proposed is not sufficient for the 46 houses proposed.
- 74 new spaces are required yet the plan appears to deliver no new spaces in real terms. Another response states that creating another 38 spaces is wholly inadequate. A minimum 1:1 ratio is required.
- 0.735 vehicles per home is insufficient, below ownership levels and not in line with RBC Policy. The new plan is to actually provide fewer spaces per home (0.73 compared to 0.82) than is currently the case ... Mind boggling!
- Proposed parking does not allow for any visitor parking.
- 36 of the 38 new parking spaces will be electric charging spaces - therefore reducing the true ratio of spaces per dwelling even more.
- There is already a massive shortfall of parking - the high-rise flats should have 301 spaces; currently there is said to be somewhere between 192 and 220 available (different figures stated in different documents). Another response states that the current parking situation around the Wensley Road loop and within the high rise block car parks is at the very least chaotic. A further response details that they do not believe the Highway Authority has been made aware of the true parking situation that currently exists (the 2 walk-round surveys performed by RBC do not reflect the true existing parking need/usage), or the true reduced ratio that will exist with the new proposals.
- The plan will take away most of Wensley Court's parking spaces and locate them to be more easily accessible for the new builds rather than Wensley Court.
- A very regular visitor to Wensley Road finds it very difficult to find a parking space and not even a space on surrounding roads; this will worsen.
- The existing parking and garage use quoted in the statement are based purely on fantasy and assumption. Another states that not all the existing car parking spaces used have been counted - residents have calculated that approximately 40 extra spaces that have not been accounted for will be lost. These are spaces on the slopes of the garages, parking courts and grass verges.
- Insufficient parking will lead to roads in the wider area becoming overburdened with parked cars, seriously impacting on highway safety.

- Residents have petitioned RBC for at least 7 years to resolve parking problems - previously told that replacing grass verges would increase parking, but this is not possible as the verges act as soakaways to mitigate flood risk.
- Concern about parking impacts on Lesford Road - will chargeable parking need to be introduced as a result of this proposal?
- In summary, the proposed parking provision is inadequate, and is not in line with policy or car ownership levels. This would lead to even more intense on-street parking pressure on surrounding roads, which would inevitably have a serious impact on highway safety.

4.111 Increased traffic / congestion / highway safety

- Increased congestion owing to Wensley Road being a single entry/exit road - 67 resident vehicles will have a huge knock on effect for an already congested residential road.
- Increase in traffic which will make congestion worse and cause more risk to safety, with large works vehicles also using the road. For example, concerns at the potential increase of traffic outside the primary school, as the standard of driving is very poor. Another response states the additional traffic will put significant strain on the existing roads and will cause further bottlenecks on Shaw Road and St Saviour's Road, at the junctions with Berkeley Avenue which are already extremely congested in the mornings.
- Increased traffic on the already congested Lesford Road. Those reaching the south or east of the loop will use Lesford Road, or use the new roads as cut-throughs, or there will be an increased use of u-turns on the loop. Those living on Lesford Road may be faced with longer journeys (more carbon emissions).
- The roads barely cope with existing vehicular movements and both become heavily congested in peak periods. It is irresponsible and naive to contemplate additional development on the estate until the capacity and safety of the existing road network is significantly improved.
- Lived here since 1977 and over that time 7 housing developments have brought excessive traffic which was never designed for. Getting in and out of the estate is a nightmare (the area has a single entry/exit point). This area is not for more housing.

4.112 Stopping off the loop / highway safety

- Stopping off the loop will be a serious contravention of Policy TR3 "compromise the safe movement and free flow of traffic on the network or the safe use of the road" and "changing the nature of an existing access or the type of traffic using the access, is likely to bring about risk to the safety of road users and increase traffic volume". Another response states the application does nothing to promote public safety, less congestion or less pollution on the public network and fails Policies TR1, TR3 and EN15 of The Local Plan.
- New roads and stopping off the loop will lead to safety issues. Children are used to coming out of the flats and going straight to the play area. Another states the new road will run through a currently pedestrian area and again almost circle the Wensley Court building, cutting residents off for any new play areas by a new main road.
- Closing off the Wensley Road loop would delay emergency services reaching their destination and we have 3 high rise blocks of flats which were cladded some years ago. Another states that most Coley residents have noted over the years that the Fire Service attend emergencies in the high-rise flats and the restricted entrance road will impede their rapid access. Similar

problems will occur when ambulance crews attend to emergencies as well as non-emergency occasions when returning non-walking patients

- Closing the loop creates a series of highly unsafe environments and cause a huge increase in traffic along Lesford Road.
- The proposal promotes stopping off the loop as a positive move; the only reason for building two new through roads, blocking off part of the loop and rerouting the bus is to accommodate the building of the new homes.
- In recent weeks the council have conducted a comprehensive Health and Safety review of the Coley Community Centre, in Wensley Road, and this has resulted in a list of over 50 shortcomings needing to be attended to. Many of these concerns have existed from the time the Community Centre was built. The safety of the Coley residents is important, and action will be taken to ensure remedial action is taken as soon as possible. Many residents are equally concerned with the safety implications of the Planning application No 200122 which proposes a new road way which will be built within 10 feet or so of the front entrance to the High Rise block of Flats (Wensley Court) which has approximate 200 plus residents many whom are children.

4.113 Highway safety

- Proposals do not give priority to pedestrian and cycle movements. The proposed shared surfaces DO NOT give priority to pedestrians and will cause conflicts between pedestrians, cyclists and motor vehicles. Shared streets are dangerous and pose an extreme risk to pedestrians, and possibly even vehicles and cyclists.
- Shared spaces are dangerous and the Department of Transport have produced a report calling for a halt on them. There is a current ban on shared space streets, except for in situations such as cul-de-sacs or mews. Despite the Design & Access Statement, P56, 4.2, claiming that the new north/south road will be a 'mews', it will not be.
- Nobody has priority in 'shared space streets' be it vehicles, pedestrians or cyclists. The NPPF states that priority must be given to pedestrian and cycle movements.
- These shared space streets pose an extreme risk to pedestrians, especially to children, blind or partially sighted people, and people who are mentally impaired to the extent they find it difficult to navigate or understand shared space areas.
- Detrimental impact on highway safety as more traffic will be forced to use Lesford Road, which already suffers from intense on-street parking pressure, as the blocked-off part of the loop will no longer be able to be used.
- Detrimental impact on highway safety as drivers will carry out u-turns around the network for convenience, rather than drive all around the loop once part of it is blocked off.
- Detrimental impact on highway safety as the new proposed roads will be used as cut-throughs.
- The introduction of the 2 new roads would create hazards and safety risks to pedestrians, particularly the many children who live on the site and are accustomed to roaming around freely without the worry of cars and buses coming through.
- The width of these new roads, closeness to the existing buildings, and the proposed car parking spaces which in many cases will be on both sides looks like a recipe for disaster. Another states it should be noted the roadway will not be across a level area which will leave pedestrians unable to see approaching traffic along a twisting route.

4.114 Buses

- It is worrying how the bus will manage to even manoeuvre around such an area whilst negotiating other moving vehicles, pedestrians - adults and children moving around the area, cyclists and the sheer number of parked cars.
- Bus stop will not improve access as stated; some people will walk shorter and others further distances. The stopping up of the loop means there is no choice but to reroute the bus. To suggest that this is being done to encourage more use of sustainable transport is a gross distortion of reality.
- During peak bus times the facility is not adequate to meet the current demand. This is forcing lot of travellers to either travel standing or use alternative ways to reach their homes. This problem needs a solution before any additional development.
- Object to the Reading Buses consultation response suggestions; further reduction of parking spaces and introduction of yellow lines will realistically have a knock on effect with vehicles having to park further along the bi directional part of Wensley Road. This in turn will cause more of an inconvenience to the bus journey. A One Way system around Coley Loop was refused at the Traffic Committee on 13th September 2017 where there were resident objections. An anticlockwise system will lengthen all journeys (North side residents from 70 metres to 600 metres), increase exhaust fumes and decrease in air quality in the area. Traffic will be forced around they loop, causing congestion when following a bus. Increase in traffic crossing the shared spaces, located near the new play areas (increased risk of accidents). Restricted spaces for delivery vehicles and double yellow lines will only add to the parking problem with more inconsiderate parking.

4.115 Cycle related matters

- Claim that cycle routes have been extended are a gross distortion of reality. Cycling through the site will create hazards to pedestrians, rather than use the existing Wensley loop network route.

4.116 Electric Charging Points

- Whilst it is great to see this forward planning, unfortunately, I feel it will only exacerbate current parking issues. The widespread adoption of electric cars is still in its infancy, & only an option for those who are committed to a greener future, & with the disposable income to afford one, as they are more expensive than petrol cars. I fear that for the present, there will be a lack of uptake of electric cars filling these 32 spaces. As a result, these spaces will be unused. This will only increase & overload the amount of on-street parking, & parking on grass verges & other roads which is currently the scenario that is occurring.
- Another important point to consider is the fact that these electric charging points, presumably, will be available for use by residents in the surrounding area, for example those around the Wensley loop, the west of the inner loop, Lesford Road, & the wider Wensley Road. Therefore, the electric charging points cannot be included when calculating the proposed parking provision for the new homes or the site overall.

4.117 Wider / other transport impacts

- Measures to reduce reliance on private cars will make no difference to use of either public transport or cars
- These new roads will deliver a lethal and toxic concoction of petrol and diesel fumes in a confined area which will be allowed to swirl around the

children's play area between the three towers within the existing 'un-safe micro-climate wind'.

- Increased pot holes on the road

4.118 Loss of Open Space / Green Space

- Existing green/open space is much valued by the community (e.g. warmer month events). Will be a great loss to the community as a whole and will potentially cause damage to community cohesion.
- Claim by RBC that the green space is under-used is strongly disputed.
- Contrary to Policy EN8 as the replacement green space will not compensate for the loss of the valuable existing community amenity.
- Reduction from 11,275sqm to 4,378sq of green space (61% reduction). Another states the erosion of public greenspace noted above seems very insensitive. It is an outright loss & deduction in space that has not been offset with alternative plans or considerations. The loss of valuable open space around & between existing dwellings would have a serious detrimental impact on the psyche & lives of existing residents in the flats. They have no roof gardens or balconies, & apart from the sense of space & openness the current public greenspace currently provides, it also serves as a valuable communal area for sitting, meeting, exercising etc. The current space also serves as a highly valued visual amenity
- Not practical for children to use remote facilities at Courage Park (currently supervised from their homes; will not be possible in the future).
- How can the Council justify taking away a large area of green and filling it with concrete?

4.119 Loss of MUGA & associated amenities

- Loss of regularly used MUGA will be a great loss to the young community.
- Replacement outdoor gym does not compensate, as it does not allow for the same type/range of exercise/enjoyment.
- Sports court, bike track and dog walking area are well used amenities.
- The proposed development plan has acknowledged that it will not be feasible to re-provide the MUGA (Multi Use Games Arena). This is a complete dereliction of duties & is in opposition to Sport England initiatives & Govt mandates & ambitions to improve the health of children, reduce obesity, & promote well-being. It would appear it is acceptable for the children to have nowhere to play sport, or to have to travel a substantial distance to perform any exercise. This is simply not feasible, especially for younger children who need adult supervision

4.120 Loss of dog walking area

- Valuable amenity to older people who struggle to walk further afield
- Some will walk their dogs in the new central space that consists largely of play areas.

4.121 Loss of garages

- Loss of garages is a major concern; detrimental effect on work and social lives of current residents (e.g. individual responses refer to storage of space for various items including a classic car, bicycles and a motocross bike, as well as personal belongings); loss of parking on verges around the garages or in-front of the garages.
- No alternative has been identified for the loss, contrary to page 43 of the DAS. Not clear where the replacement facilities are going to be located. Any replacement facilities will only be considered in phase 2, not as part of this application.
- The garages are well used and there is a waiting list for these.

- Removing garages will only exasperate the parking issue within the area (permit parking is not a solution as all it does is line the Council's pockets and move the cars one road down). Policy H14 states "there would not be an unacceptable impact on the highway network as a result of loss of parking areas".
 - Gross injustice that existing residents are to lose their garages and cycle stores for homes which will all be provided with cycle storage.
- 4.122 Density of development
- Area currently overpopulated with a density of 131 dwellings per hectare.
 - An additional 46 dwellings / 226 people will put further strain on an already strained community.
 - An additional 46 properties will increase density to 133 per hectare, 13 above RBC's recommended property density. Too much for the site and result in overdevelopment. Another response states the proposed dwellings per hectare for this planning application FAILS Reading's recommended Indicative Density Ranges from The Local Plan. This will lead to unacceptable levels of overcrowding and have a negative knock on effect on our current parking problems and other anti-social problems already rife in the area.
 - Coley has already adsorbed a huge amount of housing deficit by losing its open space and facilities (75 homes in Swallowscroft, 13 at North Lodge Mews, 71 in Castle Walk, 4 on the former community centre, Rembrandt Way and the local pub converted). Further development will make the area feel crammed, leading to social issues.
 - The area is suburban but RBC are now trying to argue that it is urban in an attempt to try and justify higher dwelling densities.
- 4.123 Site/area not designated for development / need
- Coley Park not identified in the November 2019 adopted Local Plan and therefore no basis for permitting development in this area.
 - What is the purpose of this Plan if RBC simply ignores its own policy? Coley is not identified in the document.
 - Claims that these 46 new dwellings will somehow solve Reading's housing shortage from a waiting list which is actually 0.7% higher now comparing the population in 2018 to that of 30 years ago is a complete myth.
- 4.124 Covid-19
- Coley Park has had the highest death rate from the Covid 19 in the local area. 12 in Coley Park compared to 2 in Southcote which is a much bigger estate. This is a small overcrowded estate full of people and cars. Should more any more houses be squeezed into this small area?
- 4.125 Mix of affordable housing
- This proposal does not meet the indicated housing mix requirement for affordable homes as set out in the SHMA 2016, as stated in the Planning Statement 5.16.
- 4.126 Design / Scale / dominance of new buildings
- Proposals are out of context with the surrounding area and does not respect the local context and street pattern.
 - Existing 1950s/60s character, limited to 2 storeys; proposed 3 storeys with dormers, slate roofs and different facial layout completely out of context.
 - Mix of styles will make the area seem like a fragmented mix.
 - Comparing the proposals to houses on Pell Street and Katesgrove are not relevant, as they are outside Coley Park.
 - Standard designs simply dumped on a bit of spare space. Unacceptable!

4.127 Flood risk

- Proposals will increase flood risk and have knock-on effects on other areas. Site on the very edge of Flood Zone 3. Surface run-off will cause increased pressure on Holybrook within flood zone 3. The gardens of houses on the south side of the loop are known to flood.
- Risk to further flooding has not been considered adequately. Two EA red alert warning have already been issued in 2020.
- Rain water runs from existing houses and out of an overflowing drain manhole to the front of gardens on the south side of the loop. Therefore, the current drains are struggling and this will only worsen with more dwellings. Another states taking up more land that prevents soak-away will add to the increased water levels affecting the farmers land. In January a herd of cows were trapped behind Matalan with no way of getting them off the land and with rising water levels.
- With the climate and ecological emergency, which Reading council has acknowledged by declaring a climate emergency (though they done little more than that to address it...). We will see more freak weather events such as the last 2 big storms and massive amounts of rainfall in a short period of time. There will be an increased risk of flooding in the area which is already near to Holybrook. There will be less green space to absorb the rainfall and more surface water left. Drains along will not solve this problem.
- The wider 10.678ha site is within Flood Zone 3. With Reading Borough declaring a Climate Emergency a year ago, and with the recent heavy rainfall and flooding experienced, I not only find it highly irresponsible to be building more properties 44m from a flood plain, but extremely reckless to not consider the consequences of dumping more water run off on the existing properties and the flood plain.
- Hypercritical of the council to claim grass verges cannot be removed in order to alleviate our existing parking problems because 'they play a really important role in urban drainage'. However, it is somehow acceptable to remove 6,897m² of green space and replace with concrete, hundreds of metres of new roads, and thousands of metres of new car parking in order to build more homes. What then of RBC's Climate Emergency? The Council need to take a responsible lead on what they preach and protect our environment for future generations!
- Flood assessment only makes recommendations, there is no actual plan to deal with the serious issues.

4.128 Loss of trees

- Loss of 263/273 trees, including 62 category B trees. 184 new trees still mean a loss of 79/89 trees, in contravention of Policy EN14 (paragraph 4.2.68). It is noted that there is contradicting information within different reports. For example, the Arboricultural Impact Assessment states 'trees T87, T90 and T93 will be removed due to failing health' yet in the Tree Survey it states these trees have a value/lifespan between 10+ and 20+ years.
- Some trees identified for removal have a lifespan of between 10+ to 40+. For example, T94 a high quality tree with 40 plus years of life left in it, and yet the Tree Survey recommends it for 'scattered deadwood'.
- In order to 'create space' for these new homes, 66 established trees and 13 groups of trees, totalling 275 trees will be destroyed. In view of RBC declaring a 'Climate Emergency' in 2019, this is not only very disappointing, but also criminal.
- The planning documents show that there will be an overall loss of around 80 trees once new ones have been planted. As well as these trees being a

highly valued visual amenity to existing residents, this seems to be completely at odds with claims throughout documents of reducing carbon emissions and building for a sustainable future.

- Unsure how a net loss of nearly 100 trees is meeting the Council's biodiversity, & climate needs & commitments? Or Tree Strategy for Reading (Adopted June 2010), which promises to significantly increase the amount of tree coverage by protecting trees from development pressure?
- Bearing in mind RBC's supposed policy on retaining trees and green infrastructure, and the recent blunder of removing hundreds of newly planted trees in Palmer Park 'by accident', I firmly believe this planning application should be rejected.

4.129 Proposed trees

- There will not be enough trees proposed.

4.130 Impact on wildlife

- Loss of trees will have a detrimental impact on wildlife, such as bats (common sight in the area) and birds.
- One tree identified for removal is detailed as having a moderate possibility of roosting bats. Bats and badgers are known in this area.
- Bat surveys undertaken in winter (during heavy rain) when bats mammals and birds are hibernating or migrated; a further survey should be undertaken. Even ECOSA Ltd who carried out the survey confirms 'bat surveys can only be carried out between May - September'.
- The report states 'badgers, hedgehogs and common frogs are unlikely to be present so will not be considered further in this report' This is completely untrue and has been based on out of date/incorrect desktop study results and assumptions. Badgers are regularly seen foraging along the grass verges in the area, as are hedgehogs and common frogs.
- This proposal goes against RBC's declaration of a Climate Emergency, and fails policies EN12 and EN14 in The Local Plan and Public Health England's 'Improving Access to Green Spaces'. The ECOSA Ecological Impact Assessment is not trustworthy enough to be correct.

4.131 Overshadowing / light

- Houses on the north side of the loop will be overshadowed from these overbearing homes
- New houses 23-29 will have under the minimum guidance for light to their garden

4.132 Visual amenity (visual dominance/overbearing/outlook)

- Contrary to Policy CC8, as outlook will change from footpaths and play areas to a road full of parking spaces.
- Blocks A, B & C will be visually intrusive and cause considerable harm to outlook. Current outlook is open space and trees; replaced by 3 storey houses, giving a feeling of overbearing and enclosure.
- Current outlook of footpaths and play areas will be seriously harmed by being replaced with a road full of parked cars.
- Current outlook of a pedestrian area made up of trees and grass will be seriously harmed by the fact that this will be replaced by a road with the bus route running through it.
- The plan will develop 360 degree around Wensley Court flats. Buildings in front. Car parking spaces to one side. Buildings behind and a new road through the other side.

4.133 Crime / safety / Anti-social behaviour

- Already anti-social behaviour (e.g. drug use); higher population is likely to bring even further issues, due to intensified population. Another response states there has also been an increase in crime in the area and it is feared that this will continue to increase with increased housing.
- 4.134 Wind
- Unsafe winds will not be mitigated as recommended making the new play zones and shared roads danger areas. Unacceptable! Results in public areas not being fit for purpose. 'Unsafe' wind conditions may be developed at the exposed opens spaces westerly and northerly to Tower T2 as well as easterly and northerly to Tower T3.
 - S.7.1.9 of the Wensley Road Microclimate Assessment states: "The unsafe wind conditions at pedestrian pathways can be mitigated with the planting of dense hedges or the installation of screens along them. Either measures need to be at least 2m tall, well above the height of the pedestrians in order to promote the sheltering effect". The visual solution presented in the document (dense hedges) conflicts with the proposals
- 4.135 Sewerage and drainage
- Concerns about the capability of the sewerage and drainage system coping with additional properties in the area, owing to past problems and current very slow drainaway.
- 4.136 Flytipping / litter / waste facilities
- Flytipping
 - Litter is also a problem and more people living in this area will not help.
 - The current recycling facilities are not fit for purpose. Unclear where they will be re-provided as part of this proposal.
- 4.137 Rats
- Serious on-going rat problem at the site. Issues will not be addressed until Phase 2.
 - With the building/pipe work it is likely rats will further invade existing and new buildings / pipes.
 - Proposals will disturb existing "super" rats, forcing them to seek shelter in other nearby locations.
- 4.138 General/wider amenity impacts
- Proposed development would have a detrimental impact on standard of living for individuals and the community as a whole.
 - Understand the need for more affordable housing in the town, but do not believe that planning permission should be given to build when I would have a detrimental impact on the lives of people already living here.
 - Can see no benefit for the Coley Park residents; instead it will negatively impact on all residents.
 - There is no noise assessment submitted.
- 4.139 Quality of proposed living accommodation
- These properties they will be in the shadow of the flats and have very little privacy.
 - No shadow plans for 21st December are provided, when shadows will be longer. 36% of the properties fail the sunlight assessment impact APSH Target of 25%. 28% of the properties fail the sunlight on the ground test for 21st March and 21st June - area with at least 2 hours of sun. It is fairly obvious most properties would probably fail the test for 21st December when the shadows will be considerably longer, hence the omission from the assessment.

- The block C houses are only 14.9m from Wensley Court high rise and only 12.1m from the Lesford Road flats. The gardens for the houses are only 10m in length.
 - This planning application FAILS policy CC8 and provides unacceptable living conditions for new residential properties, and BRE Assessments
 - The gardens of the proposed Block C houses will be overlooked by the Wensley Court High Rise block
- 4.140 Supporting infrastructure
- Doctor surgeries will be too crowded
 - Local school is already over prescribed.
 - Consideration has not been given to either primary school or doctor surgery availability.
 - I think the infrastructure of Reading town needs to be improved with better schools and GP surgeries and roads and retail facilities as a priority, before constructing more new homes
- 4.141 Air pollution
- Increased air pollution will worsen health of residents
- 4.142 Water pipes
- Thames Water comments stated not building should occur over or within 20m of main water pipes. No such plans shown in the application; RBC should have had these ready for viewing.
- 4.143 Safety / vibration / amenity concerns during construction
- Heavy site machinery/vehicles will have to use the road, passing a primary school on Wensley Road (far from ideal from a safety perspective).
 - Existing roads have defects - not simply potholes or weather erosion, but vibration impacts on houses when heavy traffic crosses the faults, causing great disturbance to the right to enjoy a family life - questions regarding the stability of the road and RBC are lacking in their duty of care to existing residents. Issue should be investigated before any application can be considered. Another response asks has an assessment of the ground under the road been done?
 - Construction traffic will inconvenience existing occupiers (e.g. disturbance to the flow of traffic and prevent people undertaking weekly shops).
 - There would also be problems with dust which could result in health concerns and noise from heavy plant machinery (estimated duration of 2 years).
 - Proposals will cause noise pollution. There will be an unbearable amount of noise generated by the development and the removal of trees, due to machinery being used (reference to Policy EN17 criteria).
- 4.144 Parallels with other planning applications
- The reasons cited for refusal of the Tilehurst development (171219 and 182114 6 no. 3-bedroom dwelling houses at Thorpe House Colliers Way Reading RG30 2QS, as refused at planning applications committee on 4th March 2020) are very similar to some of the issues with the proposed "Coley Rise" development:
 - o Over development. The rejected development proposed to build 6 flats on 0.3 hectares resulting in a density of 20 dwellings per hectare. Yet the "Coley Rise" development will result in 131 dwellings per hectare which will lead to overcrowding in an already congested area. It does appear that there will be one rule for the nice leafy suburban areas of Reading and another for ex-council suburban areas.

- The loss of open space. In the “Coley Rise” proposal over 60% of the green/open space will be removed with the loss of valuable community amenities. Why is it that open space cannot be used in the leafy area of Colliers Way, but it is OK to build all over it in a population dense area?
- Insufficient car parking provision. At “Coley Rise” parking provision will actually decrease but is hailed as an “improvement”. The contrast is stark.
- 50 local residents had objected to the Tilehurst plan and these were taken into account and appear to have influenced the decision. With circa 350 objections for the “Coley Rise”.
- Therefore ask that the rejection of application 182114 and 171219 (which was “deemed wholly inappropriate”) be considered as setting a precedent for the rejection of application 200122

4.145 Consultation

- HTA consultation prior to the application was misleading. Many residents believe they have already raised their objections.
- At pre-application stage not all homes were notified, and those that were only had (an inadequate) 6 days’ notice.
- Pre-application consultation looked like a community fun day flyer and were hand-delivered, so many would have been disregarded as junk mail (should have been posted via Royal Mail).
- Consultation (at the time of the planning application) has been hindered by the fact on numerous occasions the website has been inaccessible, displaying message internal server error.
- Majority of residents who attended the initial consultation meeting at the community centre agreed this was a bad idea and had their concerns, but this does not appear to be taken into account and when we met with developers they did not seem to know why they were there to meet residents. It feels like this decision has been made and that putting on meetings and putting up a planning application is just a formality when we feel that we are not being listened to.
- Why were surrounding residents (e.g. Lesford Road) not invited to the early public events?
- The feedback recorded by HTA and detailed in statement of community involvement would not be an accurate representation of resident’s opinions/concerns especially compared to the petition submitted. It also states leaflets were delivered to the whole of Coley Estate and then states delivered to 521 homes, this is far from the whole estate which is more than double, and many residents are still unaware of the proposed plans.
- The design consultation document suggests support from residents which is simply not true for the vast majority.

4.146 Other comments

- Advised by Councillors at the first public meeting that Coley Park was the only site Homes England would fund. Homes England advised they “did not identify the Coley Park site for development” - so who did? Coley Park being used as a dumping ground. The area is already looking horrible with the containers and the fencing for the work they are currently doing.
- One respondent simply comments that the proposals are a disaster and a shambles. Another states this development would be a travesty if it is allowed to go ahead...
- Consultations should have been sent to residents (whose first language is not English) in their first language to ensure they fully understand what is proposed.

- It feels that an already less affluent area has to just grin and bear changes.
- Private house prices will be effected.
- Need to sort out the many issues with the high rise flats (repairs, doors changed, flooring, walls, surrounding area) before planning any other work.
- Disappointed that the material is so hard to access on the RBC website.
- The previous development area near to Wensley Road was Castle Walk (Coley Avenue). Though the development completed 2 years back, the developer has left lot of issues/problems. Unless these breaches are addressed, any new development will just amplify the current problems.
- Please do not build more houses - look around you at vacant and derelict properties and restore them for housing and integrate people across the borough.
- Artists' impressions showing large open areas of space, wide roads and pavements and very few parked cars. All of the existing properties have been drawn to a reduced scale to hide the truth of how overbearing and close to the existing properties they will be - they are very misleading.
- There is mention within the plans of a phase 2 which involves a regeneration of the area to apparently improve the lives of the existing residents, however there are NO real details. This new proposed development must not be allowed to be used as a way of promising improvements when our council has allowed this area to become so run down after 30 plus years of neglect. It would be far better to provide these improvements first before adding more properties, people and problems to a completely unsuitable area, as it is obvious the money will run out before any improvements for the existing residents take place.
- The fact that this planning application has already received well over 300 objections and has so many things against it must be a major consideration of the outcome of the proposal.
- Extremely disappointed to have found a serious lack of honesty within the planning documents, which paint an idyllic picture of the proposals, and promote the development as being of benefit to existing residents, when the complete opposite is, in fact, true.
- Decisions should be in line with the plan, unless material considerations indicate otherwise". However, the various documents (Design & Access, Planning, Transport, Arboricultural statements etc) that support & underpin Planning Application #200122 appear to contradict the policy statements & ambitions within the Local Plan.
- The distortions in the application are breath-taking and as a tax paying net contributing resident it has come as a rude awakening that our own council who claim to serve us can operate in such an unprofessional and undemocratic manner.

4.147 **The Coley Rise Residents Support Group** submitted a redacted version of the updated 'Petition and Survey Opposing Coley Park Rise Development 2nd October 2019' (the original document having been submitted on 02/10/19 to RBC during the pre-application consultation process).

4.148 The submission states that the document was prepared by local residents in Coley Park following large scale engagement, discussions and consultation with hundreds of local residents concerned about RBC's proposals, and how any such development would impact on their lives.

4.149 The submission states that none of the substantive issues in the petition have been addressed in subsequent revisions of the design plans by either RBC or the developers, and all resident concerns to date have been completely ignored. The views of the majority of local residents directly

affected by RBC's plans must not be allowed to be ignored at the expense of rushing through an unsuitable development in an already highly over densely populated area suffering so many social problems in order to just spend money within an unrealistic 2 year deadline through fear of losing the funding.

- 4.150 The document submitted includes the following statements:
- More than 600 local signatures objecting to the development
 - Door to door surveying shows more than 95% opposed to any development in this area
 - Postal survey shows 80% object to any new housing development
 - 100% object to the building of 44 homes
 - 93% believe they have not been properly consulted
- 4.151 Key Facts:
- The Coley Park Loop has 135 homes per hectare, 15 more than RBCs own limit.
 - Development will increase this to 156 per hectare, 30% higher than the maximum!
 - At 7000 per sq km the loop is already amongst the most densely populated areas in the country!
 - Parking is already chaotic, further development will only increase it.
 - We already have existing and unresolved environmental issues such as sewage problems and rat infestations. New development will exacerbate these.
 - No new infrastructure or community services are planned to support the increased population.
 - Proposal does not support RBCs declared priority need for 1 & 2 bedroom homes to enable social housing occupation efficiency.
- 4.152 *'We are not against the building of council houses, but don't think this already overcrowded area is suitable, so we therefore request the council to find land which is more suitable and appropriate for the development'*
- 4.153 Since the proposals to build council houses around the two hectare site surrounding the high rise flats, a group of local residents have spoken to hundreds of local residents to ask them their views. A survey has also been delivered to 1,800 properties within and around Coley Park, as these proposals will not only impact the residents around the Wensley Road loop, but also around the whole Coley estate. The overwhelming consensus is it would be absolute madness to build more properties in this overcrowded area, and add to the existing parking and social problems already rife in this area. It is hard to believe anyone would even suggest knocking down garages used by residents, destroying established trees and ripping up the green environment, let alone actually offer up the land to Homes for England as an ideal site.
- 4.154 A list of the local resident's main concerns in opposing any such Development:
- Demolition of garages
 - Increased traffic/congestion
 - Lack of parking
 - Environmental issues
 - Schools
 - Doctors

- Anti-social behaviour
 - Access/roads can't cope
 - Drugs
 - High density
 - Rat infestation
 - Lack of green space
 - Crime
 - Rubbish/flytipping
- 4.155 As of 10th February 2020 a total of 645 residents have signed the petition opposing the building of new properties around the Coley Park high rise flats and object to the demolition of the garage blocks:
- Wet Signatures: 359
Avaaz.org: 251
Inyourarea.co.uk: 35
Total = 645
- 4.156 We request Reading Borough Council to find a more suitable location to build these properties which is not in such a highly densely populated area like this which already suffers from parking and other social issues.
- 4.157 The submission also includes various local press reports, a tweet from Rt Hon Alok Sharma MP, mapped out diagrams showing the home location of residents who responded to various questions and details of the petitions themselves.
- 4.158 **The Coley Park Residents' Group** later made a separate objection submission. The summary of the document, in full, states:
- 4.159 Following on from Reading Borough Council's announcement in July 2019 to build homes on the land surrounding the high-rise flats and within the Wensley Road Loop, led to a group of genuinely concerned local residents to get together and form The Coley Rise Residents' Group. Since our information, we have gained the support and trust of more than 95% of Wensley Road residents who are deeply worried about RBC's short-sighted plans.
- 4.160 We all appreciate the need for more '*affordable housing*' in Reading, but these must not be allowed to be built at the expense of damaging the local environment for future generations, and leaving a negative impact to the existing residents through the lack of any '*improvement infrastructure plans*'. RBC must not be allowed to just dump new homes, extra people, more vehicles and any associated anti-social problems within unsuitable areas of land because they can, and certainly not without valid reasons for doing so. This planning application has been cleverly disguised as a '*regeneration project*' to benefit existing residents, but in reality it seems nothing more than a '*build now and promise to fix later scheme*' which the residents haven't been taken in by and do not sign up to. This project certainly shouldn't be allowed to mask the decades of neglect suffered in this area due to lack of maintenance, support and improvements from our council.
- 4.161 It is the lack of understanding from RBC, and the potential damage to our environment and community which has upset the local residents more than anything. Throughout the whole process, residents' views have been

completely ignored and dismissed by our council, councillors and the developers. Add to this the misleading and withholding of information from our council and local councillors regarding the rationale behind these plans, and it is not difficult to see why there is such massive objection. These very same councillors who are duly elected to represent the people they serve, but instead prefer to ignore the majority view and continue with their own agenda regardless.

4.162 This report is based on a thorough, honest and detailed examination of all the planning documents, statements and surveys related to this proposal. Its objective is to discover the honest viability of the plans and proposals submitted by RBC.

4.163 A summary of the main objections to the proposals are:

- The criteria for the selection of the Coley Rise development area not clear, indeed it is the overwhelming view of the current residents that RBC would be hard pushed to find a more unsuitable site for development.
- The proposed development can be described as a piecemeal development, dropping standard, pre-designed homes onto a piece of inappropriate land simply to spend money obtained from a Homes England grant. It shows a disregard to the existing residents and to the damage it will cause to the wider Coley Estate community.
- Density / overcrowding: The Coley Park Estate is a suburban development situated to the south east of Reading Town Centre. It is surrounded by the Courage Park development, Southcote and the wider Coley Estate. The proposed development site, "Coley Rise" sits to the west of the Coley Park Estate. The area defined within the red line boundary comprises of 3 high rise blocks of flats (the towers) sitting currently on 2 hectares of land. The current homes density is 113 dwellings per hectare which is already way above the local context of 49 homes per hectare. Even though the estate is in a suburban area it is being treated as an urban area for the purposes of determining the appropriate dwellings density. There is no rationale for the change of status which is not aligned with Reading Borough Councils own current policies and surveys. The determination of the proposed site as "urban" within a "suburban" context is not aligned with current Government guidance for planners. The area is wholly unsuitable to be developed as an urban site as the local infrastructure simply cannot support it.
- Car parking provision - Flats and New Build Impact - Contrary to the submitted planning design which states an improvement in parking provision the actual situation, based on the detailed information provided in the planning application is that parking provision will decrease and thus exacerbate an already difficult and at times chaotic situation. Not only are the total number of existing car parking spaces inconsistent throughout the documents, other errors include a disparity in the number of charging points within the documents. There are clear disparities within the submission about the current parking provision. It is only right to ask that the parking figures presented are clear, accurate and unequivocal, they are not. The inaccuracies in the statements are such that the application must be refused until the information is true and accurate, and by agreement with local stakeholders.
- Parking Provision - Impact on Houses on the Inner Loop. Concern that the 55 dwellings within the inner loop have not been accounted for in the parking figures (30 use the current parking provision) and unclear if the

new provision will benefit them. Measures to mitigate the impact on these houses have not been included in the plans.

- Traffic Management - closing the "Loop" and introduction of a pedestrian priority road network - The submitted planning application proposes to close the Coley Park loop between Lesford Road and the North East section of the existing loop. This will be replaced by a network of shared space roads throughout the development area. The safety implications of this new network through what is currently a pedestrian area are not addressed in the planning proposal. Indeed, such schemes have been subject to a ban and should never have been considered during the planning stages without a thorough safety assessment. Given that the new play area will be within the new network there is a real risk to child and adult safety that access to those sites can only be made by crossing these new shared space roads.
- Loss of amenities - MUGA and pump track - The loss of physical exercise facilities is a retrograde step and in contravention with various Government policies which are aimed at improving childhood health and reducing obesity rates. The proposed mitigation by suggesting children use the facilities in Courage Park are not realistic. The other proposal to install an outside gym is also inadequate to compensate for the loss. Experience from the outside gym shows that these facilities are infrequently used.
- Loss of amenities - community space - The proposed plan will remove 2 much used community areas. The loss of these amenities will lead to a significant decrease in the quality of living for the residents of the flats. The area to the north east of the development site is used by residents to walk dogs and the children play games. The area is used in the summer months for community events such as barbecues and social outdoor events which are an important part of the community cohesion. The removal of the dog walking area will result in residents using the remaining areas, children's play zones which will lead to other social and environmental issues. No alternatives are proposed for the loss of these valuable amenities and as such are in contradiction with the Local Plan (November 2019) and the National Planning Policy Framework.
- Loss of amenities - community space - garages - The plan includes the removal of a large number of garages (29 in total). These garages are let to both residents of the flats and other local residents. They are used for parking, long term storage of vehicles and general storage. There has been no audit of the use of these garages, no consultation with the users and no provision of alternative arrangements. The removal of these garages is not consistent with the Local Plan (November 2019) and the National Planning Policy Framework. It is only right that suitable alternative provision be provided for in the planning application, so far none have been proposed.
- Loss of wildlife habitat for bats and other species - The proposed development area is home to a number of wildlife species. Bats are present in the area from March until the autumn months. The proposed plans will remove habitat for these bats and other species. Other endangered species known to be present such as stag beetles are not considered in the draft ECOSA report. There has been no inspection of garages or survey of residents. It is clear that under the planned proposals offences under the Wildlife and Countryside Act (1982) will occur.
- Flood Risk: The Flood Risk Assessment is not based on the submitted design proposal. The area borders flood risk zone 3 at the southern end of the proposed plan. The figures used in the assessment are demonstrably incorrect. There is no impact assessment for the houses on the southern perimeter of the Coley Park Loop. These areas experience flood issues on a regular basis and have had 2 incidents in 2020 already. The proposed development will add additional load which will be discharged into the

Holybrook yet no consideration of the impact is made. The risk assessment must be finalised based on the use of accurate figures and also taking into account the impact on the areas immediately adjacent to the development zone.

- Privacy and overlooking/Access to sunlight and daylight /Visual dominance and - overbearing effects - The proposed development will significantly alter the fabric of the area and amount to serious 'cramming' in what is already an overpopulated area. The plans for the 3 storey houses in particular do not respect local context and street pattern or, in particular, the scale and proportions of existing houses to the north, and would be entirely out of the character of the area, to the detriment of the local environment. It is right that the planning committee consider the responsibilities of the council under the Human Rights Act, Protocol1, Article 1 which states that a person has the right to peaceful enjoyment of all their possessions which includes the home and other land. Also states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS Private and family life therefore encompasses not only the home but also the surroundings.
- Noise and disturbance - Noise is a material consideration in the planning process & key aspect of sustainable development. Noise must therefore be given serious attention when developments might potentially create additional noise, or are sensitive to prevailing acoustic conditions. Reading Borough Council (RBC) state they will not accept objections based on noise during construction. However, given the large and far reaching scale of this development and the density of the population it is right that this aspect must be considered.
- Rodent infestation - The Coley Park Flats area have a well reported large rat problem. Some flats have been abandoned recently due to the problem. Reading Council have attempted some limited control measures however the problem is still evident. Many residents have reported these rats which appear to be within the structure of the flats and surrounding areas. It is incomprehensible that planning permission be granted to an area with such an unresolved rodent/rat problem. To build new homes which will be at risk of rats' infestation would be nothing short of irresponsible.
- Anti-social behaviour - The Coley Park Estate has suffered from a significant amount of anti-social behaviour. There is a real and present drugs and alcohol abuse as well as fly tipping directly out of windows. It is also a reality that a number of the flats are illegally sub-let with the occupants being of unknown origin or background. It would be irresponsible to construct new dwellings on a site with entrenched and unresolved social issues.
- Micro-climate - wind - Wind amplification around the towers has been a long standing issue dating back to at least 40 years. The areas around the base of the flats are subject to "wind tunnel" effects, giving rise to strong gusts which can be difficult for the elderly, frail, those pushing buggies and cyclists. The micro-climate report confirms this effect and has highlighted areas around each of the towers as being prone to unsafe wind levels for pedestrians. Even though specific mitigation measures are recommended they have been rejected simply on the grounds that the new buildings do not contribute further to the safety concerns. However, it is clear in the micro-climate report that the new development will include the introduction of pedestrian areas and that these areas will be in unsafe winds zone. Not only has the micro-climate report highlighted current safety concerns which should be acted on without delay, the refusal to include the recommended mitigation measures shows a disregard to the safety of the residents in the affected area, and those who visit.

- Stylistic context - The Coley Park estate is a well-established and settled community. It was established and built in the late 1950's and early 1960's. As well as the towers in the development area there are 2 story houses and some blocks of maisonettes. The proposed design of the new dwellings is for 2.5 storey houses and 4 story flats. These are entirely out of context and style of this well-established community. The proposal appears to be piecemeal, clashing styles of homes and thus destroying the heritage valued by the residents.
- 4.164 The conclusions of the Coley Park Residents' Group are summarised as follows:
- The development is not fit for purpose
 - Residents and tenants in the affected area are resolutely opposed to this proposed development
 - Strong feeling that the development will simply be waved through regardless of these objections and the merits of rejection
 - Every report submitted as part of this planning application contains inaccuracies. They are all little more than documents full of false assertions and misleading statements, and lack any form of transparency or credibility.
 - This development would not only disregard many Reading Borough Council, Local Government and National Government Policies, it would also have a detrimental impact on the local environment and the community of the existing residents. In the words of one of our members, it would be nothing short of 'Environmental Vandalism'.
 - On behalf of the 'hundreds' of 'local residents' we are representing, who signed the petition and submitted objection letters, and who want their voices to be heard, we all categorically oppose these developments, and outright reject this planning application.
- 4.165 **Rt Hon Alok Sharma, MP for Reading West objects, as follows:**
- 4.166 "Based on concerns expressed to me by my constituents I am writing to object to the above planning application for development of 46 new dwelling units in Wensley Road.
- 4.167 I understand that local resident, Mr Nicholas Fudge, carried out a survey of his neighbours living in close proximity to the site, the results of which I am informed demonstrates strong opposition to the proposals. Mr Fudge received 160 completed surveys and found that:
- 80% of respondents think the proposed Coley Park site is unsuitable for any homes to be built on
 - 93% of respondents felt they had not been properly consulted by Reading Borough Council on the proposal to build on the site
- 4.168 I understand that local residents are also concerned about the demolition of the gardens which are currently in use by residents, increased traffic and congestion, a lack of parking in the area, and the worsening of local environmental issues.
- 4.169 As you may already be aware, local residents organised a local petition which received over 600 signatures. Additionally, an online petition can be found on the avaaz.org website which has received over 250 signatures.

4.170 I was also contacted by a number of constituents in September 2019 who were concerned by the lack of communications they had received from Reading Borough Council in respect of the proposed development.

4.171 I would be grateful if the Council could please take these objections and the contents of my letter into consideration when determining the planning application”.

5. RELEVANT PLANNING POLICY AND GUIDANCE

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) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

5.2 For this Local Planning Authority the development plan is now in one document - the Reading Borough Local Plan (November 2019), which fully replaces the Core Strategy, the Sites and Detailed Policies Document and the Reading Central Area Action Plan. The relevant policies are:

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC3: Adaptation to Climate Change

CC4: Decentralised Energy

CC5: Waste Minimisation and Storage

CC6: Accessibility and the Intensity of Development

CC7: Design and the Public Realm

CC8: Safeguarding Amenity

CC9: Securing Infrastructure

EN2: Areas of Archaeological Significance

EN7: Local Green Space and Public Open Space

EN8: Undesignated Open Space

EN9: Provision of Open Space

EN10: Access to Open Space

EN11: Waterspaces

EN12: Biodiversity and the Green Network

EN13: Major Landscape Features and Areas of Outstanding Natural Beauty

EN14: Trees, Hedges and Woodland

EN15: Air Quality

EN16: Pollution and Water Resources

EN17: Noise Generating Equipment

EN18: Flooding and Drainage

H1: Provision of Housing

H2: Density and Mix

H3: Affordable Housing

H5: Standards for New Housing

H10: Private and Communal Outdoor Space

H14: Suburban Renewal and Regeneration

TR1: Achieving the Transport Strategy

TR2: Major Transport Projects

TR3: Access, Traffic and Highway-Related Matters

TR4: Cycle Routes and Facilities

TR5: Car and Cycle Parking and Electric Vehicle Charging

5.3 Relevant Supplementary Planning Documents (SPD) are:

Employment, Skills and Training SPD (2013)
Revised Parking Standards and Design SPD (2011)
Revised SPD on Planning Obligations under Section 106 (2015)
Sustainable Design and Construction SPD (2019)

5.4 Other relevant documentation:

Reading Tree Strategy (2010)
BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, 2nd edition (2011)
DCLG Technical housing standards - nationally described space standard (2015)

6. APPRAISAL

6.1 The main matters to be considered are:

- Principle of development - primary land use considerations
 - Loss of garages
 - Principle of additional residential accommodation
- Reconfiguration of road network / parking spaces
- Reconfiguration of open space / play space
- Trees, landscaping and ecology
- Density, mix and affordable housing
- Layout / scale / massing and design considerations
- Quality of accommodation for future occupiers
- Impact on existing nearby residential amenity
- Sustainability, energy and SuDS
- Other Matters - flooding, archaeology, pre-commencement conditions
- Unilateral Undertaking Legal Agreement
- Equalities impact

Principle of development - primary land use considerations - loss of garages

6.2 The proposals will result in the removal of 29 garages from the existing site. Based on the public consultation responses it is clear that these facilities are valued by those who use the garages (either for the parking of vehicles or storage), with this considered to contribute to the overall wider quality of accommodation for those occupiers at the site. It is relevant to also note that all spaces are owned by RBC and are rented under licence to residents living in the area (apart from one with a Tilehurst address). Accordingly, it is pertinent that residents have no over-riding right to the garages, as this is a rental agreement separate from their dwellings (none of the garages are tied to a property). However, in recognition of the evident value that users of the garages place on them, discussions with the applicant have facilitated a commitment from the applicant to offer alternative nearby provision. The applicant has confirmed:

The applicant will look to offer each household affected by the loss of a garage within the red line boundary of the site an alternative 1 garage/storage per household within the Coley area. Each household will be contacted in order of length of tenancy, those

with the longest tenancy will have first refusal on the garages available. However, if the tenant refuses the offer of an alternative garage their licence will be cancelled, and the garage will be offered to the next affected resident.

- 6.3 Such an offer is welcomed by officers in assisting to mitigate a potentially negative impact for those who rent garages at the site, should the garages be removed but not potentially replaced. To secure this offer in practice, bearing in mind that the alternative provision would be outside of the red line boundary of the application site, it is recommended that it is included as a head of term within the unilateral undertaking legal agreement. This is considered to be both reasonable and necessary in the context of these specific proposals. The applicant has encouragingly already identified potential nearby sites where this provision could be accommodated in practice. With this element secured via the unilateral undertaking legal agreement the loss of the existing garages at the site have been justified (the impact on parking provision is separately discussed below).

Principle of additional residential accommodation

- 6.4 The proposed development would seek to deliver 46 additional homes in the Borough. Under Policy H1 provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. Accordingly, as the supporting text to the policy states, there is a pressing need for additional housing in Reading and the surrounding area. Furthermore, owing to Reading being a very tightly defined urban area, provision of new housing involves a heavy reliance on previously developed land. This proposal will therefore assist the Borough in meeting its annual and plan period housing targets.
- 6.5 Furthermore, Policy H14 details that there is scope for some of Reading's suburban residential areas to undergo renewal and regeneration. Three aims are noted in this regard, namely to improve the local built environment, improve and modernise the housing stock; and deliver additional homes. In broad terms the proposals seek to fulfil these aims, and consequently the proposals will generally be supported in line with Policy H14. It is recognised that Policy H14 also specifies that this general support is subject to other policies and various other stipulations relating to undeveloped land/open and green space, retaining characterful buildings and features, adequate community facilities and there not being an unacceptable impact on the highway network. These other policies, and the specific elements referenced, will be discussed below within the rest of the assessment.

Reconfiguration of road network / parking spaces

- 6.6 As discussed in detail in the Transport Development Control observations at section 4 (from paragraph 4.1 above), the proposed development seeks to alter the car-parking arrangements at the site, and moreover, alter the road / access layout in a number of ways. It is fully acknowledged that this has generated a substantial level of public concern prior to the application and during the public consultation process as part of the planning application. In summary, nearby occupiers raise concerns regarding the adequacy of car parking, the increased traffic, congestion and harm to highway safety (in general and as a particular result of the closing of the loop) and bus related matters. As such, these matters have been carefully

considered and a number of amendments to the original proposals have been incorporated during the course of the application. In short it has been demonstrated, and will be secured through a series of conditions and legal agreement obligations, that the works comply with the adopted standards of the Transport Authority, that there will not be a material detrimental impact on the functioning of the transport network and the proposals will not be detrimental to the safety of users of the transport network, with particular regard to pedestrians and cyclists.

- 6.7 Summarising the changes to the road layout first, the stopping off of Wensley Road and provision of a new route through the site represents a significant change to the existing context, to enable the quantum of development proposed to be realised. It has been shown that the proposal at this point complies with adopted standards and will not lead to material detrimental impacts to either the functioning of the network or safety. A replacement bus stop is provided as part of the proposal. More specifically, after initial concerns were raised by officers about there being insufficient space, the geometry of the carriageway has been altered and swept path analysis has been provided to demonstrate this is compliant (see below in respect of a bus).



- 6.8 At this point the originally proposed raised surface areas have also been omitted and the space will instead be informally traffic calmed through changes in surface. These arrangements are deemed acceptable. Dedicated crossing facilities are proposed on the desire lines to aid pedestrian movements throughout the site, thereby assisting in ensuring that the proposals would not be detrimental to the safety of users of the transport network at this point. To maintain highway safety some areas of double

yellow lines will be required through the new route, which will also aid movement and turning of the bus. This will be secured in full via the S278/38 process, but also as part of the unilateral undertaking legal agreement as part of the planning application. The wider stopping up order and diversion will also be secured via the legal agreement, as well as the separate highways legislation permission required.

- 6.9 The north-south (one-way) mews vehicular route represents another significant change at the site. Again, this has been shown to comply in full with adopted standards. Particular attention has been paid to the crossing points, with the originally proposed raised table omitted. Acceptable swept path analysis has been provided during the application and officers are therefore satisfied with this element of the scheme.
- 6.10 In conclusion on this matter, the Transport Development Control Manager is satisfied that the layout allows for the sufficient and safe movement of pedestrians and vehicles, including buses, through the proposed development and fully complies with the requirements of both Local and National Policy.
- 6.11 Turning to consider the reconfiguration of parking spaces, this is discussed in detail in the Transport observations at section 4 (from paragraph 4.25) above. In summary, the methodology provided by the applicant is considered to be robust (mindful of public consultation responses disputing parking numbers) and the additional provision of parking spaces at the site is supported at an appropriate level to cater for the increase in units proposed. Most pertinently, the existing 192 and additional 38 parking spaces will be re-organised and rationalised to provide a safer, more efficient layout. The provision of dedicated disabled parking bays and EV charging point are also strongly welcomed.
- 6.13 The current parking arrangements do not provide sufficient circulation space within the parking courtyards, with difficult manoeuvres often required to access and egress spaces; they are not currently to standard. In contrast, each of the proposed spaces comply with the authority size/space standards, which will be a significant betterment for users of the existing car parks. Although the proposal may appear in simple plan form to alter the character of the area in becoming more car-dominated, the layout is far safer and more efficient than existing.
- 6.14 Accordingly, on the basis of the above and the fuller details provided in the Transport observations beginning at paragraph 4.1 above, there are no transport-based objections to the proposed development subject to a series of unilateral undertaking legal agreement obligations and planning conditions already detailed above.

Reconfiguration of open space / play space

- 6.15 The current site includes a number of large green spaces around the three existing tower blocks. Despite such spaces being undesignated, there is a presumption in favour of the open space being retained (in line with Policy EN8). Some consultation responses also suggest they provide an important recreational resource, despite appearing to be largely lacking in definition. Furthermore, there is also an existing MUGA, pump track and play area, which are again undesignated but are understood to be well used. In total, the applicant has calculated that there is currently 11,275m² public

greenspace at the site, with 1,952m² of this being formal playspace (MUGA, pump track and play area).

6.16 The proposed development seeks to reconfigure the open space. As the table and comparison plans below show, it is evident that there will be a clear reduction in the public greenspace at the site. More specifically, it will decrease from 11,275m² to 4,378m². Whilst it is acknowledged that some reduction in public greenspace will be inevitable to facilitate any development to provide a reasonable number of additional residential units at the site, in site area terms this still represents a significant reduction. The majority of the reduction is explained by the increase in footprint of buildings (+1,991m²), private garden spaces for the new residential units (+1,832m²), roads/parking spaces (+1,510m²) and additional footpaths to connect the various spaces (+392m²).



Typology	Existing (m2)	Proposed (m2)
Public greenspace	11,275	4,378
Non-accessible / under used greenspace	2,039	-
Communal private greenspace	-	3,211
Private back gardens	-	1,832
Paths	3,071	3,463
Roads/parking	5,409	6,919
Built footprint	1,892	3,883

6.17 The applicant has sought to mitigate this reduction through a series of qualitative improvements. Most notably, the reconfigured space in the centre of the site will be more integrated with the inner loop site as a whole and more accessible with the wider works proposed. The amount of formal play space is also increasing, as shown in the comparison table below. In particular, the applicant has shown a specific focus on play space for under 5's, with the area shown being circa 300m², well in excess of the

Sport England Fields in Trust guidance of 100m² for a Local Area for Play. This specific element of the re-provided space is particularly welcomed by the Leisure and Open Spaces teams (as detailed at Section 4, from paragraph 4.54, above). The space also seeks to cater for wider age ranges than present, with the outdoor gym being able to be used by adults. Furthermore, opportunities for quiet recreation are also possible. The proposed space in itself meets all the requirements detailed within Policy EN9 and exact details will be secured via condition, requiring the central green space to be ready for use prior to occupation of any residential unit.



- 6.18 In addition to the on-site qualitative improvements, Leisure and Open Space officers have negotiated a significant financial contribution of £116,200 to assist upgrading of play facilities at nearby Courage Park (to the north of the site) for older junior children and teenagers. This will be secured via legal agreement, as detailed in section 4 (from paragraph 4.54) above.
- 6.19 It is important to note that Policy EN8 does specify circumstances whereby development involving the loss of open space may be permitted, such as through providing replacement space close by, or by providing improvements on the remaining space to outweigh the loss. The applicant has sought to do this by significantly upgrading the play facilities on site and contributing towards nearby improvements at Courage Park.
- 6.20 In conclusion on this matter, despite the evident reduction in the quantity of public open and green space at the site, it is recognised that there would also be some qualitative improvements (as referenced by Policies EN8 and H14), through the play space facilities proposed within the central green space. However, in overall terms the reduction in public open and green space is considered to be one of the shortcomings of the proposals, despite the various mitigation measures put forward by the applicant (including the legal agreement financial contribution towards works at nearby Courage Park). Nevertheless, this needs to be weighed against the various benefits

of the proposals referenced elsewhere in this appraisal. As the conclusion section later details in full, ultimately officers consider that the overall planning benefits of the proposals outweigh the disbenefits, such as the reduction in open and green space at the site discussed here.

Trees, landscaping and ecology

- 6.21 In relation to tree matters first, it is considered that existing tree coverage forms part of the existing character of the area. It has been shown that in total there will be 275 trees felled as part of the proposed development, as detailed in the table below extracted from the Arboricultural Impact Assessment (10 of these are Category U trees which will be removed as part of planned works by RBC separate from this application. Also, separate from this, are 3 Category C2 Turkey Oaks between the parking areas for Irving Court and Riversley Court, which are to be removed due to declining health, as decided by RBC Tree officer (Parks) and unrelated to the development):

Table 1: Trees to be removed as a direct consequence of development

BS Category	Number of individual trees	Number of groups	Number of Trees within Groups
U	10	0	0
A	0	0	0
B	22	2	40
C	34	11	169

- 6.22 The retention of all Category A trees at the site is welcomed and considered necessary (most notably the London Plane and Turkey Oak trees within the central area of the site). However, the proposed removal of a Category B Oak (T4) between the two existing sets of garages and the row of 16 Category B London Planes to the east of Wensley Court, amongst an overall total loss of 62 Category B trees, are particularly disappointing to the Natural Environment officer (as detailed in section 4, from paragraph 4.47, above), as Category B trees should normally be retained.
- 6.23 The justification put forward by the applicant for the loss of the Oak is that its retention would have decreased the total number of homes proposed, compromised garden sizes in this area as well as issues in terms of road levels and services routes. The applicant has also noted that several high-quality trees of the same species are proposed across the site to mitigate for the loss of this tree. In terms of the group of London Planes, these will be felled to facilitate Block C and associated parking. The applicant had explored retaining these trees, but had they been retained it would have been recommended to thin out at least 50% of them due to their close proximity, leading to distorted crowns. This distortion would only increase as the trees grow and therefore it was decided to seek to remove them. The applicant acknowledges that these trees have value in their current site context, but ultimately given the nature of the redevelopment proposed, the applicant considers their retention is not feasible, as it would compromise the proposed layout. The applicant has explained in general terms that the proposal seeks to retain the maximum number of mature trees and other vegetation including all Category A trees within the site. The tree removals proposed directly facilitates the provision of new dwellings. This is duly noted by officers.

- 6.24 There has also been some ambiguity as to how tree numbers have been counted. In the Design and Access Statement the applicant has stated that the scheme will deliver an overall net gain in the number of trees on site. However, this has subsequently been qualified as a net gain in individual trees (76 to be removed, as per the table above), given that the proposal seeks to provide 184 new trees and 275 would be felled in total (209 trees are within groups of existing trees, but officers consider they should be counted individually). Hence, the proposed scheme would result in a net loss of 91 trees at the site, which is regrettable. To clarify, the suggestion of a net gain of 118 individual trees by the applicant (184 proposed minus 66 to be felled) is not accepted by officers, with individual trees within groups of trees being required to be counted.
- 6.25 The net loss can however be qualified somewhat by 213 of those trees being of lower quality (Category C) or unsuitable for retention (Category U), with further mitigation provided by the proposed new planting strategy. In discussions the applicant has also indicated that an additional 50 trees are likely to be brought forward as part of the future phase of works associated with the tower blocks (albeit this is not guaranteed at this juncture). Furthermore, it is recognised that the applicant could have altered the proposal to plant a greater number of smaller specimens to demonstrate a net gain, but the principles of the proposed strategy are separately supported by officers.
- 6.26 Ultimately, whilst the net reduction in trees and the loss of the referenced Category B trees is regrettable, when this is considered within the context of the proposals as a whole, the wider planning benefits of the scheme (as discussed elsewhere in this submission) are considered to outweigh the harm caused in this specific instance (with this detailed in full in the conclusion of this report).
- 6.27 Turning to separately consider the proposed tree strategy, this is broadly welcomed by officers and aligns with the landscaping proposals already discussed. The applicant has sought to provide a well-considered and robust replacement tree strategy, including: new succession planting for the Turkey oaks with companion planting in the central greenspace; new street trees and replacement buffer tree planting along the south eastern site boundary. The applicant has also incorporated a wider variety of tree species than is currently on site, in order to enhance biosecurity. These will comprise native species and species that are disease resistant and drought tolerant. The applicant has also explained that they have intentionally selected trees with flowering and fruiting properties in order to enhance ecology and biodiversity. Finally, the submission also emphasises the proposal to diversify the grassland within the central greenspace, to improve biodiversity and habitat potential.



Proposed tree planting overview

- 6.28 Therefore, while the loss of Category B trees and the net reduction in trees at the site is regrettable, the replacement strategy will seek to mitigate this shortcoming. Whilst the Natural Environment officer continues to have concerns with the proposals, on the basis of advice from Planning officers regarding the overall planning balance and positive recommendation, a series of conditions (as referenced above in section 4 at paragraph 4.49) shall be secured should permission be granted.
- 6.29 Turning to consider ecology matters, the RBC Ecology consultant is satisfied with the submitted assessment, as detailed at section 4 (from paragraph 4.50) above. Subject to protectionary measures being included within the pre-commencement demolition and construction method statement, the proposals are unlikely to affect protected or priority species, priority habitats or local wildlife sites. Ecological enhancements at the site, including features such as bird and bat boxes, tiles or bricks on and around the new buildings, will be secured via condition. The proposals are considered acceptable from an ecology perspective.

Density, mix and affordable housing

Density

- 6.30 Reading Borough is largely urban in nature, with the fourth highest population density in the South East at the time of the 2011 census. It is fully acknowledged that the application site is already a high density

location. This is calculated to be 113.14 dwellings per hectare (267 dwellings within the three high-rise blocks / 2.36ha site), which is towards the higher level of the indicative density ranges referenced at Policy H2 (60-120 dwellings per hectare within urban areas). With the additional housing proposed, this will increase the density to 132.63 dwellings per hectare, above the upper level of the indicative density range detailed in Policy H2.

- 6.31 However, the policy makes clear these densities will not be applied as hard-and-fast rules, and appropriate densities will be informed by a variety of factors, including the character and mix of uses of the area, accessibility and the need to: achieve high quality design, maximise the efficiency of land use; and minimise environmental impacts. In this instance it is considered that the existing character of the application site, when coupled with the significant need for housing in Reading and the need to maximise the efficient use of land provide a suitable justification for the proposed density in this instance. Furthermore, as other sections of this appraisal make clear, the proposals also achieve high quality design and minimises environmental impacts. Hence, whilst noting the proposal moves the density above the upper indicative density range limit, which could be considered a shortcoming of the proposal, this is considered appropriate in this instance.

Mix

- 6.32 With regard to Policy H2, it is first noted that the proposed mix of units is 8 x 1-bed (17.39%), 10 x 2-bed (21.74%), 26 x 3-bed (56.52%) and 2 x 4-bed (4.35%) dwellings. As such, there is a spread of unit sizes proposed in the scheme, exceeding the Policy H2 50% 3-bed or more target (60.87%). The proposals would also increase the proportion of larger units at the site as a whole, as detailed at paragraph 2.7 above. However, it is acknowledged that within the figure 4.6 table at Policy H2 (which the policy states that wherever possible residential development should contribute in line with the table) these affordable housing proposals appear at odds with the requirements, as detailed in the table below:

	1-bedroom	2-bed	3-bed	4-bed
Estimated size of accommodation type required in the affordable tenure in Reading (extract of figure 4.6 of the local plan)	43.4%	32.9%	21.6%	2.1%
Proposed mix in this application	17.39%	21.74%	56.52%	4.35%

- 6.33 The applicant has explained that although this proposal does not meet the indicated housing mix requirement for affordable homes, this is owing to other recent schemes predominantly providing 1 and 2 bedroom homes (affordable and market housing). Consequently, the provision of larger, family sized affordable housing units has in practice been more challenging and hence it is partly provided in this proposal. The explanation provided by the applicant is considered acceptable, when also set within the context of the pressing need for affordable housing in the Borough (406 new affordable homes needed per year, as confirmed at paragraph 4.4.19 of the Local Plan). Therefore, whilst not aligning with the housing mix requirements, there are no concerns raised in relation to the mix of units sought. The proposed mix will be secured via planning condition.

- 6.34 Furthermore, in terms of the mix within the proposed affordable housing tenure, it is acknowledged that the tenure split is in excess of the 70% social rent/affordable rent / 30% intermediate/shared ownership breakdown referenced in the supporting text to Policy H3. It is proposed for 100% of the units to be social rented. The reason for this is that, based on recent completions of affordable housing in the Borough and anticipated future trends, there is a shortfall in social rented units in comparison with intermediate/shared ownership. This proposal therefore seeks to partly address this shortfall and the tenure split securing solely social rented units is therefore supported by officers.

Affordable housing

- 6.35 In terms of affordable housing, the applicant has been clear from the outset of the application that the proposals will deliver 100% affordable housing on site. This will be in the form of 46 social rent affordable housing units, with rents set at Target (social) Rent. It has also been confirmed by the applicant that Homes England expect the applicant to deliver 100%, so the Homes England funding for the scheme is based on this assumption.
- 6.36 The provision of an 100% affordable housing scheme would be significantly more than the Policy H3 30% on site affordable housing requirement. As such, any provision above the required 30% amount would be considered to be a tangible planning benefit of the proposals, in the assessment of the overall planning balance for the scheme as a whole.
- 6.37 At this juncture it is relevant to note that affordable housing in the borough is generally secured through legal agreement. Legal agreements can only secure what is reasonably required to make a development acceptable in planning terms. Section 122 of Community Infrastructure Levy Regulations 2010 specifically limits the use of planning obligations. The regulations state:
- 6.38 A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—
- (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- 6.39 Officers have therefore relied on what is reasonably required by the Reading Borough Local Plan as a starting point. In this case the proposal of 100% affordable housing goes significantly beyond the 30% Policy H3 requirement (13.8 units). It is therefore questioned whether this is reasonable, also bearing in mind legal cases which demonstrate that a willing applicant does not in itself justify the provision. However, officers are also mindful of the obligation being necessary to make the development acceptable in planning terms. In short, where proposals conflict with other policies in the plan, a higher percentage can be justified. There have been other examples in the Borough where a higher (than policy required) percentage of affordable housing has been secured previously, to “make the development acceptable in planning terms”. In this instance, there are considered to be a number of factors which justify a higher than 30% affordable housing requirement. As other elements of this appraisal discuss, there are some conflicting elements in the proposals, which officers consider need to be mitigated by a more than policy compliant amount of

affordable housing being secured. Factors include the significant quantitative reduction in open space at the site, the removal of some existing play facilities, the loss of a number of category B trees, the increased density of development leading to a reduction in visual amenity for some occupiers and the loss of on-site garage facilities.

- 6.40 Officers consider that the conflicting elements of the scheme do not however justify seeking to secure 100% of the units as affordable housing. This would be considered to fail test (a) and also (c) of Section 122 of the CIL Regulations. Instead, officers consider it necessary and reasonable to seek for all of the units with the exception of the 7 houses at Block A (5x3-bed and 2x4-bed units) as affordable housing. Therefore, officers consider it necessary and reasonable to secure 39 of the 46 residential units proposed (equating to 84.78%) as affordable housing via legal agreement. This comprises Blocks B and C of the scheme (8x1, 10x2 & 21x3-bed). The applicant has confirmed that they are content with this approach.
- 6.41 In conclusion on this matter officers consider that an 84.78% provision is necessary to make the development acceptable in planning terms, is evidently directly related to the development and is fair and reasonably related in scale and kind to the development (therefore complying with the required Section 122 CIL Regulations). Securing 84.78% of the proposed units is considered to be a key tangible benefit in the overall planning balance of all considerations in this proposal. To be clear though, in practice, this does not prevent the applicant from implementing 100% of the units as affordable housing and based on discussions with the applicant, this remains the firm intention.

Layout / scale / massing and design considerations

- 6.42 First, it is confirmed that the garages to be demolished are not considered to be of any specific architectural value to warrant retention, in that they are not considered to make a positive contribution to the area's character. To clarify, there are not considered to be any designated or undesignated heritage assets in close proximity to the site.
- 6.43 Considering the proposed layout, the proposal aims to read and feel like a continuous piece of the area, fully integrated with the immediate and surrounding area, helping to ensure that a better sense of place is created. The proposals have been careful to be informed by the prevailing context and not be a detached island of additional development.
- 6.44 The proposals are laid out as a series of three legible blocks at the northern end of the site, first continuing the street frontage on the south side of the northern part of Wensley Road with three terraces. Secure private gardens sit to the rear of the plots, while at the front the street is activated by front doors for all the homes. End of terrace units include front doors on side elevations facing streets and paths to ensure the buildings turn the corner successfully (as requested by the Reading Design Review Panel - see section 4, paragraph 4.74 above) and assist natural passive surveillance in the area.
- 6.45 The layout seeks to deliberately extend the Lesford Road street frontage, with this being terminated by the single apartment block proposed as part of the development. The apartment block is positioned centrally to link with the reconfigured open space to the south and the altered

vehicular/pedestrian route to the east. The layout also seeks to improve and extend pedestrian and cycle routes through the site, both north-south and east-west, with further formal routes and links created to assist movement in a clear and legible manner. In overall terms the proposed layout, set within the context of the existing layout, is considered to stitch in successfully to the surrounding context.

- 6.46 In terms of the proposed scale and massing, this has intentionally been minimised by the applicant to align with the predominant scale of buildings in the wider area. The three existing towers at the site, at 15 storeys, are not characteristic of the wider area, which predominantly comprises 2 storey properties with pitched roofs. The Lesford Road flats, at 5 storeys, offer another contrast. While it may have been possible to justify the provision of a further single taller building at the site in urban design terms, the emphasis of the proposal has always been on creating large affordable housing dwellings. Accordingly, the majority of units proposed are single dwellinghouses, 2.5 storeys in height (the third storey comprises accommodation within the roofspace and therefore set back in prominence). Whilst roof level accommodation is not particularly characteristic of the area, in scale terms it does not represent a significant change and, moreover, given the limited space at the site and need for larger units (as discussed elsewhere) this is considered acceptable. The two detached properties in Block A are 3-storey, providing a suitable transition between the Block A terrace and Block B flats. The flatted block at four storeys appropriately marks a step up from the proposed houses (the eastern window of the flatted block is actually 3 storeys, so a transition between the Block B terrace and flats is evident), but in no way is seeking to compete with the existing towers and can be sufficiently/reasonably accommodated in this key central location within the site. Accordingly, no issues are raised in relation to the proposed scale or massing of the proposed buildings.
- 6.47 Turning to consider the appearance and detailed design of the proposed buildings, it is considered that a high quality contemporary approach is proposed. The buildings are purposefully modest and aim to be timeless, being red brick-based throughout. A simple approach of one consistent main brick, complemented with a secondary brick (a darker red) to add detail, brings a richness to the finished appearance in all instances. There is consistency in the material choices throughout the proposed buildings, assisting legibility throughout the scheme. In the terrace properties, the second brick detail is in the form of a vertical quoin, with the contrasting red brick also used to detail the window lintels. A strong white/beige parapet coping line clearly defines the roofspace, which comprises zinc dormers and slate roofs. PV panels are proposed on the southern roof slopes in all instances.
- 6.48 In the flatted block the window proportions are larger to differentiate between the houses and flats, while also maintaining the overall similar character with the same brick choices. Specific attention has been paid to the east elevation, as it will be particularly prominent in framing long views down the extended Lesford Road. It's added importance is signified by the main ground floor entrance to the upper floors being on this elevation. The south elevation is also of elevated importance, given it provides the backdrop to the reconfigured play and open space on the site. The form of the south elevation is consistent, with large window openings and prominent inset balconies. The upper most floor is slightly recessive to

reduce the overall bulk at this point. The architectural choices are considered to comply in full with Policy CC7 and have been broadly welcomed by the Reading Design Review Panel.

- 6.49 It is noted that some concerns have been raised from existing local residents that the proposals are out of context with the surrounding area, will not respect the local context and the resultant differing styles will make the area seem like a fragmented mix. In response, whilst it is acknowledged that the proposals represent a change in style and approach, in themselves the proposals are considered to be visually attractive as a result of good quality built forms of a contemporary nature. The pre-existing properties in the area are considered to be reflective of the design approaches of their time and are not considered to be of such quality to require the applicant to mimic those approaches today. It is considered that the proposed buildings represent high quality design that will consequently enhance the character and appearance of this part of the Borough, which in time will successfully stitch into the surrounding area.
- 6.50 To ensure the design quality depicted in the submission is followed through when implementing the development, it is considered essential for precise details of all external materials to be secured via condition, including the provision of sample panel details being erected on site prior to approval. Although land levels have been shown on all the elevation plans (confirming the heights of the buildings), should there be any subsequent changes required (due to services for example) it is still considered necessary for finished floor levels to be secured via condition.
- 6.51 Closely related to design matters, it is evident that the proposal includes numerous single dwellinghouses, which could in the future take advantage of permitted development rights to make numerous changes to the proposed scheme. Such changes could range from (or include all of the following): rear extensions, roof level works, front porches, altered means of enclosure, formation of a means of access to a highway or exterior painting. Individually and cumulatively such works could cause harm to what is considered to be a careful and well-constructed architectural series of buildings, as proposed. A planning condition to remove these rights is therefore considered to be necessary and reasonable to safeguard the visual amenities of the area, as individually and cumulatively the high quality design sought could be diluted in time with works possible under permitted development. Furthermore, this would also prevent the over development of the site by managing proposed extensions and alterations, which may assist in protecting the amenity of both existing and future occupiers.
- 6.52 Along similar lines, a further separate condition is recommended in relation to preventing the fixing/installation of miscellaneous items (such as lights, meter boxes, flues, vents or pipes, telecommunications equipment, alarm boxes, television aerials or satellite dishes), beyond those already shown on the plans unless permission is granted by the local planning authority. This is again required as the gradual inclusion of such items, without careful management, could undermine the design quality of the proposal in time.
- 6.53 In overall terms, the high quality design approach, as also demonstrated by the support provided by the Reading Design Review Panel (see Section 4, from paragraph 4.74 above), is considered to be one of the key tangible planning benefits of the proposed scheme.

Quality of accommodation for future occupiers

- 6.54 Ensuring a high standard of accommodation is essential to the quality of life of future residents. This is a key element of the vision for the Borough. Accordingly, Policy H5 provides a series of standards which all new build housing should be built to. The proposed scheme performs well in all respects. First, it has been demonstrated that all units comply with each of the elements within the nationally described space standards. As the sustainability/energy sections of this appraisal confirms, the proposals also meet the required water efficiency standard, and most substantially are designed to achieve zero carbon homes.
- 6.55 The access officer (see Section 4, from paragraph 4.74, above) is satisfied with the accessibility/adaptability of the units too. More specifically, 4 units at ground floor level of the Block B flats have been designed as wheelchair user dwellings. This is strongly supported, with the 8.7% provision exceeding the 5% requirement of Policy H5f. To ensure these units are provided and maintained as such, a compliance condition is recommended to state that the 4 wheelchair user dwellings are to be ready for occupation prior to the first occupation of any unit within the Block B flats, and remain as such thereafter. Accordingly, the proposals comply with the Policy H5 requirements in all respects and this is considered a tangible benefit of the proposed development.
- 6.56 More generally, Policy CC8 stipulates a number of factors that new residential developments should be considered against to ensure they are not creating unacceptable living conditions. The layout and design of the scheme has also been carefully arranged to be conscious of current and future nearby occupiers too.
- 6.57 In terms of overlooking between separately proposed dwellings, a variety of design solutions have been incorporated to protect amenity between different future occupiers. Policy CC8 references a 20m back-to-back distance usually being appropriate, although the circumstances at individual sites may allow closer distances.
- 6.58 At Block A, whilst there is a minimum distance of 11.5m between the rear (south) elevation of the houses and the north elevation of the two detached houses, no windows are included on this side elevation of either detached house, as both are east-west facing. There is a 14.4m distance between the east elevation of Block A terraced houses and the west elevation of the Block B terraced houses. At ground floor level there will be kitchen windows facing one another at ground floor level and bathroom windows at first floor level. This 14.4m distance is separated by the new north-south mews, so in practice the level of overlooking between units will be limited and not harmful. Bathroom windows will typically be obscurely glazed. At the west side elevation of the Block A terrace the orientation of windows towards the front elevation of 211 Wensley Road (and the row of existing terraced properties at that point) would be at oblique angles, minimising overlooking, while the window-to-window distance would be at least 20m too. The front-to-front distance between the Block A terrace and the north-side Wensley Road properties opposite (separated by Wensley Road) would be acceptably over 25m.

- 6.59 For the furthest west detached house proposed at Block A, the distance to 211 Wensley Road (to the west) is 16.5m, but this existing property faces north-south with no windows in the side (west) elevation. The distance between the rear elevation of both detached houses in Block A is only 12.5m, but the position of the windows in the respective rooms at first floor level (bedrooms) are offset to ensure any overlooking would be at an acute angle, rather than straight on. As such, the relationship at this point is acceptable. The front (east) elevation of the further east detached house is offset from the facing (west) elevation of the Block B flats, meaning the 14.7m distance does not result in direct overlooking. No windows are proposed on the south (side) elevation of either detached dwelling, thereby meaning no harmful overlooking is possible to/from existing No. 321 Wensley Road.
- 6.60 At Block B, the back-to-back distance between the houses and flats varies, with the closest distances being 12.1m and 14.9m. Accordingly, habitable rooms on the north elevation of the flats have been minimised, with the stair core and services at this point. Two windows within 1 bedroom at 1st/2nd/3rd floor level are specified as obscure glazed, with this bedroom also including a window on the west elevation (thereby not compromising outlook or access to day/sun). A condition will secure the windows specified as obscure glazed. The distance from north and east elevation windows (towards the north side of Wensley Road and Wensley Court) are all in excess of 20m. For the inset south elevation balconies serving the proposed flats, an annotation on the plans state privacy screens between separate flats. These details will be specified as part of the materials condition, thereby protecting amenity.
- 6.61 Block C satisfactorily includes back-to-back distances of 20.5m - 21.3m. On the southern Block C houses the west (side) elevation windows facing towards Wensley Court are acceptably over 22m away. There is a shorter 15m distance on the corresponding northern Block C west elevation, but any overlooking to/from Wensley Court would only be possible at oblique angles. The proposed windows on the east elevation, facing in the direction of Lesford Road flats, are similarly off-set, meaning no harmful overlooking would occur in either direction. Hence, in overall terms no harmful overlooking would occur for future occupiers.
- 6.62 Furthermore, each unit has natural ventilation and access to natural day/sunlight (as confirmed by the BRE independent review - see section 4, from paragraph 4.82 above). In terms of visual dominance and overbearing, it is acknowledged that some future occupiers (in particular future Block B and C) may to an extent be compromised by the existence of the 15 storey Wensley Court. However, all but two of the Block B and C units are north-south facing units, so windows do not face directly towards Wensley Court. The two east-west orientated units within Block B are due south of Wensley Court, thereby meaning these units will not be visually dominated by Wensley Court. In all other instances the proposed buildings are located either a sufficient distance away, or the nearby buildings are not of significant enough height to be visually dominant or overbearing on the proposed residential units.
- 6.63 It is also confirmed the units provide good levels of outlook. With the exception of the south-facing 1-bed units within the Block B flats, all units are at least dual aspect and all units either include a private rear garden

(all terraced properties and the two detached houses) or individual terraces (flats).

- 6.64 No significant noise and disturbance is envisaged from the units themselves, with all terraces for flats being inset and including boundary treatments between each unit. No other flat roof areas are proposed, limiting the scope for other terrace areas. Noise between units will be limited through building regulations and the consistent stacking of units within the flats at Block B.
- 6.65 It is acknowledged that disturbance for future occupiers could arise from rats. As per the Environmental Protection observations at section 4 (from paragraph 4.61) above and detailed within the public consultation responses, there is a widespread issue with rats in the area. Whilst the waste and recycling facilities are in themselves acceptable (as confirmed by Waste Services at section 4, from paragraph 4.66), a pre-occupation condition will secure details of the measures to prevent pests and vermin accessing the bin stores (individual spaces for the houses and a combined space for the existing/new flats). This condition will seek to implement measures for the bin stores to be vermin proof, thereby reducing disturbance to both existing and future residents.
- 6.66 With regard to artificial lighting, the plans and details submitted with the scheme put forward strategies for both streetlighting and landscape area lighting (uplighters and bollards). However, the exact light coverage in the landscape area and the precise design details in all instances have not been provided, so further details will be secured via condition. This is to protect the amenity of current and future occupiers alike, and potentially wildlife in nearby trees too. The pre-occupation condition will secure full details of all external lighting, including the locations of the lights, design, specifications, height, luminance; lens shape/beam pattern and any hoods/shades.
- 6.67 No significant vibrations, dust, fumes or smells are envisaged should the development be implemented and built. During the demolition and construction phase, the Environmental Protection observations (see section 4, from paragraph 4.61, above) require a demolition and construction method statement condition to confirm such matters. These measures will primarily protect existing nearby occupiers. However, should some future occupiers move into properties prior to the completion of all works they will be protected too. The Environmental Protection observations also dictate the requirement for the standard series of contaminated land conditions to be secured, which will protect future occupiers from these potential risks.
- 6.68 With regard to crime and safety matters, as per section 4 (from paragraph 4.95) above, the Crime Prevention Design Advisor supports the proposal based on the level of information submitted. However, a pre-commencement (barring demolition) condition is still considered necessary to secure full and precise details of how the development will achieve the Secured By Design Award, to demonstrate the measures detailed to date are fully designed and incorporated into the scheme and retained/maintained thereafter.
- 6.69 In terms of microclimate/wind matters, the BRE independent review (see section 4, from paragraph 4.87, above) has confirmed no significant issues

for future occupiers. While the proposed development is not more than 8 storeys (Policy CC8 references new development of more than 8 storeys) it was considered necessary to test conditions around the proposed buildings due to the proximity of the three 15 storey towers at the site.

- 6.70 Separate from the Policy H5 and CC8 matters, each unit will also include suitable cycle parking and waste storage facilities, as confirmed in the separate Transport and Waste Services observations at section 4 above. Compliance conditions will ensure these are provided prior to occupation and retained/maintained thereafter.
- 6.71 Finally, as per Policy H10, each of the houses proposed includes its own private outdoor space, predominantly to the rear, but also including a small front amenity space too. The provision of private amenity space is strongly welcomed for the benefit of future occupiers and is a size and nature which is comparable with other existing properties on the inner loop of Wensley Road. Although it is acknowledged that there will be a degree of overlooking to/from these spaces (e.g. from other proposed properties and the existing Wensley Court building for instance), this is inevitable in a scheme of this nature and is not considered to unduly compromise the overall quality of the private spaces provided. The proposed flats all include an inset terrace area and are located closest to the reconfigured open space to the south, which all current and future occupiers can utilise.
- 6.72 The overall high quality of accommodation proposed strongly aligns with part of the vision of the 2019 adopted Local Plan, in providing Reading's residents, particularly those in most need, with access to high quality housing that meets their requirements and safeguards their quality of life. Accordingly, the high quality housing provided is considered to be a key tangible planning benefit in the overall planning balance of considerations for this proposal.

Impact on existing nearby residential amenity

- 6.73 Given the footprint and use of the proposed buildings in relation to nearby properties, the safeguarding of amenity for nearby occupiers is particularly pertinent in this case and has been carefully considered. It is evident that the design and internal layout of the proposed units has been influenced by the existing context and various steps have been taken to minimise the impact for existing occupiers, in accordance with Policy CC8.
- 6.74 Considering privacy and overlooking first, this has been discussed in detail in the quality of accommodation section above in respect of the proposed units. In short, the same conclusions are reached in relation to existing occupiers being overlooked by new units; the steps put in place (orientation of buildings / position of windows) result in an overall conclusion that no significant detrimental overlooking impact on the living environment of existing residential properties would occur. Furthermore, the proposed condition to limit permitted development rights on the future units (as discussed in the design section above) would also help safeguard this in the future.
- 6.75 BRE has independently reviewed the daylight, sunlight and overshadowing information submitted, as detailed at Section 4, from paragraph 4.82, above. In short, BRE has confirmed that no nearby occupier will be

significantly impacted by the proposed development in daylight, sunlight and overshadowing terms.

- 6.76 Turning to consider whether the proposed development is visually dominant, overbearing or harms outlook to existing nearby occupiers, it is acknowledged that for some the context will undoubtedly change as a result of the proposed development. For occupiers of properties directly to the west of the application site (No's 263-279 & 311 - 321 odd) the context will alter with the replacement of the current footpath with the north-south vehicular route at this point. The possibility of parked cars and associated vehicular movements contrasts with the current context. It is acknowledged that for some this will be a more visually dominant change and impact on outlook. However, when this harm is applied in an overall planning balance, the level of harm is considered to be outweighed by the benefits of the scheme detailed elsewhere.
- 6.77 For existing Wensley Road properties closest to Block A (predominantly No's 211-221, 297-321 odd), the improvements in outlook created by the removal of the existing garages are considered to mitigate any limited visual dominance or overbearing effects of Block A properties.
- 6.78 For occupiers of Wensley Court, the ground floor environment around the block will change as a result of the new route through the site at this point. The intensification of the uses to the east and west are also acknowledged (from garages to Block B properties to the west and from green space / Wensley Road to Block C properties the east). For occupiers on the lower floors this will alter the outlook from the properties, while the context for all occupiers when entering and leaving the block will change too, with this being more overbearing than the existing situation. This is an acknowledged shortfall of the proposals, but when this harm is applied in an overall planning balance, the level of harm is considered to be outweighed by the benefits of the scheme detailed elsewhere.
- 6.79 At Riversley Court, the new highway to the north marks a change in context when compared with existing (impacting on outlook for the lower floor units at this point), but this is partly mitigated by the reconfiguration of the open space becoming closer to the entrance of the block to the west. This will improve outlook at this point when compared with the present parking arrangements.
- 6.80 For occupiers of Irving Court, the open space to the north becomes more readily accessible, with the reduction in extent of car parking at this point. This is considered to partly mitigate the acknowledged reduction in green space to the west and provision of the new north-south vehicular route at this point.
- 6.81 More widely, outside the inner loop of Wensley Road, views into the application site will undoubtedly change as a result of the proposed works. This is particularly the case for properties on the north side of Wensley Road and when approaching the site from Lesford Road, with a 'more urbanised feel' to the area. However, the relatively limited scale of the proposed buildings, together with the separation distances and provision of roads means that the level of harm is not considered to be a sufficient basis to resist the proposals on, when applying an overall critical planning balance.

- 6.82 In terms of noise and disturbance, artificial lighting, vibration, dust and fumes, smell, crime and safety (with the exception of pedestrian and highway safety - which is discussed separately in the transport section above) amenity-based matters, the conclusions reached in the quality of accommodation section above are equally applicable in relation to existing nearby occupiers. In short, subject to a series of conditions the proposals are considered appropriate in these regards. In particular, the public consultation responses have raised particular concerns regarding disturbance during the construction period and the presence of rats in the area. Conditions detailed in the quality of accommodation section above will protect the amenity of both existing and future occupiers.
- 6.83 Finally, with regard to wind, the independent review of the information submitted by BRE (see section 4, from paragraph 4.87 above) concludes that officers should accept the updated wind comfort report submitted during the course of the application as being reasonable and robust.
- 6.84 Separate from the Policy CC8 considerations, it is noted that part of the waste facilities are to be relocated for existing tower block occupiers as part of the works. Cycle parking is also proposed to be relocated. Transport and Waste comments (see section 4 above) confirm that the re-provision is considered appropriate, with conditions recommended to ensure there is no temporary loss in either facility.
- 6.85 In overall terms, in the majority of instances, the scheme will not cause a detrimental impact on the living environment of existing residential properties. There are acknowledged to be some shortcomings in respect of outlook / visual dominance and overbearing effects to some existing nearby properties, such as those at Wensley Court and Wensley Road addresses directly west of the site where the north-south vehicular route is proposed. As shall be detailed in full in the conclusion however, the level of harm is considered to be outweighed by the benefits of the scheme, as detailed elsewhere in this appraisal.

Sustainability, energy and SuDS

- 6.86 Given that RBC has declared a climate emergency, the applicant considers that this proposal is an opportunity to demonstrate the type of sustainable development that the applicant would like to see delivered throughout the borough. The proposal has therefore been designed to achieve zero carbon, incorporating design features such as air source heat pumps, arrays of photovoltaic panels on the roofslopes of the buildings (predominantly those south facing), highly efficient insulation and triple glazed windows. To provide a more specific example, in terms of water efficiency, the new dwellings will reduce the use of water to below 105 litres/person/day using water efficient fittings. To assist further in this regard, a downpipe is proposed to the rear of each house to enable the possibility of rainwater collection for gardening purposes. In overall terms the proposed scheme is considered to incorporate a variety of passive and active measures to be a highly sustainable development for the borough.
- 6.87 Considering specifically the energy strategy, as detailed at section 4 (from paragraph 4.90), Element Energy undertook a review of this on behalf of the local planning authority. Element Energy's key finding was strong support of the proposed strategy to achieve Passivhaus standards and reduce regulated emissions to zero via on-site reductions. There were a

number of initial items which were required to be addressed to ensure the strategy would work in practice, which were subsequently satisfied by the applicant and confirmed by Element Energy in an addendum report. Hence, Element Energy have advised that they encourage this type of residential development across Reading as it achieves RBC's policy requirements, whilst theoretically avoiding high heating costs for prospective dwelling occupants.

- 6.88 As such, it is considered by officers to be an exemplar scheme for the Borough and this is a clear tangible benefit of the proposed development. No legal agreement financial contribution is required in this instance, as zero on-site emissions will be achieved. To ensure that these sustainability credentials are achieved in practice, a design stage SAP assessment will be secured via pre-commencement (barring demolition) condition, with a separate second condition securing written verification prior to first occupation. With these standard conditions secured, it is considered that the proposal will fully comply with the Policy CC2 and H5 requirements, with this being a flagship scheme for RBC in this regard.
- 6.89 In terms of SuDS, as detailed at section 4 (from paragraph 4.58) above, the applicant submitted further information during the course of the application to satisfy officers that the strategy, fundamentally comprising permeable paving at various points of the site, is appropriate. The final details of all elements of the strategy will be secured via condition.

Other Matters - flooding, archaeology, pre-commencement conditions

- 6.90 Although the application site is solely within Flood Zone 1, given the site area is in excess of 1ha a Flood Risk Assessment is required as part of this planning application. It is also acknowledged that the southern half of the site is close to the boundary with Flood Zone 2/3, which is to the south of the buildings on the south side of Wensley Road. It is also recognised that there is a noticeable fall in land levels across the site from north to south, generally of 5m. These changes in topography continue to the south of the application site too. Furthermore, it is noted that flooding and related drainage issues are of concern to a number of nearby residential occupiers, as demonstrated in the public consultation responses (in particular surface water flooding with water running south on the site).
- 6.91 With the above context in mind, the Flood Risk Assessment details the impact the proposed development will have on the site itself and the areas downstream to ensure there are no adverse effects. In particular, the applicant has detailed that the proposed development will restrict the flow of surface water through the site to a greatly reduced level. The restriction will lower the flow rate of the water to that of a 1 in 1 year storm for all events up to a 1 in 100 year event (+40% climate change allowance). This will lower the impact the existing area has on the existing drainage network downstream of the proposed development. The proposed SuDS strategy will assist in this regard. In conclusion, it is considered that the applicant has submitted sufficient information to demonstrate that the proposals will comply with Policy EN18 in terms of flooding.
- 6.92 With regard to archaeology matters, the consultation response from Berkshire Archaeology (detailed at Section 4, from paragraph 4.81 above) concurs with the conclusions of the report submitted. Accordingly, a pre-

commencement (including demolition) condition will secure a further archaeological investigation of the application area.

- 6.93 Pre-commencement conditions - In line with section 100ZA(5) of the Town and Country Planning Act (as amended) discussions have been undertaken with the applicant regarding pre-commencement conditions. In short, the applicant has agreed to the pre-commencement conditions referenced in the recommendation at the outset of this report.

Unilateral Undertaking Legal Agreement

- 6.94 In addition to the elements already discussed as being secured within a unilateral undertaking legal agreement (e.g. transport-based matters, affordable housing, play space financial contribution and commitment to replacement garage spaces), there is a further head of term in this instance.
- 6.95 As detailed at section 4 (from paragraph 4.79) above, an Employment and Skills Plan (ESP) financial contribution will be secured via the unilateral undertaking legal agreement. This amounts to £11,448, as per the SPD formula, which will be used by Reading UK CIC. The applicant has advised that in the past they have encountered difficulties with contractors fully engaging with actual ESPs secured as part of schemes. Accordingly, in this instance the applicant's preference is to meet the required obligation through a financial contribution. At the same time however, RBC Housing have advised that will also look to offer training opportunities to apprentices employed by RBC to gain valuable experience on a live site. This, in practice, goes above and beyond the requirement, albeit this element will be managed separately outside the formal ESP process.
- 6.96 It is considered that all obligations would comply with the National Planning Policy Framework and Community Infrastructure Levy (CIL) in that they would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development.

Equalities Impact

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

7. CONCLUSION

- 7.1 The application is required to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance the harmful impacts of the proposed works need to be weighed against the benefits of the works. On the basis of the assessment above, there is identified harm caused by the proposed development, which in

itself would be contrary to the development plan. This includes the significant quantitative reduction in open space at the site, the removal of some existing play facilities, the loss of a number of category B trees and net tree reduction, the increased density of development which will reduce outlook and make the living environment more overbearing for some occupiers (e.g. Wensley Court and some Wensley Road properties directly to the west in particular) and the loss of on-site garage facilities. There will be other temporary impacts, such as disturbance during the demolition and construction phases for example. However, a number of these matters will be sufficiently mitigated by various measures applied by the applicant and secured by recommended conditions and legal agreement obligations.

- 7.2 This harm needs to be weighed with the benefits of the proposals. In particular, the development facilitating the provision of 46 affordable housing units (39 of the 46 units can reasonably be secured via the legal agreement, although in practice it is anticipated that all units will be affordable housing units) is a considerable planning benefit, when set within the context of a pressing need for housing, and affordable housing, in the Borough. The sustainability credentials of the proposals are another factor which, when applying an overall critical planning balance of all material considerations, tips the balance in favour of the proposals. More specifically, the proposed strategy to achieve Passivhaus standards and reduce regulated emissions to zero via on-site reductions makes this an exemplar scheme for the Borough. Furthermore, the high quality design and the high standard of accommodation provided (e.g. 4 wheelchair accessible units) are further material benefits.
- 7.3 As such, officers have concluded that the conflicts with the development plan are outweighed by the benefits of the proposals in this instance. Officers have applied a suitable planning balance when reaching this conclusion. Planning Permission is therefore recommended subject to conditions and the completion of a unilateral undertaking legal agreement.

Case Officer: Mr Jonathan Markwell



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Location of Photos



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Location of Photos



Views from beyond the north-west corner of the site, looking south and east



Above and below: Proposed locations of Blocks A and B from Wensley Road





Location of north-south vehicular route along the west side of the application site - Left: west elevation of Irving Court. Right: 263-277 Wensley Road.



Centre of site looking north (playground, pump track, garages & Wensley Court on right). Proposed location of central playspace & Block B flats



Centre of site looking south (playground, Irving Court & parking)



From the junction of Lesford Road & Wensley Road (location of Proposed Block C)



Lesford Road looking west towards Riversley Court (left) & Wensley Court (right)



From Wensley Road looking south (row of London Planes) towards proposed Block C



- New Homes**
- ① 3 Bedroom Houses
 - ② 4 Bedroom Houses
 - ③ Apartment Building
- New Landscaping**
- ④ Shared surface streets
 - ⑤ -11 year old's play area
 - ⑥ Under 5's play area
 - ⑦ Seating area
(inc. existing memorial benches)
 - ⑧ Outdoor gym
 - ⑨ Bus Stop

Visualisation of the proposed site layout (aerial view looking north)

4.9 Street Scenes



Proposed visualisations from Lesford Road and Wensley Road

4.9 Street Scenes

Key Plan



View looking north-west across the central green space

Key Plan

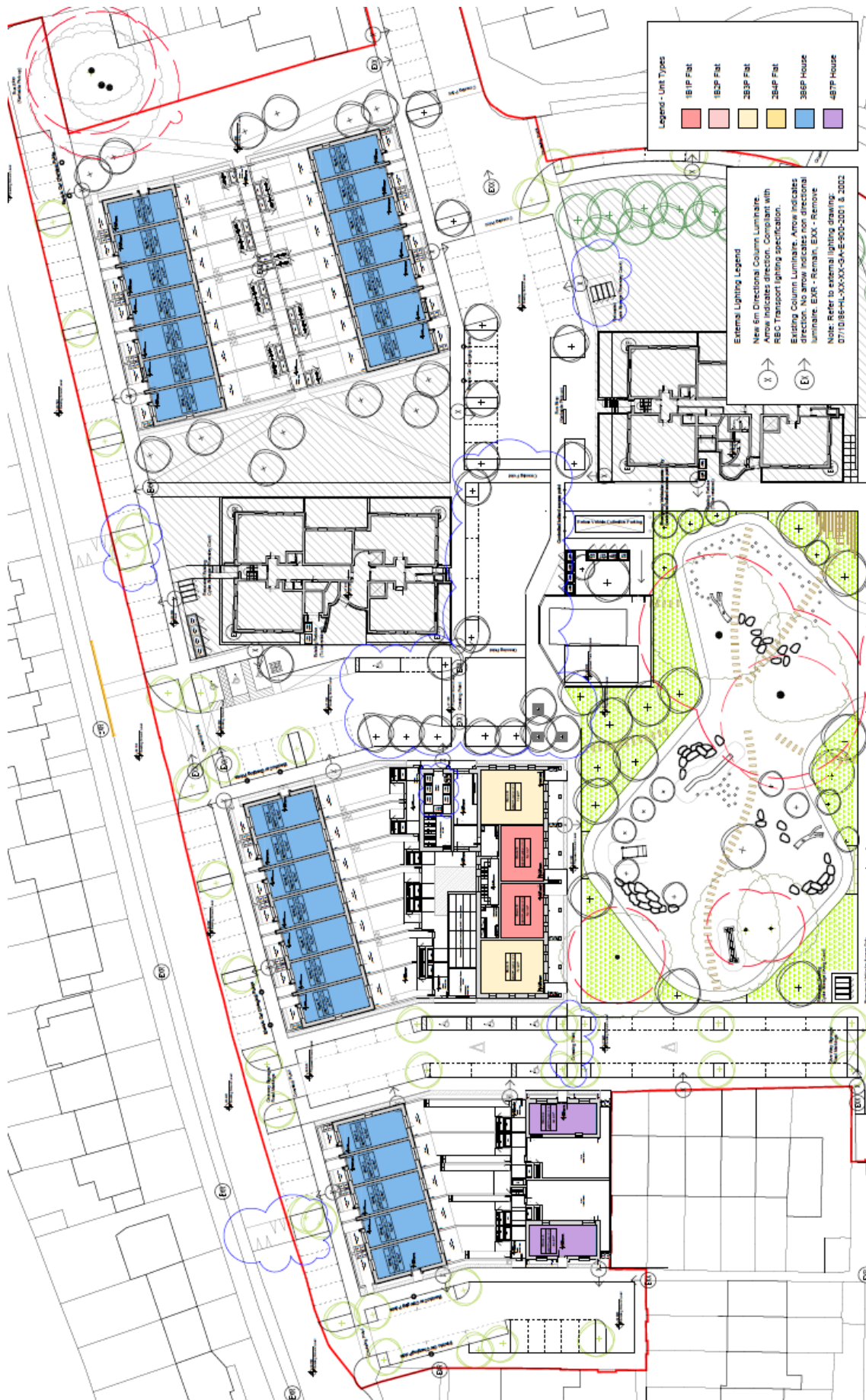


View looking east across the central green space

Proposed visualisations from within the site, towards the open space / Block B flats



From Lesford Road. Block C is in foreground on the right, beyond which is Wensley Court. In the background is the side elevation of the Block B flats



Legends - Unit Types

1B1P Flat	1B3P Flat	2B3P Flat	2B4P Flat	3B5P House	4B7P House

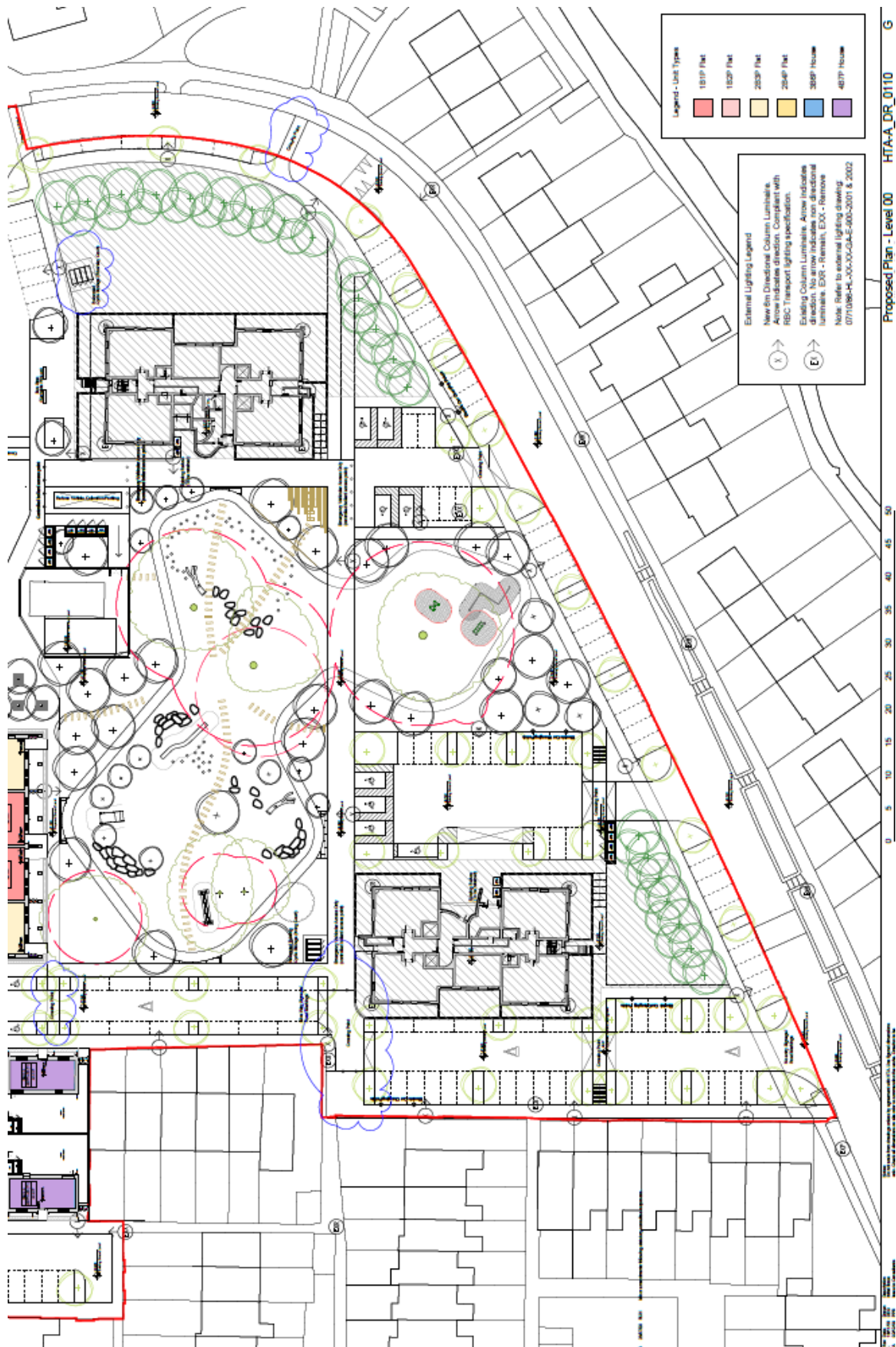
External Lighting Legend

New 5m Directional Column Luminaire
 Arrow indicates direction. Compliant with
 RBC Transport lighting specification.

Existing Column Luminaire. Arrow indicates
 direction. No arrow indicates non-directional
 luminaire. EXM - Remain, EXX - Remove

Note: Refer to external lighting drawing
 011101844-00-00-01-00-000-001 & 002

Proposed Level 00 - Rev H, received 28/07/2020 - northern half of the site



Proposed Level 00 - Rev G, received 27/07/2020 - southern half of the site

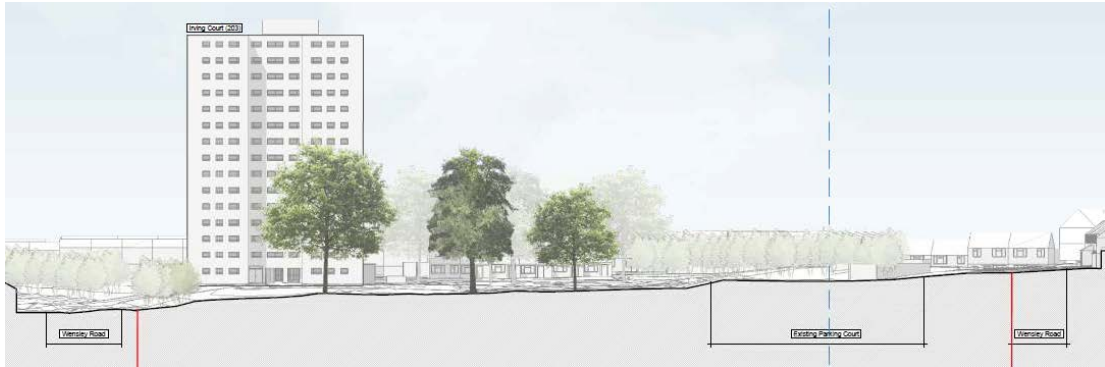


Existing and Proposed Section AA - north-south mews looking west showing Block A

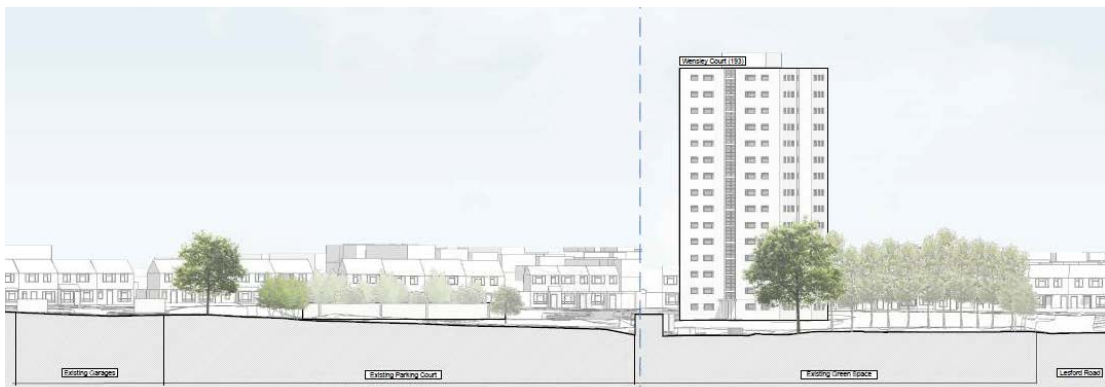
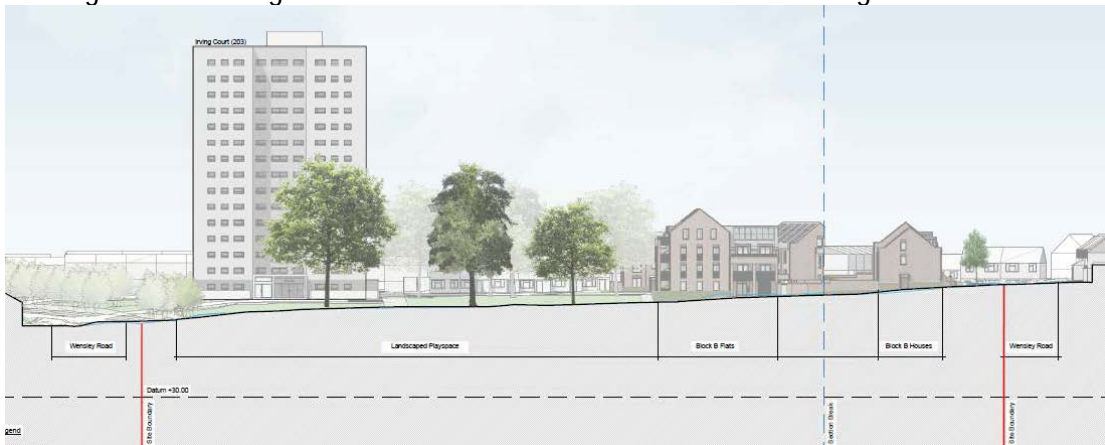


Existing and Proposed Section BB - north-south showing section through Block B

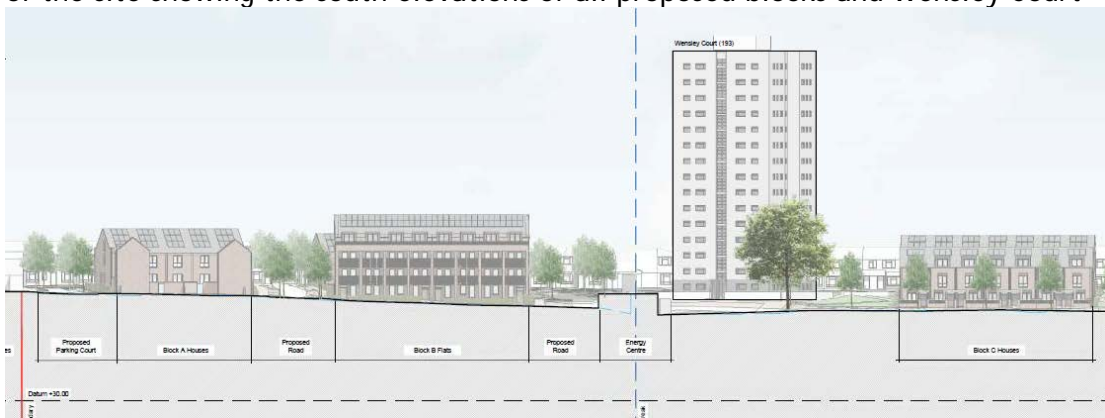


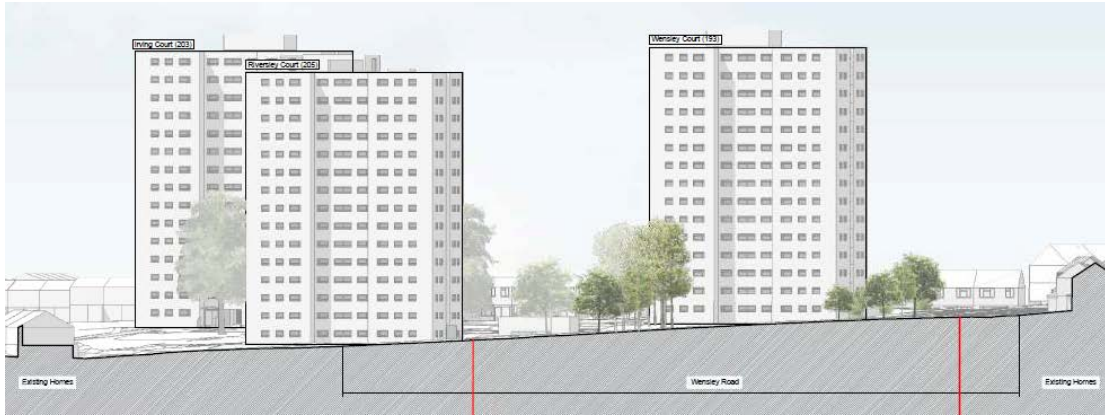


Existing and Proposed Section CC - north-south view through the centre of the site looking west showing the east side elevation of Block B and Irving Court

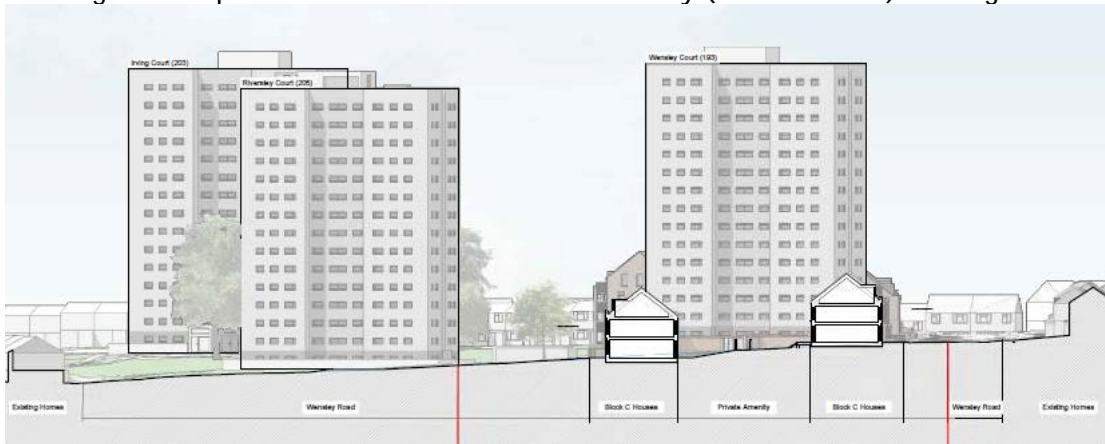


Existing and Proposed Section DD - east-west view looking north through the centre of the site showing the south elevations of all proposed blocks and Wensley Court





Existing and Proposed Section EE - eastern boundary (Lesford Road) looking west

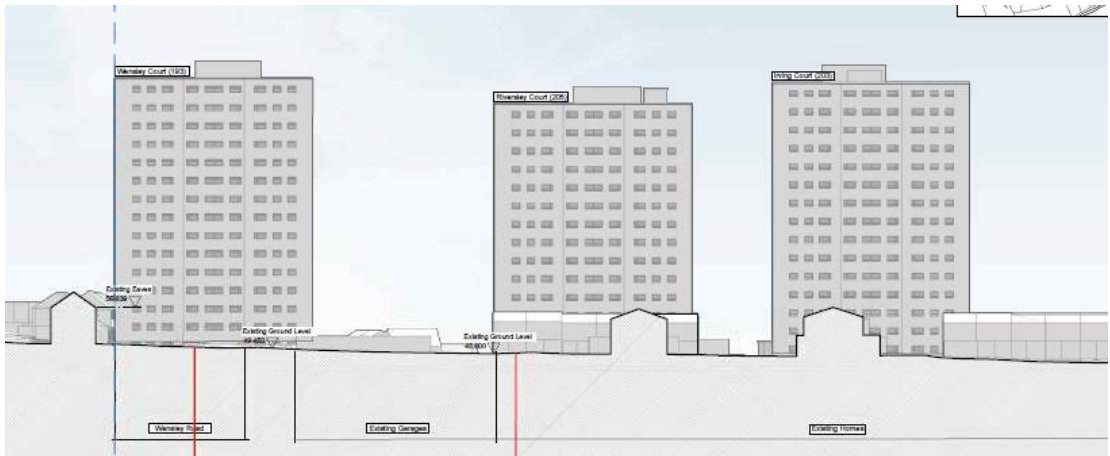
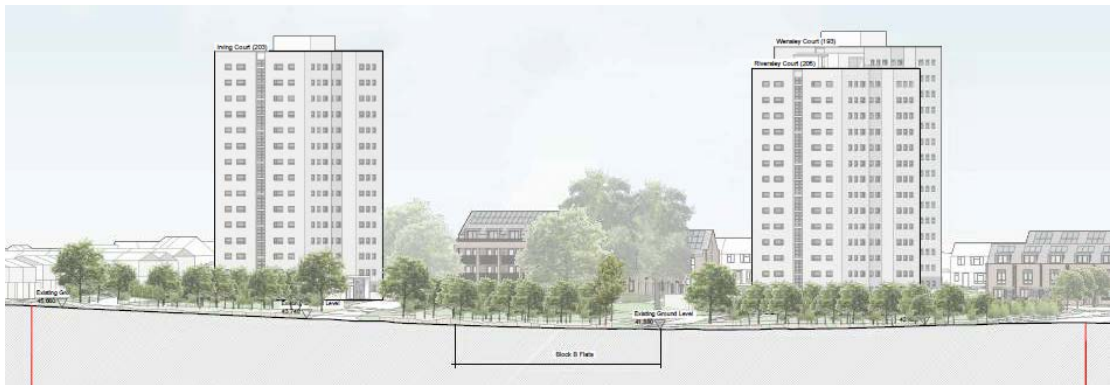


Existing & Proposed Section FF: north side of Wensley Rd streetscene looking south

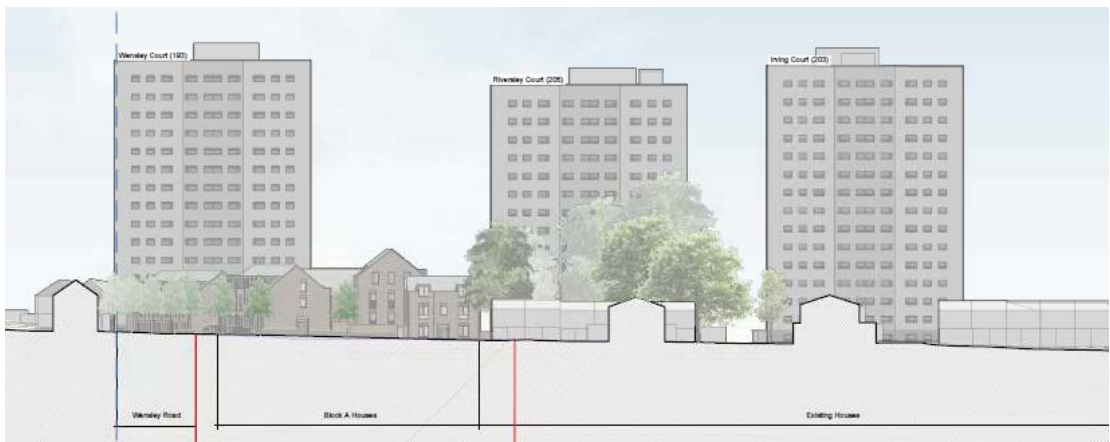


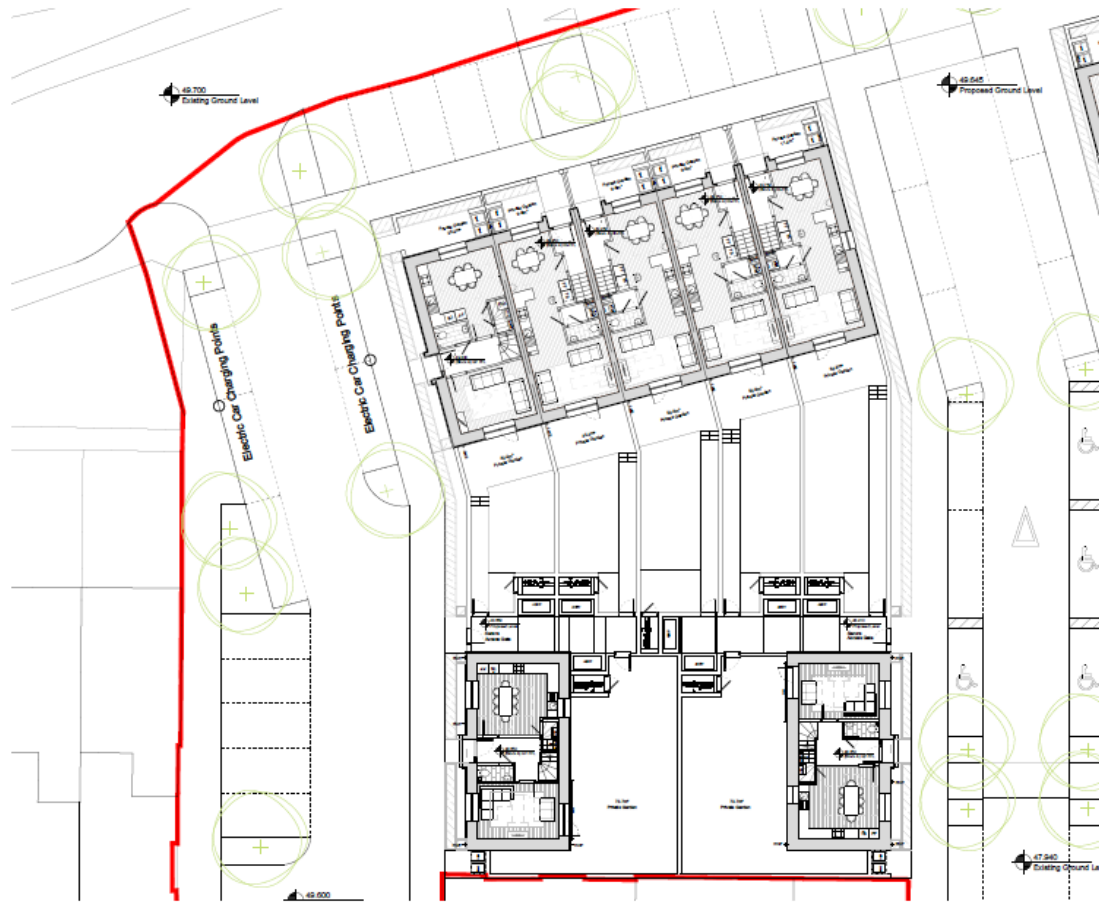


Existing & Proposed Section GG south side of Wensley Rd streetscene looking north



Existing and Proposed Section HH - from the west looking east





Block A - Ground Floor Plan



Block A Wensley Road elevation



Block B flats - north and south elevations

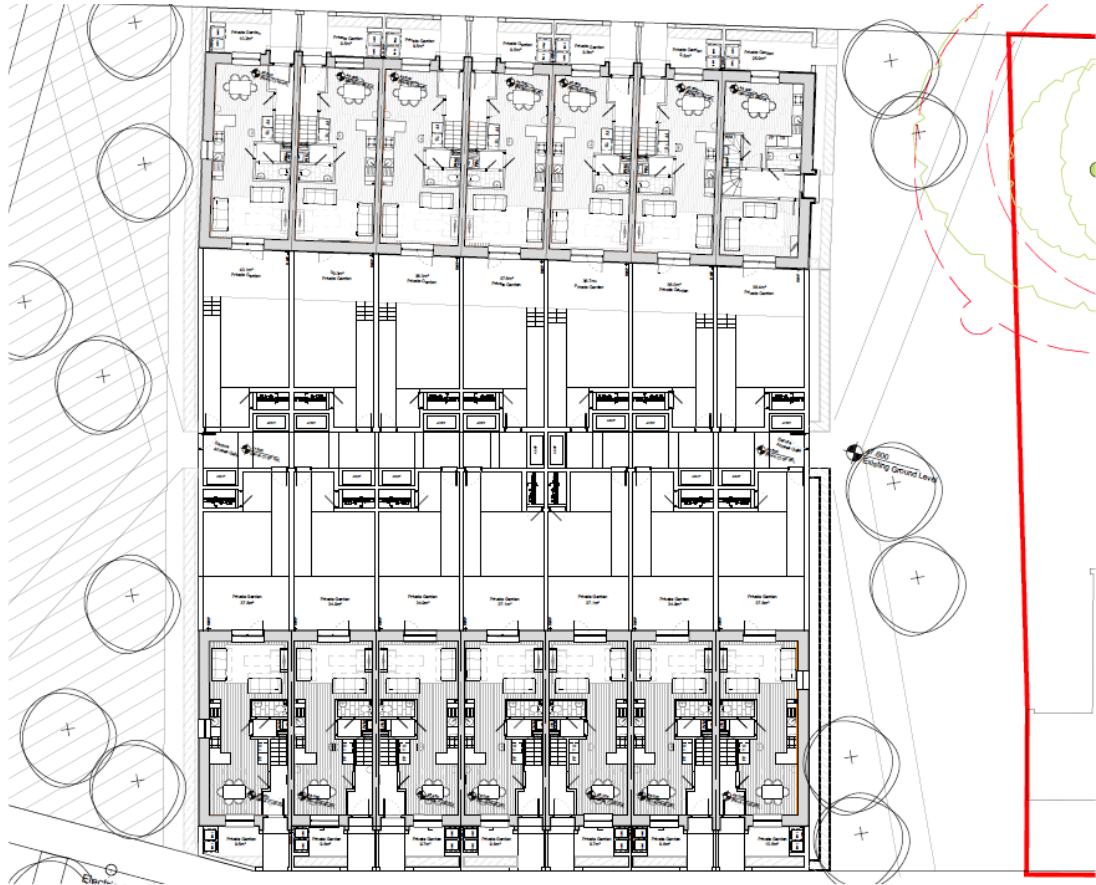


East Elevation
1:200 @ A3



West Elevation
1:200 @ A3

Block B - east and west elevation plans



Block C Ground Floor Plan














Block C - Front and rear elevations of terrace fronting Wensley Road





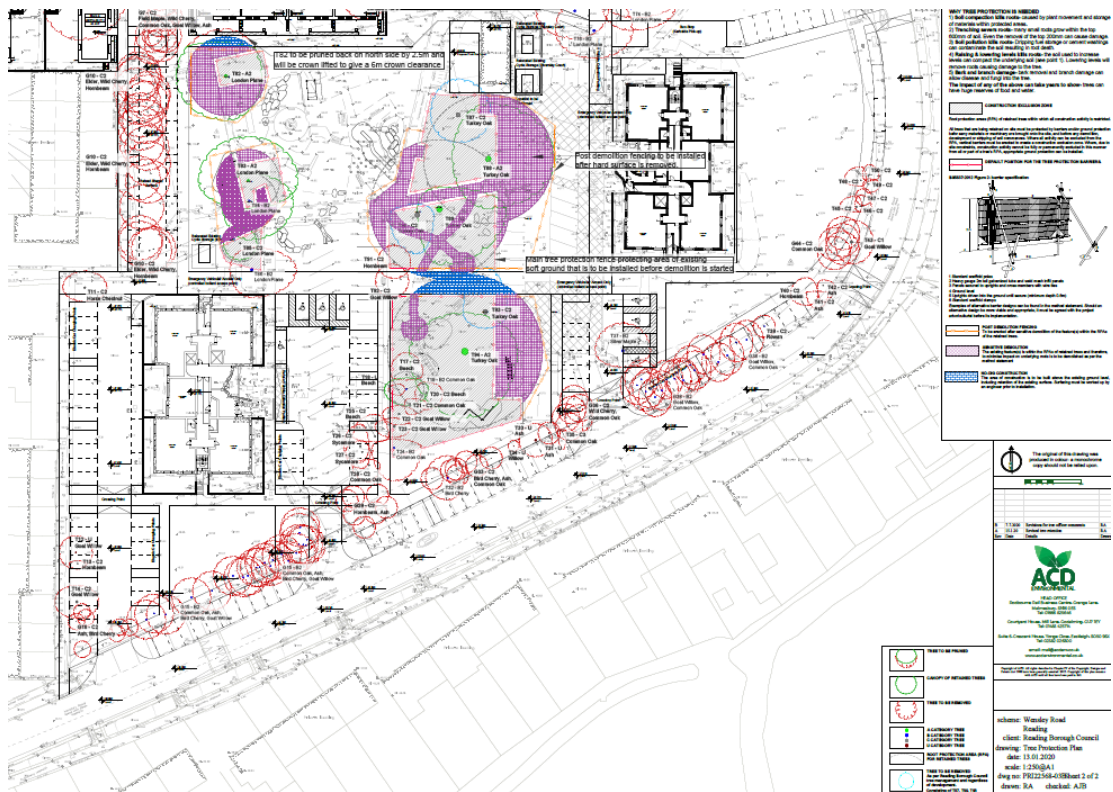
Landscape Illustrate Masterplan, as received 28/07/2020

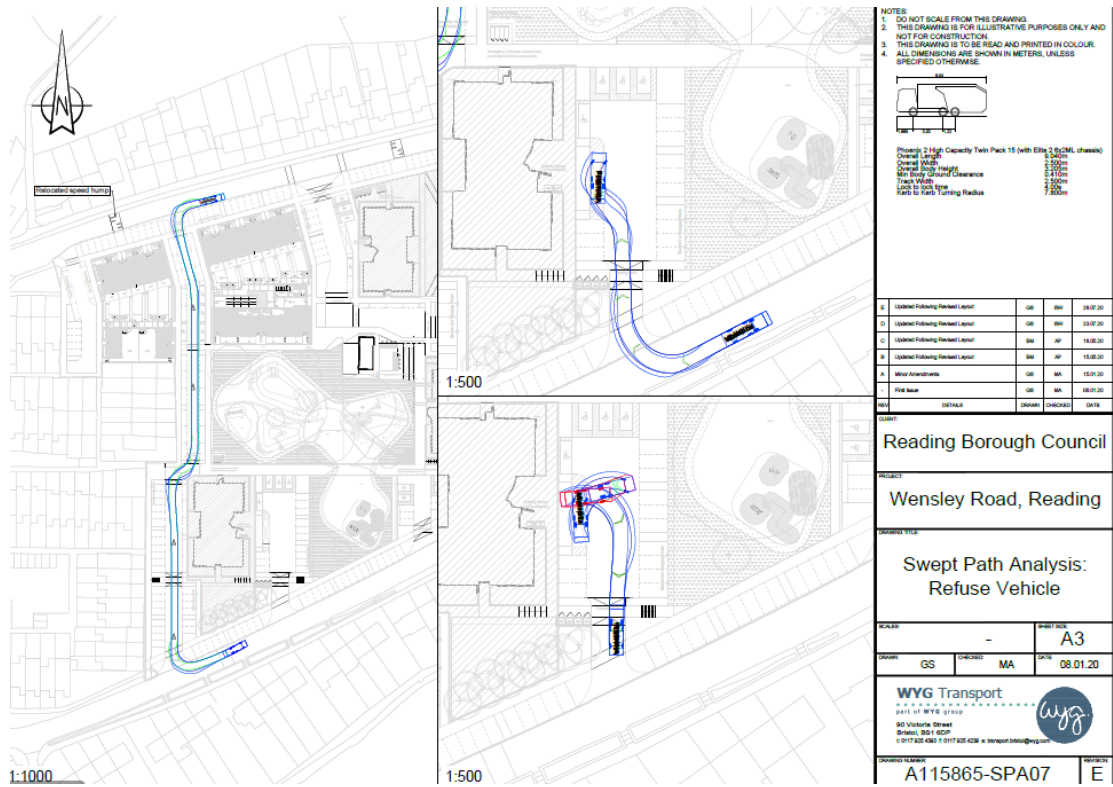
Key

Surface Type - Vehicular build up where overrun by vehicles		Play Features		Planting	
	Threshold surface		Boulders		Existing Trees
	Asphalt		Slide		Proposed Trees
	Play Trail		Stepping stones		Succession Planting
	Planting		Exercise equipment		



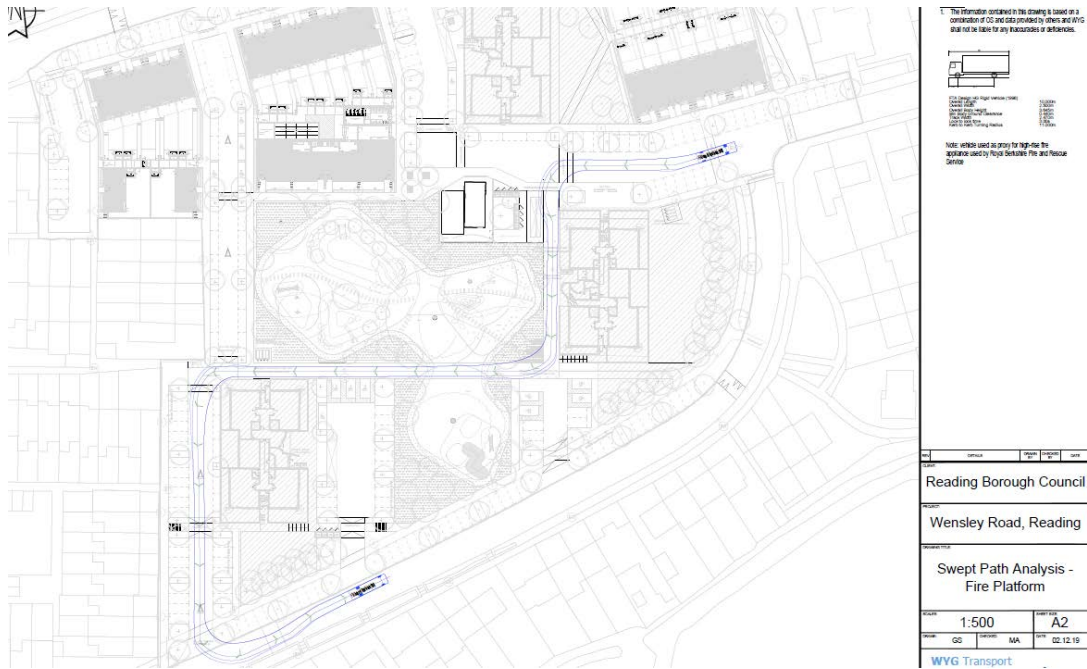
Tree Protection plans (red indicates trees to be removed)





Swept path analysis for refuse vehicles and buses





Fire platform swept path analysis

Response to RBC Transport comments

Shared Surfaces

In response to comments following the planning submission, all raised surface areas have been omitted from the proposal. To highlight the key areas and interfaces between pedestrian and vehicular routes, contrasting surface material is proposed to the carriageway. Designated crossing points will be clearly defined in these spaces.

Routes be as flat as possible

The scheme has been designed to provide a network of coherent and easily navigable routes across the site providing access for all.

Proposed crossing points will either be raised in line with the level of the adjacent footpath or a drop kerb to the carriageway will be incorporated.

Raised crossing points have been proposed as a measure to reduce vehicle speeds within the development, and along with the contrast in materials, enables a sense of pedestrian hierarchy to these residential streets.

- Crossing points flush with adjacent footpaths/ raised tabletops
- Crossing points with dropped kerbs to carriageway
- ◀•••▶ Enhanced connectivity routes





Crossing points at the site - northern (above) and southern (below)



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