

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

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29 September 2020

Your contact is: **Nicky Simpson - Committee Services (nicky.simpson@reading.gov.uk)**

**NOTICE OF MEETING - PLANNING APPLICATIONS COMMITTEE 7 OCTOBER 2020**

A meeting of the Planning Applications Committee will be held on Wednesday, 7 October 2020 at 6.30 pm online via Microsoft Teams. The Agenda for the meeting is set out below.

AGENDA	ACTION	WARDS AFFECTED	PAGE NO
1. MINUTES	-		7 - 8
2. DECLARATIONS OF INTEREST	-		
3. QUESTIONS	-		
4. PLANNING APPEALS	Information	BOROUGHWIDE	9 - 12
5. APPLICATIONS FOR PRIOR APPROVAL	Information	BOROUGHWIDE	13 - 18
6. PERFORMANCE MONITORING REPORT - DEVELOPMENT MANAGEMENT SERVICE - QUARTERS 1 & 2 2020/2021	Information	BOROUGHWIDE	19 - 24
7. PLANNING WHITE PAPER AND OTHER NATIONAL PLANNING CHANGES	Decision	BOROUGHWIDE	25 - 68

**PLANNING APPLICATIONS TO BE DETERMINED**

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- |            |  |   |            |           |
|------------|--|---|------------|-----------|
| <b>8.</b>  | 191792/FUL - 71-73 CAVERSHAM ROAD                                    | Decision  | ABBEY      | 69 - 138  |
|            | <b>Proposal</b>  | Demolition of former retail warehouse and erection of a mixed-use building comprising 44 residential units consisting of x5 affordable units, 194sqm of retail floorspace (Use Class A1) at ground floor and associated car parking, cycle parking and landscaping.   |            |           |
|            | <b>Recommendation</b>  | Application Permitted   |            |           |
| <b>9.</b>  | 201109/REG3 & 201110/LBC - KATESGROVE PRIMARY SCHOOL, DOROTHY STREET | Decision  | KATESGROVE | 139 - 146 |
|            | <b>201109 &amp; 201110 - Proposal</b>                                | New boiler flue to East elevation of Henry Building. Replacement buttressing to retaining wall of Henry Building  |            |           |
|            | <b>Recommendation</b>  | Application Permitted   |            |           |
| <b>10.</b> | 201108/FUL - UNIT 1, STADIUM WAY, TILEHURST                          | Decision  | KENTWOOD   | 147 - 158 |
|            | <b>Proposal</b>  | Proposed industrial unit to replace existing fire damaged industrial unit. The new building will consist of 4 smaller base build units suitable for class use B1(C), B2 or B8 with flexibility for trade counter fit out (B8). Note, Demolition of existing building has been covered under separate Prior Approval - Demolition of Building Application. |            |           |
|            | <b>Recommendation</b>  | Application Permitted   |            |           |
| <b>11.</b> | 191265/FUL - ST PAUL'S CHURCH, WHITLEY WOOD LANE                     | Decision  | WHITLEY    | 159 - 208 |
|            | <b>Proposal</b>  | Redevelop the site, creating a new Church Centre building, comprising Cafe, Worship Area, Meeting Rooms, two one bed residential flats and also a Health Centre Building.   |            |           |
|            | <b>Recommendation</b>  | Permitted subject to Legal Agreement  |            |           |

# GUIDE TO PLANNING APPLICATIONS Agenda Annex

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.

## Guide to changes to the Use Classes Order in England.

Changes of use within the same class are not development.

Use	Use Class up to 31 August 2020	Use Class from 1 September 2020
Shop - not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop	A1	F.2
Shop	A1	E
Financial & professional services (not medical)	A2	E
Café or restaurant	A3	E
Pub, wine bar or drinking establishment	A4	Sui generis
Takeaway	A5	Sui generis
Office other than a use within Class A2	B1a	E
Research & development of products or processes	B1b	E
For any industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area)	B1c	E
Industrial	B2	B2
Storage or distribution	B8	B8
Hotels, boarding & guest houses	C1	C1
Residential institutions	C2	C2
Secure residential institutions	C2a	C2a
Dwelling houses	C3	C3
Small house in multiple occupation 3-6 residents	C4	C4
Clinics, health centres, creches, day nurseries, day centre	D1	E
Schools, non-residential education & training centres, museums, public libraries, public halls, exhibition halls, places of worship, law courts	D1	F.1
Cinemas, theatres, concert halls, bingo halls and dance halls	D2	Sui generis
Gymnasiums, indoor recreations not involving motorised vehicles or firearms	D2	E
Hall or meeting place for the principal use of the local community	D2	F.2
Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms	D2	F.2

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

### RESOLVED ITEMS

#### 36. MINUTES

The Minutes of the meeting held on 12 August 2020 were agreed as a correct record.

#### 37. DECLARATIONS OF INTEREST

Councillor Ennis declared a prejudicial interest in Item 41 (application 200716/REG3 - Blocks 1 & 2 Aveley Walk) on the grounds of predetermination. The application had been submitted by the Council and as Lead Councillor for Housing he had been involved in the development of the scheme.

#### 38. APPLICATIONS DETERMINED UNDER NEW DELEGATED AUTHORITY

The Executive Director for Economic Growth and Neighbourhood Resources submitted a report informing the Committee that, since the previous report, two planning applications had been decided by officers under the extended delegated authority to determine applications and manage 'called-in' applications during the Coronavirus crisis.

**Resolved -** That the report be noted.

#### 39. 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.

#### 40. APPLICATIONS FOR PRIOR APPROVAL

## PLANNING APPLICATIONS COMMITTEE MEETING MINUTES - 9 SEPTEMBER 2020

The Executive Director for Economic Growth and Neighbourhood Services submitted a report giving details in Table 1 of six prior approval applications received, and in Table 2 of eighteen applications for prior approval decided, since 31 July 2020.

The report also explained how recent changes to the Use Classes Order which took effect from 1 September 2020 would have implications for change of use prior approvals and that the Government had introduced a 'material period' running from 1 September 2020 to 31 July 2021, meaning that, for all the current Permitted Development rights, the Use Classes in place up to the end of August 2020 would remain in effect until the end of that period. This meant that applications submitted before 1 September 2020 would be determined based on the Use Classes in place up to the end of August 2020.

**Resolved -** That the report be noted.

### **41. 200716/REG3 - BLOCKS 1 & 2, AVELEY WALK**

Conversion of existing ground floor stores in 1 & 2 Aveley Walk to form a 1 bedroom dwelling in each block.

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

Comments and an objection were received and considered.

Lead Councillor for Housing John Ennis addressed the Committee on this application.

**Resolved -**

- (1) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to grant full planning permission for application 200716/REG3, subject to completion of a unilateral undertaking by 28 October 2020 (unless a later date be agreed by the Deputy Director of Planning, Transport and Regulatory Services) to secure the Heads of Terms set out in the report;
- (2) That, in the event of the requirements set out not being met, the Deputy Director of Planning, Transport and Regulatory Services be authorised to refuse permission;
- (3) That planning permission be subject to the conditions and informatives as recommended.

(Councillor Ennis declared an interest in this item, made a statement as Lead Councillor then abstained in the vote. Nature of interest: Councillor Ennis was the Lead Councillor for Housing and had been involved in the development of the scheme).

(The meeting started at 6.31 pm and closed at 6.55 pm)

READING BOROUGH COUNCIL  
REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND  
NEIGHBOURHOOD SERVICES

<b>TO:</b>	PLANNING APPLICATIONS COMMITTEE		
<b>DATE:</b>	7 <sup>th</sup> October 2020		
<b>TITLE:</b>	PLANNING APPEALS		
<b>AUTHOR:</b>	Julie Williams	<b>TEL:</b>	0118 9372461
<b>JOB TITLE:</b>	Planning Manager	<b>E-MAIL:</b>	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: KENTWOOD  
APPEAL NO: APP/E0345/D/20/3255866  
CASE NO: 200388  
ADDRESS: 12 Lower Armour Road, Tilehurst  
PROPOSAL: First floor rear extension  
CASE OFFICER: Tom Hughes  
METHOD: Householder Written Representation  
APPEAL TYPE: REFUSAL  
APPEAL LODGED: 14.09.2020

## **APPENDIX 2**

**Appeals Decided:** None

## **APPENDIX 3**

**Address Index of Planning Officers reports on appeal decisions.**

**No reports available this time.**

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**READING BOROUGH COUNCIL  
REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD  
SERVICES**

<b>TO:</b>	<b>PLANNING APPLICATIONS COMMITTEE</b>		
<b>DATE:</b>	7 <sup>th</sup> October 2020		
<b>TITLE:</b>	<b>APPLICATIONS FOR PRIOR APPROVAL</b>		
<b>AUTHOR:</b>	Julie Williams & Richard Eatough		
<b>JOB TITLE:</b>	PLANNING MANAGER (acting) & Team Leader	<b>E-MAIL:</b>	<a href="mailto:Julie.williams@reading.gov.uk">Julie.williams@reading.gov.uk</a> <a href="mailto:Richard.eatough@reading.gov.uk">Richard.eatough@reading.gov.uk</a>

## 1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To advise Committee of the types of development that can now be submitted for Prior Approval and to provide a summary of the applications received and decisions taken in accordance with the prior-approval process as set out in 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.
- 3.2 Since May 2015 more and more changes of use or development have been brought under the prior approval approach in an attempt to give developers more certainty on their proposals by avoiding the typical planning application consultation and assessment process. Section 4 below lists the current types of prior approval applications.
- 3.3 Members have been advised in previous reports of changes to the Use Classes Order and a comparison list of old and new use classes has been added at the beginning of your agenda papers. These changes will have implications for change of use prior approvals going forward. The extract below from the Planning Portal website (the platform for submitting planning applications) tries to explain:

### ***Changes to Use Classes***

*Wholesale legislative changes determining how uses of buildings and land in England are classified will take effect (with certain transitional procedures and periods) from 1 September 2020.*

*In making these changes, Government has also introduced a ‘material period’ that runs from 1 September 2020 until 31 July 2021 meaning that, for all the current Permitted Development rights, the Use Classes in place up to the end of August 2020 will remain in effect until the end of this period. This also*

*applies to any existing direction that restricts these rights.*

***So, what does this mean for content on the Planning Portal and our application service?***

*Applications submitted before 1 September 2020 will be determined based on the Use Classes in place up to the end of August 2020.*

*Based on the ‘material period’ detailed above, our permitted development content and Prior Approval application types will also continue to reference the ‘old’ Classes for the time being, though we will be updating relevant areas to acknowledge this.*

*For other applications, any reference that needs to be made to the new E & F Use Classes will need to be added as ‘Other’ and have detailed provided. This is an interim measure while we work to update the relevant question sets and our data standard to account for the new classes.*

- 3.4 Officers are still unclear how this will all pan out as we start to receive applications for prior approval and I suspect that applicants and their agents will have similar questions to ours. For example, for Class J below some changes from retail to leisure will mean that the use remains in Class E but not all types of leisure uses.
- 3.5 The preparation of the application forms might help as the one published for Part 20 Class A has a checklist of 12 questions to establish if a site is eligible to use this process.

#### **4 TYPES OF PRIOR APPROVAL APPLICATIONS**

- 4.1 The categories of development requiring prior approval appear in different parts of Schedule 2 of 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. Those that are of most relevance to Reading Borough are summarised as follows:

##### SCHEDULE 2 - Permitted development rights

PART 1 - Development within the curtilage of a dwelling house

- **Householder development - larger home extensions. Part 2 Class A1.**
- **Householder development - upwards extensions. Part 2 Class AA.**

PART 3 – Changes of use

- **Change of use from A1 shops or A2 financial & professional, betting office, pay day loan shop or casino to A3 restaurants and cafes. Class C.**
- **Change of use from A1 shops or A2 financial & professional, betting office or pay day loan shop to Class D2 assembly & leisure. 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. Class M**
- **Change of use from an amusement arcade or a casino to C3 dwellinghouse & necessary works. Class N**
- **Change of use from B1 office to C3 dwellinghouse Class O\*.**
- **Change of use from B8 storage or distribution to C3 dwellinghouse Class P**
- **Change of use from B1(c) light industrial use to C3 dwellinghouse 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. 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. Class R.
- Change of use from Agricultural buildings and land to state funded school or registered nursery D1. 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. Class T.

PART 4 - Temporary buildings and uses

- Temporary use of buildings for film making for up to 9 months in any 27 month period. Class E

PART 11 - Heritage & Demolition

- Demolition of buildings. Class B.

PART 16 - Communications

- Development by telecommunications code system operators. Class A
- GPDO Part 11.

Part 20 - Construction of New Dwellinghouses

- **New dwellinghouses on detached blocks of flats** Class A
- **Demolition of buildings and construction of new dwellinghouses in their place.** Class ZA

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 GDPO. 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 £1,352,242.

(Office Prior Approvals - £1,225,757: Householder Prior Approvals - £78,142: Retail Prior Approvals - £13,816: Demolition Prior Approval - £3,599: Storage Prior Approvals - £5716: Shop to Restaurant Prior Approval - £5770: Shop to Leisure Prior Approval - £305: Light Industrial to Residential - £18,270: Dwellings on detached block of flats - £768)

*Figures since last report*

Office Prior Approvals - £828: Householder Prior Approvals - £330

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 27<sup>th</sup> August 2020 to 24<sup>th</sup> September 2020**

Type:	How many received since last report:	Loss in possible fee income:
Householder Prior Approvals	3	£330
Office Prior Approvals	1	£828
Shop to Restaurant Prior Approval	0	0
Retail Prior Approvals	1	£828
Demolition Prior Approval	1	£366
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	1	n/a
Dwellings on detached block of flats	1	£768
<b>TOTAL</b>	<b>8</b>	<b>£3,120</b>

**Table 2 - Applications decided since 27<sup>th</sup> August 2020 to 24<sup>th</sup> September 2020**

Type:	Approved	Refused	Not Required	Withdrawn
Householder Prior Approvals	0	0	4	2
Office Prior Approvals	2	0	0	0
Shop to Restaurant Prior Approval	0	0	0	1
Retail Prior Approvals	0	0	0	1
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	1
<b>TOTAL</b>	<b>3</b>	<b>1</b>	<b>4</b>	<b>5</b>

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# Agenda Item 6

## READING BOROUGH COUNCIL REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	7 <sup>th</sup> October 2020		
TITLE:	PERFORMANCE MONITORING REPORT - DEVELOPMENT MANAGEMENT SERVICE - Quarters 1 & 2 2020/2021		
SERVICE:	PLANNING	WARDS:	BOROUGHWIDE
LEAD OFFICER:	JULIE WILLIAMS	TEL:	0118 937 2461 (72461)
JOB TITLE:	PLANNING MANAGER (acting)	E-MAIL:	Julie.williams@reading.gov.uk

### 1. PURPOSE AND SUMMARY OF REPORT

- 1.1 The purpose of this report is to provide information on how the Planning Service has performed over the past 6 months in terms of meeting government set targets for dealing with planning applications and success at planning appeals.
- 1.2 Detail on the types of applications handled and appeal decisions for Quarters 1 & 2 (the period 1 April 2020 - 30 September 2020) are provided with comparison data from the previous year.
- 1.3 This has been, and continues to be, a challenging year for officers with new processes and procedures for working remotely in addition to getting used to a raft of changes introduced by government (see previous reports in June, July and August). However, Reading's Planning Service has still managed to perform well, working with applicants and consultees in similar circumstances, to meet MHCLG's performance criteria as shown on the following tables.

### 2. RECOMMENDED ACTION

- 2.1 That the contents of the report be noted.

### 3. BACKGROUND

- 3.1 Performance by a local planning authority is assessed by government based on the speed and quality of decisions made on major and non-major planning applications. Major applications are those for 10+ dwellings or dwellings on sites over half a hectare or non-residential building(s) exceeding 1000m<sup>2</sup> or on sites exceeding 1 hectare. Non-Major (or Minor) applications are those for 1-9 dwellings (unless floorspace exceeds 1000m<sup>2</sup> / under half a hectare or non-residential buildings up to 999 m<sup>2</sup> or on sites under 1 hectare.

Other applications are therefore a subset of minor applications and include all the other types of applications including householders.

Householder applications are for changes to or in the grounds of an existing dwelling for any purpose of a domestic nature.

- 3.2 The MHCLG published criteria (2018) judges that a Local Planning Authority is not performing well if:
- a. For applications for major development: less than **60 per cent** of an authority's decisions are made within the statutory determination period or such extended period as has been agreed in writing with the applicant;
  - b. For applications for non-major development: less than **70 per cent** of an authority's decisions are made within the statutory determination period or such extended period as has been agreed in writing with the applicant.
  - c. For applications for both major and non-major development over **10 per cent** of an authority's total number of decisions on applications have been overturned at appeal.

#### 4. PERFORMANCE AGAINST MHCLG TARGETS

##### Speed

- 4.1 The Council's performance over the past 6 months in terms of speed of determination of planning applications (see Table 1 below) is:
- 86% of major development applications within the statutory determination period or an agreed extended period.
  - 85.7% of all non-major development applications within the statutory determination period or an agreed extended period.
- 4.2 Table 1 provides a breakdown on the types of planning applications handled with a comparison with the same two quarters last year with data given for the whole of year 2019/2020. As can be seen the number of applications received and decided so far in 2020/21 has dropped on all types of applications and this pattern is consistent with the experience of planning authorities across the country. However, performance on issuing decisions remains good and above the MHCLG's targets.

##### Quality

- 4.3 The quality performance requirement is based on the percentage of appeal decisions allowed, thus overturning the local planning authority's decision, when compared to the total number of decisions made. The current percentage threshold is 10 per cent of an authority's total number of decisions.
- 4.4 Table 2 provides the results on appeals decided so far this year in comparison with the same 2 quarters last year. It shows that over the past since months only one appeal has been allowed so we are well within the target set. The table also shows how in the first quarter there were a number of appeals decided but then as a consequence of the lockdown the number of appeals determined slowed down. The Planning Inspectorate are now performing better with new processes in place and indeed we had our first on-line planning appeal informal hearing last week to consider 205-207 Kings Road, Reading, LPA ref 190160.



Table 1: Application Performance so far in 2020/2021 for the Planning Service compared with previous year.

Description	MCHLG Target	19/20	Q1 19-20	Q2 19-20	Q1 Apr - Jun 20/21	Q2 Jun - Sep 20/21
Number and Percentage of major applications decided within: (i) statutory 13/16 weeks, or (ii) the extended period agreed with the applicant.	60%	22 100%	4/4 100%	5/5 100%	2/3 66%	4/4 100%
Number and Percentage of all other minor applications decided within (i) statutory 8 weeks or (ii) the extended period agreed by the applicant.	70%	178 86%	44/52 85%	52/62 84%	36/50 72%	41/53 77%
*Number and Percentage of other applications decided within (i) statutory 8 weeks or (ii) the extended period as agreed by applicant.	70%	528 90%	167/177 94%	112/137 82%	106/121 88%	99/105 94%
<i>*Of these decisions the following were for householder applications (not prior approval)</i>		342 84%	114/118 97%	75/90 83%	82/93 88%	81/88 92%
<b>TOTAL DECISIONS</b>		728	215/233 92%	169/204 83%	144/174 83%	144/162 89%

. TABLE 2: Section 78 Appeals against the refusal of planning permission

	Annual 2019/20	Q1 & 2 Apr - Sep 19/20	Q1 Apr - Jun 20/21	Q2 Jun - Sep 20/21
APPEALS LODGED	50	35	6	9
NUMBER OF APPEAL DECISIONS	47	25	7	2
APPEALS ALLOWED	11	8	1	0
APPEALS DISMISSED	35	17	7	1
SPLIT DECISIONS	0	0	0	0
APPEALS WITHDRAWN	1	0	0	0

**5. CONTRIBUTION TO STRATEGIC AIMS**

- 5.1 Planning services contribute to producing a sustainable environment and economy within the Borough as set out in some of the Council’s Corporate Plan priorities:
1. Securing the economic success of Reading and provision of job opportunities
  2. Ensuring access to decent housing to meet local needs
  3. Keeping Reading’s environment clean, green and safe
  4. Ensuring that there are good education, leisure and cultural opportunities for people in Reading.

**6. COMMUNITY ENGAGEMENT AND INFORMATION**

- 6.1 Statutory consultation takes place on planning applications and appeals and this can influence the speed with which applications and appeals are decided. Information on development management performance is publicly available.

**7. EQUALITY IMPACT ASSESSMENT**

- 7.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, 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 In terms of the key equalities protected characteristics, it is considered that the development management performance set out in this report has no adverse impacts.

**8. ENVIRONMENTAL AND CLIMATE IMPLICATIONS**

- 8.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).
- 8.2 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.

**9. LEGAL IMPLICATIONS**

9.1 The collection and monitoring of performance indicators is a statutory requirement and a requirement of MHCLG. In addition a number of the work related programmes referred to in this report are mandatory requirements including the determination of planning applications and the preparation of the development plan.

**10. FINANCIAL IMPLICATIONS**

10.1 There are no direct financial implications arising from this report.

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## READING BOROUGH COUNCIL

### REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

<b>TO:</b>	<b>PLANNING APPLICATIONS COMMITTEE</b>		
<b>DATE:</b>	7 <sup>th</sup> October 2020		
<b>TITLE:</b>	<b>PLANNING WHITE PAPER AND OTHER NATIONAL PLANNING CHANGES</b>		
<b>AUTHOR:</b>	Mark Worringham		
<b>JOB TITLE:</b>	Planning Policy Team Leader	<b>E-MAIL:</b>	<a href="mailto:mark.worringham@reading.gov.uk">mark.worringham@reading.gov. uk</a>

#### 1. PURPOSE AND SUMMARY OF REPORT

- 1.1 The government is proposing to completely overhaul the planning system in England, which was established in 1947. The Planning White Paper (Planning for the Future) was published on 6<sup>th</sup> August for consultation, and proposes a new planning system with the intention of delivering development more quickly, based around zoning land in local plans and much reduced requirements for applying for development that complies with those plans. This consultation is open until 29<sup>th</sup> October, and this report recommends a draft response (Appendix 1).
- 1.2 At the same time, another consultation on changes to the existing planning system looked at measures that can be introduced within the existing context in advance of primary legislation to enact the White Paper. This consultation closes on 1<sup>st</sup> October, and this consultation reports on the Council's response (Appendix 2).
- 1.3 Appendices  
Appendix 1 - Proposed response to the Planning White Paper  
Appendix 2 - Response to changes to the existing planning system

#### 2. RECOMMENDED ACTION

- 2.1 That you agree the proposed response to the consultation on the Planning White Paper (Appendix 1).
- 2.2 That you note the response to the consultation on changes to the current planning system (Appendix 2).

### 3. PROPOSED CHANGES

- 3.1 The current planning system in England has been in place since the Town and Country Planning Act 1947. Changes have been made periodically, and these changes have sped up considerably over the last ten years, but they have been made within the basic framework of the system that was established after the Second World War with the intention of enabling and managing the large-scale rebuilding needed at that time.
- 3.2 On 6<sup>th</sup> August 2020, the Government published a Planning White Paper ('Planning for the Future') for consultation. It proposes the most fundamental change to the planning system since it was established in 1947. It starts from the assumption that the current system is unfit for purpose and stands as a significant block to the development that the country needs, and, in particular, that it is responsible for the current housing crisis. The motivation for the overhaul is therefore to remove barriers to development and significantly increase the supply of homes in particular.
- 3.3 Alongside the White Paper, a number of other planning changes were published for consultation, which would operate within the current system and would be introduced largely through national policy. The purpose would be to make these changes in the shorter term before a new system can be introduced by an Act of Parliament, although some of these changes may form part of the new system.

#### *Planning White Paper*

- 4.1 At its heart, the Planning White Paper proposes a form of zoning system, whereby the use of all land is defined at the plan-making stage, which means that the planning application process is substantially reduced. Zoning systems exist in many other countries, including most European countries, although these vary significantly and no specific model appears to have been used in the White Paper
- 4.2 The White Paper is based around the following three pillars:
- Pillar One - Planning for Development
  - Pillar Two - Planning for Beautiful and Sustainable Places
  - Pillar Three - Planning for Infrastructure and Connected Places
- 4.3 The following are some of the main elements to be aware of in **Pillar One - Planning for Development:**
- Local Plans would be fundamentally changed, to become first and foremost map-based, using a standard national template and software, dividing all land in their area into three categories: 'growth', 'renewal' and 'protection'.
  - Land for 'growth' would be suitable for substantial development (with substantial being defined in policy), i.e. comprehensive

development/redevelopment. Inclusion in the Local Plan would automatically confer outline approval or permission in principle. Flood zones would be excluded (unless risk can be fully mitigated).

- Land for ‘renewal’ would be suitable for development, which would cover existing urban areas, and include infill, town centre development etc, with the Local Plan specifying which development would be suitable where. There would be a statutory presumption in favour of development for the uses specified, and this will include some kind of automatic permission where a development complies with the specifications of the plan. It is likely that most of Reading would be a ‘renewal’ area.
- Land for ‘protection’ will be land where more stringent controls apply, either defined nationally or locally on the basis of policies in the NPPF (the implication being that local authorities would not have scope to invent their own protection categories). These could include Green Belt, Areas of Outstanding Natural Beauty, Local Wildlife Sites, local green spaces and conservation areas. Here, a planning application would be required as is the case currently. The paper states that this can include back gardens.
- Policy in the local plan would be restricted to clear and necessary area- or site-specific parameters, such as height and density. General development management policies would be set out in national policy only.
- Design guides and codes would be produced for local areas and either included within the plan or later as a Supplementary Planning Document (SPD).
- Many of the plan-making requirements would be removed, for instance sustainability appraisal, duty to co-operate and the tests of soundness, and would be replaced with a simpler ‘sustainable development’ test.
- A binding housing figure would be set at a national level through a standard methodology. This methodology would take account of constraints as well as need, unlike the current methodology, which is based on need only.
- There would be a statutory 30-month timetable for Local Plan production. The new process would include only two consultation stages - an initial call for ideas/sites, and consultation on a full draft after the plan has been submitted. Authorities would have either 30 months (where there is no local plan adopted within the last 5 years) or 42 months to adopt a new plan after the legislation comes into force. The White Paper envisages that engagement will be made much more extensive and effective at the plan-making stage, to make up for loss of consultation opportunities at planning

application stage, but the only proposals for how this can be achieved seem to be based on new technology and social media.

- Neighbourhood plans would be retained, but how they would fit in an entirely new system is unclear.
- There would be faster decision-making through new technological solutions (e.g. more automated validation, machine-readable documents), reduction on information requirements (e.g. one short planning statement), standardisation of technical reports and data, standard national conditions, template decision notices. There would also be delegation to officers to decide applications where the principle is established.
- The Paper proposes refunding application fees where an application goes over statutory time limits (with no scope to negotiate extensions), and potentially a deemed consent in those cases. There would also be an automatic rebate of the application fee if an appeal is successful.

#### 4.4 The following are some of the main elements of Pillar Two - Beautiful and Sustainable Places:

- A National Model Design Code will be published in autumn 2020, accompanied by a revised Manual for Streets.
- Local design guides and design codes should be produced either as part of the Local Plan or as SPD, but will only be given weight if effective input from the local community can be demonstrated. Without local design codes, developments should comply with the national design code.
- A new national expert body on design and place-making will be set up, which will assist local authorities with design codes, and every local authority will be expected to appoint a chief officer for design and place-making.
- There will be a fast-track process for developments which comply with design codes in areas for 'growth' and 'renewal' in the Local Plan. There will also be a widening of permitted development rights to allow "popular and replicable" forms of development, according to a pattern book, in 'Renewal' areas.
- There is continued commitment to various elements of the Environment Bill, including biodiversity net gain, as well as a national expectation on trees, and the continued push for the Future Homes standard and development to be net zero carbon by 2050.
- Environmental Impact Assessment processes would be simplified.



- There would be an updated framework for listed buildings and conservation areas. The government also want to look at whether some simple listed building consents can be dealt with by suitably experienced specialists in the industry.

4.5 Finally, the following are the main elements of **Pillar Three - Planning for Infrastructure and Connected Places**:

- The Community Infrastructure Levy and Section 106 agreements would be abolished and replaced with a new Consolidated Infrastructure Levy.
- Rather than a charge per sq m of floorspace, the new Levy would be based on a proportion of the final value of a development, over a certain threshold. It would make the Levy more responsive to market conditions, but means the actual contribution would not be known until the development is completed, and may well be zero if the development value falls below the threshold. It would also only be paid on occupation, so there would be no contributions at earlier development stages. Local authorities could borrow against future levies so they can forward fund infrastructure.
- The rate would be set nationally. It may be a single rate across the country, or more regionally based. It would continue to be collected and spent locally.
- The Levy may be extended to cover more developments that benefit from permitted development rights, for instance where there is no new floorspace.
- The Levy would cover affordable housing, which could be secured on-site through the levy or be an off-site payment. The implication is that the amount of affordable housing would therefore also be set nationally.
- There is potentially more freedom on spend, and this could include provision of council services and reducing council tax. The Paper also proposes that a proportion should be kept to cover planning service costs on Local Plans, enforcement, etc.

4.6 Finally, the government would develop a comprehensive resourcing and skills strategy. This will include greater regulation of pre-application fees. The proposal is to work closely with the property technology ('PropTech') sector to roll out much greater digitalisation. There may be more enforcement powers, and local authorities are expected to be able to refocus on enforcement due to less application requirements.

- 4.7 For every proposal, the White Paper sets out alternative options to inform consultation, although these are generally a middle-ground between the proposals and the existing system. The government clearly does not see ‘no change’ as an option.

***Changes to the existing planning system***

- 4.8 Alongside the White Paper, another consultation document was published that proposes a number of changes to the existing planning system. These would not require primary legislation, and would be brought in in advance of the White Paper, potentially later in 2020.

- 4.9 The four changes are as follows:

- A revised standard methodology for calculating housing need;
- The introduction of ‘First Homes’;
- An increased threshold for requiring affordable housing; and
- Extension of the ‘permission in principle’ process.

- 4.10 There is currently a national **standard methodology for assessing housing need** which local plan-making needs to take account of. It is based on a combination of national household projections and affordability. Using current information, it leads to a figure of 649 homes per year for Reading, which is below the 699 homes per year which was calculated for Reading’s Local Plan (which pre-dated the introduction of the methodology). The new methodology provides a much greater emphasis on affordability, and would also factor in a minimum 0.5% annual growth in the existing dwelling stock. Based on this approach, using most recent available information, Reading’s need would be 700 homes per annum. On the face of it, therefore, the methodology does not result in a great deal of difference for Reading, but it is worth responding to as the methodology is highly sensitive to different demographic assumptions, and could increase very significantly if the household projections change significantly (which they have done in recent years).

- 4.11 The consultation also proposes making **First Homes** a compulsory part of developer contributions to affordable housing. This is a new affordable housing product, largely to replace Starter Homes, and is defined as homes to be sold at a minimum 30% discount to local first-time buyers in need of housing. The discount would apply in perpetuity. The proposal is that at least 25% of on-site affordable housing contributions, as well as 25% of off-site financial contributions where this is provided in place of an on-site contribution, will be First Homes. National policy currently requires that 10% of all housing on sites of over 10 dwellings would be for affordable home ownership products, and in Reading this is largely delivered as shared ownership. In practice, this will mean that First Homes would generally replace shared ownership as the favoured affordable home ownership product.

- 4.12 The consultation proposes raising the **site threshold for providing affordable housing** from 10 units to 40 or 50 units, for an initial time-limited period of 18 months to enable SME developers to recover from Covid-19. The assumptions are that this would result in a 7-14% (if 40 units) or 10-20% (if 50 units) reduction in affordable housing delivery. The consultation states that the government would monitor the impacts on the sector before reviewing the approach, but there are no guarantees that the threshold would revert back to 10 dwellings after 18 months.
- 4.13 Reading is in an unusual position, in that we do not apply the existing national policy threshold in any case, and this has been supported at appeal and by the Local Plan Inspector. We will therefore continue to apply our own local policies on this matter that seeks affordable housing from all sizes of development, but we would need to be aware that we may face fresh challenges on this at appeal.
- 4.14 A ‘**permission in principle**’ (PiP) application route has been in place since 2017, in which an application can be made for permission in principle for housing-led development on sites of up to 10 dwellings. This then needs to be followed by a technical details consent stage, at which the detailed matters are considered. The proposal is to extend the ‘permission in principle’ application route to include major developments, up to 150 dwellings or 5 hectares (which is the Environmental Impact Assessment limit). A time period of 5 weeks would continue to apply to these larger developments, as would the same, very minimal, requirements in terms of information submission. It is proposed to keep fees low and based on the area of the site rather than dwelling numbers, which may not be known until the technical details are applied for.
- 4.15 The permission in principle route has been little-used in Reading so far, as it offers few clear advantages for minor development over the outline and reserved matters route. However, for major developments, a 5-week route to some form of consent may prove very attractive. Fees based on site area rather than dwelling numbers may also provide a much cheaper route in Reading where sites are comparatively small by national standards.

#### **4. COUNCIL RESPONSE**

- 4.1 A report was brought to Policy Committee on 28<sup>th</sup> September recommending draft responses to both of the consultations. These recommended responses are set out at Appendix 1 (for the Planning White Paper) and Appendix 2 (for the changes to the current planning system).
- 4.2 The recommendation to Policy Committee included a delegation to the Deputy Director for Planning, Transport and Regulatory Services, in consultation with the Lead Councillor for Strategic Environment,

Planning and Transport to make any changes to the response to the Planning White Paper (Appendix 1) agreed by Planning Applications Committee. PAC therefore has the opportunity to suggest amendments to the response before it is submitted.

- 4.3 As the deadline for submission of the response to changes to the current planning system of 1<sup>st</sup> October will have passed at the time of the PAC meeting, there is not an opportunity to amend the response to this consultation (Appendix 2), but this is included for your information.

## **5. CONTRIBUTION TO STRATEGIC AIMS**

- 5.1 The operation of the planning system in Reading contributes to the following priorities in the Corporate Plan 2018-21:
- Securing the economic success of Reading;
  - Improving access to decent housing to meet local needs;
  - Keeping Reading's environment clean, green and safe;
  - Promoting great education, leisure and cultural opportunities for people in Reading.
- 5.2 The changes proposed within the Planning White Paper may have significant impacts on the ability of planning to continue to meet those priorities.

## **6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS**

- 6.1 The implications for the environment and the response to the climate emergency will largely depend on the detail of the new planning system and how it will operate. Many of the environmental and climate elements in the Reading Borough Local Plan are in the general development management policies, and, under the proposed new planning system, development management policies would be set at national level. Therefore, the implications would depend on the content of those policies, but they would inevitably be less responsive to local circumstances.
- 6.2 The White Paper does continue to commit to the progress of the Environment Bill, which includes provisions such as a 10% biodiversity net gain on development sites. It also includes the objective of making new homes 75-80% more energy efficient by 2025 and achieving net zero carbon by 2050. The Government has already consulted on these proposals under the Future Homes Standard, and the intention is to continue with this proposal.

## **7. COMMUNITY ENGAGEMENT AND INFORMATION**

- 7.1 The proposed response to the Planning White Paper consultation does not require community engagement.

7.2 The Planning White Paper would result in fundamental changes to the planning system that will have sweeping implications for community involvement. The paper intends that much more fundamental and wide-ranging consultation will be included at the plan-making stage, to counterbalance the loss of consultation opportunities at the planning application stage. However, there are no firm proposals for how this would work, and it seems to rely largely on technological solutions and greater use of social media, which would increase engagement with younger people, who tend to be heavily under-represented in planning consultations. More detail is needed on how this would work in practice. In reality, the streamlined local plan process over a 30-month period would include only two opportunities for community involvement (the recent Reading Local Plan process had four), and there would be no opportunities for engagement on matters such as development management policies, which would be set at national level.

## **8. EQUALITY ASSESSMENT**

8.1 The Planning White Paper specifically asks for responses on the equalities impacts of the proposals. These impacts would need to be formally assessed when greater detail of the proposals is available. There are no equalities implications of the recommended actions of this report.

## **9. LEGAL IMPLICATIONS**

9.1 The current planning system was established by the Town and Country Planning Act 1947. The current primary legislation covering the planning system is set out in the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004.

9.2 Implementation of the proposals in the Planning White Paper would require a new act of parliament to replace the existing acts. No firm timescales for enacting legislation are set out in the White Paper, but the paper does specify that it would want the new generation of local plans in place by the end of this parliament.

9.3 Permission in principle (PiP) was introduced as Section 58A of the Town and Country Planning Act 1990 by the Housing and Planning Act 2016. The Town and Country Planning (Permission in Principle) (Amendment) Order 2017 specifies that PiP cannot apply to major development. Secondary legislation will therefore be required to make the proposed amendments to PiP.

## **10. FINANCIAL IMPLICATIONS**

10.1 The preparation of the responses has been undertaken within existing budgets and does not have any financial implications for the Council.

- 10.2 The proposals in the Planning White Paper would have very substantial and wide-ranging financial implications for the Council. At this stage, it is not possible to fully assess how the system will operate and how it would be financed. The planning function would be resourced very differently, with much more of a focus on setting expectations for sites up front in planning policy, and much less at application stage, which would also have implications for income from application fees. The White Paper suggests that a portion of the Consolidated Infrastructure Levy could be retained to help fund the planning service, although it does recognise that there will continue to be some need for central funding.
- 10.3 The proposed new Consolidated Infrastructure Levy would directly affect the money available to local authorities for infrastructure provision, but, again, until firm proposals are in place it is not possible to assess the financial implications in full. The most clear-cut implications include that the Council would lose the ability to set its own levy requirements, and would be dependent on national government to set a levy rate that reflects the circumstances of authorities such as Reading. There would also potentially be more freedom on spend, to enable services to be funded as well as infrastructure.
- 10.4 The changes to the current system may also have financial implications. National policy which requires 25% of off-site affordable housing contributions to be spent on First Homes would reduce the funds available for Local Authority New Build. If applied in Reading, the raising of the threshold for affordable housing contribution could also reduce the financial contributions that the Council receives, although the largest impacts would be expected to be on on-site affordable housing provision. Finally, the extension of PiP could offer a cheaper route to outline planning permission and could therefore reduce application fee income.

#### Value for Money (VFM)

- 10.4 The consultation has potentially very serious financial implications for the Council, and a robust response at this stage therefore represents good value for money.

#### Risk Assessment

- 10.5 There are no direct financial risks associated with making this response.

### **11. BACKGROUND PAPERS**

- Planning for the Future - Planning White Paper (August 2020) <https://assets.publishing.service.gov.uk/government/uploads/sys>

[tem/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

- Changes to the Current Planning System Consultation (August 2020)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907215/200805\\_Changes\\_to\\_the\\_current\\_planning\\_system\\_FINAL\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907215/200805_Changes_to_the_current_planning_system_FINAL_version.pdf)

**APPENDIX 1: PROPOSED READING BOROUGH COUNCIL RESPONSE TO CONSULTATION ON PLANNING WHITE PAPER (as recommended to Policy Committee 28<sup>th</sup> September)**

***Q1. What three words do you associate most with the planning system in England?***

Local, accountable, transparent.

***Q2(a). Do you get involved with planning decisions in your local area? [Yes / No]***

Yes.

***Q2(b). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other - please specify]***

Local authority response

***Q3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other - please specify]***

Local authority response

***Q4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other - please specify]***

As a local planning authority, it is not possible to choose only three of these priorities, all of which are extremely important for us to achieve.

However, the Council declared a Climate Emergency in February 2019, and action on climate change is a priority which must guide all that local and national government does into the future.

***Q5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]***

No.

The need for these changes to be made is not evidenced. In Reading, there are 3,754 dwellings with planning permission but not started at March 2020, which is enough to meet our needs for over five years. This is not unusual - the number of homes with permission but not started has generally hovered



between 2,000 and 4,000 over the last 15 years. In addition, in Reading at March 2020, there are local plan allocations and developments with a resolution to grant permission subject to Section 106 for almost 9,000 homes. The existing planning system delivers land for homes here, and a fundamental change to the system is simply not required.

As the White Paper consultation states, there are many zoning-based systems in other countries, particularly in Europe. These zoning systems may create the greater certainty that the government is looking for, but all systems have their pros and cons. However, this White Paper does not appear to have been based on any analysis of any of the zoning systems that have operated for many years elsewhere and the effects of which have been widely studied, but rather attempts to build a bespoke, experimental, extremely light touch zoning approach from scratch. What consideration has been given to lessons that have been learned from other countries? Do these systems speed up development, and if so, what are the consequences? We would expect such a fundamental change in how planning works to have been properly researched and considered.

The proposal that land be zoned for only three categories ('growth', 'renewal' and 'protection') is extremely restrictive and does not in any way reflect the complexity of the areas that these local plans will cover. As an urban borough with very few greenfield sites, most of Reading for instance would fall within the 'renewal' category. However, renewal will take many different forms across the town. In the town centre, it may involve high density redevelopment of underused areas including buildings of more than 20 storeys - or, within a few hundred metres of the same site, it may include low-rise, sensitively-designed development within a conservation area or its setting. Outside the town centre, it may involve medium density development along public transport corridors, extensive regeneration of suburban housing estates, or very small-scale infill within areas of existing high quality character. The current local plan system can, and does, reflect these vital differences, but simply badging something as 'renewal' on a map and then giving broad guidelines on what is acceptable cannot.

The different application processes for 'growth', 'renewal' and 'protection' areas set out in this White Paper create an incentive for authorities to identify land for protection as open countryside, because it appears that the alternative is largely uncontrolled development. A protection designation under the current proposals at least results in a planning application. Some sites that might actually be appropriate for the right form of development may well end up in the protected category, and this may therefore serve to prevent supply coming forward in some cases.

The proposal also fails to fit with our experience of how the planning system operates. The proposals rely upon accurately predicting how developers and landowners will want to develop their sites in the future, but in our experience this can change substantially over time, and the development that comes forward is rarely exactly the same as that which was proposed at the time the plan was drafted. This means that setting policies with

appropriate levels of flexibility to take account of these changes is an essential part of local plan-making and actually helps to deliver development. Certainty in the local plan only works if that certainty is reflected in the developer intentions.

In summary the proposals have potentially huge implications, and may well not work in the manner intended, with risks including poor-quality development and, in some cases, actual suppression of supply. The need to make such a fundamental change to a system which was, after all, founded to deliver significant post-war growth, and was successful in doing so, must be much more clearly established based on real evidence. RBC does not believe that evidence would point to a need to make changes to the basic principles of the system, but if the need for a change is clearly demonstrated, the government should look first at the operation of those systems which already exist.

***Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]***

No.

This amounts to a wholesale centralisation of much of planning policy. Local areas will lose much of the control that they have over the form of development, leaving only location and design in their hands. They will no longer have the ability to set policies that respond to their own local priorities and deliver the development that the local community needs. This will lead to a further deterioration in confidence in the planning system, and will undermine any notion of changing public opposition to development.

In addition, the tendency for national government to continually change the planning system means that it is highly unlikely that there will be any consistency in these policies, which will almost certainly change frequently, and in ways which some developers will exploit to provide poor quality developments. It is also fair to say that national leadership on some matters, for instance climate change, has been considerably behind some local authorities, and a reliance on purely national level development management policies may well mean a reluctance to meet key challenges.

If national development management policies are to be set, the process for putting them in place needs to be improved. Local planning policies have to go through a rigorous process including consultation, sustainability appraisal (or equivalent) and public examination. This means that they can be given considerable weight at determination. National planning policy goes through a much lighter-touch process, and one of the consequences of this is that it can change much more frequently. A process would be required which ensures that policies are appropriately tested. There does not appear to be any suggestion in the consultation that such a process will be in place.

***Q7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]***

Not sure.

RBC would need to see details on how this “sustainable development” test is actually worded before an opinion could be given.

RBC has concerns about the removal of the duty to co-operate in the continued absence of any genuine strategic planning. The duty is far from the ideal tool in ensuring that areas are properly planned to take account of strategic matters, but it is better than nothing at all. Whilst there would presumably continue to be provisions for authorities to undertake joint planning, one of the main levers that promotes such joint planning is the need to demonstrate that the duty to co-operate has been complied with.

***Q7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?***

More formalised strategic planning is required if there is to be no duty to co-operate. In many cases, this would best be based on a city region approach, with local authorities working closely together to meet the strategic priorities of their areas. Without any firm proposals for stronger strategic planning, the removal of the duty to co-operate will mean that strategic issues are often simply not planned for, leading to disjointed development and failure to support development with the right strategic infrastructure.

***Q8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]***

No.

A standard methodology for assessing needs, where that methodology is soundly based and does not fluctuate significantly from year to year, is a helpful way of eliminating much of the back and forth at local plan examination stage. However, it needs a local assessment of constraints for this to be translated into a proposed supply figure. There is no way for constraints to be accurately assessed at the national level for an authority such as ours. Whilst it may be possible to use broad definitions such as Green Belt, AONB and designated wildlife sites to calculate a capacity for some areas, in an urban area such as Reading where many of those constraints do not exist and where almost all development is brownfield, the only way to reliably assess capacity is a site-by-site analysis taking account of the unique circumstances of each site. This cannot be done at a national level. It is far better to calculate the need at a national level and

continue to allow local planning authorities to use their local knowledge of capacity to assess what can actually be delivered.

***Q8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]***

No.

Affordability is an appropriate indicator of need, although it needs to be carefully balanced by other factors.

The extent of existing urban areas is not a good indicator of the quantity of development to be accommodated, in part because relying on this will create a self-perpetuating cycle whereby the more homes are delivered, the greater the need. RBC has responded in more detail on this in the response to changes to the current planning system. Whilst it is true that it is often the most sustainable solution to focus on existing urban areas, it is not always the case, and, in any case, use of household projections already accounts for this to some extent because the needs will generally arise in existing urban areas.

***Q9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]***

No.

The proposed automatic outline permission gives no scope to consider whether there has been a significant material change that means that development is no longer appropriate. Even with the streamlined process, a new local plan would take 30 months to prepare, which may not be sufficiently fast to respond to those changes. The current system, in its wording of Section 38(6) of the Planning and Compulsory Purchase Act 2004, allows for these material considerations to be taken into account.

The need for a masterplan to be in place prior to submission of the detailed application is noted, but if these are to follow on from the local plan (which is probable, as the 30-month timescale for local plan production is unlikely to give sufficient time to prepare a masterplan) it would need to be an established principle that authorities can refuse the detailed permission if such a masterplan does not exist.

Reference is made to faster routes for detailed consent, but no details are available on what these would be, unless this is a reference to the faster decision-making under Proposal 6, in which case RBC's comments in response to Q10 apply.

***Q9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]***

No.

Judging by the comments in the White Paper, we anticipate that most of our area would be an area for 'renewal'. The proposals for how planning approval would be given in such areas are, frankly, confusing. The three routes to consent are set out on p34, although actually, it is four routes to consent because planning applications that do not accord with any of those three routes can still be considered in the normal manner, and based on our experience of planning in an urban area, development will come forward in a form not predicted in the local plan much more frequently than the White Paper seems to anticipate.

However, the ways in which terms are used interchangeably makes it difficult to work out what is actually proposed. Page 34 refers to an 'automatic permission' for certain development types, which mirrors the language for growth areas, where a form of permission in principle is proposed. However, it then cross-refers to the fast track for beauty proposals, which in that section are couched more as a permitted development right subject to certain criteria.

Meanwhile, a statutory presumption in favour of local plan-compliant development is also proposed in 'renewal' areas. The text on p34 refers to this being development that complies with the local plan description and NPPF. No mention of local design codes is made, leading to the question of which applications will actually benefit from those codes other than area-specific codes for growth areas.

The proposals also seem to set up a dual system, whereby a developer could choose to exercise permitted development rights via a national pattern book approach, or to make an application for local plan-compliant development. Although it is appreciated that local authorities can seek to modify (not replace) the pattern book, the starting point appears to be that developers can ignore the local plan and instead go down a pattern book route. Much of the development that takes place in renewal areas would therefore be development over which the local authority has no control. We strongly disagree that this is an appropriate approach. A genuinely plan-led system with strong emphasis on local design preferences would not contain these potentially wide-ranging permitted development rights.

In terms of 'protection', there are a number of issues with the proposals.

Firstly, the suggestion seems to be that local authorities will only be able to choose from a shopping list of possible protections that are set in national policy. This would prevent local authorities from identifying their own protections that pick up on matters of local, rather than national, significance. Almost inevitably, national policy would be unlikely to be able

to adequately cover all possible protections that may be needed at local level.

Secondly, when protections are included in a local plan, they are not necessarily protections against all form of development, but come with important contextual wording that clarifies how the protection will apply. Simply zoning an area for protection will not give the required level of granularity.

Thirdly, it is noticeable that the certainty that would be afforded to 'growth' areas would not be reflected in a corresponding certainty in 'protection' areas. There is no automatic refusal proposed in such areas that counterbalances an automatic approval in growth areas, rather it is anticipated that a planning application would be made as under the current system. Developers, benefitting from automatic consents elsewhere, will be able to simply funnel their resources towards areas defined for protection, where there could be an increase of appeals.

Finally, the proposal states that the 'protection' areas can include back gardens. On a purely map-based local plan system, is the suggestion that a local planning authority should map every back garden that is proposed to benefit from this protection? It does not seem practical to do so, and would potentially lead to much discussion of individual gardens at examination stage, which cannot be a good use of time. Further thought is needed about how this would operate.

***Q9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]***

No.

The Nationally Significant Infrastructure Projects process removes all local democratic accountability from the process, and using it to determine proposals for new settlements would amount to a huge power grab by central government, as the Secretary of State would be the decision-maker.

New settlements are not nationally significant in the same way as vital infrastructure projects are, where there are often limited options for how that infrastructure can be delivered and where it benefits a much wider area than the local authority or even the region. It is of course essential that the homes that the country needs are delivered in total, but a new settlement is in most cases one of a number of options for how those homes (which are usually derived from a local rather than national need) are delivered in a local area, and it is not therefore a decision which is appropriate to make through this process.

This proposal works against some of the ostensible aims of the White Paper. It is pure fantasy to imagine that local residents will happily engage in a local plan process to make developments of a few dozen homes more

'beautiful', whilst a new settlement of many thousand new homes down the road would be dealt with over the heads of local representatives by the Secretary of State.

***Q10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]***

No.

There are some elements of the proposals which would be helpful to all concerned, including shorter and better presentation of the key data and technological solutions to improve validation timescales. However, these could easily be introduced within the current framework and would be far more effective in that context, assuming that planning departments are sufficiently resourced.

As for proposals on local plans, there is a massive reliance on technological solutions to make processes faster and more consistent. RBC agrees that working towards this is in everyone's interests, and this is now more critical than ever following large scale remote working brought on by the Covid-19 pandemic. However, we have used various software packages to manage the application process over the years, and our experience suggests that this is a considerable hurdle to overcome. Therefore, we are very concerned that legislation could end up being introduced before the technology is in place and is affordable to allow local planning authorities to adequately comply with it. Given how important it is to the White Paper proposals, ensuring that the technology and funding is in place must be a prerequisite to introducing the legislation to avoid a chaotic situation playing out.

The proposals would delegate technical details to officers where the principle of development has been agreed, and would therefore reduce democratic oversight of planning decisions on some very major developments. Technical details in some cases are much more wide-ranging than the title suggests, and may include such matters as height. Removal of local democracy from this process will only serve to further erode public confidence in planning.

We do not agree with any notion that there should be either a refund of the application fee or a deemed consent for any application that is not determined within statutory timescales. Difficulties in determining applications within timescales are often the result of lack of resources, and this will hardly be solved by the fees on which local authority planning departments depend being returned. A positive conversation about how planning should be better resourced is needed, and it is fundamental that any reforms ensure planning departments are sufficiently resourced if the reform is to have any chance of success from the outset. In addition, often long determination periods are not the fault of local authorities and relate to getting input from statutory consultees or are because the applicant has not provided adequate information. In terms of deemed consents, allowing

poor quality developments simply because applications were not determined in time punishes a whole community and may cause severe environmental impacts simply because of a procedural issue. This would be a wildly disproportionate sanction.

In addition, we fundamentally disagree with any suggestion that local authorities should have to refund the application fees for developments when an appeal is allowed. This would only exacerbate any financial incentive to appeal a decision, and would create a climate in which local authorities cannot refuse an application without certainty that an appeal would be dismissed. Such certainty is rarely possible, as Planning Inspectors' decisions are not always predictable, and can be inconsistent.

Should the changes to decision-making proposed here be made, this would need to be accompanied by appropriate transitional funding, alongside some form of ring-fenced income generation to replace or supplement planning application fees.

***Q11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]***

Not sure.

RBC is supportive of the principle of plans being web-based and accessible from all devices, which can only aid transparency and make consultation processes run more smoothly. However, this will only be the case if functioning software can be rolled out to achieve this. Our strong concern is that legislation will be brought in in advance of that functioning software resulting in a situation where local planning authorities are expected to comply with legislation for which the technology is simply not in place.

In terms of being purely map-based, in practice this will be difficult to achieve, even if development management policies are set out at the national level. The White Paper talks about the potential for design codes to be part of the local plan, and there will be a need to set out parameters for what development is identified for growth and renewal areas. An accompanying document will always be necessary, even if it is slimmed down.

***Q12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]***

No.

The only way a 30-month timetable is achievable is by significantly reducing opportunities for the community to be involved, which flies in the face of local democracy in plan-making. This is demonstrated by the proposed process, which has two stages at which the community are involved - Stage 1, where there is a call for ideas, and Stage 3, after the plan has been



submitted. This means that there is no stage at which the local planning authority publishes a draft plan and is then able to respond to the consultation, because at this point the plan has already been submitted. Opportunities for the public to make their voices heard are proposed to be removed at the planning application stage, due ostensibly to the front-loading of involvement at the plan-making stage - yet, in actual fact, opportunities for involvement are also proposed to be removed at plan-making stage.

Even with the restricted consultation process proposed, a 30-month timescale would be challenging enough in an authority such as Reading which receives comparatively few representations. In an authority where a local plan regularly generates more than 10,000 representations, simply reading and considering those representations is a hugely time-consuming process, and trying to fit this into a very short timeframe will mean needing a huge investment in temporary resources to deal with them. Technology on its own will not be a substitute. Even if technology allows for quick analysis of a standard questionnaire, in practice consultees want to make comments that do not necessarily fit into standard questions, and if they are denied that opportunity this will certainly not help to engage and empower the community.

Other constraints on achieving a plan within this timescale will be the capacity of the Planning Inspectorate. Our, relatively straightforward, local plan was submitted in March 2018, yet it was not until September 2019 that an Inspector's Report was received. The consultation notes the delays with the Inspectorate as needing to be addressed, but does not include any proposals for doing so. Hopefully, the expectation is not that Inspectors will be freed up by a reduction in planning appeals, as that is highly unlikely to be realistic.

Finally, it is worth noting that one of the biggest reasons that there is a delay in plan-making is because of continual changes by central government. Plans reach advanced stages of preparation, yet policy or legislation at national level changes and authorities need to redraft their plans or review their evidence base, or wait to see whether changes that have been mooted in white papers, ministerial announcements or, as recently, opinion pieces in national newspapers will be followed through, and how. This considerable uncertainty is never recognised in documents such as the White Paper as being part of the problem, but it should be, as it works in direct opposition to swift plan-making, and is the biggest contributor to plans being out of date as soon as they are adopted.

***Q13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]***

No.

Neighbourhood plans as they currently exist simply do not fit into the proposed system. If development management policies are set nationally, and a local plan has defined all land within its area for growth, renewal or protection, and design codes are also outside this process, there is nothing left for Neighbourhood Plans to do. They will simply exist as a wish-list with no bearing on the development that actually takes place. This will serve only to lower confidence of local residents in the planning system. The proposed local design codes offer an opportunity for neighbourhoods to help shape developments, but it does not appear to be the proposal that these be introduced as neighbourhood plans.

***Q13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?***

As set out in our answer to Q13(a), if there is no clear role for neighbourhood planning in the new system, there would be no purpose in reflecting community preferences, and doing so will only increase mistrust.

***Q14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

The government is correct to say that there is a need to examine ways to secure timely build out of developments, and prevent ways of housebuilders sitting on land with planning permissions. However, there is a misplaced belief that the best way to do this is through the planning system, as planning permission generally relates to the land, not to the identity of the developer. The government needs to look at other ways of regulating the market rather than the planning regime, which is unlikely to be an efficient way of tackling the issue.

***Q15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other - please specify]***

Other.

It is not possible to generalise about the design of development in our area in this manner. Quality differs between developments. However, it is certainly worth stating that some of the poorest development that has taken place has come through the permitted development route.

***Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other - please specify]***

Other.

Our sustainability priority is tackling and adapting to the climate emergency. All of the items specified in the question are a bare minimum requirement in achieving this priority, as is much more, such as dealing with flood risk and extreme weather events, protecting and enhancing biodiversity, promoting renewable and decentralised energy and reducing waste. These priorities cannot be divorced from one another.

***Q17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]***

Not sure.

Design guides and codes can be very useful, and the principle of wider use of them is reasonable. However, the increased use of local design guides and codes is highly dependent on sufficient resources in terms of time, money and skills being available, as set out elsewhere in our response. This will need to be addressed within the resourcing strategy mentioned in the White Paper, and an assumption that resources currently directed to development management can be reallocated to design guides will not be sufficient.

The White Paper also proposes that design guides should only be given weight where it can be demonstrated that local input has been secured. There will need to be further guidance to substantiate what this means, and how it is to be demonstrated. It could imply a simple consultation statement, or it could also mean a local referendum as in neighbourhood planning. One of the risks of this clause is that it will lead to poorer design outcomes in less affluent areas, where residents tend to be less well engaged with the planning process. Efforts should of course be made to improve this engagement, but it is not always possible, and it may mean that a local design code cannot achieve sufficient weight to be relied upon in some areas.

***Q18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]***

Not sure.

The establishment of a new body would be one way of helping to address the skills and resourcing issues that local authorities are likely to face. However, the specific remit of such a body would need to be defined before we could comment further.

It is not currently clear that local authorities will have the resources to appoint a chief officer for design and place-making. Whilst applications may reduce, so will application fees with automatic permissions, and the expectation that local authorities will simply be able to reallocate resources to other priorities such as design or enforcement may well be misplaced. In addition, urban design skills are a limited resource, and it is not at all clear that there are sufficient qualified and experienced individuals for every authority in England to have a chief officer for design and place-making. There needs to be further thought on how this would be resourced.

***Q19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

Placing a further emphasis on design would be welcome, as long as Homes England is adequately resourced to deliver it. Much would depend on the wording, however.

***Q20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]***

No.

The fast-track to beauty is a seriously misleading concept. A fast-track route for development that complies with the plan and a design code does not equate to beauty, however good that design code is. Beauty is a hugely subjective term. The more prescriptive a design code is to try to achieve this intangible 'beauty', the more likely it is to restrict truly innovative design and architecture that might actually deliver what many consider to be beautiful developments. Aesthetic quality is not by any means the sole determinant of a successful development.

This also betrays a lack of understanding of local opposition to development. The aesthetic quality of development is rarely the main reason that local residents object. Strain on infrastructure is much more significant, as are noise and disturbance and environmental impacts. However 'beautiful' a development is, if it places an unacceptable burden on roads and schools, residents will object, and it is not clear that the infrastructure proposals in this White Paper will do anything to resolve that. Planning is about much more than agreeing with the design of a development, but the proposal does not make clear how all of the other issues that need to be considered will be resolved.

RBC is not opposed to an increasing emphasis on local design codes, and would actively welcome any change which will genuinely allow local areas to reject poor design. However, it is not clear how local authorities will be resourced to create these design codes (in terms of time and staffing, but

also in terms of skills), as there will inevitably be great variation in these codes even within local areas.

The White Paper proposes that permitted development rights should be rolled out to 'popular and replicable' forms of development, using a pattern book approach. This will inevitably lead to the increasing standardisation of development across England, and result in an accelerated decline in local distinctiveness. As such it is likely to actively work against achieving 'beautiful' development. Such a proposal will also hugely benefit the large housebuilders that already dominate the market, who will tailor their standard products to these national pattern books and roll them out at scale across the country. The proposal that local areas can define elements such as materials might help achieve some level of local distinctiveness (where there are locally-distinctive materials in the first place), but this will only be skin-deep.

We are also generally concerned that permitted development rights are being proposed to be further expanded even within the context of a planning system with much reduced local oversight. Surely a new system should be in place of expanded permitted development rights, not alongside it? If the system is designed properly, and a well thought out zoning system is introduced, there should be no need for further deregulation via permitted development.

***Q21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other - please specify]***

Other.

All of the above, as well as many others, are priorities.

***Q22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]***

No.

This proposal on the face of it would have some merit in reducing discussion around contributions, particularly affordable housing, and making the application process quicker. However, the risk is that a set levy rate will have to be set at a lowest common denominator level (as it is for CIL) and will therefore actually reduce contributions to affordable housing. In addition, the more one delves into the detail, the more difficult it is to see how this proposal could satisfactorily be achieved.

Use of development value to calculate the levy causes some issues. A levy which is calculated at the stage that the development is completed will be difficult to predict. Decision makers will need to assess a development without being at all clear how much, if anything, will be contributed either in-kind or as a payment, including affordable housing. This will make it impossible to know whether the impacts of a development will be adequately mitigated, and therefore whether it is acceptable. Justifying a development in the face of local opposition will be considerably harder with no certainty about infrastructure provision or affordable housing.

Basing a system on development value will require a valuation to be prepared and considered for every development that would be liable to pay the levy, and may require being assessed by someone suitably qualified to do so. In some cases, this may mean that disagreement on elements of the calculation simply takes place once the development is completed, when local authorities have fewer enforcement tools to ensure compliance. It will also have resourcing implications.

In addition, a high development value is not the same thing as a good level of viability. The levy may act as a disincentive to develop more complicated brownfield sites, such as those in our own area, which may have relatively high existing use values and particular costs such as remediation of contaminated land. In addition, rates would need to be set carefully to avoid creating an incentive to develop at a value just below the threshold for paying the levy.

The proposal for a threshold based on total development value is a particular concern, as it suggests that small developments will be exempt. In our area, small developments often have very good levels of viability, and are able to make extremely valuable contributions to affordable housing and infrastructure. In addition, evidence which RBC used in its Local Plan examination demonstrates that small sites continue to deliver well during economic downturns when compared to larger sites, and this ensures that contributions continue to be made during times when people have particular need of affordable housing in particular.

For the above reasons, if it is to be tied to values, a levy based on a proportion of the difference between gross development value and land value would be more likely to achieve the aims of the White Paper, although this will carry its own difficulties of assessing viability and detailed discussion over assumptions and methodology.

A new system based entirely on a levy would also fail to deal with non-financial obligations that are currently part of a Section 106 agreement. Whilst on-site affordable housing and transport and highway works would presumably be viewed as in-kind developments (although valuing these works for levy purposes presents an issue in itself), a levy would not address requirements to produce local employment and skills plans or travel plans, or would deal with other provisions such as occupancy restrictions on

serviced apartments or granny annexes. Some alternative means of addressing these issues would need to be developed.

**Q22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]**

Locally.

Given the vast differences between values in different parts of the country, a flat national CIL rate would lead to extreme reductions in the amount of money available for infrastructure provision in more buoyant parts of the country such as ours where infrastructure is already under strain. Far from maximising revenue nationally, it would have the opposite effect. If rates are to be set nationally, they should at the very least be area-specific to reflect these substantial differences in value. However, it is far better that rates be set at a local level to enable differences in viability between areas, and indeed within an authority's own area, to be addressed.

There is no clear rationale for national government to take over the setting of CIL rates. The CIL charging schedule process has been substantially slimmed down, with examinations often taking place by written representations, and is relatively straightforward. The White Paper does not say what the advantages are of taking the setting of rates out of local authority hands, and it therefore simply seems to be part of the centralisation of planning powers that is a running theme in these proposals.

**Q22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]**

More value.

The current levy is rarely sufficient to address all of the infrastructure effects of development as it is, and when combined with those developments that are exempt from CIL or the provision of affordable housing, there is clearly a need to maximise the funding available.

**Q22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]**

Not sure.

Greater flexibility for local authorities in financial tools to help to deliver infrastructure is generally welcome.

However, in practice, it is likely to be very difficult to take advantage of this where the actual amount to be paid for infrastructure (if anything), and the timing of that payment, is not yet known. Basing the levy on a calculation performed only on completion is not likely to generate the certainty necessary to allow for such borrowing.

***Q23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

Any reformed Infrastructure Levy should capture all developments which create a need for infrastructure or where affordable housing will be needed to create a mixed and balanced community. Developments under permitted development rights should not be exempt from this, particularly if the government proposes to continue to extend those rights.

Permitted development rights are not exempt from CIL at the moment (albeit a Notice of Chargeable Development is needed), so it is assumed that the proposal would be to ensure that permitted development contributes to affordable housing. This would be a welcome change. We have estimated that, between 2013 and March 2020, Reading lost out on 570 affordable housing units plus financial contributions to affordable housing of over £3 million, which could have been secured on office to residential conversions had they been received as planning applications. These permitted development rights have been a considerable blow to our efforts to meet the very substantial need for affordable homes in our area.

However, to be clear, our strong belief is not that a Levy including affordable housing is charged on permitted development schemes, but rather that these permitted development rights are removed and the infrastructure needs are considered by the planning application route, along with all of the other many effects of such developments.

***Q24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

It should go without saying that the aim should be to secure more affordable housing wherever possible.

***Q24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]***



In-kind payment wherever possible. However, we have concerns about how this would work in practice.

Once the levy is paid and, potentially, the site sold, it is difficult to see what enforcement mechanisms there would be to ensure that the affordable housing remains affordable in perpetuity without a legal agreement of some format. And, without such an owner, if the housing does cease being affordable, and the current owner is not the individual/company that was responsible for compliance with the levy, it may not be clear who is legally responsible without the legal agreement.

In terms of whether in-kind affordable is preferable to a 'right to purchase', the onus should be on the developer to provide the units on-site wherever possible, and pass those units to a registered provider where necessary. This will help to achieve mixed and balanced communities, which is the purpose of affordable housing delivery, without creating an additional workload and financial risk for local authorities in purchasing all of the discounted affordable housing units.

***Q24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

It is clearly in the local community's interest that the risk of overpaying is reduced.

***Q24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

Removal of the Section 106 agreement and therefore any oversight of affordable housing quality (as distinct from the housing quality generally) through the planning application process would lead to a need for other measures to ensure that the affordable housing provided reflects the overall quality of the development. It would also remove the mechanism by which occupancy and management of affordable housing that is not provided by a registered provider, i.e. affordable private rent, is overseen, as this currently requires substantial detail to be set out in the Section 106.

At this point, it is difficult to be specific about what additional steps are required, as there is no detail about how provision of in-kind affordable housing as part of the levy would work in practice.

***Q25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]***

Yes.

If a new Infrastructure Levy replaces Section 106 as well as CIL, there will need to be greater flexibility in any case to cover matters not traditionally regarded as 'infrastructure'. This includes affordable housing and funding of local employment and skills initiatives.

However, RBC would have concerns about the suggestion in the White Paper of allowing authorities to use Infrastructure Levy funding to fund normal Council services or reduce council tax. This could lead to development taking place and not being supported by sufficient infrastructure. As the government will be aware, the timely provision of infrastructure is one of the main reasons local communities object to development, and this could lead to that infrastructure not being delivered at all. If one authority decided that its priority was to use the new CIL to reduce council tax, this could mean that development relies places an unacceptable burden on infrastructure provided in an adjacent authority.

***Q25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]***

Not sure.

Authorities which face affordable housing needs should be expected to use the Levy to meet those needs. However, the extent of affordable housing needs differ significantly from authority to authority, and it is not clear that a single defined ring-fence could work across the country.

***Q26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?***

These are extremely wide-ranging proposals, and as such their effects on groups with protected characteristics could potentially be significant, and may only become more apparent when further detail emerges.

A move towards much greater reliance on engagement using digital technology will favour younger age groups. It is recognised that these groups tend to be underrepresented in planning consultations at the moment, but that does not mean that changes should be made that exclude many older people. Proposals will have to be carefully developed to avoid that effect.

The proposal to set development management policies at national level could have effects on people with disabilities. Local plans such as ours contain expectations for the accessibility and adaptability of new housing, based on local evidence of likely need. National development management policies may well result in less accessible and adaptable housing being provided.

**APPENDIX 2: READING BOROUGH COUNCIL RESPONSE TO CONSULTATION ON CHANGES TO THE CURRENT PLANNING SYSTEM (as recommended to Policy Committee 28<sup>th</sup> September)**

**Standard methodology for calculating housing need**

***Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?***

No.

There are three major reasons for this, as set out below.

- A standard annual growth in dwellings is a crude measure which has no relation to need. If there are sufficient homes in an area to accommodate needs, to build more will only negatively affect the natural environment of those areas for no reason and with no likelihood of take-up of dwellings.
- The effect of a 0.5% annual increase in a baseline will be to reinforce existing patterns of urban areas, as stated in paragraph 25 of the consultation. However, the standard methodology is intended to be a reflection of need, not a choice about distribution. Consideration of distribution of need should be taking place at local plan-making stage, and if necessary through the duty to co-operate.
- Using existing stock as part of the calculation creates a self-perpetuating cycle. Delivering significant levels of new housing, in line with the government's aspirations, would only serve to inflate the need in the standard methodology in the future, and would not take account of whether that delivery has in fact served to reduce the level of need.

***Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.***

No. Please see the answer to question 1.

***Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.***

When the methodology was first proposed, RBC's response highlighted that in some areas, the greatest pressure is in terms of lower-quartile earnings to house prices rather than median. This was evidenced for our area in the 2016 Berkshire Strategic Housing Market Assessment. This highlights the issues in the area, in that it is generally affluent, but there are pockets of

high levels of deprivation, in Reading in particular, and the high purchase and rental prices within the area place market housing out of reach of a significant number of people as a result. RBC continues to consider that there is a case for including an adjustment for lower-quartile affordability alongside median affordability.

***Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.***

RBC is not opposed to the idea of including an adjustment for change in affordability over 10 years, and considers that this is a reasonable indicator of market signals of a need for housing. However, we are concerned that the way it has been applied in the proposed formula, in which it is simply added to the adjustment for current affordability, gives it a disproportionately significant role.

To demonstrate this, we can examine the application of the formula to the 2019 affordability ratio for Reading, which is 9.06. The corresponding ratio from 2009 is 6.37.

The calculation would be as follows:

$$[((9.06 - 4)/4) \times 0.25] + [(9.06 - 6.37) \times 0.25] + 1$$

Simplified, this is:

$$0.316 [\text{current affordability}] + 0.673 [\text{change in affordability}] + 1 = \mathbf{1.989}$$

In our case, the formula therefore places more than twice as much weight on past changes in affordability as current affordability. This will mean that the housing need of one authority may be very significantly higher than another authority even where affordability is currently the same. Whilst this affordability trend may continue into the future, it is also possible that it is the result of some factor (such as significant infrastructure delivery) which is a one-off and will not continue to affect affordability into the future.

Therefore, RBC believes that, if an adjustment for recent affordability changes is to be made, it is better made as an adjustment to the overall affordability ratio rather than added to it. If the government still considers that it is necessary to give affordability greater weight within the calculation, this can be achieved in a more equitable manner by simply applying a greater mathematical weighting to the affordability adjustment, perhaps by using an alternative multiplier to 0.25.

***Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.***

This is a difficult question to answer, as so much depends on what the current figures are at the time that the calculation is undertaken. Using current calculations, the figure that it generates for Reading at least appears about right, and corresponds closely to our own locally-assessed need which pre-dated the standard methodology.

The difficulty comes in particular with changes to the household projections. The more significant affordability multiplier created (in most cases) by adding in past affordability changes magnifies any changes in the household projections. These projections are much more volatile at local authority level than they are for England as a whole: whilst the growth in households over the 2020 to 2030 period in the 2018-based projections is only 3% lower for England than the 2016-based projections, the growth for the South East is 18% lower, whilst the growth for Reading is 66% lower. At the same time, the growth for neighbouring Wokingham is 40% higher. The difference from the 2014-based projections is even greater in most cases.

This volatility, magnified by an increased affordability multiplier, means that housing need levels may fluctuate wildly depending on when a plan is being prepared, and often during plan preparation. Plan preparation often becomes an art of waiting until the most favourable household projections are available. One way of addressing this could be using smoothed averages of the last two (or three) sets of projections. Another way could be basing the calculation on less volatile affordability calculations to begin with, and using the household projections as a sense-check and only increasing need if the projections indicate that it is required. RBC does not necessarily endorse these options, but they may be worth investigating to allow for a more consistent and predictable outcome. The government has made clear that it wants more certainty in the planning system, but housing need calculations are currently a source of considerable uncertainty.

***Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:***

***Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?***

***Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?***

***If not, please explain why. Are there particular circumstances which need to be catered for?***

RBC does not have a particular view on this matter, other than the phrase 'close to publishing' will have to be defined much more clearly in order to avoid uncertainty and debate at examination.

### **First Homes**

***Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):***

***i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.***

***ii) Negotiation between a local authority and developer.***

***iii) Other (please specify)***

RBC believes that, if a minimum of 25% of affordable housing is to be delivered as First Homes, the priority should be option i), to replace other affordable home ownership tenures. This would generally mean shared ownership. The affordable housing products which most clearly address affordable housing needs in our area are rental products, at a rate wherever possible and viable well below 80% of market rates. RBC would be extremely concerned if First Homes were to be introduced in a way that reduced its ability to secure rented accommodation, as that would considerably reduce our ability to respond to the most significant needs.

It is somewhat surprising that option ii) would be even considered. If local plan policies are already in place, with tenure requirements that respond to local needs, it would be supremely unhelpful if national policy were to contradict these requirements with an expectation that the remaining 75% is simply negotiated on a case by case basis. Negotiation needs to take place within some form of context, as usually provided by national policy, and in any case this does not seem to fit within the spirit of introducing greater certainty into the system.

Additionally, it is worth noting that none of these consultation questions ask whether a change to require a minimum 25% First Homes should be made at all, which is a curious omission. RBC's strong view is that it should be for local authorities to set out the affordable housing tenure expectations that best meet the needs in their local areas. It is at local level that assessments of needs have been carried out, which should inform these expectations.

RBC is particularly concerned with the proposal that national policy specify that 25% of off-site financial contributions should be spent on First Homes. This goes further than existing policy on affordable home ownership, which contains no such explicit requirement. The best use of financial contributions in our area is usually for delivery of new local authority

housing, as this delivers a greater number of homes at rental levels that are affordable to those in need. Provision of new local authority homes not only meets needs in terms of affordability, but it can be a key driver of overall housing delivery.

***With regards to current exemptions from delivery of affordable home ownership products:***

***Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?***

The existing exemptions set out in paragraph 64 of the NPPF should continue to apply to the First Homes requirement. The reasoning for the exemptions to the affordable ownership requirement existing apply equally to First Homes. For instance, the reasons why the exemption for build to rent exist apply equally to First Homes, in that homes for sale cannot practically be delivered as part of a build to rent scheme. The exemptions retained should not only be those specifically set out in criteria a) to d) of paragraph 64, but also the more general wording, including where a the minimum proportion of affordable home ownership would “significantly prejudice the ability to meet the identified affordable housing needs of specific groups”, which represents a valuable flexibility where there are particular local circumstances.

***Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.***

No. Please see the answer to Q9.

***Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.***

No additional exemptions are required, as long as the wording “unless this would ... significantly prejudice the ability to meet the identified affordable housing needs of specific groups” (paragraph 64) is retained. Loss of this wording would unacceptably limit local flexibility, and may result in the need for further exemptions to be established.

***Q12: Do you agree with the proposed approach to transitional arrangements set out above?***

Yes.

***Q13: Do you agree with the proposed approach to different levels of discount?***

RBC welcomes the scope to apply higher levels of discount based on evidence at plan-making stage. We would want this opportunity to be extended to those authorities where local plans have already been adopted

before the introduction of First Homes, with tenure to be specified in a SPD, as this will enable First Homes to be introduced in a manner which matches the particular affordable housing needs of those authorities. We would also ask why it is necessary to specify that an alternative can only be 40% or 50% - if, for example, a 45% discount responds best to the needs of the area and can be suitably evidenced, there seems no reason for this to be prevented.

***Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?***

RBC considers that it should be for the applicant to demonstrate why this is necessary on a case-by-case basis, and based on viability considerations only.

***Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?***

No. No limits on site size could allow for substantial developments to come forward without any reference to most local plan policy, since exception sites are only required to reference policy in the NPPF or local design policies. This could significantly undermine local plan-making and a planned approach to development.

***Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?***

RBC does not wish to comment on this matter.

### **Affordable housing threshold**

***For each of these questions, please provide reasons and / or evidence for your views (if possible):***

***Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?  
(see question 18 for comments on level of threshold)***

No.

RBC does not agree that national policy should prevent local authorities from seeking contributions to affordable housing for any size of site if it can be justified by evidence. The government will be aware of RBC's strong feelings on this matter, having challenged the previous Written Ministerial Statement in the courts, and having recently demonstrated that there are strong reasons for seeking affordable housing from all sizes of site in areas with considerable affordability pressures to the satisfaction of a planning inspector during the examination of our now-adopted local plan, as well as in more than 30 planning appeals.



There remains an overwhelming need for affordable housing in many areas. This need has been calculated at 406 homes per annum in Reading (Berkshire Strategic Housing Market Assessment), which equates to some 58% of our overall housing need. This need will only become more acute as the effects of the coronavirus pandemic make themselves felt and manifest themselves in job losses and economic hardship. Securing affordable housing is already being made substantially more difficult by the continued expansion of permitted development rights that do not allow for affordable housing to be secured. In that context, a 7-20% reduction in affordable housing as estimated in paragraph 77 (and which in any case presumably does not take account of new permitted development rights) is not acceptable. Raising the threshold for provision of affordable housing may in the short-term provide a financial boost to some developers, but it would prioritise those development interests over the needs of the many who require affordable housing.

In any case, local policies generally allow for viability to be considered at the planning application stage in exceptional circumstances. The economic conditions brought about by the coronavirus pandemic could certainly represent exceptional circumstances. These economic conditions are already feeding into the information that will be used as the basis for viability testing. Therefore, if it is not viable to provide a policy-compliant level of affordable housing due to the current circumstances, the planning system already allows this to be considered. Furthermore, by the time developments come to be built, the economy may well have recovered in any case, but a blanket threshold approach prevents mechanisms being built into Section 106 agreements to secure contributions where viability improves.

In short, this represents a blanket approach to an issue that can be considered on a case-by-case basis, and would unnecessarily reduce affordable housing provision at a time where many more people are likely to need it.

***Q18: What is the appropriate level of small sites threshold?***

***i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)***

iii). National policy should not specify a threshold for contributions to affordable housing. Please see the answer to Q17.

***Q19: Do you agree with the proposed approach to the site size threshold?***

As set out in the answer to Q18, RBC does not agree that national policy should set a threshold.

If a site size threshold is to be introduced alongside a threshold of number of dwellings, it should be made clear that it only applies where the dwelling number threshold is not already exceeded. It is not clear from the

consultation document that this would be the case, but this is the way that the current 'major' development threshold is applied. An increase to 2 or 2.5 hectares (as suggested in the consultation) could, in the case of a dense urban authority such as Reading, equate to several hundred homes.

***Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?***

For clarity, RBC does not agree with the introduction of the threshold in the first place, for any period. However, if it is to be introduced for a time limited period of 18 months, it should come with a clear presumption that the threshold will expire automatically after 18 months unless there are clear recovery-related reasons for extending it. Such an extension should be subject to further consultation and clearly based on relevant evidence. Ideally, the criteria for considering whether it should be extended should be available at the point that the initial threshold is introduced. There is certainly a perception that changes to the planning system are not always based on relevant evidence, as the recent expansion of permitted development rights on the same day as publication of a report highlighting the poor accommodation created by such rights demonstrates. It would therefore be very welcome if changes to the system could be linked more effectively to the evidence justifying those changes - as is expected of local authorities in plan-making.

***Q21: Do you agree with the proposed approach to minimising threshold effects?***

It is agreed that, where a threshold exists, there should be measures to minimise the effects of this threshold by preventing sites from being artificially divided. The consultation does not specify what this proposed approach to minimising effects is, and it is not therefore possible to state whether or not we agree.

In our experience, the most frequent effect of an affordable housing threshold is not the subdivision of sites but the artificial lowering of the number of dwellings on a site. For many years, while national policy set a threshold of 15 dwellings, an entirely disproportionate number of sites in Reading were proposed for 14 dwellings. A threshold therefore had the effect of reducing overall housing delivery. RBC does not agree that national policy should set a threshold (as set out in our answer to Q17), but if it exists, this effect should be addressed.

***Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?***

RBC does not wish to comment on this matter.

***Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?***

The Government has many means at its disposal to support specific sectors and groups of businesses, and use of the planning system to do so is an extremely blunt tool given that it is based on the merits of the proposal not the identity of the applicant. The planning system should not be the only, or the main, means to support SME builders.

### **Permission in principle**

***Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?***

No.

Permission in Principle (PiP) is in an unusual place, in that it rarely offers any clear advantages over a more traditional route, such as outline and reserved matters, or pre-application followed by a full application. In our case, where much of our development takes place on often complex, brownfield sites, it is rarely possible to divorce consideration of the principle of land use and amount of development from detailed consideration of some of the key issues, which will include contamination, flood risk, biodiversity, transport impacts, character and heritage. This will increasingly be the case if it is to be expanded to cover major development. Those sites where development is clearly acceptable in principle are usually already local plan allocations, and these allocations at least offer the opportunity to caveat the principle of development with some of the main considerations to overcome, unlike PiP. A grant of PiP does not, in practice, appear to confer much more certainty on a development than a plan allocation.

Removal of the restriction on major development would not be of particular assistance, because in practice the information required to be submitted alongside a PiP application is rarely sufficient to actually establish the principle of a development, unless a site is allocated, in which case PiP adds very little value. In order to secure PiP on a site with a minimum of information, an applicant may in fact have to reduce the development capacity of the site, because, for some sites, a higher level of development can only be justified with much more substantial evidence by a different application route.

***Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.***

If PiP is to be extended to major development, the differences in scale between an 11-dwelling development and 149-dwelling development mean that any limit on the amount of accompanying commercial development should not be a defined floorspace (as for minor developments) but should instead be a proportion of the total development.

In our experience, if more than around 25% of floorspace on a development is commercial, it moves away from being a residential-led development towards a more mixed scheme which is more likely to have impacts beyond the site boundary and which require testing through, for example, retail impact assessments at application stage.

For clarity, however, RBC does not agree that PiP should be extended to any major developments, however much commercial floorspace is included.

***Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?***

The quality of a decision is only as good as the quality of the information on which that decision is based. The very limited information submitted at PiP stage will very rarely be sufficient to establish the principle of the location, land use and amount of development. However, if the amount of information to be submitted were to be extended, the 5-week timescale would not be sufficient to assess it, particularly for major development. This therefore underlines why it does not make sense to extend PiP to major developments.

***Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.***

The issue of height illustrates the difficulties with the entire PiP process that we have already referred to. Height is often a key factor in the consideration of the principle of development in our area, because, in a dense urban area, height is one of the main determinants of the amount of development. Sensitivities of height in an urban area such as ours include the historic environments, daylight, climate and impacts on townscape and landscape. For many sites, the principle of the development cannot be divorced from consideration of height. Therefore, on the face of it, height should indeed be considered at PiP stage rather than Technical Details.

However, if height is to be included at a PiP stage for which the five-week timescale is unchanged, this causes an issue in that it is unlikely to be practicable to deal with height in this timescale. This is because acceptable height is likely to depend on daylight and sunlight assessments and potentially wind effects, as well as on assessment of impacts on any nearby heritage assets and local townscape, and will also be subject to considerable representations during public consultation which would expect to be informed by those assessments. Without these assessments at PiP stage, it is unlikely to be possible to determine that a certain height is acceptable in principle.

RBC therefore considers that the issue of height demonstrates why PiP should not be extended to major developments.

**Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:**

**i) required to publish a notice in a local newspaper?**

**ii) subject to a general requirement to publicise the application or  
iii) both?**

**iv) disagree**

**If you disagree, please state your reasons.**

We agree with ii). Newspaper notices are expensive and in our experience rarely represent value for money as a Public Notice in a newspaper is rarely the way the public expect to receive notification of a forthcoming development. However, otherwise, the consultation requirements for a major PiP application should mirror the consultation requirements for a major planning application.

**Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?**

Whilst this approach would reflect the outline application fee arrangements, it is not ideal. A flat fee based on hectareage is highly unlikely to reflect the complexity of consideration of a proposal in an urban area such as Reading, where development will often be at a high density, and where the considerations of proposals are likely to be significantly more complex than in a rural location with a similar hectareage. A flat fee may well fall significantly short of covering the costs of assessing the application.

**Q30: What level of flat fee do you consider appropriate, and why?**

Current PiP fees are slightly below the equivalent outline planning application fee for a similarly sized site. A similar approach to major applications may be most appropriate if PiP is to be expanded. The fee should avoid creating a significant incentive for using a PiP route rather than outline where an outline application may well be the most appropriate route. It is worth noting that applicants are already abusing the outline system by submitting the vast majority of information at the outline application stage where the fee is substantially lower.

**Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.**

This would seem to be a logical change to make.

**Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.**

What is lacking in making decisions on PiP is not so much national guidance, but the necessary information at application stage to justify the use and amount of development. National guidance will not resolve this issue, unless it expands upon the minimum requirements for submission, for instance, at least desk-based analysis of the relevant issues, in which case timescales for consideration would need to be extended.

***Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?***

This depends to a large extent on the level of information requirements, the timescales for determination and the application fee, all of which are matters that are not yet determined. Without significantly greater information requirements for major PiP applications, it will often simply not be possible to agree to the principle of development - however, a five-week timescale would not be sufficient to assess those information requirements, and the application fee would also need to reflect the costs of assessing this information. Ultimately, PiP does not fit comfortably within the current planning system and represents an unnecessary duplication of processes in most cases.

***Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.***

In our experience so far in Reading, Permission in Principle has rarely been used as an application route. Although the novelty of PiP may play a role in this, in our view this reflects the degree to which the purpose of PiP when compared to other application routes is not clear. It is still not clear what gap PiP is intended to fill. An approach with considerable upfront pre-application discussion followed by a planning application works well in Reading, and delivers well against development needs whilst minimising risk for applicants at the earliest stage. Therefore, it would not in our view provide any particular advantage to expand PiP to major developments.

If PiP were set at a significantly lower fee than an outline application, it is possible that more applicants might choose that route. However, given the minimal information required, it is unlikely that it will often be possible to grant PiP in most cases, which will only serve to place more costs on the applicant and lead to further delays.

***Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?***

***If so, please specify the proposal and explain the impact. If there is an impact - are there any actions which the department could take to mitigate that impact?***

RBC does not wish to comment on this matter.

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## COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 7<sup>th</sup> October 2020

Ward: Abbey

App No.: 191792/FUL

Address: 71-73 Caversham Road, Reading, RG1 8JA

Proposal: Demolition of former retail warehouse and erection of a mixed-use building comprising 44 residential units consisting of x5 affordable units, 194 sqm of retail floorspace (Use Class A1) at ground floor and associated car parking, cycle parking and landscaping.

Applicant: S2 Caversham Ltd

Extension of time date: 9<sup>th</sup> October 2020

### RECOMMENDATION:

Delegate to the Head of Planning, Development and Regulatory Services (HPDRS) to:

- i) **GRANT** full planning permission, subject to the satisfactory completion of the Section 106 agreement and it being delegated to Officers to satisfactorily calculate the sustainability (carbon off-setting) contribution;

The S106 to include the following heads of terms:

- Secure the agreed level of on-site affordable housing (5 units shared ownership) and an off-site commuted sum of £500,000 towards the provision of affordable housing elsewhere in the borough;
- £92,400 Open Space contribution to improve and extend facilities within the Thames Parks;
- Ensure land fronting onto Caversham Road is offered for adoption to provide a shared pedestrian/cycle facility;
- Secure resident access to a car club on site or demonstrate that occupants of the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator;
- Offset the remaining tonnes of CO2 not being captured by the redevelopment as per the Council's Sustainable Design and Construction SPD (2019), estimated to be £3,510 (To be finalised).
- Secure an agreement under Section 278 of the Highways Act 1980, for proposed works affecting the existing highway as shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.
- Secure a construction phases Employment Skills and Training Plan or equivalent financial contribution. As calculated in the Council's Employment Skills and Training SPD (2013).

All contributions payable on first commencement of the development and index-linked from the date of permission.

Or;

- i) Refuse full planning permission if the S106 agreement is not completed and sustainability matters resolved by 9<sup>th</sup> October 2020 (unless officers on behalf of

the Head of Planning, Development and Regulatory Services Officers agree to a later date for completion of the legal agreement)

Conditions:

1. TIME LIMIT (STANDARD)
2. APPROVED PLANS
3. DWELLING MIX (RESTRICTION)
4. MATERIALS (TO BE APPROVED)
5. SAP ASSESSMENT MAJOR - DESIGN STAGE (TO BE APPROVED)
6. SAP ASSESSMENT MAJOR - AS BUILT (TO BE APPROVED)
7. BREEAM NON-RESI - INTERIM (TO BE APPROVED)
8. BREEAM NON-RESI - POST CONSTRUCTION (TO BE APPROVED)
9. DETAILS OF PHOTOVOLTAIC ARRAY(S) (TO BE APPROVED)
10. SUSTAINABLE DRAINAGE (TO BE APPROVED)
11. FLOOD PROTECTION MEASURES (AS SPECIFIED)
12. LANDSCAPING LARGE SCALE (TO BE APPROVED)
13. HABITAT ENHANCEMENT SCHEME (TO BE APPROVED)
14. NOISE MITIGATION SCHEME (AS SPECIFIED)
15. HOURS OF DELIVERIES/WASTE COLLECTION
16. HOURS OF OPENING/OPERATION
17. MECHANICAL PLANT (NOISE ASSESSMENT REQUIRED)
18. CONTAMINATED LAND ASSESSMENT (TO BE SUBMITTED)
19. REMEDIATION SCHEME (TO BE SUBMITTED)
20. REMEDIATION SCHEME (IMPLEMENT AND VERIFICATION)
21. UNIDENTIFIED CONTAMINATION
22. HOURS OF CONSTRUCTION/DEMOLITION
23. CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)
24. NO BONFIRES
25. CONSTRUCTION DUST CONTROL MEASURES
26. REFUSE AND RECYCLING (AS SPECIFIED)
27. VEHICLE PARKING (AS SPECIFIED)
28. VEHICULAR ACCESS (AS SPECIFIED)
29. CYCLE PARKING (AS SPECIFIED)
30. ACCESS CLOSURE WITH REINSTATEMENT
31. PARKING PERMITS 1
32. PARKING PERMITS 2
33. EV CHARGING POINTS
34. ADAPTABLE UNITS
35. COMMERCIAL USE RESTRICTION
36. EXTERNAL LIGHTING

Informatives

1. Positive and Proactive Working - approval
2. Pre-commencement conditions
3. Highways
4. S106 and S278
5. Terms
6. Building Control
7. Complaints about construction
8. Encroachment
9. Contamination
10. Noise between residential properties - sound insulation of any building
11. Community Infrastructure Levy (CIL)

- |     |   |
|-----|---|
| 12. | Bats & works to roofs                           |
| 13. | Parking Permits                                 |
| 14. | Do not damage the verge                         |
| 15. | Ongoing information conditions                  |
| 16. | Access construction                             |
| 17. | Canopies and structures overhanging the highway |

## 1. INTRODUCTION

- 1.1 The site for which this application relates is 0.16 hectares located immediately to the northwest of the town centre and the railway station. It occupies a prominent corner plot fronting the north/south Caversham Road, part of the town's Inner Distribution Road (IDR). Its north side elevation runs alongside the much quieter east/west Northfield Road. The site is directly opposite the west of the former Royal Mail sorting office site and Vastern Road Retail Park. To the north across Northfield Road is the large red and white Shurgard Self Storage building. To the immediate south is a large low-profile commercial building occupied by PureGym Reading and Dawsons Music and Sound with an expanse of parking to the rear.
- 1.2 Members will be aware of the current major outline application for the redevelopment of the former Royal Mail Group site opposite the IDR at 80 Caversham Road. This neighbouring application involves the demolition of all existing buildings and structures and redevelopment to provide a range of commercial and residential uses, along with associated car parking and public and private open space (182252/OUT). This application includes buildings up to 8-storey in height fronting Caversham Road opposite the site, and importantly follows the previous approval 11/00276/OUT for a similar development in 2012. This live application and former approval seek to fulfil part of the requirement of strategic site allocation CR11e, North of Station, as set out in the Local Plan. In addition, to the northwest and directly next to 80 Caversham Road, is the Vastern Road Retail Park, which also has a live outline planning application. Both these applications are material planning considerations and if implemented, 80 Caversham Road in particular, would have a profound effect on the immediate surroundings of 71-73 Caversham Road itself and the wider area north of the station.
- 1.3 Whilst this stretch of Caversham Road is currently composed of a mix of largely modern and uninspiring commercial buildings to both sides, further west along Northfield Road the character is distinctly more domestic, made up of more traditional Victorian terraces (See Figure 1 Site location Plan below).

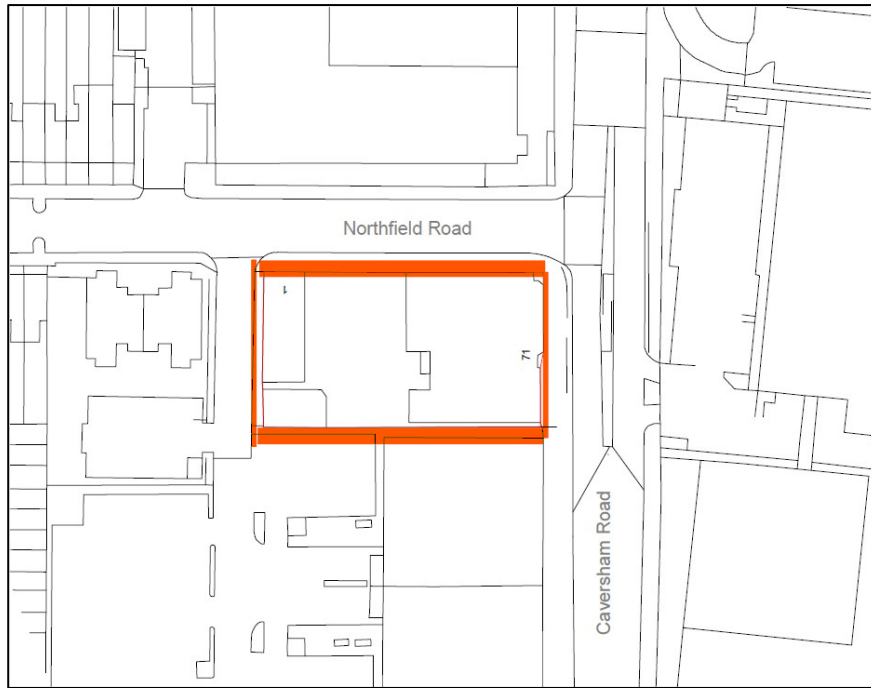


Figure 1 - Site location Plan

- 1.4 The application site is occupied by a two-storey retail warehouse known as 71-73 Caversham Road. To the rear is an area of hardstanding used as a service yard and parking, along with two attached 2.5 storey office buildings to the westernmost boundary (See Figure 2 & 3 below). 71-73 Caversham Road was in use as a hardware/ironmonger's store for 87 years until its closure in December 2018. It is formed of two parallel, linked rectangular buildings with pitched roofs fronting onto Caversham Road. This building has undergone various changes over its lifetime, consisting of extension, alterations, modern replacement windows and doors on the ground floor, whilst several openings have been boarded or bricked up, or covered with metal roller shutters. The smaller buildings to the rear are known as The Brewery and The Malthouse and like 71-73 Caversham Road were both historically former brewery buildings. Both have been in office use since at least the mid-2000s. Beyond these buildings is an access/parking area and a modern three-storey block of flats known as Monmouth Court (See Figure 3 below).



Figure 2 - Aerial view west (Google maps 2020)



Figure 3 - Aerial view south (Google maps 2020)

- 1.5 The parking and service yard between both the main building and the two office buildings is accessed off Northfield Road and currently enclosed by 2.4m high metal gates. The front elevation of the main building has been extended to create a corrugated metal window enclosure which partially obscures the original ground floor elevation at street level. The former customer entrance to the main building is opposite a staggered pedestrian crossing on the IDR (See Figure 4 below).



Figure 4 - Looking west across the IDR (Google Street View 2020)

- 1.6 The buildings on site are not Listed nor are they located within a Conservation Area. However, as a group of buildings they were recently included within Reading Borough Council's List of Locally Important Buildings and Structures in recognition of their local heritage significance. They are therefore defined as Non-Designated Heritage Assets for the purposes of national planning policy, local planning policy and all related guidance.
- 1.7 Prior to the submission of this planning application, the applicant undertook extensive pre-application engagement with officers, was considered by the Design Review Panel and benefitted from public consultation at pre-app and live application stage.



## 2. PROPOSAL

- 2.1 The application seeks permission for the redevelopment of the eastern portion of the site to provide a total of 44 residential units and 194sqm of flexible commercial space at ground floor. It has been agreed that 5 of these units will be more affordable, shared ownership units. The development will take the form of a new stepped 7 storey building fronting onto Caversham Road. The existing office buildings to the rear (The Brewery and Malthouse) will be retained. The proposal would result in the complete removal of 71-73 Caversham Road fronting the site. A total of 15 car parking spaces will serve both future residents and the existing/proposed commercial uses on site. 8 Spaces would remain available for the existing office uses within The Brewery and The Malthouse to the rear.



Fig 5 - CGI visual of proposal looking southwest

- 2.2 In addition, the proposal will provide 22 two-tier secure bicycle racks (44 cycle spaces in total), 5 Sheffield stands (10 spaces) located externally for visitors and customers but a covered area within the car park, which provide an additional 10 cycle parking spaces for visitors and other users. The development will include individual balconies, terraces, winter gardens and two podium communal roof terraces for residents. To the front elevation onto the IDR the proposal will create a pedestrian colonnade with access to the new flexible ground floor retail unit (see Figure 6 below)



Fig. 6 - Colonnade looking northwest across Caversham Road

2.3 Members are advised that the affordable housing offer was formally revised in late August 2020, resulting in the item's deferral from the last Planning Applications Committee. The previously agreed off-site Affordable housing contribution (the equivalent of 15% total provision) was revised upwards to enable a provision to be secured on-site in the form of 5 on-site shared ownership apartments alongside an enhanced off-site financial contribution equivalent to 34%. This is covered in detail later in the appraisal (para 6.1.22

2.4 Submitted Plans and Documentation:

Original proposed plans submitted with application on Nov 2019:

Site Location Plan - 01662\_MP01  
Proposed Masterplan - 01662\_MP02  
Proposed Ground Floor Plan - 01662\_P01  
Proposed Ground First Floor Plan - 01662\_P02  
Proposed Second Floor Plan - 01662\_P03  
Proposed Third Floor Plan - 01662\_P04  
Proposed Fourth Floor Plan - 01662\_P05  
Proposed Fifth Floor Plan - 01662\_P06  
Proposed Sixth Floor Plan - 01662\_P07  
Proposed Roof Plan - 01662\_P08  
Proposed South and West Elevations - 01662\_E01  
Proposed East and North Elevations - 01662\_E02  
Proposed Soft Landscaping Plans - 01662\_P10  
Height and scale - 01662\_SK01  
Proposed Sections 1 & 2- 01662\_SS03  
Proposed Sections 3 & 4- 01662\_SS04

2.5 Revised proposed plans received on 3 April 2020:

Site Location Plan - 01662\_MP01  
Proposed Masterplan - 01662\_MP02  
Proposed Ground Floor Plan - 01662\_P01 Rev P2  
Proposed Ground First Floor Plan - 01662\_P02 Rev P2  
Proposed Second Floor Plan - 01662\_P03 Rev P2  
Proposed Third Floor Plan - 01662\_P04 Rev P2  
Proposed Fourth Floor Plan - 01662\_P05 Rev P2  
Proposed Fifth Floor Plan - 01662\_P06 Rev P2  
Proposed Sixth Floor Plan - 01662\_P07 Rev P2  
Proposed Roof Plan - 01662\_P08 Rev P2  
Proposed South and West Elevations - 01662\_E01  
Proposed East and North Elevations - 01662\_E02 Rev P2  
Proposed Soft Landscaping Plans - 01662\_P10 Rev P1  
Height and scale - 01662\_SK01  
Proposed Sections 1 & 2- 01662\_SS03  
Proposed Sections 3 & 4- 01662\_SS04

2.6 Revised plans received on 21<sup>st</sup> August 2020:

GF Plan - Green Wall Location - 01662\_JTP\_SK19

### 3. PLANNING HISTORY

7437 Full Planning Permission - STORE FOR CELLULOSE  
GRANTED 25 March 1960

13987 Planning Permission - Lean to extension.  
GRANTED 09 September 1966

77/01066/00 Planning Permission - NEW SHOPFRONT CENTRAL INFILL LINK  
REPLACING EXISTING BUILDING FOR RETAIL & STORAGE.  
GRANTED 06 January 1978

95/00345/FD Planning Permission - TO FIT ROLLER SHUTTERS TO FRONT  
WINDOWS ON OUTSIDE  
REFUSED 15 June 1995

97/00509/AD Advert - FREE STANDING ADVERTISEMENT PANEL SIGN  
REFUSED 08 September 1997

#### 4. CONSULTATIONS

##### 4.1 Transport

Full comments received on 30<sup>th</sup> July 2020 reproduced as follows:

*"The Council has received AMENDED PLANS for the above application. The amendments include:*

- Enhanced landscaping - Incorporating architectural planters to the parapet edges of the communal terraces, additional tree planting within the car park, additional planting and removal of brick edges to the parking spaces along the western boundary and the incorporation of planters to the window-facing elements of the winter gardens on the eastern facade.*
- A reduction in car parking by 1 space*
- A reduction in retail area from 239m<sup>2</sup> to 194m<sup>2</sup> (GIA)*
- A small reduction in residential lobby space at ground floor • Additional CGIs showing the proposed scheme.*

*This application is for the demolition of 71-73 Caversham Road, and the delivery of a residential development. The site was formerly occupied by Drews Ironmongers.*

*The proposed scheme consists of 44no. residential units and a reduced provision of 194m<sup>2</sup> retail floorspace at ground floor retaining an active frontage to the main road. At upper levels it is proposed to deliver 44no. residential units consisting of 17no. 1-Bedrooms, 24no. 2-bedroom and 3no. 3-bedroom units. It is proposed to retain the existing office buildings on site, within The Brewery and The Malthouse at the rear of the site.*

##### *Site and surroundings*

*The site is located to the corner of A329 Caversham Road and Northfield Road. The pedestrian network surrounding the site has adequate footway and street lighting provision. There is pelican crossing on Caversham Road immediately south of Northfield Road.*

*The improvements to Reading railway station that were completed in 2014 have enhanced connectivity between the area north of the station and Reading town centre, through the provision of a new underpass. As part*



*of the Reading railway station northern entrance completion, a signalised pedestrian crossing has been provided across Trooper Potts Way and across the A329 east of the junction, with dropped kerbs and tactile paving. This provides a pedestrian/cycle link to Christchurch Bridge.*

*The completed Christchurch Bridge across the River Thames is appropriate for cyclists and forms part of the North Reading designated cycle route, enabling a shorter journey time to reach Caversham and other northern suburbs of Reading. It links to National Cycle Network Route 5.*

*The signalized pedestrian crossing located on Caversham Road adjacent to the site south of Northfield Road, is due to be upgraded to accommodate cyclists as part of a recent application (182252) at 80 Caversham Road. This application is still to be determined but improved access to the north and west for cyclists is a key component to an acceptable development.*

*In view of these improvements to the Caversham Road crossing, new dedicated cycle facilities are required to fit together existing parts of the cycle network to make it a comprehensive network that allows residents of Reading to utilize cycling as an alternative mode of travel. This is also an important aspect for this development given that the residents will be reliant on alternative modes.*

*The applicant has submitted a scheme to provide an on-carriageway dedicated cycle link along Northfield Road between the Caversham Road crossing and Swansea Road to the west. This will provide connectivity to the northern entrance of the station connecting access to the town centre to the south and Christchurch Meadows to the north as well providing access to schools, leisure and employment in west Reading (see drawing titled Cycle Route Improvement MBSK200205-01 Rev P3).*

*In order to facilitate this, land fronting onto Caversham Road adjacent to the pedestrian crossing would need to be offered for adoption to provide a shared pedestrian/cycle facility. The applicant is requested to submit a plan clearly showing the land for adoption to be secured within the S106 agreement.*

#### *Access and Parking*

*Vehicle access to the site is currently provided via Northfield Road. Caversham Road and the surrounding road network all have extensive parking restrictions preventing on-street parking.*

*The development proposes to consolidate the existing vehicular accesses to the site into a single dropped kerb access. This will provide access to the parking spaces for the development. Any existing disused accesses onto Northfield Road should be stopped up and the footway reinstated to line and level.*

*It is stated that the proposed reduction in retail floor space will mean less demand for deliveries to the site. To maximise land use on the site, it is proposed that servicing and deliveries will take place from Northfield Road. To allow for this, a new loading bay is proposed along the site frontage, which will require a rearrangement of the on-street parking bays. This process involves changes to the Traffic Regulation Order (TRO)*

*which will require approval by the Traffic Management Sub Committee (TSUB) and will be subject to statutory consultation. Given TRO's are under separate legislation to the Planning Act there is a possibility they may not be approved. However, any costs associated with the changes to the TRO and on-street signage and markings would have to be paid upfront by the applicant before commencement on site.*

*The site is located within the Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per unit and 1 space per 10 units for visitor parking. In terms of the commercial uses, the existing office buildings would require 1 space per 100m<sup>2</sup> (4 spaces) and A1 non-food retail use would require 1 space per 50m<sup>2</sup> (7 spaces).*

*There are 24 parking spaces within the gated car park. The Design and Access statement indicates that 15 spaces including 2 accessible parking will be provided for the residential element of the development (a ratio of 0.36 spaces per home); and 8 spaces including 1 accessible parking spaces are provided for the existing offices.*

*It is noted that the proposed parking provision is below the Council's requirements. However, given the site's close proximity to the centre of Reading, and its easy access to public transport connections and the facilities within the town centre, a lower parking provision can be considered. The surrounding road network all have parking restrictions preventing on-street parking, therefore, a reduction in the parking provision will not lead to on street parking being detrimental to road safety.*

*The Council's adopted Parking Standards and Design SPD states that developments of more than 10 residential units in the town centre should provide or support a car club on the site, or demonstrate that the development will have access to and the use of a car club on a nearby site. The Transport Statement does not provide any detail regarding the provision or access to a car club. Given that the development has a reduced parking provision, car clubs allow members access to cars and reduce the need to own a car themselves. Therefore, the applicant is requested to address this.*

*The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. Policy TR5 of the Local Plan also states that "Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point." In view of this, the development must provide at least 3no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. The Transport Statement states that the development proposals include the provision of 3no electric vehicle charging points.*

*The applicant should be made aware that the appropriate condition and informatives would be applied preventing future occupants applying for resident and visitor permits for the surrounding residential streets where parking is under considerable pressure. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.*

*Cycle parking should be provided as per Reading Borough Council, Revised Parking Standards and Design SPD 31st October 2011. All the cycle parking will be secure and accessible via pin pad-controlled entry points. Additional provision of 5 Sheffield stands located in an external but covered area within the car park, which provide an additional 10 cycle parking spaces for visitors and other users.*

*The bin store is conveniently located on the ground floor of the site which will provide easy access for refuse collection from Northfield Road. The residential element will generate a requirement for up to 5 4-wheeled recycling bins and 5 4-wheeled general waste bins on a weekly collection. In principle, the layout is acceptable but the Council's Waste development should be consulted to determine whether a weekly collection is feasible.*

*A Construction Method Statement will be required given the significant remodelling of the site proposed within this application. The proposed work should be in accordance with the Borough's Guidance Notes for Activities on the Public Highway.*

#### *Conditions*

*C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)  
DC1 VEHICLE PARKING (AS SPECIFIED)  
DC3 VEHICULAR ACCESS (AS SPECIFIED)  
DC5 CYCLE PARKING (AS SPECIFIED)  
DC10 ACCESS CLOSURE WITH REINSTATEMENT  
DC20 PARKING PERMITS 1  
DC21 PARKING PERMITS 2  
DC24 EV CHARGING POINTS*

#### *Informatives*

*IF3 Highways  
IF4 S106  
I13 Parking Permits*

#### *S106 Requirements*

*An agreement under Section 278 of the Highways Act, 1980, will be required with respect to proposed works affecting the existing highway. The Highway works are shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3."*

## **4.2 Environmental Protection**

Full comments received on 3<sup>rd</sup> December 2019. These have been summarised as follows:

*Noise impact on development*

*The noise assessment submitted shows that the recommended standard for internal noise can be met, if the recommendations from the assessment are incorporated into the design. It is recommended that a condition be attached to consent to ensure that the glazing (and ventilation) recommendations of the noise assessment (and air quality assessment, where relevant) will be followed, or that alternative but equally or more effective glazing and ventilation will be used.*

#### *Noise generating development*

*The noise assessment confirms that sufficient insulation will be incorporated to achieve Building Regulations' standards between the dwellings and also between the commercial use and the dwellings above - assuming a retail use on ground floor.*

*The noise assessment has included proposed noise limits for the mechanical plant but no full assessment to demonstrate compliance as the plant detail is not yet available. It is therefore recommended Noise Assessment required via condition.*

#### *Air Quality - Increased exposure*

*The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO<sub>2</sub>) and introduces new exposure / receptors.*

*The air quality assessment concludes that the levels of pollutants at the proposed development are not predicted to exceed the limit values therefore mitigation measures are not required.*

#### *Air Quality - Increased emissions*

*Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>).*

*The air quality assessment concludes that there will not be an impact on air quality as a result of the development therefore a mitigation scheme is not required.*

#### *Contaminated Land*

*The contaminated land desk study concludes that further investigation is required in the form of a phase II site investigation due to the potential presence of contaminants and exposure pathways, therefore conditions are required to ensure that future occupants are not put at undue risk from contamination.*

#### *Light - Security lighting*

*There is concern about any proposed lighting resulting in loss of amenity to nearby residents. The applicants should be made aware that lighting should be angled appropriately and of an appropriate brightness to ensure that lights are not shining onto neighbouring properties and the area is not*

*over-lit as this has the potential to result in nuisance or loss of amenity. An informative is therefore recommended.*

#### *Construction and Demolition*

*Recommended conditions to control construction management as with any site of this nature.*

#### *Bin storage - rats*

*There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels 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. This can be secured via refuse storage conditions.*

### **4.3 RBC Heritage Consultant**

Comments received on 3<sup>rd</sup> June 2020. These are reproduced as follows:

#### ***Brewery Building***

*The existing brewery building (71-73 Caversham Road) is in origin a Malthouse building which formed part of Reading's important brewing industry. Located close to the GWR railway goods yard for access to markets it dates from at least 1879 as it is shown on the First Edition OS mapping as 'Malthouses'.*

*The building proposed for demolition is a two storey malthouse building on a corner plot, which appears to be largely intact although the roof has probably been replaced in corrugated iron. Built of good quality brick with burnt headers in Flemish garden Wall bond, with buff brick detailing over segmental windows and doors. It appears to have 'ghost' sign-lettering at first floor level on Northfield Road.*

#### ***Proposals***

*Proposals consist of demolition of the existing Maltings building which is one of RBC's Locally Listed buildings. The proposed replacement building would be a 7-storey building which includes an enlarged ground floor storey which adds to the overall height of the building. The proposed replacement brick building would be a residential-led, mixed-use development.*

#### ***Discussion***

*The Brewery building is considered to be an undesignated heritage asset which is defined as:*

*"Non-designated heritage assets are 'buildings, monuments, sites, places, areas or landscapes identified by local planning authorities as having a degree of significance meriting consideration in planning decisions but which are not formally designated"*

*(Historic England, Local Heritage Listing Historic England Advice Note 7, p.2).*

*As noted by Historic England:*

*In some areas, local planning authorities have created a 'local list' of 'non-designated heritage assets' as suggested in the Government's Planning Practice Guidance (paragraph 39) (Historic England . Local Heritage Listing Historic England Advice Note 7, p.2).*

*In addition:*

*Local heritage listing is a means for a community and a local planning authority to identify heritage assets that are valued as distinctive elements of the local historic environment Historic England (Local Heritage Listing Historic England Advice Note 7, p.3).*

*The building has been Locally Listed due to its age, architectural quality, landmark presence in the streetscene and relationship to one of Reading's historic industries, following advice from Ms. Amber Patrick. Based on Ms. Patrick's research and expertise in maltings buildings, the buildings were Locally Listed, giving it added weight in the planning process. Ms. Patrick is an acknowledged expert on Maltings and the author of English Heritage's Strategy for Historic Industrial Environment Report No.1 : Maltings In England (Patrick, 2004).*

*Amongst other elements, the building has the following importance which contributes to its architectural and historic value:*

- *Historical Association*  
*The building was built in 1870 by Dowson associated with him until he died in 1900 and association of 30 years. This is considered a direct and prolonged association by any measure. Dowson was prominent locally as a businessman and active in Liberal politics locally.*
  
- *Industrial Importance*  
*The building was built as an industrial malt-house and its external features of the buildings are mainly unchanged since construction with alterations to the buildings mainly to the internal structure. The buildings construction marked the start of a period of development of the building of the roads and houses which fanned out to the west and north of 71 - 73 Caversham Road and the final period of brewing in the town, one of Reading's principal industries.*  
  
*The structure clearly relates to its industrial use with the ground floor windows of the 'malthouse' probably 'blind windows' with bins behind for barley storage and with any germination floor separated from these bins. The kiln was in the part of the building on Northfield Road that was demolished and the flat bottomed steep and an adjacent couch frame would have been located at the opposite end of the building. Such features would have been required to conform to the Malt Tax regulations (repealed 1880).*
  
- *Architectural Importance*  
*The building is representative of a style that is characteristic of Reading. As a maltings building with decorative brickwork, it represents a once widespread Reading style. The buildings also have group value as a survival of whole maltings.*

*The effect on an undesignated heritage asset should be considered in accordance with paragraph 197 of the NPPF. Substantial harm is a high bar but in this case, the demolition of the non-designate heritage asset, the*

*proposals would result in 'substantial harm' to the undesignated heritage asset, within the terms of the NPPF. Paragraph 197 of the NPPF which states that:*

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

*The building, especially along Northfield Road, retains its original character as a maltings building, but has lost part of its setting due to the construction of a group of characterless and soulless modern developments around it. The presence of the building in the streetscene represents a remnant of one of Reading's most important former industries: brewing. The last physical remains of 'industrial Reading' are increasingly being lost, adding to its importance locally.*

*The proposed replacement 7-storey building would also be out-of-scale with the surrounding buildings and the predominant heights. The townscape to the north of the Railway Station averages 2-3 storeys at most. The replacement building would therefore be harmful to not only the non-designated heritage asset but also to Reading's townscape, due to its uncharacteristic height and incongruity.*

#### **Conclusions**

*As stated in paragraph 197 of the NPPF, the effect of a development on the significance of a non-designated heritage asset should be taken into account in determining the application, based on the scale of the effect on the heritage asset and its significance. The substantial harm to this Locally Listed Building must be taken into consideration in the planning balance and in relation to Reading Borough Policies, in particular, EN1.*

#### **4.4 RBC Ecology**

Comments received on 12th December 2019 and 30<sup>th</sup> April 2020. These have been summarised as follows:

*The bat survey report (Amphibian, Reptile & Mammal Conservation Limited Species protection and habitat conservation specialists) have been undertaken to an appropriate standard and concludes that the building is unlikely to host roosting bats. As such, since the proposals are unlikely to affect bats or other protected species, there are no objections to this application on ecological grounds.*

*The proposals however only include very limited soft landscaping and very few trees and it would be preferable if a greater quantity of trees and planting were to be provided. You therefore set a condition to ensure that a detailed landscaping scheme is submitted (and implemented) and should use standard condition L2.*

*In accordance with paragraph 175 of the NPPF, which states that "opportunities to incorporate biodiversity in and around developments should be encouraged" a condition should be set to ensure that enhancements for wildlife, in particular swifts, are provided within the new development. It is*

*recommended that a slightly adjusted condition L10 is attached to any consent.*

#### 4.5 Natural Environment Team (Landscape)

Final comments received on 19th August 2020:

*The site is located on a 'treed corridor', is within a 10% or less canopy cover area (both defined in our 2010 Tree Strategy), is within a low canopy cover Ward (as defined in our 2020 Tree Strategy) and within the AQMA hence sufficient greening of the site is vital.*

*I note the inclusion of some trees at ground level (Northfield Road only) and the roof terraces/podiums which are positive, but, given the location and height of the roof terraces in relation to the height of the eastern elevation, none of this soft landscaping will benefit Caversham Road as it will not be visible. Caversham Road fronts a main road and a 'treed corridor' where pollution levels are high (ref policy EN15), therefore the greening of this element by the later inclusion of a green wall at ground to first floor level on the Caversham Road and Northfield Road elevations is positive.*

*However, I don't think that, given the Council's climate emergency declaration, the proposals are ambitious enough. In addition to the reasons given above, any proposal should respond to this climate emergency declaration and to relevant Local Plan Policies, along with the Sustainable Design and Construction SPD, in maximising green wall provision to meet the requirements of those policies. Further provision would also provide additional biodiversity value, which I note that GS Ecology felt was lacking initially, hence would better meet requirements of the forthcoming 2020 BAP.*

*I do appreciate that there are many factors that need to be weighed up by both the developer, in making the proposal financially feasible, and by the LPA in balancing competing factors. As such, I understand that the landscaping proposed may be considered as acceptable in that balance.*

*I note that the DAS states that trees have been included to 'enhance boundaries', however, the only boundary trees are on either side of the entrance in Northfield Road which provides little amenity benefit to the IDR; the visuals indicating small trees and the species mentioned not including any large canopy species.*

*The DAS mentions use of Cherries, Birch & Parrotia. It should be noted that as a result of work on our revised Tree Strategy, we have undertaken an exercise to determine which genus/species are over-represented in the Borough (on RBC land). Cherries are second on the list (second to Lime) so should be avoided. Our forthcoming revised Tree Strategy and BAP will have an expectation for tree planting to be all wildlife friendly unless heritage, for example, demands exotic species. Any Birches proposed should be native and the Parrotia (chosen only for its appearance) should be replaced with a wildlife friendly species.*

*A number of layout plans and Proposed soft landscape plan (indicative) were received on 6/2/20, CGIs received on 9/3/20 and the additional visuals received on 11/3/20, which I assume you will be referring to in the*



approved plans list. However, as advised, the Soft Landscape Plan P10 Rev P1 (which is indicative) does not appear to show the proposed green wall at ground level, therefore an amended plan is required so it is consistent with the visuals.

I am not clear at the time of writing whether the application will go to PAC with a recommendation to approve or refuse. If it is to refuse, I assume that no tree/landscape reasons for refusal will be included if you consider there is sufficient greening 'on balance'. If the application is to be approved, please include the following condition, which I have amended to make it appropriate for this site:

- Landscaping large scale (to be approved)
- Habitat enhancement scheme, to include a minimum of 6 swift bricks built into the new building (to be approved).

Officer comments: A ground floor plan '01662\_JTP\_SK19 - GF Plan - Green Wall location' was received 21<sup>st</sup> August 2020 showing the position of the proposed green wall and its membrane thickness - 82mm in the example given. To be clear this plan shows details from Biotecture, one such supplier, and is for reference only to show the position and how the would work with the building. The detailed specification would be secured within the above detailed landscaping condition.

#### 4.6 RBC Access Officer

No comments received.

#### 4.7 Environment Agency

This planning application is for development the Environment Agency do not wish to be consulted on.

#### 4.8 RBC Leisure Team

Comments received on 27<sup>th</sup> November 2019:

*"As with all town centre developments, and this is no exception, there is limited open space on site for residents. The proposed podiums are a positive element of the design, but accepting that the delivery of adequate on site open space is not achievable, we will therefore be seeking an off-site financial contribution in order to mitigate the additional pressure on local parks and recreation facilities as a direct consequence of this development. This is in accordance with the newly adopted Local Plan, Policy EN9: PROVISION OF OPEN SPACE which states that "All new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities."*

*Policy CC9: SECURING INFRASTRUCTURE in the Local Plan sets out the objectives of securing infrastructure, services, resources and amenities to ensure that developments are both sustainable and that they contribute to the proper planning of the area. It also provides the basis for justifying infrastructure provision as part of development proposals. The added*

*pressure from an increase in the number of residents moving into new developments increases the wear and tear on the existing infrastructure. In accordance with the policy, the procedure for calculating off-site provision has been established for many years, based on the old Supplementary Planning Guidelines which tabled a summary of S106 requirements including for open space, sport and recreation. The cost of providing suitable facilities was calculated as £2,100 for dwellings up to and including 75m<sup>2</sup> and £2,800 for dwellings over 75m<sup>2</sup>. To this end we believe that a contribution of £2,100 per unit is appropriate and is fairly and reasonably related in scale and kind. It is also directly related to the development. This S106 funding, which equates to £92,400 and which is in addition to CIL funding, would be used to continue to improve and extend facilities within the Thames Parks which are in close proximity to the development."*

#### **4.9 Thames Water**

No comments received

#### **4.10 Historic England**

No comments received

#### **Non-statutory**

#### **4.11 Public representations**

2 individual letters of objections have been received, summarised as follows:

- Notes this is an important site which marks the transition north of Reading to the river, the Belltower area, and the approach to Caversham.
- The existing brick warehousing is consistent with the surrounding architecture to the west of the site, and has historical value in terms of its consistency with its setting.
- The proposed elevations are non-descript, generic, over-sized, and make no reference to the still intact character of this part of 'Caversham borders'.
- Development is an opportunity to do something more imaginative and architecturally appropriate like retaining the frontage of the existing buildings while building something new behind.
- Concern that the proposed number of storeys will dwarf surrounding low-rise residential buildings.
- A reduction in total height to no more than the Shurgard building on the other side of Northfield Road would seem more appropriate.
- The proposed height of the development would dwarf everything in the area and set a dangerous precedent.
- Not keen on the double height windows for the top two storeys of the proposed development - they seem out of proportion.
- Classical architecture usually sees window heights reduce for the upper floors, and a sudden increase with height seems inharmonious alongside an area with Victorian houses and shops. A better solution might be to keep the height of the upper windows the same as for lower floors or reduce it slightly and have brick arches above the upper windows to give the development more of a feel of a Victorian industrial building. A good example for

comparison is the former Granada studios in a Victorian warehouse in Manchester.

- More use should be made of decorative brickwork or terracotta tiling to break up the design. A good comparison is the terraced houses at 3-13 Northfield Road, which are close to the site.
- The ground floor space would probably work best if designed for multiple smaller mixed-use units rather than a small number of larger retail units - probably by having more smaller windows. This would allow greater flexibility of use for this floor - for example, there might be the option of a cafe, community space and a few small business/craft workshop units.

#### 4.12 Reading Conservation Area Advisory Committee

Comments made on 23 January 2020:

*"This application is to demolish the Drews building and replace it with an apartment block with retail at ground floor level rising from five seven floors. The buildings at 1 Northfield Road, currently let as offices would remain.*

*The Drews building (together with the offices behind) was once a maltings (Dowsons) and has also been used for other commercial purposes including by Smallbones motor engineers who were responsible for the 'SMALLBONES' ghost sign on the Northfield Road.*

*We object to this application for the following reasons:*

##### 1. HERITAGE

###### 1.1 Local Listing

*1.1.1 We understand that a nomination has been made for local listing by the Bell Tower Community Association. We fully support this nomination which recognises the importance of the building as a former maltings.*

*1.1.2 Malting was an important industry in Reading in the eighteenth/nineteenth centuries and this is a significant example in a prominent setting of a small scale maltings. Dowsons provided malt for H & G Simonds from 1872 until the large maltings buildings were built on their brewery site at the end of the nineteenth century (part of one of which remains and is nationally listed - 1155180).*

*1.1.3 The building should be adapted creatively for commercial/ residential use so that it is retained.*

###### 1.2 1 Northfield Road

*1.2.1 Any development on the Caversham Road/Northfield Road building should respect and enhance the context of the maltings buildings at 1 Northfield Road which are not part of this application. A building of the height proposed does not do this and moreover devalues the heritage appeal of the properties as offices in the centre of Reading.*

##### 2. HEIGHT AND SCALE

*2.1 The site is not mentioned as a site for future development on the New Local Plan. The closest to this development are CR11f (West of Caversham Road) and CR11e (North of Station). As this site is on the west of Caversham Road, the expectation for this site can be assumed to be similar.*

*New Local Plan p147: CR11f This area will be developed for residential with on-site open space. Densities will be lower than elsewhere in the Station/River area to reflect the proximity to low-rise residential areas, and the edge of the site nearest to the areas of terracing will require careful design treatment and respect the historic context of areas to the west.*

*2.2 We agree with the comments made by CADRA on this point, that any development on this site should not exceed two-three storeys. At two-three storeys Monmouth Court, adjacent to 1 Northfield Road is currently the tallest property on the street. The older terraced properties are only two storey.*

### **3. DESIGN**

*3.1 The inclusion of random architectural details, such as green tiles and arches, represent only a token nod to the heritage building being replaced.*

*3.2 The saw tooth roof is out of keeping with the character of the area and jars with the glazing arrangement of the Caversham Road and Northfield Road frontage.*

*3.3 The five storey block to the rear with winter gardens, although still too tall, is more pleasing.*

### **4. CONCLUSION**

*4.1 The Drews building should not be demolished but should be locally listed and sympathetically reused as a commercial premises or housing, preferably no taller than the current building.*

*4.2 This application should be rejected."*

**Officer Comments:** Above comments made prior to revised plans being received in 9<sup>th</sup> April 2020.

#### **4.13 Caversham and District Residents Association (CADRA)**

Comments made on 20<sup>th</sup> December 2020

*"Caversham and District Residents Association (CADRA) would like to comment on the Planning Application proposals for this site as follows:*

##### **1) RETENTION OF EXISTING BUILDING**

*CADRA believe that serious consideration should be given to retaining, converting and possibly extending the existing buildings on the site. We note that the partial retention of the buildings on the western boundary is already proposed. The Malthouse buildings on this site dating from the 1870s are one of the few remaining examples of 19C industrial architecture in this area and the town. They relate to the Brewing Industry, a close part of Reading's identity historically, and for which Reading was renowned. The buildings still form an identifiable unified group with historic value both to the local area and the town.*

*Although the buildings have been altered in the 20C, both the overall form and much of the detailing is still apparent and this detailing can be repaired/ reinstated. Much of the detailing on the building (for example polychromatic brick detailing) is representative of a 19C style characteristic of Reading, and whilst many domestic examples survive, industrial examples do not. We note the applicants design statement make frequent reference*

*to the architectural details on the existing building, the most appropriate way to celebrate these would be to therefore retain the existing building.*

*The massing and scale of the existing building relates well to the scale of the existing residential area to the west of the site and the setback of the upper floors from back of pavement level on the south eastern corner of the site visually eases the turn into Northfield road.*

*We understand that an application for Local Listing was made in September 2019 and this gives greater detail on the history and value of the buildings on the site which should be taken into consideration.*

#### **2) A TRANSITIONAL SITE AND PROPOSED HEIGHT**

*If the existing frontage buildings are not retained, this site should be treated as a transitional site between the larger scale development some 6-7 storeys of the proposals on the Aviva and Hermes sites on the eastern side of Caversham Road and the predominantly 2 storey development of the residential area around Swansea Road. In CADRA's view, development on this western side of Caversham Road should relate to the 2/3 storey scale of the residential community to which this site relates and none of the sites on this side of the road is appropriate for 7 storey development. We note in the Design and Access statement, in pre application advice the Planning Officer expressed concern about the height of the proposals.*

#### **3) BUILDING LINE**

*The proposals build right up to the back edge of pavement over seven storeys on Caversham Road. Careful examination of the building lines on this and existing adjacent sites indicate a variation in building line to the benefit of space on Caversham Road approaching the roundabout. The main building line, on the southern corner of the Drews site, lines with the adjacent Dawsons/ Pure Gym site but then cuts back at upper level approaching Northfield Road and relates to the building lines of the 19C development beyond the 1970s Shurgard building further down the road. Building seven storeys to the back edge of pavement on this site would be oppressive on this corner and form an unfortunate precedent for other sites likely to come forward on this side of the road.*

#### **4) ROOFSCAPE**

*The saw tooth roofscape proposed on top of the seven storey building seems to be an arbitrary response to a comment from the Design Review Panel, rather than to have any design logic. There do not seem to be precedents for this in the area.*

*For the above reasons CADRA object to this development.  
I hope that these comments are helpful to your consideration of the application.*

*Kind Regards,  
Kim Pearce (on behalf of Caversham and District Residents Association)"*

**Officer Comments:** Above comments made prior to revised plans being received in 9<sup>th</sup> April 2020.

#### **4.14 Bell Town Community Association**

Comments made on 11<sup>th</sup> March 2020

*“Section 4.2.2 of the local plan states: The role of the Local Plan is to proactively conserve and enhance the historic environment and promote its enjoyment. This entails recognition of the value of historic features that are desirable for retention, ensuring that the most valued townscapes and landscapes (e.g. those with national and international designations) are given the highest level of protection and other locally valued assets are recognised, retained and enhanced wherever possible. ;*

*Given the local listing of building (LL15), the proposed demolition of the building on the corner of Caversham and Northfield Roads would run counter to this objective of the local plan. I would also run counter to the national guidelines as well as EN4 of the local plan cited in the applicant’s Heritage and Townscape Assessment. This also means the proposal to preserve the Brewery and Malthouse office buildings is very welcome.”*

**Officer Comments:** These comments were made prior to revised plans being received in 9<sup>th</sup> April

Additional comments made on 27 April 2020:

*“I am writing to object to amended planning application No. 191792 (71-73 Caversham Road, Reading RG1 8JA) on behalf of the Bell Tower Community Association.*

*The proposed changes in no way address the concerns over the height of the proposed tower block or the heritage issues involved in the demolition of a locally listed building. Scaling down the retail area at the same times as reducing parking spaces also does not deal with the problem of the lack of parking for both staff and customers. Below is my original objection:*

*Section 4.2.2 of the local plan states: “The role of the Local Plan is to proactively conserve and enhance the historic environment and promote its enjoyment. This entails recognition of the value of historic features that are desirable for retention, ensuring that the most valued townscapes and landscapes (e.g. those with national and international designations) are given the highest level of protection and other locally valued assets are recognised, retained and enhanced wherever possible.”*

*Given its local listing (LL15), the proposed demolition of the building on the corner of Caversham and Northfield Roads would run counter to this objective of the local plan. I would also run counter to the national guidelines as well as EN4 of the local plan cited in the applicant’s Heritage and Townscape Assessment. This also means the proposal to preserve the Brewery and Malthouse office buildings is very welcome.*

*In the planning statement the applicant makes much of proposals to develop the former Post Office Sorting Office site (Hermes development Ref. 182252) on the opposite side of the road to 71-73 Caversham Road, saying that the height of the proposed block of flats on the site will blend in with this. However, no permission has as yet been granted for either the Hermes development or the planned re-development of the Aviva-owned site (TGI Friday’s, Aldi, etc. Ref. 200328), meaning the planned development might not blend in with what is eventually built on those sites. Little or no regard seems to have been paid to the existing height of buildings on the same side of Caversham Road. There is a strong risk of setting a precedent in terms of*

*height of buildings, particularly in the context of the potential redevelopment of the Carters site. We would oppose any buildings on the site that are higher than the Shurgard building particularly given the low-rise nature of the buildings in the Bell Tower area to the west of 71-73 Caversham Road because of the overlooking and overshadowing.*

*The applicant also plans 239 square metres of retail space. There has to be a question mark over the economic viability of this given that no parking provision has been made for either staff or customers.*

## 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 also states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".

5.2 The following relevant planning policy and guidance is applicable to the assessment of this application.

### 5.3 National Planning Policy Framework (NPPF) (Feb 2019)

Section 2 - Achieving sustainable development  
Section 4 - Decision-making  
Section 5 - Delivering a sufficient supply of homes  
Section 6 - Building a strong, competitive economy  
Section 7 - Ensuring the vitality of town centres  
Section 8 - Promoting healthy and safe communities  
Section 9 - Promoting sustainable transport  
Section 11 - Making effective use of land  
Section 12 - Achieving well-designed places  
Section 14 - Meeting the challenge of climate change, flooding and coastal change  
Section 15 - Conserving and enhancing the natural environment  
Section 16 - Conserving and enhancing the historic environment

### 5.4 Reading Borough Local Plan 2019

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT  
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION  
CC3: ADAPTATION TO CLIMATE CHANGE  
CC5: WASTE MINIMISATION AND STORAGE  
CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT  
CC7: DESIGN AND THE PUBLIC REALM  
CC8: SAFEGUARDING AMENITY  
CC9: SECURING INFRASTRUCTURE

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT  
EN4: LOCALLY IMPORTANT HERITAGE ASSETS  
EN9: PROVISION OF OPEN SPACE  
EN10: ACCESS TO OPEN SPACE  
EN12: BIODIVERSITY AND THE GREEN NETWORK  
EN14: TREES, HEDGES AND WOODLAND  
EN15: AIR QUALITY

EN16: POLLUTION AND WATER RESOURCES  
EN17: NOISE GENERATING EQUIPMENT  
EN18: FLOODING AND DRAINAGE

EM1: PROVISION OF EMPLOYMENT  
EM2: LOCATION OF NEW EMPLOYMENT DEVELOPMENT  
EM4: MAINTAINING A VARIETY OF PREMISES

H1: PROVISION OF HOUSING  
H2: DENSITY AND MIX  
H3: AFFORDABLE HOUSING  
H5: STANDARDS FOR NEW HOUSING  
H6: ACCOMMODATION FOR VULNERABLE PEOPLE  
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE

TR1: ACHIEVING THE TRANSPORT STRATEGY  
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS  
TR4: CYCLE ROUTES AND FACILITIES  
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

RL1: NETWORK AND HIERARCHY OF CENTRES  
RL2: SCALE AND LOCATION OF RETAIL, LEISURE AND CULTURE  
DEVELOPMENT

CR1: DEFINITION OF CENTRAL READING  
CR2: DESIGN IN CENTRAL READING  
CR3: PUBLIC REALM IN CENTRAL READING  
CR6: LIVING IN CENTRAL READING

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

#### 5.5. Supplementary Planning Documents

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

#### 5.6 Other Reading Borough Council Corporate documents

Reading Tree Strategy (2010)  
Reading Open Space Strategy Update Note (2018)  
Reading Open Space Strategy (2007)  
Waste Management Guidelines for Property Developers, Reading Borough  
Council

#### 5.7 Other material guidance and legislation

National Planning Practice Guidance (2020)  
The Town and Country Planning (General Permitted Development)  
(England) Order 2015  
Section 66(1) of the Town and Country (Listed Buildings and Conservation  
Areas) Act 1990



Section 72 of the Town and Country (Listed Buildings and Conservation Areas) Act 1990  
The Community Infrastructure Levy (CIL) Regulations (Amended 2015)  
Department for Transport Manual for Streets  
Department for Transport Manual for Streets 2  
Berkshire (including South Bucks) Strategic Housing Market Assessment - Berkshire Authorities and Thames Valley Berkshire Local Enterprise Partnership, Final Report, February 2016, prepared by GL Hearn Ltd  
Technical Housing Standards - Nationally Described Space Standard, DCLG, 2015  
Site Layout Planning for Daylight and Sunlight: a guide to good practice (BR 209), P. Littlefair, 2011

## 6. APPRAISAL

The main matters to be considered are:

- 6.1 Principle of development
- 6.2 Heritage
- 6.3 Design
- 6.4 Natural environment
- 6.5 Sustainability
- 6.6 Amenity
- 6.7 Health and wellbeing
- 6.8 Transport
- 6.9 Environmental Protection
- 6.10 S106/Community Infrastructure Levy
- 6.11 Other matters

### 6.1 Principle of development

6.1.1 Planning law requires that applications for planning permission must have regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the development plan for the area is the Reading Borough Local Plan (2019). At a national level, the National Planning Policy Framework (NPPF) constitutes guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but constitutes a material consideration in any subsequent determination.

6.1.2 The NPPF sets out a presumption in favour of sustainable development running through both plan-making and decision-taking. The three dimensions to achieving sustainable development are defined in the NPPF as: economic, social and environmental. Paragraph 11 of the Framework indicates that, for decision taking, where Local Plan policies are up to date: development proposals that accord with the Development Plan should be approved without delay. Both the adopted Local Plan and the NPPF require a positive approach to decision-taking to foster the delivery of sustainable development. These three dimensions of sustainable development are also central to the Council's Local Plan core policy CC1. This which repeats the aims of the NPPF in approving development proposals that accord with the Development Plan. The degree in which this proposal meets the three dimensions to achieving sustainable development will be concluded at the end of this report against the level of Local Plan compliance.

### Land use principles

- 6.1.3 The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. This Framework clearly identifies that planning should promote the efficient use and redevelopment of brownfield land.
- 6.1.4 The application seeks the redevelopment of a vacant former ironmonger's (Formerly Use Class A1 and now Class E from 1<sup>st</sup> Sept 2020) to provide 44 no. residential units and 194m<sup>2</sup> flexible retail floorspace at ground floor.
- 6.1.5 The site is located within the 'Reading Central Area' and the 'Office Core' as defined by the Local Plan. As mentioned, it is also located on the edge of allocated site CR11e, North of Station. Previously, under the Reading Central Area Action Plan (RCAAP) the west side of the Caversham Road was labelled as 'Transition to zone of low density residential', where specifically reference was made to "*Areas along the western side of Caversham Road have room for improvement in terms of design and efficiency of land use*". Whilst no longer referenced in the Local Plan, the site continues to mark the transition between significant new planned development to the east (North of the Station) and low-rise traditional residential neighbourhood to the west. Therefore, its role as a 'transition zone' would continue. It would also need to ensure that any improvements in terms of design and efficiency of land use are able to take place without constraining and potentially preventing neighbouring low-density sites on the west side of Caversham Road from fulfilling their own development potential in the future

### *Residential use*

- 6.1.6 The proposed development would deliver 44 new homes and therefore based on the proportion of floorspace proposed, would be a residential led scheme. Under core housing Policy H1, housing provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in the Borough up to the end of the Plan period (2036). Furthermore, because of the borough's overwhelmingly urban character, there is a heavy reliance on previously developed land meeting such needs.
- 6.1.7 The site is located approximately 270m from the north entrance of Reading Station, is 30m from the nearest bus stop and approximately a 5mins walk from all main services and facilities offered by a central town location. In this regard the site is recognised as being one of the most sustainable locations in the south east and would be entirely consistent with Council's spatial strategy for new residential development.
- 6.1.8 The proposal would therefore contribute to meeting the Borough's housing need through an uplift of 44 units in a highly sustainable location for new residential development. This accords with the aims of Policy CC6 (Accessibility and Intensity of Development) of the Local Plan and is afforded positive weight in the overall planning balance.

### *Non-residential uses*

- 6.1.9 The proposal would result in the loss of the existing commercial use (vacant hardware store) and replacement with 194sqm of flexible commercial space at ground floor and residential above. The commercial floorspace was revised

down from 239sqm during this application to accommodate the colonnade and additional on-site landscaping enhancements. The site is not located within a defined employment area, primary retail frontage or covered by any policies that seek to protect the existing vacant commercial unit. The existing use of the building could, via current permitted development rights, be converted into a range of other uses including residential via the prior approval process, thereby resulting in the loss of all employment-generating uses on site. Furthermore, it should be noted that from 1<sup>st</sup> September 2020, the permitted use of the site has changed to Class E (flexible commercial use) which encompasses a much broader category of residential compatible '*commercial, business and service*' uses.

6.1.10 Paragraph 121 of the NPPF advises LPAs to take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular LPAs should be supporting proposals which, "*use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres*". Local Plan Policy RL1 relates to the network and hierarchy of centres and identifies Reading as the regional centre within the area. This policy highlights the need for new development to maintain and enhance the vitality and viability of these centres. This has increased importance following the economic and social consequences of the Covid19 pandemic. Finally, Policy RL2 (Scale and Location of Retail, Leisure and Culture Development) requires provision to be made for up to 34,900 sqm of retail and related facilities up to 2036.

6.1.11 In terms of the equivalence of the replacement commercial floorspace, the current unit has been vacant for 20 months and is recognised as requiring significant investment in order to bring up to a modern occupancy standard, whether for continued commercial use or for an alternative permitted use. Furthermore, any alternative use or conversion would be constrained by the building's existing physical and previously altered form. This relates to the significant amount of support columns within the existing building, which makes the existing floorspace operationally very difficult for prospective retailers.

6.1.12 Following national and local policy support for alternative land uses on unallocated land such as this, the proposed redevelopment of the site to create more flexible and attractive commercial space at ground floor would support continued employment opportunities within both the town centre and Office Core, and importantly assist in the economic recovery and improved future resilience of the borough. Therefore, replacing the existing vacant A1 unit with an enhanced flexible commercial ground floor unit is considered to be a positive element of the scheme.

#### Housing mix and density

##### *Housing mix*

6.1.13 The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. In terms of housing mix, Policy CR6 (Living in Central Reading) supports this and further seeks that residential developments within the town centre area should incorporate a maximum of 40% of 1-bedroom units and a minimum of 5% of 3-bedroom units.

6.1.14 A total of 44 new flats are proposed with the following mix:

- 1 bedroom (2 Person): 17no. (typical size 50m<sup>2</sup>)
- 2 bedroom (3 Person): 19no. (typical size 61-66m<sup>2</sup>)
- 2 bedroom (4 person): 5no. (typical size 70m<sup>2</sup>)
- 3 bedroom (4 person): 3no. (typical size 74m<sup>2</sup>)

6.1.15 When considered against the requirements of Policy CR6, the following proportions are calculated:

- 1 bedroom units 17 no. = 38.6%
- 2 bedroom units 24 no. = 54.6%
- 3 bedroom units 3 no. = 6.8%

6.1.16 The proposal is therefore compliant in provision of 1-bedroom units (38.6% compared to a maximum 40% required), and provides a higher proportion of 3-bedroom units than the policy minimum required (6.8% compared to 5% required). Furthermore, the provision of 2-bedroom units is composed of two sizes, 3 or 4 person occupancy. Based on the characteristics of the site and the appropriateness for range of units in such an arrangement, the overall dwelling mix proposed by the development is considered acceptable and in accordance with the requirements of Policy CR6 of the Local Plan.

#### *Density*

6.1.17 Achieving an efficient use of the land within the context of any central and sustainably located site is a key priority both at a national and local level. The NPPF states that LPAs should actively *“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”*. In general terms, officers support those urban design principles which encourage an ambitious approach to density, as this is beneficial in terms of:

- ensuring efficient use of land
- preventing urban sprawl
- supporting a range of uses
- increasing the viability and hence availability of public transport
- encouraging social interaction.

6.1.18 The spatial strategy for Reading identifies Central Reading as the focus for meeting much of the identified development needs at a medium and high density. The Local Plan identifies the fact that there are considerable areas of underused land around the edge of the centre like those existing plots which front onto Caversham Road that offer an opportunity to accommodate a considerable amount of development at higher densities.

6.1.19 Policy CC6 ‘Accessibility and the intensity of development’ makes the important link between the scale and density of development and its inherent level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. This does not override other considerations but is an important element of meeting the borough’s development needs in the most sustainable way. Policy H2 which specifically considers density and mix, requires that the appropriate density of residential development is informed by amongst other things:

- the character and mix of uses of the area in which it is located (including nearby heritage assets);
- its current and future level of accessibility; and
- the need to achieve high quality design and the need to maximise the efficiency of land use.

6.1.20 Within the Local Plan, indicative densities for different areas are set out in Local Plan extract Figure 4.5 (Below). This indicates such a site located within the Town Centre and in such close proximity to the station, would have an indicative density of above 100 dwellings per hectare. It is important to note, no upper limit is provided for the Town Centre, as each application would be considered on a case by case basis and informed in conjunction with other factors.

**Figure 4.5: Indicative density ranges (dwellings per hectare)**

Town Centre	Urban	Suburban
Above 100	60-120	30-60

6.1.21 The supporting text goes on to acknowledge that the criteria discussed above may indicate that different densities are appropriate, despite the indicative density range indicating otherwise.

6.1.22 Regarding the proposal in question, a density of 275 dwellings per hectare is calculated across the site. Whilst this is considered high-density in comparison to the much lower neighbouring commercial sites to the north and south within the Caversham Road transition zone, the plan recognises the opportunities available to increase density to help to meet identified needs in highly sustainable locations like this. Given the proposed format of development (a single block fronting the IDR and with residential above a ground floor commercial use), such density does not represent any significant conflict with policy or departure from the prevailing density of other existing or recently approved developments fronting onto the IDR to the south. However, notwithstanding the conclusion that such density may be appropriate in this location, this does not negate the need for careful attention to be paid to the existing character of the surrounding area and important issues such as heritage, which will be covered separately.

#### Affordable housing

6.1.23 Affordable Housing is a key priority within the borough. Policy H3 of the Local Plan (Affordable Housing) seeks to ensure that development proposals of more than 10 dwellings should provide the equivalent of 30% on-site provision of affordable housing. Policy H3 states that where proposals fall short of the policy target as a result of viability, the Council will take an 'open-book approach' with the onus on the developer/landowner to clearly demonstrate the circumstances justifying any lower affordable housing provision. At a national level Paragraph 64 of NPPF requires has an expectation that major housing development secure at least 10% affordable home ownership, unless this would exceed the level of affordable housing required in the area.

6.1.24 The Council's current Affordable Housing SPD (2013) requires that new development should include a range and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs. This is

reflected in the current SPD which identifies a tenure mix of 50% social rent and 50% shared ownership/intermediate housing.

6.1.25 The application was accompanied by an Affordable Housing Financial Viability Appraisal (FVA) which demonstrates that the development could not sustain such a policy complaint contribution towards affordable housing. Officers in association with the Council's Valuer explored ways to allow the scheme to either provide some form of contribution or achieve policy compliance over time. In this regard a minimum upfront affordable housing contribution of £250,000 (equivalent to 15%) was offered, along with a late stage deferred payment mechanism.

6.1.26 Therefore, whilst this initial affordable housing offer would not have achieved the full local policy compliant level of 30%, a 15% financial contribution up-front with a deferred payment mechanism to recover any increase in value, would not only have exceeded NPPF expectations but would have constituted a reasonable and justified position for the Council. As an agreed and acceptable position, this would have constituted a material public benefit that would have weighed in favour of the scheme, although not in a substantial way.

6.1.27 Officers were notified on the 19<sup>th</sup> August 2020 that the applicant has significantly revised their affordable housing position from that contained within the initial FVA and as described above. This revised approach proposed a mixture of on-site affordable housing provision and off-site financial contribution. This would take the form of 5 on-site shared ownership, and an off-site financial contribution of £500,000. The proposal would represent an on-site affordable provision of 11%, with the off-site financial contribution confirmed as being the equivalent of a further 30%. Taken as a whole, the revised offer was presented to Officers as the equivalent of 41%.

6.1.28 A updated FVA was requested and verified by the Council's external consultant Valuer. This confirmed that the offer would be the equivalent of 40% based upon a 100% shared ownership tenure mix, rather than the SPD compliant tenure split. Therefore, whilst broadly correct, if calculated based upon an more desired and compliant tenure split, the whole package would equate to an affordable housing contribution of 34%. See Fig 7 below which shows a breakdown of the original proposal, updated proposal and SPD complaint equivalent.

	On-Site Provision	Off-Site Payment in lieu	Total Affordable Housing Provision
Original Proposal	0 (0%)	£250,000 (equivalent to 15%)	15%
Updated Proposal	5 shared ownership/intermediate units (11%)	£500,000 (equivalent to 30% Shared ownership)	40% Shared ownership
Calculated SPD tenure complaint)	5 shared ownership/intermediate units (11%)	£500,000 (equivalent to 23% 50/50 split)	34% 50/50 split

Figure 7 - Original, revised and calculated affordable housing offer.

- 6.1.29 The Council's Housing Officer and the Affordable Housing SPD confirm that any desired tenure split is largely influenced by the specifics of the site. Anything other than a 30% contribution with a 50/50 split would not comply with the aim of the SPD as a starting point and is therefore reliant upon the viability of the scheme.
- 6.1.30 The Council's consultant valuer confirmed to Officers that the overall revised package could support the delivery of around 15 new tenure compliant affordable housing units within the borough, consisting of 5 shared ownership units on-site, and the remaining split 50/50 off-site. Whether delivered in either tenure, the offer is recognised as a significant improvement on that originally accepted and constitute a substantial public benefit.
- 6.1.31 The Council fully accepts that despite urban design principles requiring affordable housing to be pepper potted within developments, Registered Providers (RP) prefer separate access cores, as this allows them to control service charges. The Housing Officer also supports this view in that separate access, management and service charge arrangements for a RP would in this instance make the inclusion of on-site rental tenures (e.g. social rent) not practically feasible.
- 6.1.32 Whilst the 5 on-site shared ownership housing units proposed are recognised as not being the most in demand tenure type, the Council is now able to secure a significant off-site cash payment which can be converted into a tenure mix that most in need e.g. Social Rent/Affordable Rent. This part of the contribution along with the flexibility it offers is considered to outweigh the risk posed by a reduced proportion of AH of a policy compliant tenure that would prove less attractive to an RP. Either way, both options (40% or 34%) are in excess of the 30% policy requirement of Policy H3 (the shared ownership split notably so) and both substantially exceed the NPPF expectation for major schemes.
- 6.1.33 Notwithstanding the above position, it is necessary to consider whether securing such a greater level of affordable housing is reasonable in the circumstances, bearing in mind Case Law which confirms that a willing applicant does not in itself justify provision of a planning obligation.
- 6.1.34 Paragraph 56 of the NPPF outlines clearly the tests which must be met for a planning obligation to be sought:
- (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.*
- 6.1.35 Firstly, in considering test (a) as to whether the obligation would be '*necessary to make the development acceptable in planning terms*', there is no disagreement that a degree of harm would be caused as result of this development and that the harm caused would require a significant level of public benefits in order to off-set it. Whilst the specific level of harm caused and the applicable policy tests are discussed in detail under Section 6.2 of this report, the specific wording of Policy EN4 '*Locally Important Heritage Assets*' and Paragraph 197 of the NPPF provide a clear requirement for the LPA consider any relevant counter-benefits to a proposal that would cause harm to a Non-Designated Heritage Asset (NDHA). Specifically, the relevant section of Policy EN4 states:

*“Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset’s significance”.*

- 6.1.36 In taking a consistent approach with other residential-led schemes in the borough and with the clear intent on seeking policy compliant affordable housing contributions from other live applications in close proximity to this site (80 Caversham Road and Reading Station Retail Park etc.) affordable housing is justifiably held as an important material public benefit of any scheme considered by the LPA. This application is no exception. Policy H3 along with the NPPF requires such benefits to be realised upon the grant of planning permission, and it is considered consistent that Policy EN4 affords the decision-maker the ability to take into account such provision alongside all other benefits, whether below or above policy compliance. Whilst not explicitly stated within supporting text, the wording of Policy EN4 above effectively allows the LPA to secure such benefits in instances where harm is being caused to a Non-Designated Heritage Asset and wider conflict caused against more general heritage policies (e.g. Policy EN1).
- 6.1.37 In returning to test (a) of paragraph 56, it is established that where the proposal conflicts with other policies in the plan, a higher percentage of affordable housing is therefore capable of being justified. This approach is consistent with other examples in the borough where a higher (than policy required) percentage of affordable housing has been secured to *‘make the development acceptable in planning terms’*.
- 6.1.38 In this instance and as described, there is one primary matter which Officers consider justifies the consideration of a higher than 30% affordable housing requirement. This centres on the partial loss of the Locally Listed frontage building at 71-73 Caversham Road. This engages the primary test under Policy EN4 which requires Officers to assess the public benefits of the scheme as whole (See Heritage section below). Officers therefore have a responsibility to fairly consider the value of the raised affordable housing contribution alongside all other benefits and disbenefits under Policy EN4.
- 6.1.39 With regard to test (b) the provision of affordable housing within any residential development is directly related to the development. This is set out in Section 5 of the NPPF *‘Delivering a sufficient supply of homes’*, the general policies within Section 4.4 of the Council’s Local Plan (2019), and the Council’s Affordable Housing Supplementary Planning Document (2013). Affordable housing is most directly related to a residential-led scheme than any other type of development, in terms of its importance in achieving mixed and balanced communities.
- 6.1.40 With regard to the final test which must be met for a planning obligation to be sought (test (C)), this requires any planning obligation to be fairly and reasonably related in scale and kind to the development to which it relates. The overall proportion of affordable housing being offered as part of this residential-led scheme is considered fairly and reasonably related in scale and kind to the development as a whole. With a minimum equivalent of 34% in total (11% on-site), the proportion of affordable housing represents the smaller portion of the overall residential accommodation provided, with 66% remaining as market tenure housing (89% on site). This is a reasonable proposition in the context of the general housing objectives of the NPPF and Policy H3. The proportion of affordable housing offered is also not considered



disproportionate in context to the general requirements of the local plan, nor represents such a level of provision that it would distort the overall nature of the development proposed. The obligation is therefore considered to meet test (c).

- 6.1.41 In accepting that the tests within paragraph 56 of the NPPF are met, an additional factor which must be considered is any perceived risk that by granting a planning permission that secures an above policy compliant amount of affordable housing, the Local Planning Authority exposes itself to the risk that a subsequent Section 73 application could subsequently be submitted with a reduced affordable housing offer as a result of a change in the applicant's circumstances or those on site, with the risk that the Local Planning Authority may be obliged to grant such an application. Officers have considered this possible scenario carefully in consultation with the Council's Planning Solicitor and Valuers.
- 6.1.42 Firstly, it has been agreed between officers and the applicant that the description of development should be amended to include specific reference to the onsite provision of 5 affordable units of which the tenure is to be agreed. Following the *Finney* (Court of Appeal) decision in 2020, the description of original permission can no longer be altered by a Section 73 application or a condition included which purports to alter that description. Therefore, the 11% on-site affordable housing would be secured and would be included within the S106 Legal Agreement. Any intention to alter this on-site obligation would require a whole new (full) planning application.
- 6.1.43 With regard to the off-site financial contribution (amounting to £500,000) this would also be secured via a S106 Legal Agreement relating to the planning permission. Firstly, whilst any subsequent application received would be considered on its own merits, a negative financial position which would come about as a result of such an improved offer is made at the developer's own risk and made under the full understanding that the original and revised FVA information submitted as part of this application is on record (confidentially) and has formed the basis of agreed affordable housing position.
- 6.1.44 Whilst there is no specific policy or guidance preventing the current improved offer being made or accepted, legal advice was sought by officers to establish whether any Section 73 application could result in a reduction of this part of the affordable housing contribution. This advice confirms that the earlier 'intent' of the Council is a material consideration in any subsequent assessment of a Section 73 application. So for example, should Members resolve to grant permission at your meeting, the Committee could reasonably refuse a future application, if the original public benefits of the scheme as a whole diminish to such an extent that they no longer outweigh the harm caused.
- 6.1.45 To summarise, whilst the Affordable Housing offer is the equivalent of 40% as shared ownership tenure, it is more relevant to consider it the equivalent of a 34% policy compliant 50/50 split. Whilst the 11% on site provision of shared-ownership units is not the primary tenure need in the borough, the fact the Council is able to secure commitment from the developer to deliver a significantly greater AH contribution as part of the permission (including the flexibility offered by the £500k) is considered to outweigh the risk posed by a SPD compliant tenure split that may prove less attractive to an RP because of the physical limitation of the proposed building. Either way, both

compliant and non-compliant tenure options are in excess of the Council's 30% policy requirement. As such, this would constitute a significant and tangible public benefit of the proposal and provide a welcome and material contribution to local affordable housing needs in the borough. This would be secured via S106 agreement and be considered as part of the overall planning balance for the scheme in a later section of this report. This does not negate the need for all other matters, including heritage, to be considered in detail.

## 6.2 Heritage

### The building's status

- 6.2.1 England has an established statutory system for the formal listing of buildings of architectural or historic interest. These are buildings which are objectively assessed by Historic England as being of architectural or historic interest and which are then included on the Statutory List under the Planning (Listed Buildings and Conservation Areas) Act 1990. Buildings which are not included in the statutory list are, by definition, not of listable quality.
- 6.2.2 In addition to the above mechanisms, LPAs have their own power to compile lists of individually 'locally listed' buildings which are not of listable quality but are considered of local historic or architectural significance. It is important to note that the inclusion of a building in a 'local list' does not afford it any formal legal protection, has no statutory effect and does not affect the legal status of that building. The Council's Local Plan confirms *"Local heritage assets do not qualify for statutory listing and are not protected from loss in the same way as listed assets"*. It is important to note that such buildings which are located outside of a Conservation Area could also be subject to demolition under Part 11 Class B (demolition of buildings) of the General Permitted Development Order 2015 (as amended) without the express need for planning permission.
- 6.2.3 Whilst not benefiting from any formal legal protection, such buildings are recognised by the NPPF as 'non-designated heritage assets' (NDHAs). Accordingly, the effect any development proposal would have on a locally listed building as an NDHA must be considered carefully and in accordance with local policy and the overarching sustainable development objectives of the NPPF. This approach is consistent with any other building of heritage value that is not afforded legal protection of the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990. The PPG provides a definition of non-designated heritage assets in paragraph 39: *"Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets."*
- 6.2.4 The fact that a building or buildings is included in a 'local list' is considered an important material consideration in the determination of any planning application that relates to development which would affect the building in question, as in this case.
- 6.2.5 By way of background, the Council received a completed local listing nomination from the Bell Tower Community Association. Following an assessment of the buildings under the Council's adopted local listing process, the Council notified the landowner that the collection of buildings on the site were added to Reading Borough's List of Locally Important Buildings and

Structures on 11<sup>th</sup> February 2020. All buildings on site were considered to meet the adopted criteria. It should be noted that the Council's local listing process is independent of the formal planning application process and is not covered by the Planning (Listed Buildings and Conservation Areas) Act 1990.



Figure 8- Caversham Road and Northfield Road elevations

- 6.2.6 This local listing decision was appealed by the applicant against the backdrop of comprehensive pre-application engagement, independent design review, community engagement and meetings with local Ward Members prior to the local listing nomination being received. The main reasons for the appeal was firstly the applicant's view that the specific building for which this application relates did not possess sufficient heritage significance to warrant local listing, and secondly that Historic England best practice guidance on local listing was not followed.
- 6.2.7 Whilst outside the scope of this planning application and not for debate at Planning Applications Committee, the Council's established Local Listing procedure has been followed and the decision to locally list these buildings has been justified on the historical and architectural merits of the buildings in question, in accordance with the Council's criteria for local listing. As part of this planning application, the LPA has a duty to consider the proposed development's impact on these NDHAs along with due regard to all other material considerations as required by Section 38(6) of the planning and Compulsory Purchase act 2004 and the provisions of the NPPF as stated above.

#### Policy tests

- 6.2.8 The proposals would involve the complete loss of 71-73 Caversham Road whilst the Malthouse and Brewery building to the rear would be retained in their current form. This constitutes a partial loss of the locally listed

structures. The building being demolished (71-73 Caversham Road) is recognised by Officers as being a notable historic building and inherently contributes to this part of Caversham Road. It is therefore necessary to consider the development proposal against the relevant national and local policy criteria. This primarily consists of Section 16 of the NPPF 'Conserving and enhancing the historic Environment', Policy EN1 'Protection and Enhancement of the Historic Environment' and Policy EN4 'Locally Important Heritage Assets' contained within the Local Plan.

#### *National Policy*

- 6.2.9 Paragraph 197 of the NPPF concerns the effect of an application on the significance of a Non-Designated Heritage Asset (NDHA). It states that such effects *"should be taken into account in determining the application"*. It goes on to qualify that *"In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.
- 6.2.10 Unlike paragraphs 195 and 196 of the Framework which relate specifically to Designated Heritage Assets (DHA) e.g. Listed Buildings and Conservation Areas, which are concerned solely with the effect of the application on the asset itself, Paragraph 197 calls for the weighing of the application as a whole (including what would replace the NDHA - which is considered later in this report). Furthermore, unlike those tests relevant to a DHA, which impose a presumption against the grant of permission which would cause harm to a heritage asset, Paragraph 197 merely requires a 'balanced judgement' to be made by the decision maker. Unlike those earlier paragraphs and as established by Case Law, Paragraph 197 does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter. This is a matter for the LPA, with Officers required to apply the policy test in Paragraph 197 of the NPPF to this proposal alongside the relevant local plan policies.

#### *Local Policy*

- 6.2.11 Firstly, Policy EN1 'Protection and Enhancement of the Historic Environment' of the Local Plan specifically seeks to ensure that assets on the Local List are protected and where possible enhanced. As a starting point, the policy requires proposals to avoid harm in the first instance. The policy does recognise that should any loss of a heritage asset occur, this must be accompanied by clear and convincing justification, usually in the form of public benefits. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement, which duly accompanies this application.
- 6.2.12 Policy EN4: 'Locally Important Heritage Assets' is most relevant, as it is the most specific local policy which affects locally important heritage assets. Policy EN4 seeks to ensure that development which specifically affects locally important heritage assets conserve the architectural, archaeological or historical significance of the asset. It is important to note, that like EN1, this policy also recognises that *"Planning permission may be granted in cases where a proposal could result in the loss of a locally important heritage asset"* subject to certain criteria being met. As this proposal results in the loss of part of a Locally Important Heritage Asset, the following tests contained within this policy must be considered and met for any such loss to

be supported. The policy wording contains the following three requirements relevant to this planning application:

1) *"Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance".*

(Officer's emphasis)

2) *"Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals."*

(Officer's emphasis)

3) *"Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality."*

6.2.13 It is clear that Criteria 1) of Policy EN4 must be satisfied before Criteria 2) and 3) can then be considered. The reason being, retention would only ever be 'not important' as described by Criteria 2), if Criteria 1) was satisfied. Furthermore, Criteria 3) references the assessment of any replacement building, which would only be considered if the principle of replacing the building was accepted as part of 1). Paragraph 4.2.20 of the policy's supporting text identifies the preference that such buildings should be reused where possible, and modifications made to reduce carbon emissions and secure sustainable development without harming the significance of them in order to help mitigate against the effects of climate change.

6.2.14 As the proposal results in the total loss of 71-73 Caversham Road, it is necessary to consider Criteria 1) of Policy EN4, and whether the "benefits of the development significantly outweigh the asset's significance" (Officer emphasis). It is therefore necessary to establish the asset's significance prior to considering whether any benefits identified as a whole, significantly outweigh it.

#### Significance and benefits

6.2.15 In first establishing the asset's significance, it is helpful to consider Annex 2 of the NPPF which provides the following definition of 'Significance'. This is defined as "*The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*". In understanding 'significance', it is also necessary to consider what information is available to inform the LPA conclusion on such matters.

6.2.16 Although the building lies within a prominent position along the Caversham Road and is locally well known, there is no specific reference to the building itself within any adopted development plan documents or adopted Supplementary Planning Document (SPD). As the building is not within a Conservation Area, there is no Conservation Area Appraisal that contains an identification of the building's significance to the area in question. The building is also not located within a distinct character area that benefits from an adopted area design appraisal, nor is there a specific Heritage SPD which

outlines the Council's approach to NDHAs. Alongside national guidance, and general local policy there is a need for officers to consider the information contained within both the local listing entry, applicant's Heritage Statement and Council's Heritage Consultant response in order to inform a view as to the significance of the building and its contribution to the character and appearance of the area.

6.2.17 The Council's local list entry (LL15) states the following:

*A collection of buildings at the corner of Caversham Road and Northfield Road, with strong historical/social and industrial connections to the Reading beer industry. The original owner, Henry Pendlebury Dowson, was a notable Reading figure. He was a well-known local businessman and maltster who owned two other malthouses in Reading. The buildings were built for the purposes of malting in the latter part of the Nineteenth Century, but these were later converted to other commercial uses; although the principal structures survive. The buildings contain features notable to the area and the industry such as patterned brickwork and decorative arches and are an important feature in the local townscape.*

6.2.18 A Local Listing entry considers buildings under three main categories, historic interest, architectural interest and townscape value. In terms of historical interest, the listing identifies the fact the buildings were clearly owned by a well-known local businessman/maltster (for 30 years), and directly relate to the town's industrial heritage (in brewing). In terms of architectural interest, the buildings undoubtedly display a strong sense of their original function, with the facades considered to be of interest and reflective of the town's once extensive and important malting industry (despite having undergone significant alterations). Given the similarities between the buildings on the site, their traditional and industrial character contributes to the architectural value of the buildings as a group.

6.2.19 Finally, in terms of townscape value, the local listing rightly identifies the buildings (in particular 71-73 Caversham Road), as prominent structures when viewed from Caversham Road, and one which is recognisable as having had an industrial use in the past. The prominence of these buildings is brought into sharper relief as they are inevitably viewed in isolation to the more modern and far less pleasing neighbouring commercial buildings built in the late 20<sup>th</sup> Century. In this respect 71-73 Caversham Road is often referred to as an informal local landmark, primarily with its more recent association with 'Drews' the ironmonger.

6.2.20 The local listing concludes as follows *"Based on evidence currently available, there is considered to be a high level of architectural significance with these buildings dating from between 1840-1913, being substantially complete and unaltered, although accepting that they have been adapted for other uses over the years. The buildings have strong Historical, Industrial and Architectural interest, as detailed above."*

6.2.21 The applicant's Heritage Statement is an extensive document which considers the historic development of the site and surroundings, the form and condition of the building itself, with a detailed assessment of significance and the impact of the proposed development.



6.2.22 In terms of the building itself and significance, it identifies the fact that 71-73 Caversham Road contains a number of interesting historic features which are reflective of its former use and age. These consist of bricked/boarded up doorways and window openings, ghost lettering on the Northfield Road elevation spelling 'S-M-A-L-L-B-O-N-E' (the name of the motor engineering company that occupied the site from 1925-1947).

6.2.23 The statement also identifies the main alterations which have occurred to the building. These concern the rear elevation of the main building which was wholly rebuilt at some point between 1971-1988 and is characterised by poor-quality brickwork (See Figure 9 below). The building has also experienced the demolition of a large element (approximately one-third), again between 1977-81, and the rebuilding of a large proportion of the interior with a new steel structure and associated re-roofing. In addition, infilling has occurred between the buildings along with the rebuilding of large portions of the interior.



Figure 9 - Rear elevation

6.2.24 Of note is the 1980s corrugated metal and glass extension to the front elevation which is of poor architectural quality and detracts from the traditional frontage when viewed along Caversham Road (Figure 8). This is symptomatic of the building having been adapted and used for various purposes throughout its life.

- 6.2.25 With regard to the interior of the building, this unfortunately retains little true sense of its historic architectural character, due to modernisation and adaptation which has come about during intervening 120 years of commercial use. In this regard, the internal structure of the building appears to have been largely or wholly rebuilt, with a steel framed system of new columns and roof trusses, which based on their appearance, are believed to date from the 1960s onwards. This was confirmed during a site visit and the planning history listed in section 3 identifies such alterations.
- 6.2.26 With regard to the smaller Brewery and Malthouse buildings to the rear, the elevations of these rear buildings are less altered than the main building, and their more recent uses as office accommodation appears relatively sympathetic as an alternative sustainable use (See Fig 11).
- 6.2.27 The Council's Heritage Consultant has considered the background evidence for the local listing entry and similarly has relied upon advice provided by Amber Patrick (an acknowledged expert on Malting buildings). These comments restate those elements within the Local listing entry which contribute to its architectural and historic value, namely the historical association of the building and its industrial and architectural importance.
- 6.2.28 As the building is located directly onto a busy stretch of the IDR, the four lanes of continuous traffic do not create the most pleasant human scale environment from which meaningful cultural enjoyment of the buildings can occur. Furthermore, whilst visible from the north and south along this stretch of Caversham Road, the building is a significant distance from any pedestrianised areas, open space or urban squares from which the building's inherent historical value and architectural interest can be appreciated or enjoyed in relation to its original context. Nonetheless, as described above, the building is considered a well-known local landmark and undoubtedly contributes to the character of this part of the town.
- 6.2.29 It must also be recognised that the buildings have spent the vast proportion of their lives (almost 120 years out of a total of 150 years) in wider commercial use rather than as an integral part of the town past brewing heritage. Not uncommon throughout Reading, the buildings themselves are constructed in red brick, with a string course, dentil course or saw tooth detailing under the eaves and decoration around the window openings, as seen. Whilst not architectural unique this does not detract from the pleasing and locally significant contribution that they make to what is generally considered an uninspiring stretch of Caversham Road. Maltings were once common in the town, but where examples survive, now remain isolated and functionally detached from their original historic purpose. The fact they constitute one of the last physical remains of the town's industrial heritage - which is increasingly at risk of being lost - adds to their importance locally and adds additional weight to their significance.
- 6.2.30 In considering the condition of buildings, observations made when visiting the site and with due regard to the local listing entry and supporting evidence submitted with this application, Officers consider the significance of these buildings to be derived less from their specific historic association with any one person, historical setting or architectural style, but more reliant upon their unique physical presence, visual link with the town's industrial past and the interest they provide to this specific part of Caversham Road. This is further informed by public consultation exercise undertaken as part of this planning application and the how the NPPF's ordinary definition of



'Significance'. In this regard, the buildings as a cluster and as NDHA are considered to be of high local significance through common association, but lack evidence to demonstrate wider significance given their isolated context and altered condition.

- 6.2.31 Notwithstanding this significance, it remains necessary for the benefits of the development to be identified before an accurate assessment can be undertaken against Criteria 1 of Policy EN4.
- 6.2.32 So far in this report it has been identified that the proposal would provide a suitable form of mixed-use development (land use), an appropriate residential mix and density for the location, and make a substantial contribution towards affordable housing provision within the borough. However, an assessment of character/design, natural environmental credentials, sustainability, amenity and transport is still to be made.
- 6.2.33 Therefore, officers must defer making a full assessment as to whether the benefits of the development (as a whole) would significantly outweigh the asset's established level of significance as required by Policy EN4 until the end of the report where all the benefits and disbenefits of the proposal are able to be considered in their entirety.

### **6.3 Character and design**

- 6.3.1 One key aspect of considering the proposed development against paragraph 179 of the NPPF and the Local Plan Heritage criteria would be understanding the merits of any replacement building on site. This would include the layout, scale and external appearance of the proposed block in relation to those existing and future surrounding land uses. It should be noted that the views of the Council's independent Design Review Panel (DRP) were sought at pre-application stage, and this has informed the proposal before you.
- 6.3.2 Section 12 of the NPPF 'Achieving well-designed places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high-quality places. Paragraph 127 of the NPPF includes the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 6.3.3 The Government's National Design Guide 2019 (NDG) is clear that well-designed places contribute to local distinctiveness. This may include introducing built form and appearance that adds new character and difference to places or reinforcing existing features to create a positive and coherent identity that residents and local communities can identify with.
- 6.3.4 Policy CC7 'Design and the Public Realm' sets out the local requirements with regard to design of new development and requires that all developments must be of high design quality that maintains and enhances the character and appearance of the area in which it is located. The aspects of design include: layout: urban structure and urban grain; landscape; density and mix; scale: height and massing; and architectural detail and materials.
- 6.3.5 Any proposal will be considered carefully against this policy, including heights, building lines, and plot coverage, of adjacent sites, taking into

account the existing built form/ footprint. These points will be considered under the following sub-headings.

### Layout

- 6.3.6 The proposed development is considered to build on and respect the existing grid layout structure of Reading's central area, providing continuity and enclosure through appropriate relationships between buildings and spaces. In terms of the proposed building, the footprint and frontages continue to align with the historic frontage established by the existing building and those created by neighbouring buildings. The inclusion of a colonnade to the principal elevation provides additional set back and greater pedestrian space from what is recognised as a busy and unpleasant stretch road. As such, this approach to the building frontage is welcomed. On the much quieter Northfield Road, the footprint of the building broadly follows that of the existing vacant building, with small divergences (both within and outside the current footprint) at various points.
- 6.3.7 The proposed layout along with the colonnade along its key frontage is not considered to conflict with the envisaged format of development being brought forward on the Major CR11e site opposite or to the north and south along Caversham Road. Therefore, in this respect the proposal is considered to respond positively to its local context and reinforce the existing grid structure which exists at this part of town as required by Policy CC7, the NDG and NPPF.

### Scale

- 6.3.8 Scale refers to perception of size, and this is often understood in relative terms. Generally, there are two types of scale: the general scale, meaning the size of the building in relation to the building next to it; and the Human scale, the size of the building or elements relative to the dimensions of people e.g. entrances and the street scene.
- 6.3.9 As described above, the site occupies a transition zone between much larger scale emerging development to the east (80 Caversham Road site) which proposes 8 storeys and a site frontage onto Caversham Road opposite of over 100m, and contrastingly the more domestic 2-3 storeys residential area to the west. The site is also a prominent corner plot, where the relationship of the building is largely determined by its position fronting onto what is the town main orbital traffic route. When considering the general scale and proportions of this proposal, it is important to acknowledge that the building will be primarily read when approaching from the north/south and from immediately to the west along Northfield Road. In responding to this context, the development proposes seven storeys fronting Caversham Road, stepping down to five storeys at the rear along Northfield Road.
- 6.3.10 At seven storeys, the overall height of the new block would signify a visually discernible reduction from the heights envisaged in policy and pending planning applications for the developments sites on the opposite side of the IDR. . However, when viewed along the Caversham Road, this would not amount to a significant difference in overall height between the two sites; nor would it clearly indicate the proposal was within a transition zone to lower scaled buildings to the west. Yet, it is worth recognising that the proposal has a much narrower plot frontage than the pending planning application on the former Royal Mail sorting office site to the east, the

Shurgard Self Storage site to the north or 69 Caversham Road to the south for that matter. Therefore, whilst appearing to a certain extent as a continuation of the scale of the redevelopments opposite (Fig 10 below), officers consider that the overall height of the building would not translate to any significant or extensive increase in built form along Caversham Road itself. In this regard, officers are also of the view that no harmful tunnelling affect would be created because of the narrowness of the frontage and the fact it occupies a corner plot.

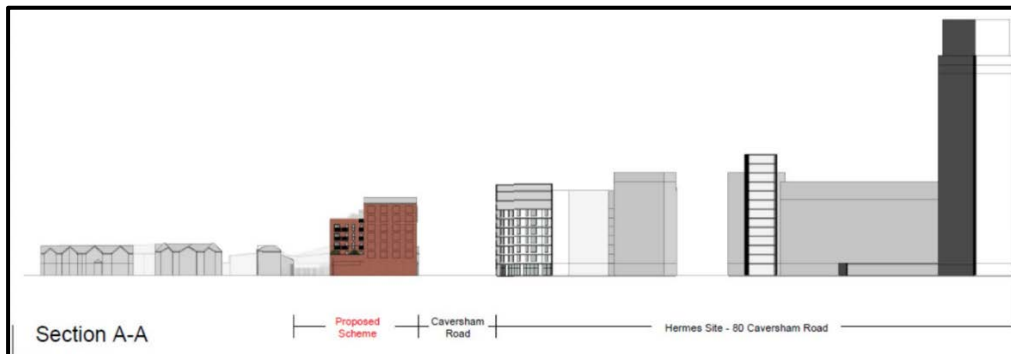


Figure 10 - Section of comparable building heights (Approved 80 Caversham Road)

- 6.3.11 To the west, The Brewery and The Malthouse are of a much-reduced scale to both that of the proposed or existing building which front onto the IDR. Considering their position between 71-73 Caversham Road and the three-storey block of flats at Monmouth Court, it is recognised that these buildings experience a far greater degree of visual detachment from the more traditional and extensive terrace rows to the west or the larger lower density commercial buildings which currently occupy the Caversham Road frontage. Beyond Monmouth Court along Northfield Road (approximately 66m from the new development) is the first terrace house. Given the orientation and distance of those more traditional terraces to the west, only the top proportion of the building would be viewed from the rear gardens of certain terraces at a minimum distance of 85m, and likely to be viewed against the backdrop of the much taller and far greater massing of the 80 Caversham Road development along Caversham Road.
- 6.3.12 The western part of the proposed building reduces to 5-storey closest to The Brewery and The Malthouse. This scale responds more directly to a transition to the Monmouth Court flats rather than The Brewery and The Malthouse itself. The transition to The Brewery and The Malthouse is considered rather more abrupt, with a sharp reduction in scale from 5-storeys, to 2.5 storey and then rising slightly to Monmouth Court at three storeys (See Fig 10 above). Officers must consider whether the proposed scale and the stepped approach to the west would offer a positive degree of visual coherence between these buildings.
- 6.3.13 By way of context, when approaching the IDR in Reading from secondary or arterial routes leading into town, the character and role of buildings that front onto the town's main orbital road distinctly change. This can be seen most clearly at the junctions of the IDR with Southampton Street, Weldale Street, Church Street, Castle Hill, East Street and Watlington Street. In overall terms, whilst taller than neighbouring buildings further away from the IDR, the increase in scale of such buildings is considered appropriate in the context of their transitional location, announcing the start of the defined central and office Core, and Town Centre beyond.

6.3.14 Notwithstanding this, the more abrupt step down would be noticeable from the quiet and secondary nature of Northfield Road. The traditional relationship 71-73 Caversham Road has with the IDR (as a principal movement corridor in which the most 'trade' would be generated for its former commercial use), does not negate the need for this development to proportionately scale down to the more modest Brewery and Malthouse buildings, which will be separated by an open parking area. The proposal would not result in the most sympathetic transition between these two parts of the site, as the difference in scale (7 to 5 to 2.5 storey) would occur over a small distance and be noticeable when approaching Caversham Road from the west.



Fig 11 - The Brewery and Malthouse buildings looking west

6.3.15 The nearest residential terraces are considered to be a sufficient distance from the development site and largely screened by Monmouth Court itself. Furthermore, when viewed in context with the possible development at 80 Caversham Road or the Shurgard Self Storage site (should the site allocation be fulfilled), the scheme is unlikely to be viewed in isolation to those existing adjoining low-density commercial uses in the longer term.

6.3.16 Notwithstanding this, the reduction in height to the more domestic-scale Brewery and Malthouse building would make the proposal appear prominent within the street scene of Northfield Road at close proximity but would not introduce an unfamiliar or significantly harmful relationship that is not already found between much larger 'town centre' buildings and smaller more historic buildings, especially when approaching the IDR from quieter secondary routes within the town.

6.3.17 With regard to the human scale of the proposal, the ground floor entrances to the commercial unit and residential units are considered well-articulated, with a 1.5 storey colonnade facing both the Caversham Road and Northfield Road. The colonnade successfully defines the building at street level and provides this corner plot with much-needed definition and activity at street level. This creates a degree of local character and distinctiveness, which does not currently exist, and this design feature is welcomed.

6.3.18 In conclusion, it is felt that a development of this scale sits comfortably opposite planned redevelopment and is reflective of many such buildings that front onto the IDR. However the relationship to with its smaller and more characterful neighbours to the west (The Brewery and Malthouse) whilst not the most harmonious, is not uncommon and must be weighed in the overall balance. The human scale of the development and the individual site characteristics mean that overall the proposed scale is not considered to cause a significant level of harm to the immediate or wider character of the area.

6.3.19 It should be noted that any conclusion regarding scale must be considered in conjunction with the development's overall design and its wider impacts upon affected heritage assets in the planning balance.

### Design

6.3.20 In turning to the detailed design of the replacement building, the Council's Design Review Panel (DRP) assessed this proposal at pre-application stage. Whilst not Locally Listed at the time, the Panel were considering purely the merits of the replacement building and this has informed the design evolution of the scheme now presented.

6.3.21 The Panel accepted that the site is in a low-density commercial area where various sites are presently coming forwards, and an opportunity exists for any replacement building to contribute the regeneration of this part of the town and be 'architecturally significant'. Earlier iterations were not considered to benefit from a compelling design rationale, with a main facade being "too busy" and uncomfortable. The DRP recommended a less complex and fussy approach be explored, recommending any worked up proposal references the site's plot width (rather than the pretence of two buildings which previously existed - suggesting the verticality of a residential Victorian or Georgian typology).

6.3.22 A 1.5 storey ground floor commercial element was considered to better link its commercial use to those adjoining units to the south and provide better articulation as a plinth for the re-worked upper floors. With a 5-storey middle section and 1 storey top section, the approach proposed was considered better able to accord with the tall buildings policy. By avoiding an oversimplified grid, this was felt to offer the opportunity for improved accommodation and a more defined roofline and silhouette (See Fig 12 below).

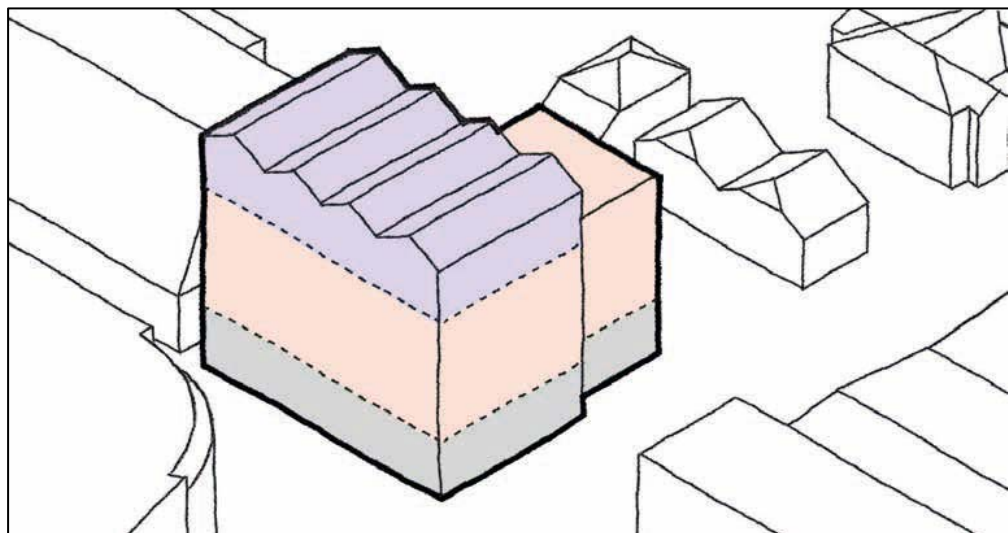


Figure 12 - Showing the distinct base, middle and upper sections to the building

6.3.23 The articulated roof (consisting multiple pitches), was considered to create an interesting roofscape to the top section of the building, with symmetrical gable ends creates contextual roofline. This acknowledges the town's past industrial heritage. The grid applied to each primary facade is considered to



respond to massing of the roof and create a pleasing windows alignment (See Fig 13 below). Officers support this robust urban design approach.

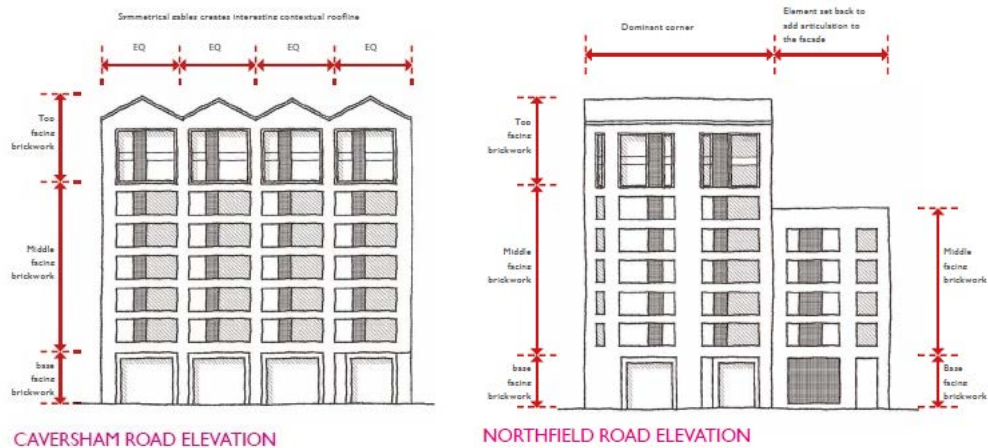


Fig 13 - Showing window alignment and façade treatment

6.3.24 The National Design Guide supports the need for any replacement building to have regard to its context, not only historically, but in terms of occupying a key position fronting onto the town's main orbital/arterial route and is situated a short distance from the commercial core. Currently the surrounding modern buildings are not considered high quality or imbued with a distinctive character reflecting any historic significance. Officers therefore consider replicating any such approach is also not considered good design.

6.3.25 In terms of architectural detailing and the need to bring forward those positive identified features found on the existing building, the green glazed brick arch to the Northfield Road façade is replicated twice in framing the entrances to the new commercial unit. Brick detailing to the former malthouse Building is able to be integrated to the upper floor façade through material treatment, whilst the recessed brick to mock window is replicated successfully on the southern elevation (See Fig 13 above).



Figure 14 - Initial bay detail & material use (view from north and south along of Caversham Road)

6.3.26 In responding to design feedback, the ground floor proportions were taken on board, whilst the use of red brick, a reduced material palette and less fussy articulation was considered to display a much more visually coherent appearance, and one which acknowledged as far as possible on a replacement building of this scale, the site's former historic significance. Two distinct roof

gardens are now included for residents, providing a degree of usable amenity space and adding interest to the rear and side elevation. Overall, the design approach of the current application is considered to successfully respond to the feedback from Officers and the DRP.



Fig 15: CGI of proposed scheme looking south along Northfield Road

- 6.3.27 Further to the above, Officers in conjunction with the Council's Natural Environment Team actively pursued the need to enhance the public realm around the building, providing more opportunity for both human interaction soft landscaping. To replicate the narrow pinch point current experienced whilst walking past the site along Northfield Road and into Caversham Road at the pedestrian crossing would not take advantage of the opportunities presented as part of this redevelopment scheme.
- 6.3.28 This led to the introduction of a colonnade around the two principal elevations of the building, framing the commercial entrance and providing welcome relief to the busy Caversham Road. This is not only considered to enliven and enhance what is currently a blank and poorly-surveyed façade to both streets (See Fig 8), but in conjunction with the proposed flexible commercial use, glazed frontage and ambitious green wall framing the colonnade, the development will encourage greater public interaction and reinforce the site's prominent corner plot position. In this respect the development is considered to perform a positive role and replicate the site's current function as a local landmark. This is considered to provide a welcoming intervention on what is currently a busy and unpleasant crossing between the station and the more traditional residential terraced streets to the west.
- 6.3.29 In summary, the design of this replacement building is considered to respond positively to the opportunity created by the immediate area's lack of street activity and seeks to raise design standards through a more distinctive building and ultimately creating a greater sense of place to the junction with Northfield Road and Caversham Road. This approach is also considered to compliment the planned development sites on the opposite side of the IDR.

6.3.30 The proposal is considered to represent a robust design overall, and through its articulation and materiality, successfully integrates with both the more modern planned development in the vicinity and that more traditional 'red brick' industrial style of development which currently exists to west. Notwithstanding those concerns identified with regard to the overall scale of the building and neighbouring relationship, the particulars of the proposed design at street level are supported and considered on balance to outweigh the limited harm caused by the transition of the 5-storey element to existing buildings to the west.

#### **6.4 Natural environment**

6.4.1 The Local Plan recognises the importance of natural features, the valuable contribution they can make to a place and to people's quality of life, especially in a developed urban area like Reading. There is a need for development in such locations to take all opportunities realistically available to integrated additional natural features into the overall design. These include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting etc. This is a key aspect in demonstrating the Council's ambition and commitment to tackling climate change and supported through the Council's Tree Strategy.

6.4.2 The current site is occupied by vacant commercial buildings and hard standing. The site contains no soft landscaping or natural vegetation. Considering the site's size and proximity to the IDR, the opportunities for significantly enhanced greening are currently limited. Whilst acknowledging the absence of any ecological and environmental contribution, there is the need to consider how the site's natural environmental role can be substantially enhanced as part of the development.

6.4.3 As described above, as a result of engagement with Officers, revised plans were received which included an enhanced landscaping package. This included the incorporation a green wall to the Caversham Road and Northfield Road frontage, architectural planters to the parapet edges of the communal roof terraces, additional tree planting within the car park, additional planting and removal of brick edges to the parking spaces along the western boundary and the incorporation of planters to the window-facing elements of the winter gardens on the eastern facade.

#### Green infrastructure

6.4.4 The proposed green wall would frame the colonnade arches and compliment the enhanced supplemental landscaping to the site perimeter onto Northfield Road (see Fig 16 below)





Figure 16 - Visual of soft landscaping when viewed southeast along Northfield Road.

- 6.4.5 This green wall is considered to be an effective means of improving the sustainability credentials of the building, increasing thermal insulation and providing pollution filtration along the heavily trafficked Caversham Road frontage. Given the limited space between the historical building line the pavement, it is considered a positive and creative way of allowing this site to make a contribution practically and visually to local green infrastructure, where limited opportunities would otherwise have existed given its location, use and any required future density. As described, this feature combined with the extended colonnade, creates welcoming and enlarged public realm around the building. The details of the green wall, alongside its ongoing maintenance, would be secured specifically via an amended landscaping condition and this is considered reasonable.
- 6.4.6 The proposal also seeks to maximise soft landscaping through the provision of two landscaped roof terraces which offer good opportunities for soft landscaping in addition to the site boundary along the Northfield Road entrance. To the entrance are two trees. The overall species mix and ongoing management/maintenance can also be secured via condition.
- 6.4.7 The Council will seek to ensure that hard and soft landscaping is designed in conjunction with the onsite drainage connecting planting pits with the proposed soakaways and drainage systems in this area so that the trees and smaller plants can filter surface water within the site. This will be secured as part of any drainage condition.
- 6.4.8 In considering the level of 'greening' that can be realistically secured on a previously developed site in a central urban location, Officers are now of the view that from a natural environment perspective, the development provides a meaningful contribution to the town's environment and performs a considerably greater role than the existing vacant commercial unit does. The green wall, two landscaped terraces, tree planting and soft landscaping is an innovative and considered package to enhance green infrastructure on this brownfield site in a prominent location on a busy road frontage. This positive contribution is afforded significant weight in the overall balance.

#### Ecology and trees

- 6.4.9 The Council's Ecologist has raised no objection to the proposal subject to conditions ensuring habitat enhancement measures be secured. Tree planting to the front of the site on highway land (the footway) was explored

at length with the developer and the Council Transport Team, however the technical limitations posed by the proximity to the existing pedestrian crossing with underground and above ground infrastructure along with the narrowness of the footways prevented this from being pursued. However, two trees are proposed to the Northfield Road frontage framing the access into the parking area. In line with the forthcoming revised Tree Strategy and Biodiversity Action plan, tree planting can be secured as wildlife friendly (in line with an appropriately worded condition) to achieve compliance with policies.

#### Flood risk and drainage

- 6.4.10 Policy EN18 (Flooding) seeks that development should not increase the risk of flooding and that major schemes should include provision of sustainable drainage systems (SuDs).
- 6.4.11 The site is located within Flood Zone 2. As a more vulnerable development in terms of flood risk classification any planning application is required to successfully demonstrate that it has passed the flood risk sequential test. The sequential test seeks to steer new development to areas with the lowest probability of flooding.
- 6.4.12 The Council's latest 'Housing and Economic Land Availability Assessment' (May 2017) (HELAA) notes that 'there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2'.
- 6.4.13 The HELAA and the submitted Sequential Test are felt to adequately demonstrate that there are no reasonably available, sequentially preferable sites within the surrounding area which are at a lower probability of flooding and that would be suitable for the proposed development proposed. On this basis, it is considered that the Sequential Test has been satisfied.
- 6.4.14 A site specific Flood Risk Assessment has also been submitted with this application. All residential accommodation will be located at first floor level and above, significantly above the modelled fluvial flood level. Flood resistance and resilience techniques are recommended to be incorporated at ground floor level and this can be secured via condition. Whilst safe access and egress is not available during a 1 in 100 year plus climate change event, it is recommended that site management and residents sign up to receive free flood warnings from the EA. The residential units at upper floors themselves comprise safe refuge and it is considered that adequate warning will be provided for the retail unit to be evacuated, especially given the proximity of an area wholly outside of the floodplain. Officers recommend that a Flood Management Plan is prepared to detail the actions to be taken before, during and after a potential flood event.
- 6.4.15 As a requirement of the Building Regulations, it is recommended that the ground floor level is elevated 150mm above surrounding ground levels to help mitigate the increase of floodwater from other sources, should an extreme event occur. Officers are able to secure this along with the need to incorporate permeable paving and underground attenuation storage to reduce the surface water discharge rate prior to discharge to the Thames Water surface water sewer. This would be secured via separate conditions.

- 6.4.16 Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the inclusion of surface water attenuation techniques and constitute an improvement to the site's current drainage performance in accordance with Policy.

#### Leisure and open Space

- 6.4.17 Policy CC9 'Securing Infrastructure' provides the basis for justifying infrastructure provision as part of development proposals. Based on the calculation provided by the Council's Leisure Team, the development is liable for a contribution of £92,400 for improvement and extension of existing facilities within the Thames Parks which are in close proximity to the development.

### **6.5 Sustainability**

- 6.5.1 Local Plan Policy H5 'Standards for New Housing' seeks that all new-build housing is built to high design standards. In particular, new housing should adhere to national prescribed space standards, water efficiency standards in excess of the Building Regulations, zero carbon homes standards (for major schemes), and provide at least 5% of dwellings as wheelchair user units. Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.
- 6.5.2 The applicant has submitted a sustainability and energy report as part of the application which follows the relevant policies and Sustainable Design and Construction SPD guidance applying the recognised energy hierarchy of 'be lean', 'be clean' and 'be green'.
- 6.5.3 The information submitted as part of the application demonstrates that through the measures outlined in the energy strategy, for the residential element of the proposal it is anticipated that a 95.1% reduction in CO<sub>2</sub> emissions can be achieved in comparison to a Building Regulations Part L compliant baseline. In line with the Council's Sustainable Design and Construction SPD (2019), a \$106 contribution will be provided to offset the remaining tonnes of CO<sub>2</sub>. This is calculated as £3,510.
- 6.5.4 As the commercial unit will be completed as a 'shell only' assessment, initial simulations show that this could achieve a Building Emission Rate (BER) of 29.5 kgCO<sub>2</sub>/m<sup>2</sup> compared to the Notional Building's Target Emission Rate (TER) of 31.6 kgCO<sub>2</sub>/m<sup>2</sup>, leading to a 6% decrease in carbon emissions when compared to a Part L baseline. Should planning permission be granted, agreement of the final level of the carbon off-setting contribution is delegated to Officers to ensure a review of the calculations has been completed.
- 6.5.5 In terms of decentralised energy provision, the applicant has considered a number of measures with a community Air Source Heat Pump (ASHP) system and Domestic Hot Water generation being selected as the most suitable Low and Zero Carbon technology for site. It is important to note that some roof space will be required for the location of ASHPs. Furthermore, roof mounted

Photo Voltaic cells have been determined to be a suitable technology to support the ASHP system in achieving a Zero Carbon strategy.

- 6.5.6 As described, a sustainable drainage strategy (SuDs) has also been submitted as part of the application. No objection is raised by the Local Flood Authority (RBC Transport), subject to conditions to secure a timetable for its implementation and details of management and maintenance of the scheme and its implementation in accordance with the approved details.
- 6.5.7 Officers are satisfied that the proposals demonstrate a good standard of sustainability and in particular the requirement adhering to zero carbon homes standards and therefore the development is policy compliant in this regard.

## 6.6 Amenity

- 6.6.1 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 and more important than ever in light of the ongoing Covid19 pandemic which is affecting every aspect of urban life. As described earlier in this report, Policy H5 provides a series of standards which all new build housing should be built to. 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, whilst the layout and design of the scheme must have due regard to current nearby and future occupiers.

### Privacy and overlooking

- 6.6.2 In terms of overlooking between future units, the layout of the building has been suitably designed to ensure future occupiers will not suffer from any harmful loss of privacy from existing nearby buildings or other units within the scheme itself. The orientation of windows is generally such that opportunities for direct overlooking is minimised, with this only possible at acute angles and commensurate with a central urban location and the type of accommodation proposed. With regard to the nearest residential neighbours, there would be approximately 27m between the eastern frontage of the development and the proposed western frontage of the proposed development (pending planning application) at 80 Caversham Road opposite on the IDR. To the west there would be approximately 35m between the western elevation of the proposed building and the eastern elevation of Monmouth Court. These distances are considered commensurate with the prevailing urban layout and sufficient to ensure no harmful relationship is created or privacy unacceptably compromised.

### Daylight/sunlight

- 6.6.3 In terms of light effects of developments, the Building Research Establishment (BRE)110 has guidelines on assessing daylight and sunlight effects of development, which the Council applies flexibly given the high-density prevailing character of the central area of the town.
- 6.6.4 In considering the findings of the Daylight and Sunlight report provided by the applicant's light consultant, the report demonstrates that the majority of rooms will meet the BRE recommendations for Average Daylight Factor and Daylight Distribution or will be within a negligible distance. Where the rooms are below negligible, these rooms are situated on the elevation that

faces the proposed scheme opposite at 80 Caversham Road. In considering the content of this report, Officers support the view that any building proposed for this site will struggle to meet the BRE recommendations on this elevation due to the bulk and massing of the proposed scheme at 80 Caversham Road.

- 6.6.5 Having due regard to the particular location of this urban development and its surrounding constraints, it would achieve daylight/sunlight results commensurate with the area within which it is related. Furthermore, it should be noted that given the sufficient distance to the nearest dwellings to the west, this scheme causes the minimum impact on these receptors. No objection is therefore raised to the daylight sunlight findings. It is also calculated in the Sustainability Statement that 100% of the retail unit will meet the required BREEAM daylighting assessment criteria.
- 6.6.6 In terms of microclimate/wind matters, the proposed development is not more than 7 storeys. As Policy CC8 references new development of more than 8 storeys, it is not considered necessary to test conditions around a proposed building of the scale proposed. It is also notable that the proposed colonnade will provide a pleasing relief to pedestrians in poor weather.

#### Internal and external living space

- 6.6.7 The internal layout of the proposed units is arranged so as to create an adequate overall standard of living accommodation for future occupiers. Although the internal shape of the southern-most 2-bed 3-person unit is irregular, the overall size of the units as a whole comply with the national space standards, as do the bedrooms, of which the majority include space for storage. Finally, half of all units are dual aspect, with the remainder providing suitable outlook and access to natural ventilation and private external amenity space.
- 6.6.8 With regard to external space, two types of private amenity space are proposed in the development, conventional projecting balconies and integral winter gardens. The projecting balconies are on the quieter south and west facing facades to allow for maximum sunlight, whilst the winter gardens are on the north and south facing facade along Northfield Road and Caversham in order to provide a more usable type of amenity space that is ultimately sheltered from the noise of the road.
- 6.6.9 Winter gardens are enclosed balconies integral to the building. They benefit from floor-to-ceiling external glass walls, normally with adjustable glass louvre panels. In busy locations near traffic noise (as in this case), or where windy, cold and inclement weather occurs, these winter gardens allow future occupants the ability to better control their environment at any time of the year. The proposed winter gardens also have internal glazing which can be opened to allow air flow into adjacent living areas (See Fig 17 below). In the case of this proposal, they would allow occupants to sit out, dry clothes, and grow plants on the busy Caversham Road elevation, at all time of year.

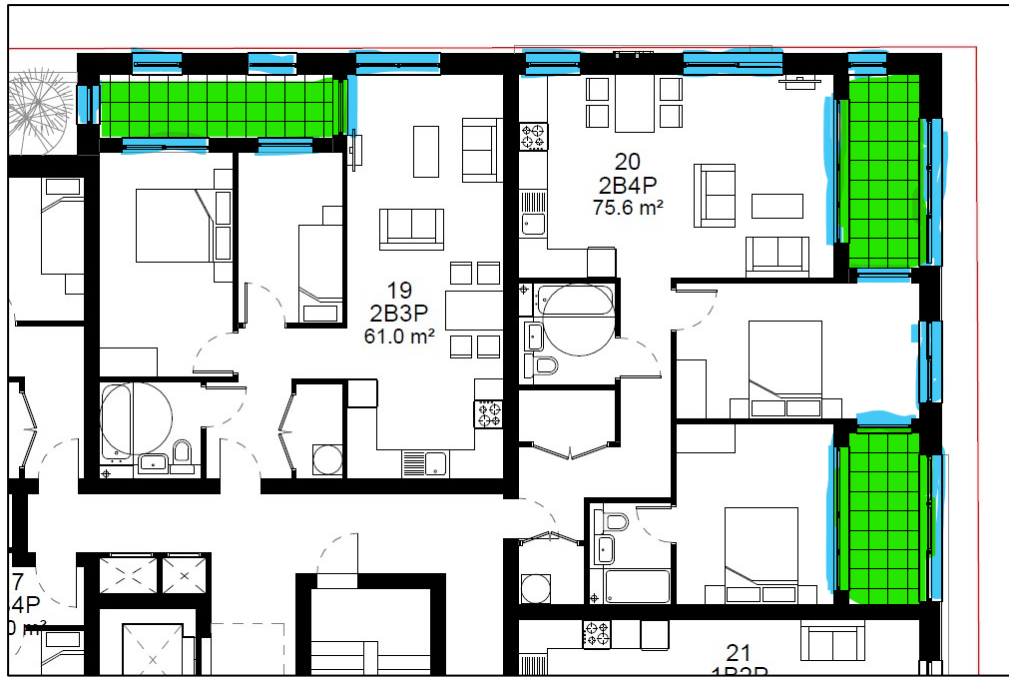


Figure 17 - Typical floor plan showing winter gardens (green) and external and internal glazing (blue)

6.6.10 With regard to communal amenity space, as described above the proposal provides two separate areas. These take the form of a 1st floor shared roof terrace/podium garden of 107sqm and 5th floor shared roof terrace/podium garden of 129sqm (see Fig 18 below). These communal roof gardens allow sitting out, socialising, and general outdoor space for residents. They also offer a safe and pleasant space for residents to relax, work and meet visitors, especially if working from home or to support any unintended or prolonged occupation should the situation require. Detail of the exact arrangement and soft landscaping can be secure via condition.



Figure 18 - Showing 1st and 5th floor roof terrace/podium garden

6.6.11 In summary, the scheme provides a policy compliant range of internal space standards and private amenity provision. Whilst the two communal roof gardens offer additional space to relax, socialise and meet the day to day needs of future occupants.

## Accessibility and lifetime homes

- 6.6.12 Policy H5(f) requires that on all developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in Part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.
- 6.6.13 Officers are satisfied that the accessibility/adaptability of the units can meet these requirements. To ensure these units are provided and maintained as such, a compliance condition is recommended to state that a policy compliant proportion of wheelchair user dwellings are ready prior to first occupation and are retained as such thereafter.
- 6.6.14 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, the overall quality and standard of accommodation strongly supports the requirements of Policy H5. Accordingly, the quality of the accommodation provided is a key tangible planning benefit in the overall planning balance of considerations for this proposal.

## **6.7 Health and wellbeing**

- 6.7.1 The current Covid19 pandemic has highlighted the critical role our urban environment has on the way we live and work. It also highlights how, as a Local Planning Authority, supporting well planned development can have a huge impact on peoples' health, wellbeing, safety and overall comfort. In addition to the above discussion on amenity, the Council has an obligation to consider the following health and wellbeing topics in relation to any new development.
- 6.7.2 Maximising exposure to natural daylight, providing users with an external view and connection to nature are crucial measures in supporting the mental wellbeing of occupants and supported strongly by Policy CC8 'Safeguarding amenity'. As described, for an urban location all proposed flats have access to natural light, and outdoor space, with the smallest 1-bedroom flats benefitting from multiple windows and winter gardens serving bedrooms and living areas. Larger 2/3 bedroom flats have access up to 6 windows (many with dual aspect) along with private balconies/terraces. This access to private and communal outside space would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation should the situation require. The development will maximise the use of natural daylight and reducing the need for artificial light by occupants through generous amounts of glazing.
- 6.7.3 In recognition of the challenges presented by climate change and with due regard to the Council's recently declared climate emergency, extreme temperatures can also have an immediate and detrimental effect on health and wellbeing of residents. Effectively controlling and regulating temperature both in warmer months and those colder months is crucial in maintaining a healthy and comfortable environment which is supported by Policy CC3: 'Adaptation to climate change'. The proposed glazing has been specified to have a G-value of 0.5 which will prevent excessive solar gains, with the majority of units having an east/west principal elevation to avoid

excessive heating. Winter gardens and private balconies provide the opportunity for natural ventilation to habitable rooms.

6.7.4 Crime and the fear of crime also have a major impact on quality of life and the wellbeing of a building occupants. Enabling occupants to feel safe and secure is therefore essential to successful, sustainable communities and is supported by Policy CC7 'Design and the public realm'. The proposed development provides natural surveillance of streets and open spaces between buildings, with the retail entrance and residential lobbies covered by CCTV services and audio/visual entry system. The car park security gate will have security access systems to avoid any intruders entering and all the cycle parking will be secure and accessible via pin pad-controlled entry points. Notwithstanding this, a pre-commencement (barring demolition) condition would still be 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.

6.7.5 As described earlier in this report, green infrastructure and access to green space provides benefits not only to the natural environment, but to the building's occupants. Introducing design elements within a building which supports human interaction with nature can lead to the promotion of a healthy lifestyle through the promotion of exercise, opportunities for relaxation and subsequently reducing stress levels. This development provides all flats with private amenity space in the form of winter gardens, balconies, private roof terraces, and additional access to larger communal roof terraces. This offers the opportunity for fresh air, small scale horticulture, drying of clothes and importantly ventilation of internal spaces. This would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation by residents should the situation require. Accordingly, the above health and wellbeing factors are considered key material planning benefits which must be afforded weight in the overall balance.

## 6.8 Transport

6.8.1 With regard to cycle infrastructure, the signalized pedestrian crossing on Caversham Road adjacent to the site south of Northfield Road is proposed to be upgraded to accommodate cyclists as part of the pending planning application at 80 Caversham Road. Improved access to the north and west for cyclists is a key component of this adjacent application.

6.8.2 This current application includes a scheme to provide an on-carriageway dedicated cycle link along Northfield Road between the Caversham Road crossing and Swansea Road to the west. This will provide connectivity to the northern entrance of the station connecting access to the town centre to the south and Christchurch Meadows to the north as well providing access to schools, leisure and employment in West Reading. In order to facilitate this, land fronting onto Caversham Road adjacent to the pedestrian crossing would need to be offered for adoption to provide a shared pedestrian/cycle facility. This can reasonably be done via a S106 agreement.

6.8.3 An agreement under Section 278 of the Highways Act, 1980, will also be required with respect to proposed works affecting the existing highway. The Highway works are shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.



- 6.8.4 Vehicle access to the site is currently provided via Northfield Road. Caversham Road and the surrounding road network all have extensive parking restrictions preventing on-street parking. The development proposes to consolidate the existing vehicular accesses to the site into a single dropped kerb access. This will provide access to the gated parking area.
- 6.8.5 To maximise space on site, servicing and deliveries will take place on Northfield Road via a new loading bay along the site frontage. This will require a rearrangement of the on-street parking bays through a Traffic Regulation Order (TRO) which will require approval by the Traffic Management Sub Committee (TSUB) and will be subject to statutory consultation. Given TROs are under separate legislation to the Planning Act there is a possibility they may not be approved. However, any costs associated with the changes to the TRO and on-street signage and markings would have to be paid upfront by the applicant before commencement on site.
- 6.8.6 The site is located within Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per unit and 1 space per 10 units for visitor parking. There are 24 parking spaces within the gated car park. The revised proposal indicates that 15 spaces including 2 accessible parking will be provided for the proposed residential element of the development (a ratio of 0.36 spaces per home); and 8 spaces including 1 accessible parking spaces are provided for the existing offices.
- 6.8.7 The proposed parking provision is recognised by the Transport Team as being below the Council's requirements. However, given the site's close proximity to the centre of Reading, and its easy access to public transport connections and the facilities within the town centre, a lower parking provision can be supported in this location and is consistent with meeting the Council's Climate Change obligations. The surrounding road network all has parking restrictions preventing on-street parking, therefore, a reduction in the parking provision will also not lead to on street parking being detrimental to road safety. Parking permit restriction conditions would be applied.
- 6.8.8 The Council's adopted Parking Standards and Design SPD states that developments of more than 10 residential units in the town centre should provide or support a car club on the site or demonstrate that the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator and agreement has been reached for provision or access to a nearby car club to be secured via the S106 agreement.
- 6.8.9 Policy TR5 of the Local Plan states that *"Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point."* In view of this, the development must provide at least 3no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. The proposals include the provision of 3no electric vehicle charging points and this could be secured via condition.

- 6.8.10 All the proposed cycle parking will be secure and accessible via pin pad-controlled entry points. Additional provision of 5 Sheffield stands located in an external but covered area within the car park, provide an additional 10 cycle parking spaces for visitors and other users.
- 6.8.11 Finally, with regard to refuse and waste, the proposed bin store is considered to be conveniently located on the ground floor of the site which will provide easy access for refuse collection from Northfield Road. Therefore, from a transport perspective, no objections are raised to the highway safety, access or parking elements of the scheme. It should be noted that the identified cycle infrastructure improvements to Northfield Road (to be secured via a S106 agreement) are also a wider public benefit of the proposed development.

## 6.9 Environmental Protection

- 6.9.1 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 4.6.1, 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. Separate to Planning, the proposed works are also required to be in accordance with the Borough's Guidance Notes for Activities on the Public Highway.
- 6.9.2 With regard to noise, the submitted noise assessment shows that the recommended standard for internal noise can be met if the recommendations are incorporated. The noise assessment also confirms that sufficient insulation will be incorporated to achieve building regulations between the dwellings and also between the commercial use and the dwellings above. These matters are to be secured via condition.
- 6.9.3 The proposed development is located within an AQMA that is identified as being a pollution hot-spot (likely to breach the EU limit value for NO<sub>2</sub>) and introduces new exposure / receptors, i.e. Residential flats. The submitted Air Quality Assessment (AQA) concludes that the levels of pollutants at the proposed development are not predicted to exceed the limit values therefore mitigation measures are not required. The AQA concludes that there will not be an impact on air quality as a result of the development therefore a mitigation scheme is not required. The Council's Environmental Protection Team do not object to these conclusions.
- 6.9.4 Finally, the submitted contaminated land desk study concludes that further investigation is required in the form of a Phase II site investigation due to the potential presence of contaminants and exposure pathways. Conditions are therefore recommended to ensure that future occupants are not put at undue risk from contamination should development proceed.

## 6.10 S106/Community Infrastructure Levy

6.10.1 The proposals would be liable for CIL and the liability is projected to be £591,000. Albeit this may decrease in practice as the applicant could apply for relief on the on-site affordable housing units and or deferral of payment as permitted under new legislation enacted because of Covid19.

6.10.2 A construction phase Employment Skills and Training Plan would also be secured via the section 106 legal agreement as per the Council's Employment Skills and Training SPD. This could be in the form of a site-specific plan or equivalent a financial contribution. As such, the S106 will secure this in a flexible manner covering both options.

6.10.3 With regard to a planning obligation, a Section 106 Agreement would be required to secure the following heads of terms as described in this report:

- Secure the agreed level of onsite affordable housing (5 units shared ownership) and an off-site commuted sum of £500,000 towards the provision of affordable housing elsewhere in the borough;
- £92,400 Open Space contribution to improve and extend facilities within the Thames Parks
- Ensure land fronting onto Caversham Road is offered for adoption to provide a shared pedestrian/cycle facility;
- Secure resident access to a car club on the site or demonstrate that the development will have access to and the use of a car club on a nearby site. The developer has identified 'Co-wheels' as the preferred Car Club operator.
- Offset the remaining tonnes of CO2 not being captured by the redevelopment as per the Council's Sustainable Design and Construction SPD (2019), estimated to be £3,510 (To be finalised).
- Secure an agreement under Section 278 of the Highways Act 1980, for proposed works affecting the existing highway as shown on Drawing titled Cycle Route Improvement MBSK200205-01 Rev P3.
- Secure a construction phases Employment Skills and Training Plan or equivalent financial contribution. As calculated in the Council's Employment Skills and Training SPD (2013).

6.10.4 Policies CC9 (Securing Infrastructure) and DM3 (Infrastructure Planning) allow for necessary contributions to be secured to ensure that the impacts of a scheme are properly mitigated. It is considered that each of the obligations referred to above would comply with the NPPF and Community Infrastructure Levy (CIL) in that it 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.

## 6.11 Other matters

### Equalities Impact

6.11.1 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 as identified in the Act 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.

### Representations

6.11.2 All matters raised are considered to be covered within the Appraisal section above.

## **7. CONCLUSION**

7.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), an assessment to be made in accordance with the development plan unless material considerations (which include the NPPF) indicate otherwise.

7.2 In returning to Paragraph 197 of the NPPF, there remains the need for the effect of the proposal on the significance of a NDHA to be taken into account in determining the application. It makes it clear that for applications that directly or indirectly affect such assets it will be necessary to carry out a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset. As has already been noted, Policy EN4 contains the primary criteria such a proposal must meet alongside wider heritage policies within the Local Plan and NPPF. Both Policy EN4 and the NPPF contains the need to have regard to the overall public benefits of the development in undertaking this balanced judgement. The established degree of heritage significance meriting consideration in this proposal is also material consideration.

7.3 As described in paragraph 6.2.33, it is therefore necessary to return to the benefits and disbenefits of the proposal in their entirety in undertaking an accurate assessment against Criteria 1 of Policy EN4. These have been considered under the three dimensions of sustainable development, economic, social and the environmental. As heritage relates to the historic environment, heritage and will be considered under 'environmental' dimension as consistent with case law.

### Economic

7.4 During the construction phase, the proposed development would clearly contribute to and encourage associated economic activity within the borough by directly sustaining jobs in the construction industry. This would be supported further by a construction phase Employment Skills and Training Plan which can be secured via the Section 106 legal agreement.

7.5 The proposal would replace an existing vacant commercial unit that would require significant investment to be brought up to modern occupancy standard and an attractive commercial proposition. The more flexible and commercially attractive space created at ground floor as a result of this scheme would support continued employment opportunities within the Town Centre and Office Core, complimenting surrounding future planned non-commercial uses. Through redevelopment of such vacant and under-utilised land, the site would also make an important and positive contribution to the economic recovery of the borough throughout and following the Covid19 pandemic.

- 7.6 In the longer term, future occupants of 44 new dwellings will contribute to the viability and vitality of businesses in the town centre at a time where the economic health of the High Streets is a key Council priority. Other related economic benefits include CIL contributions, the matters set out in the S106 Heads of Terms, as well as the award of new homes bonus payments, business rates and Council Tax receipts to the Council. The development would therefore clearly perform a positive economic role.

### Social

- 7.7 In terms of the social role, the proposal will undoubtedly fulfil one of the NPPF's core aims to 'boost significantly the supply of housing' and deliver a wide range of homes of different types and tenures. The proposal would contribute to meeting the Borough's identified housing need through an uplift of 44 units, and of a mix and density appropriate to its highly sustainable location.
- 7.8 The proposal also makes significant affordable housing contribution of a minimum of 34%. This is above policy compliance and substantially in excess of the offer agreed and accepted originally by Council Officers. Ensuring a supply of good quality, secure and affordable housing to meet identified local housing needs is a key priority for Reading Borough Council as highlighted in the Council's Homelessness Strategy 2016-2021, Local Plan, and corporate objectives. This development would therefore make a welcome contribution to improving access to local affordable housing to meet local needs and would constitute a significant and tangible public benefit. It would clearly maximise the benefits of the proposed development in delivering sustainable development, but also in supporting the provision of sustainable communities within Reading Borough in an evidenced and justifiable way consistent with the NPPF.
- 7.9 In design terms, by introducing a colonnade along Caversham Road and Northfield Road, the scheme will provide much needed visual uplift to what is a busy and often unpleasant junction, allowing better natural surveillance and activity along what is currently a series of inactive frontages. The proposal also presents an appropriate layout and design quality. In terms of scale, the replacement building is recognised as being of notably greater scale than those existing traditional buildings to the western boundary. However, the evolving nature of the townscape to the north of the Station and juxtaposition which is often experienced between much smaller historic buildings and larger more modern buildings is not uncharacteristic around the town main orbital route, and considered with the design benefits as a whole, it is not considered to translate to any significant level of harm given the degree to which the site is already compromised by surrounding and planned development.
- 7.10 Finally, in terms of health and wellbeing, the current Covid19 requires Local Planning Authorities to actively ensure new development maintain peoples' health, wellbeing, safety and overall comfort. As described, the development is considered to create a good quality level of residential accommodation that would not prejudice or prevent future occupiers from enjoying a good quality of life, hinder any recovery from respiratory illnesses, or make any unintended or prolonged occupation by residents difficult should the situation require. Accordingly, the above health and wellbeing factors are considered key material social benefits.

- 7.11 In light of the above, the development would clearly perform a positive social role, fulfilling a range of key Local Plan Policy and wider social objectives.

#### Environmental

- 7.12 Firstly, with regard to the natural environment and the role this development will play in meeting the challenge of climate change, it is recognised that new purpose-built mixed-use development would inherently meet an enhanced level of sustainability than existing through compliance with the Council's enhanced energy efficiency and sustainability standards. Through the efficient use of previously developed land, the development will also meet the Council's spatial strategy for the location of new development by reusing land of low environmental value.
- 7.13 In terms of sustainable transport and supporting the Council's key objective of reduced car usage and improved air quality, the proposal would provide improved and more desirable cycle facilities for residents and the wider public. Through a S278 agreement, the development allows new dedicated cycle infrastructure on Northfield Road to connect existing parts of the cycle network to thereby contributing to a comprehensive network in the town. An agreement to secure membership of a car club for residents is also a positive aspect given that residents will largely be reliant on alternative and more sustainable modes of travel. These are additional wider public benefits which fulfil the environmental dimension of sustainable development.
- 7.14 The introduction of a significantly greater level of on-site planting, a green wall and two roof terraces, would provide a visual and environmental uplift to the site and the immediate area, thereby allowing the redeveloped site to confidently perform a far greater environmental role than it does at present.
- 7.15 With regard to the historic environment it is necessary to return to whether the proposal satisfies the policy test set by Criteria 1 of Policy EN4 of the Local Plan. This involves an assessment of whether the benefits of the development would significantly outweigh the asset's significance.
- 7.16 As described, the NDHA is afforded sufficient local significance to be listed as one of the boroughs 'Locally Important Buildings and Structures' and the report fully recognises that the proposal would result in the complete loss of 71-73 Caversham Road. The development would therefore substantially harm 71-73 Caversham Road by virtue of its removal and further compromise the setting of the remaining NDHA buildings in the identified cluster. The development would detach them further from their former industrial relationship and reducing their isolated contribution to the area.
- 7.17 In considering 'significance', the public consultation exercise undertaken as part of any application (neighbour letters and site notice) proves a useful indicator of value alongside the submitted documentary material with the application. Public consultation is a fundamental aspect of the planning process and provides the opportunity for those affected by a development to consider what is proposed, and how it will affect them. As described earlier in this report, two separate letters of objection were received from individuals in addition to those received from the Reading CAAC and CADRA objecting to the proposal for the reasons given in Section 4.4.

- 7.18 For what is a densely populated inner urban area, it is clear from the amount and nature of representations received by the Council, that whilst valued, there was little overwhelming public sentiment that the building itself being replaced had a significant level of inherent cultural or historic value to individuals within the local community. Those views expressed through public consultation and through enquiries with the Council focused more on its status as a local landmark through its past association with a much loved hardware store (Drews), rather than its specific architectural value or historic relationship with Henry Pendlebury Dowson and the town's former brewing heritage.
- 7.19 This is maintained by the fact that there is no specific reference to the building itself within any adopted development plan documents, adopted SPD, nor is it within a Conservation Area. As described, the building's location fronting onto one of the town busiest orbital roads prevents meaningful cultural enjoyment of the building by the local community.
- 7.20 Notwithstanding this, and as informed by the Council's Heritage consultant, and the local listing entry, the proposed development would result in the loss of one of the few physical remains of the town's industrial heritage in this part of town. This adds to its importance locally and adds additional weight to the NDHA's significance as a whole. As described in Section 6.2, this identified level of significance is prevented from being at the 'upper end' on the spectrum of local 'significance' given the supporting evidence submitted with this application, the condition of building and the limited role it currently performs.
- 7.21 It is now necessary to return to the tests imposed by Criteria 1 of Policy EN4 of the Local Plan and revisit the benefits of the development as a whole. This also fulfils the requirement of Paragraph 197 of the NPPF, which requires a balanced judgement to be made by the decision maker.
- 7.22 Earlier in this report it was identified that the proposal would provide a supported form of mixed-use development (land use), an appropriate residential mix and density for the location, and importantly, make an overwhelmingly positive contribution towards affordable housing provision within the borough. It has now been established in the above sections that the overall design of the replacement building, its natural environmental credentials, sustainability, amenity and outcomes would themselves result in compliance with the Local Plan and sustainability objectives of the NPPF and result in significant and wider ranging public benefits. Therefore, such a balancing exercise can now be undertaken as benefits and disbenefits of the proposal have been identified.
- 7.23 The overwhelmingly positive economic, social and natural environmental benefits of the development are considered (in the overall planning balance) to significantly outweigh the heritage significance of 71-73 Caversham Road and the loss of one of the existing three buildings which make up this NDHA as a whole. As the overall public benefits of the proposal are considered to significantly outweigh assets identified significance, the development is considered to pass the test imposed by Criteria 1 of Policy EN4.
- 7.24 In satisfying Criteria 1) to Officers' satisfaction, Criteria 2) and 3) can then be considered. In accepting retention is no longer 'important' as implied by Criteria 1, the wording of the policy Criteria 2) requires recording of the heritage asset should be undertaken and submitted alongside development

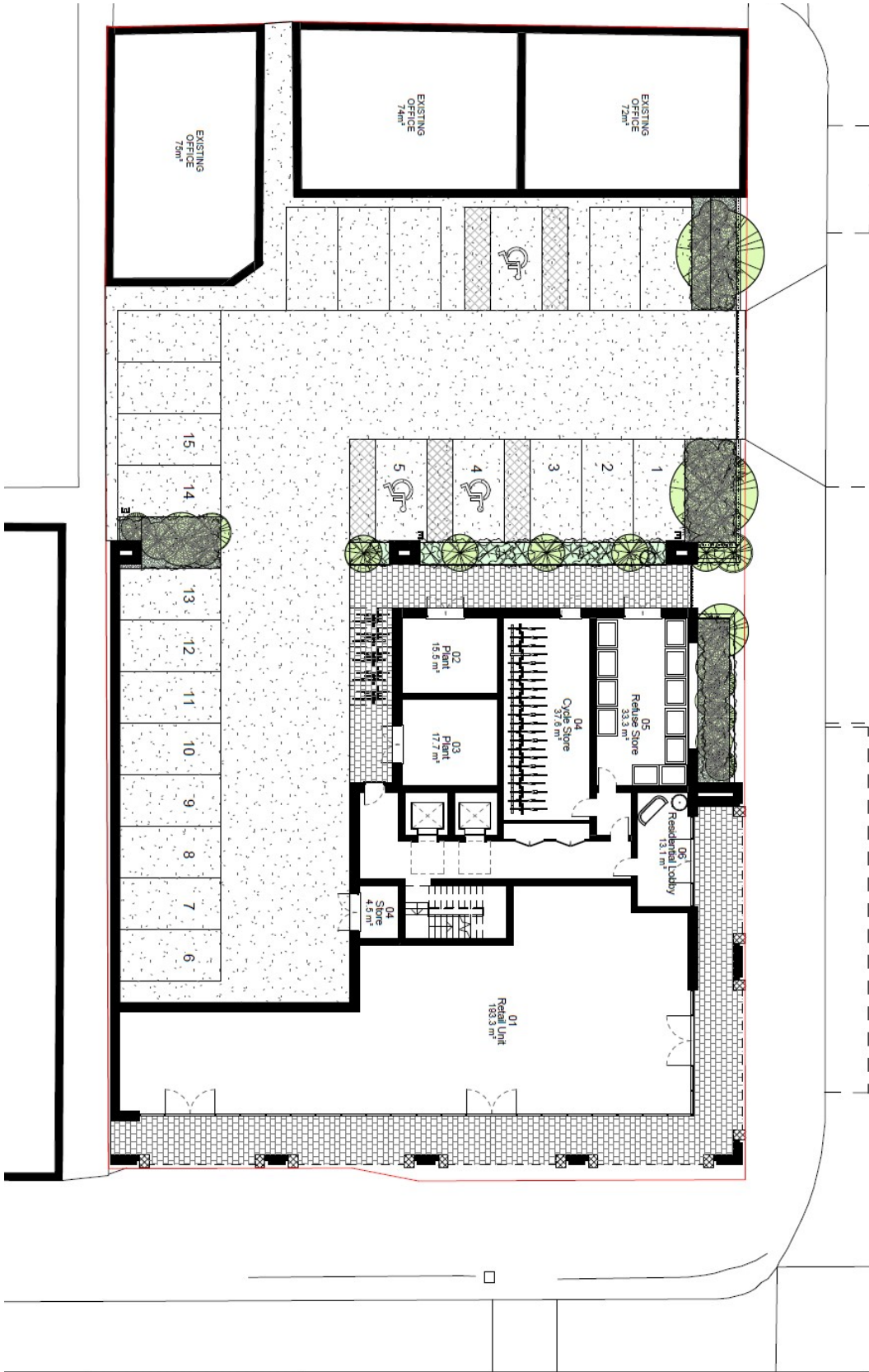
proposals. This has been done to a satisfactory standard as part of the applicant's Heritage Statement. Finally, Criteria 3) requires that replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. Section 6.3 of the above report identified those elements of 71-73 Caversham Road which "*draw upon heritage elements of the previous*" to the satisfaction of the LPA.

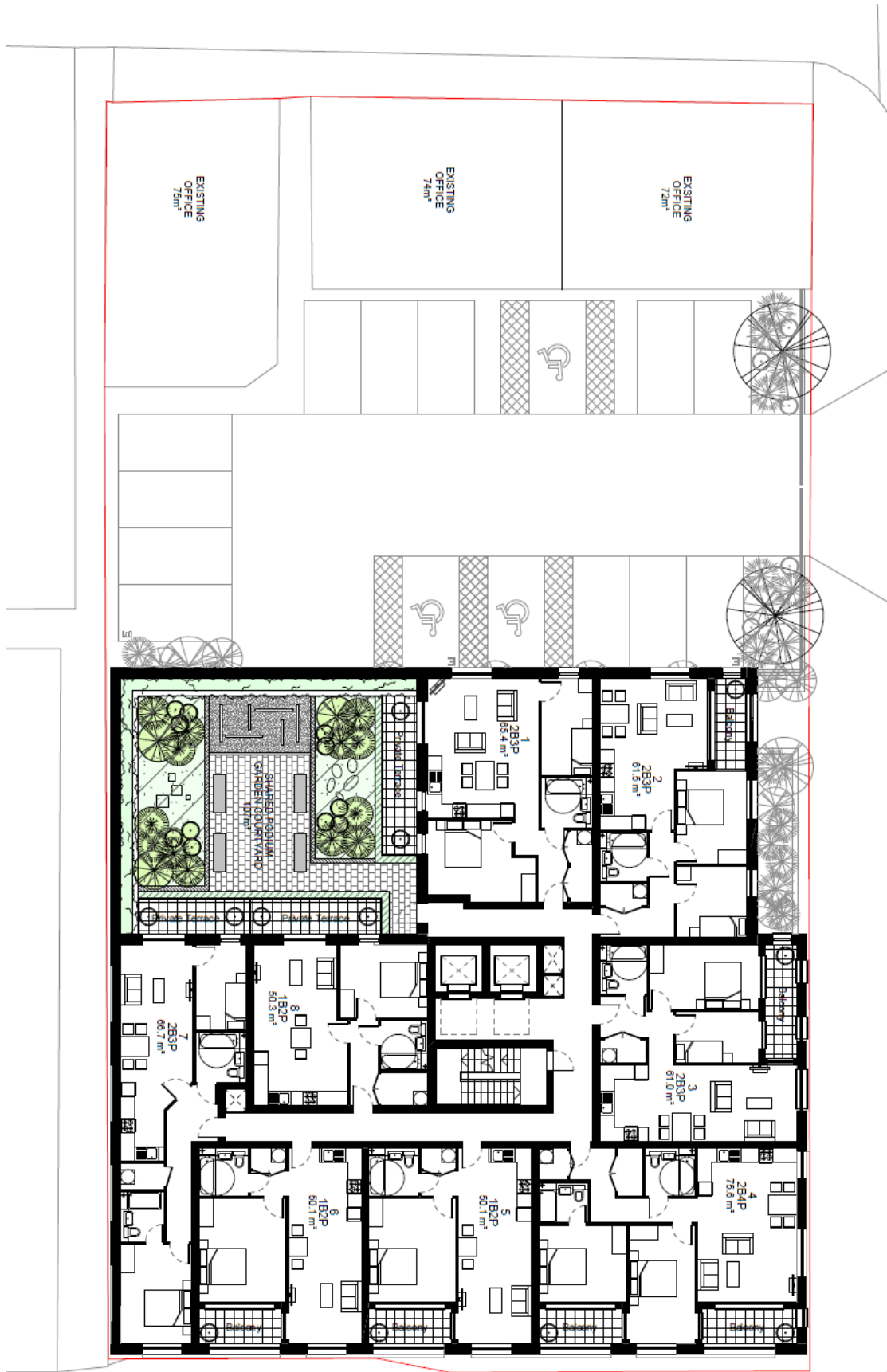
### Summary

- 7.25 As described above, the proposed development provides notable and tangible benefits, fulfilling many aspects which contribute to achieving the three dimensions of sustainable development. These three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 7.26 Having regard to the harm outlined above and the conflict with both Policy EN1 and EN4 of the Local Plan, it is concluded that the adverse impacts of this proposed development would be significantly and demonstrably outweighed by the benefits, when assessed against the relevant policies in the Framework as a whole. This conclusion means, insofar as the heritage balance is concerned, that there are over-riding public benefits from this proposal to justify a partial loss of the non-designated heritage asset on the site, as discussed earlier.
- 7.27 Therefore, when applying an overall critical planning balance of all material considerations presented, the application is recommended for approval, subject to the recommended conditions, completion of a S106 Legal Agreement and S278 Agreement as set out in this report.

Case Officer: Brian Conlon









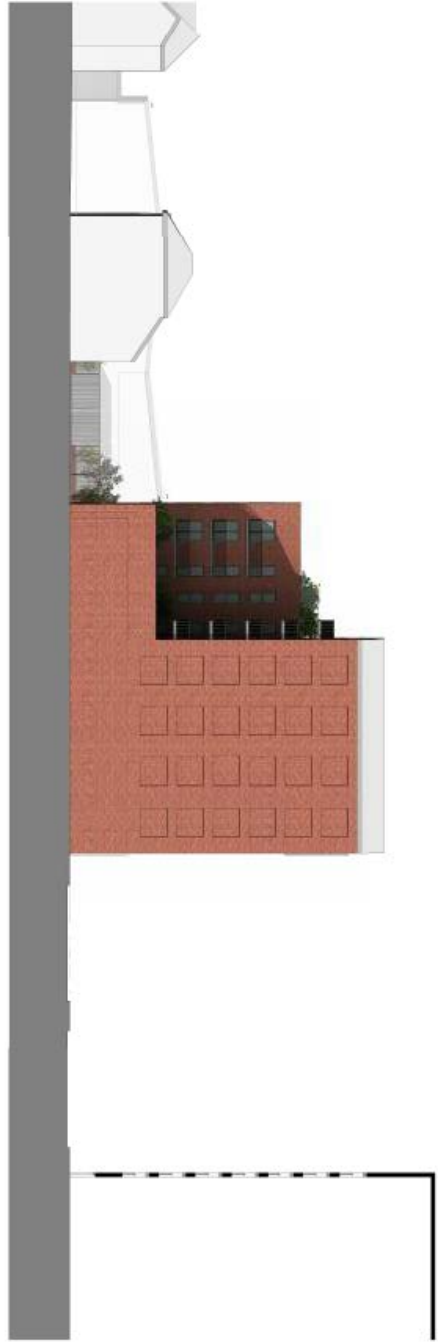
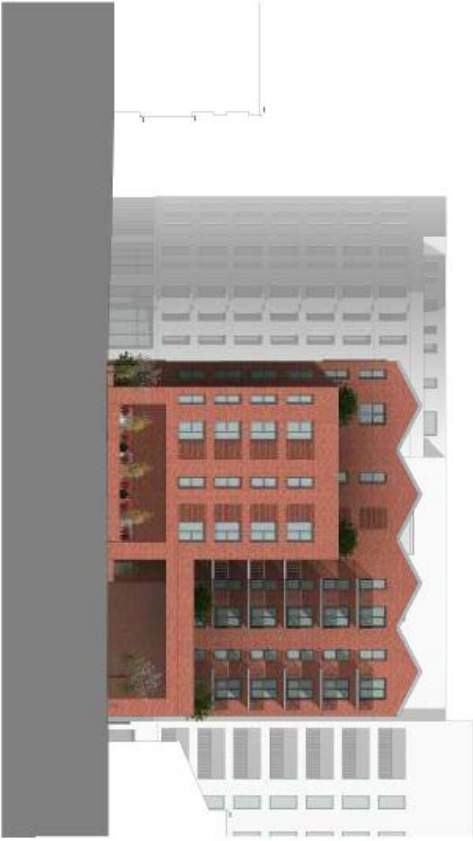


Proposed East Street Elevation



Proposed North Street Elevation

Proposed West Street Elevation







## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 7 OCTOBER 2020

Ward: Katesgrove

App Nos.: 201109/REG3 and 201110/LBC

Address: Katesgrove Primary School, Dorothy Street, Reading

Proposals (same description for both): New boiler flue to East elevation of Henry Building. Replacement buttressing to retaining wall of Henry Building.

Applicant: Education Asset Management, Reading Borough Council

Date received (valid): 6 August 2020

Minor Application 8 week target decision date: 1 October 2020

### RECOMMENDATION

201109/FUL: GRANT planning permission.

201110/LBC: GRANT listed building consent.

#### 201109 conditions to include:

1. TL1 three year time limit
2. AP1 plans approved
3. Materials to be submitted (bricks, mortar, strike and enamel paint)
4. Flue controls

#### Informatives:

1. Positive and proactive requirement
2. Terms and conditions
3. Separate Building Regulations approval required
4. A separate Listed Building Consent is relevant

#### 210110 conditions to include:

1. LB1 three year time limit
2. Plans approved for LBC
3. Materials to be submitted
4. Compliance with submitted schedule of works as set out in heritage statement
5. No other works authorised by this Consent, any further works should be applied for under an LBC or LBC CLP (certificate) as may be required.

#### Informatives:

1. Positive and proactive requirement
2. Terms and conditions

## 1. INTRODUCTION

- 1.1 Katesgrove Primary School is a large, three-form entry primary school accommodating approximately 630 pupils. It lies within a dense residential area of predominantly terraced housing and is sited at the North-East crossroads of Pell Street, Elgar Road North, Berkeley Avenue and Katesgrove

Lane. The application site extends to 1.4 hectares and includes a steep escarpment and retaining wall running approximately north-west to south-east through the site. There are two principal heritage school buildings which reflect the history of the school: the ‘Trooper Potts Building’ was a separate former Boys’ school (formerly known as the ‘Dorothy Building’) and stands on the higher ground towards the east; the ‘Henry Building’ (Grade II Listed) on Katesgrove Lane, on the west side, is the former girls, boys and infants school. Other buildings within the application site are Katesgrove House (Grade II Listed), a former caretaker’s cottage for the Henry Building and a further large structure on the higher part of the site which consists of the current Caretaker’s House. The School was subject to a major redevelopment and expansion scheme in 2011-12, which included the demolition of the former dining-hall and replacement with a new dining-hall/teaching building and provided the expansion from 420 to 620 pupils. As the Henry Building is listed, all buildings/structures within the curtilage pre-1948 are also listed.

**Location plan (not to scale)**



Red squares indicate flue works, orange line shows extent of buttress works



## 2. PROPOSAL

- 2.1 The proposals seek planning permission and listed building consent for minor works which lie within the school site in the locations indicated above. The proposals consist of the installation of a new boiler flue and chimney adjustments on the rear side of the Henry Building and remedial works to some of the tall buttresses, which provide support to the retaining wall between the two levels towards the south-west of the site.
- 2.2 Supporting information submitted with these applications includes:  
-plans and sections; and  
-a heritage statement
- 2.3 These applications are being reported to your meeting as these works are being submitted by the RBC Education Department. CIL is not liable for these works.

## 3. PLANNING HISTORY

- 3.1 The school has extensive planning history. Of most relevance is the following:

Reference	Description	Decision/action
110355/REG3 and 110356/LBC	Demolition of existing dining block, caretakers house and ancillary structures. Removal of existing temporary accommodation. Construction of new four storey teaching and administrative building. Alteration and extension works to Katesgrove House to relocate existing pre-school accommodation. Alterations to Key Stage 1 (Henry Building) including removal of modern extension and external fire escape staircase with works to adjacent walls/structures. Alterations to Key Stage 2 (Dorothy Building) to form new Kitchen and classroom accommodation. Alterations to existing car parking and both vehicle and pedestrian entrances including the relocation of main entrance to Orchard Street. Remodelling of external works to enhance external teaching and play spaces. Provision of associated temporary 1 and 2 storey buildings for decanting of pupils and contractors accommodation.	PERMISSION 20/12/2011 with S106 unilateral undertaking AND CONSENT 14/11/2011 and implemented
181259/LBC	Replacement of doors, fanlights and skylight. (Henry Building).	CONSENT 12/9/2018 and implemented

## 4. CONSULTATIONS

(i) **Statutory:**

None.

(ii) **Non-statutory:**

**RBC Conservation Consultant:** The proposed works to the retaining wall would arrest a long-standing structural problem in the wall which would allow the full use of the grounds by the school. The proposed works to the flues are considered to be minimal and would not harm the special interest of the school but would help to ensure the continued long-term use of the school in its current sustainable use.

**RBC Environmental Protection:** comments awaited.

### Public consultation

Site notices were erected outside the application site. There have been no representations received at the time of writing.

## **5. RELEVANT POLICY AND GUIDANCE**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework, among them the 'presumption in favour of sustainable development'. Section 66(1), in the determination of applications affecting the setting of a Listed Building, states that: in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

5.2 The application has been assessed against the following policies:

5.3 National Planning Policy Framework and associated Guidance

5.4 Reading Borough Local Plan (2019)

Policy CC1 - Presumption in Favour of Sustainable Development

Policy CC7 - Design and the Public Realm

Policy CC8 - Safeguarding Amenity

Policy EN1 - Protection and Enhancement of The Historic Environment

5.5 Supplementary Planning Guidance

None relevant.

## **6 APPRAISAL**

6.1 The main issue to be considered in these applications is the suitability of these proposals in terms of their impacts on the character and special architectural interest of the Listed structures.

### Buttress works

6.2 The present retaining wall has been substantially altered, although the original bricks are likely to be pre-1948. This is therefore a curtilage listed structure. The applicant has been monitoring the south-western part of the school site for some time, as subsidence has been detected in part of the

Trooper Potts Building and also the retaining wall. Observations have indicated that movement in the school building has halted. However, it has become necessary to repair the buttresses. The works consist of the following measures:

- removal of 11 'modern' buttresses, which appear to be constructed of engineering brick;
- construction of 12 new retaining wall buttresses;
- removal of single skin brickwork (east end of south facing section of wall); and
- repairs and making good to the brickwork and render of the wall.

- 6.3 The proposed works to the listed wall have been instructed by Hampshire County Property Services on behalf of the applicant, who found that a number of modern buttresses had physically 'detached' from the retaining wall section - it is proposed to repair this middle section of wall only. The removal of the 11 brick buttresses would not harm the listed building as these are modern and have detached anyway. The construction of the 12 new buttresses would replace these with the addition of 'tooth-ing-in' of the wall into the brickwork and correct angled bedding plane in the new foundations which will increase the structural support and stability of the proposed buttresses. The removal of the single leaf skin wall is also acceptable, it being a modern addition. Repairs will also be undertaken to the damaged brickwork and render to make them good and improve structural strength, appearance and weatherproofing. Brick choice has not been specified but can be conditioned. The conservation advisor recommends conditions for a sample panel and works to match and make good. In this instance, the requirement for a sample panel is considered to be unnecessary for this utilitarian structure; providing that the applicant is able to specify the brick and the mortar type and the strike used and confirms that these will in all respects match existing. These details have been requested of the applicant, but at present, these are conditioned to be supplied via a pre-commencement condition.
- 6.4 In summary, these works are considered to be minor and localised and will increase the structural stability of the site. Being largely a like-for-like replacement, this part of the proposals raises no amenity issues.

#### Boiler flue

- 6.5 The Henry Building is considered to be an important building of itself, due to its characteristic 'Proto-Gothic' styling by an eminent local municipal architect (Joseph Morris) and it remains in its original use in generally sound condition and continues to be the most important local building in this part of Katesgrove.
- 6.6 These works concern the rear (east) elevation of the listed building. As a consequence of installing a new boiler system, the previous flue pipe has already been removed, as can be seen from the photo at the end of this report. In its place would be a similar stainless steel flue, with a stove enamelled colour, colour to be agreed. The applicant advises that the supports will be carefully inserted into the mortar, not the bricks. The proposal also involves a reduction in height of some old flues to create an air inlet for the plantroom and the fitting of cowls ('hats') on top. The proposed works to the boiler flues would consist of the cutting down of the existing flues, which are modern, would not affect the building's special

interest and would allow the installation of the modern boilers to comply with existing regulations. The new boiler flue, whilst it would be taller than the existing, is reversible and would allow the school to install the energy efficient boilers and thereby help to ensure the sustainable long-term use of the school.

### **Other issues**

- 6.7 These proposals are considered to raise no significant issues in external amenity terms.
- 6.8 The replacement flue is distant from surrounding residential and other uses and is not expected to result in the need for any further information but the Council's Environmental Protection Team has been consulted and any further issues will be reported to your meeting.

### **Equalities Act**

- 6.9 When determining applications, 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 as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this 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 proposed development/works proposed.

## **7 CONCLUSION**

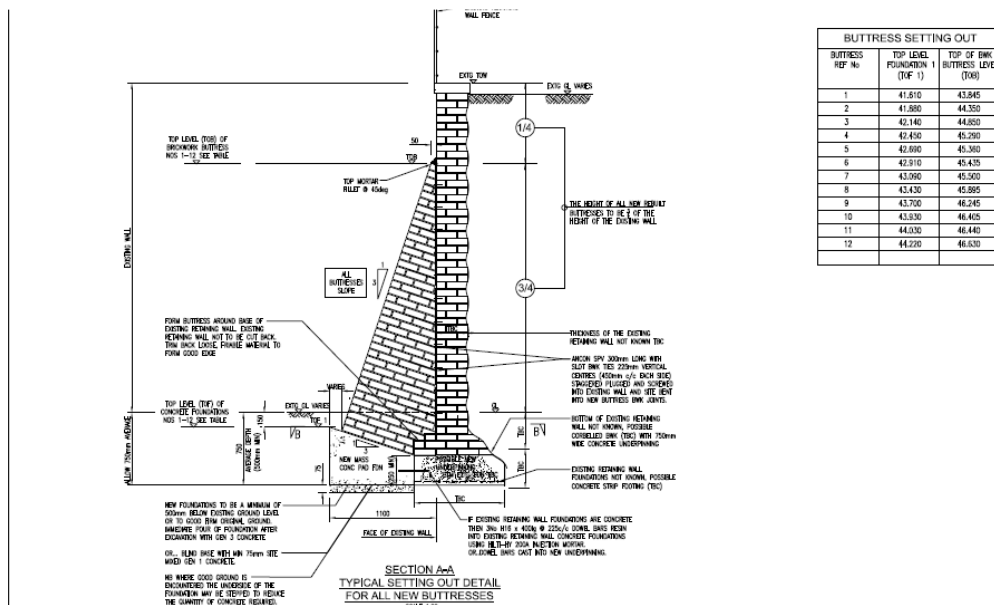
- 7.1 These are minor and suitable works to the heritage school building and an associated wall. The proposals comply with the objectives of Policy EN1. The proposals do not raise any design or appearance concerns and with no significant neighbour/amenity issues identified the proposals comply with policies CC7 and CC8. The recommendation is to grant both planning permission and listed building consent for the proposed works.

**Case Officer:** Richard Eatough

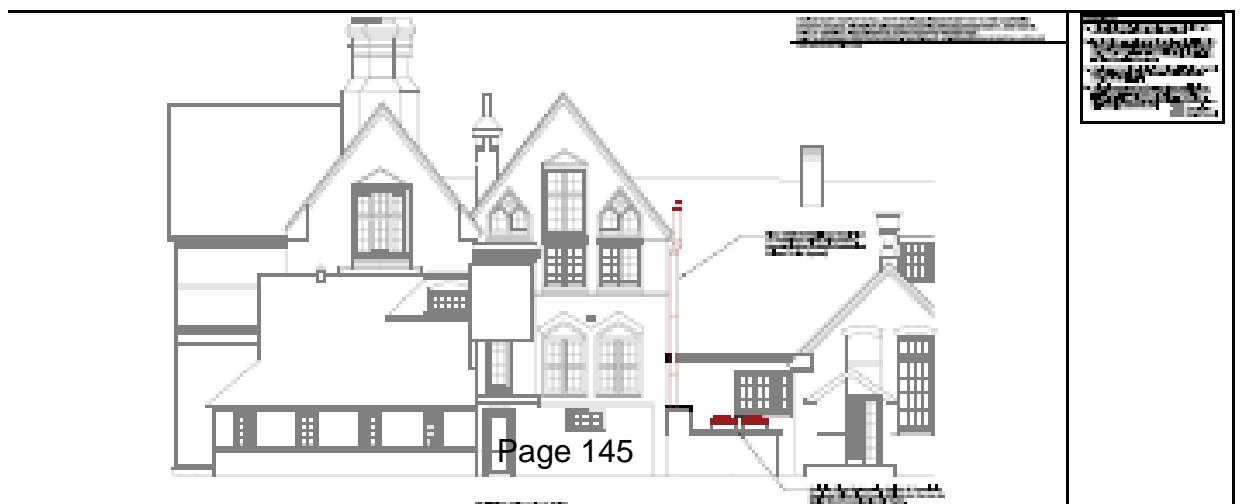
**View of school from the south**



## Buttress detail



## Location of flues







East Facing Gable, line of former flue just visible on north facing return brickwork



South-facing elevation showing modern buttresses

## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 7 October 2020

**Ward:** Kentwood

**App No.:** 201108/FUL

**Address:** Unit 1-2, Stadium Way, Reading

**Proposal:** Proposed industrial unit to replace existing fire damaged industrial unit. The new building will consist of 4 smaller base build units suitable for class use B1(C), B2 or B8 with flexibility for trade counter fit out (B8). Note, Demolition of existing building has been covered under separate Prior Approval - Demolition of Building Application.

**Applicant:** Hathaway Opportunity Fund General Partner Ltd

**Determination Date:** 3 November 2020

### RECOMMENDATION:

Subject to no objection from the Environment Agency being received, GRANT full planning permission subject to the following conditions:

1. Time limit - standard three years for implementation
2. In accordance with the approved Plans
3. Materials to be as proposed
4. Pre-commencement submission of construction method statement to be approved (including noise and dust control)
5. Pre-commencement submission of employment, skills and training plan to be approved
6. Pre-commencement SUDS Drainage strategy details
7. Details of external lighting prior to installation of any external lighting
8. Pre-occupation vehicle parking as specified
9. Pre-occupation electric vehicle charging points as specified
10. No plant equipment to be installed until noise report submitted and approved
11. Constructed in accordance with flood risk assessment recommendations
12. Constructed in accordance with energy and sustainability report
13. Construction/Hours of Working (standard hours)
14. Use restriction to B1(c); B2; or B8 (including any ancillary trade counters) (notwithstanding UCO amendments on 31 August 2020) and no other uses, including that the use after 10 years becomes the lawful use.
15. No additional mezzanine without prior approval of the LPA

### Informatives

1. Terms and Conditions
2. Building Regulations
3. Highways
4. Pre-Commencement Conditions
5. Complaints about Construction
6. Positive & Proactive



## 1. INTRODUCTION

- 1.1 The application site comprises the now demolished fire damaged unit 'Unit 1' Stadium Way and adjacent land as illustrated below. The site backs on to Scours Lane to the west and is accessed from Stadium Way to the north.
- 1.2 The site is located within the identified 'Core Employment Area' on the Local Plan proposals map and is also located adjacent to an identified wildlife corridor which relates the TPO trees running along the West of the site and Scours Lane.
- 1.3 As stated above, the building on the site was recently demolished under prior approval application 200790 and as such the land is currently vacant.

**Site Location Plan**



**Aerial View of Site before fire**





## 2. PROPOSAL

- 2.1 Full planning permission is sought for the erection of a replacement building of an identical scale and appearance to what previously stood on the site, being 8.5m at ridge height, with an internal height of 5.8m, and containing some 1,330m<sup>2</sup> of internal floor space (as shown on the above “aerial image photograph”), with the exception of providing additional entrances to the rear (Western end near Scours Lane). The proposed building would contain 4 units with two larger units (444m<sup>2</sup>) facing inward of the site and two smaller (223m<sup>2</sup>) units facing Scours Lane.
- 2.2 The proposed development seeks approval for flexible uses Class B1(c) (any industrial process capable of being undertaken within a residential area as long as it would not be of detriment to the amenity of that area); B2 (light industrial); B8 (storage and distribution) and seek to provide where necessary ancillary trade counters (generally considered ancillary to a B8 use) (see note below).
- 2.3 The proposal includes provision of on-site parking, van/loading areas, accessible parking spaces, and provision of three electric vehicle charging points, and cycle parking/bin storage on existing hardstanding areas.
- 2.4 Drawings submitted:
- Drawing No: 20-078-SGP-02-oo-DR-A-P006 Rev A - Location plan
  - Drawing No: 20-078-SGP-02-oo-DR-A-P008 Rev E - Proposed site plan
  - Drawing No: 20-078-SGP-02-oo-DR-A-P009 Rev D - Floor plans
  - Drawing No: 20-078-SGP-02-oo-DR-A-P013 - Roof plan
  - Drawing No: 20-078-SGP-02-oo-DR-A-P0014 - Block plan
  - Drawing No: 20-078-SGP-02-oo-DR-A-P010 Rev D - Proposed elevations  
Received 5/8/2020
  - Drawing No: 20-078-SGP-02-00-DR-A-P008 - Proposed site plan  
Received 11/9/2020
- 2.5 Supporting information submitted with the application includes:
- Design and access statement - Prepared by SGP Architects dated July 2020
  - Transport statement - Prepared by Steer, dated July 2020
  - Amended Transport statement - Prepared by Steer, dated September 2020
  - CIL form
  - Application form
  - Energy and sustainability assessment, prepared by SVM and dated 17 September 2020
  - Ref: 220115-MNP-XX-XX-RP-C-0001 - Flood risk assessment and surface water drainage strategy, prepared by Mason Navarro Pledge and dated September 2020
  - Additional swept path analyses
  - Drawing No: 220115-MNP-XX-XX-DR-C-1800 - Drainage layout, as received 17 September 2020
  - Drawing No: 20-078-P008 Rev G - Proposed site plan, as received 18 September 2020
  - Energy and sustainability assessment Rev v4, prepared by SVM and dated 23 September 2020, as received 24 September 2020
- 2.6 The CIL requirement for industrial/office development (outside the central core) is nil under the Council’s adopted CIL Charging Schedule.

- 2.7 This application is being reported to your meeting because it is classified as a major development based on proposed floor space.

### 3. PLANNING LEGISLATION UPDATE

- 3.1 The recent amendments to the Use Classes Order (UCO) included a number of use class changes including changes to A class (removal thereof), and some B class uses (among other things). Within the UCO 2020, it states:

*“the material period” means the period beginning with 1st September 2020 and ending with 31st July 2021, and “a relevant planning application” means an application for—*

*(a) planning permission or permission in principle, or  
(b) approval of a matter reserved under an outline planning permission within the meaning of section 92 of the 1990 Act.”*

And goes on to state:

*“If prior to the commencement of the material period, a relevant planning application was submitted, or was deemed to be submitted, to the local planning authority which referred to uses or use classes which applied in relation to England and were specified in the Schedule to the Use Classes Order on 31st August 2020, that application must be determined by reference to those uses or use classes”*

- 3.2 Therefore, in accordance with the above, the application is required to be determined in accordance with the Use Classes Order as existed prior to 31 August 2020.

### 4. PLANNING HISTORY

200790/DEM - Application for prior notification of proposed demolition. PRIOR APPROVAL GRANTED 31/7/2020

90-00298-FUL (900952) Extension of unit 2 to form ancillary light industrial use. WITHDRAWN

91-00984-FUL (910259) Change of use to form vehicle repair workshop with bodywork repair and paint spraying. APPROVED 28/10/1991

96-00298-FUL (960825) Open storage for scaffolding. Terrapin office, storage container APPROVED 23/04/1996

98-00804-FUL (980424) Change of use from yard to storage and siting of 19 metal containers APPROVED 11/09/1998

01-00395-FUL (11149) of detached single storey building to house electrical intake room and CCTV monitoring position APPROVED 22/03/2001

02-00232-FUL (21011) Change of use from Offices (B1) TO B8 (Storage/Distribution) APPROVED 26/02/2002

77/00118/00 - Warehouses in 3 phases (outline) APPROVED 1/04/1977

## 5. CONSULTATIONS

### Internal

- 5.1 RBC Ecologist - The site is located adjacent to the railway which is an important corridor for wildlife. As such, as long as a condition is applied to ensure that any new lighting is approved by the LPA, there will be no objection to this application on ecology grounds.
- 5.2 RBC Natural Environment Officer - No objection on the basis that no additional hardstanding is proposed. Therefore, no impact on TPO trees. Condition recommended that if any trenching/ground works near TPO trees is required, an Arboricultural method statement shall be submitted and approved prior to any trenching/ground works.
- 5.3 RBC Environmental Protection Officer - No comments have been received at the time of writing. Comments will be provided within an update report.
- 5.4 RBC Transport Officer - Generally acceptable, with concern over conflict between LGV in loading bays and parking spaces, more details are required and will be clarified in update report.

### External

- 5.5 Environment agency - The EA have been consulted, subject to no objection from the EA being received the recommendation is to grant.

### Public consultation

- 5.6 A site notice was placed on a lamp post nearby on Scours Lane. No objections have been received at the time of writing.

## 6. RELEVANT PLANNING POLICY AND GUIDANCE

- 6.1 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". However, the NPPF does not change the statutory status of the development plan as the starting point for decision making. In this case the development plan consists of the Reading Borough Local Plan 2019.
- 6.2 Accordingly, the following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (2019)  
National Planning Policy Guidance (2014 onwards)  
Town and Country Planning Use Classes Order as at 30 August 2020

### Reading Borough Local Plan 2019:

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
- EN12: Biodiversity and the Green Network
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- EN16: Pollution and Water Resources
- EN17: Noise Generating Equipment
- EN18: Flooding and Sustainable Drainage Systems
- TR1: Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-Related Matters
- TR5: Car and Cycle Parking and Electric Vehicle Charging

**Relevant Reading Borough Council Supplementary Planning Documents (SPD):**

- Revised Parking Standards and Design (2011)
- Planning Obligations Under Section 106 (2015)
- Employment, Skills and Training (April 2013)
- Tree Strategy (2010)
- Draft Tree Strategy (currently out for consultation)
- Draft Biodiversity Action Plan (currently out for consultation)
- Draft Climate Change Strategy (currently out for consultation)

**7. APPRAISAL**

**The main issues to be considered are:**

- Principle of Development
- Use Considerations
- Design Considerations
- Transport Matters
- Employment skills and training
- Sustainability
- Other Matters

**Principle of Development**

- 7.1 The application site is located within an identified Core Employment Area as per the proposals maps (EM2h - Portman Road). The application would not seek to introduce a non-employment use within this core employment area, and would provide 4 units of varying size, compared to the previous unit, which would aid in the provision of a variety of premises in line with Policy EM4 (Maintaining a Variety of Premises). The layout of the building would also enable the units to be integrated in future should an occupier seek to occupy more than one unit. As such, the principle of a flexible commercial/industrial use B1(c) (other industrial); B2 (light industrial); B8 (storage and distribution) is considered acceptable subject to a condition to ensure that the use as existing after 10 years becomes the established lawful use of the premise.

**Use Considerations**

- 7.2 The application proposes a flexible use approval for B1(c); B2 (light industrial), and B8 (Storage and distribution). In accordance with the amended UCO (see Part 3 above) a condition is recommended to restrict the use to the uses applied for. This is because the new E use class for light industrial would allow a change to retail or uses not combatable with the policy objectives for our core employment areas.

### **Design Considerations**

- 7.3 Policy CC7 of the Local Plan (2019) states that: *“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* The proposed development includes a built form to replicate the now demolished unit, and materials for the main east facing façade to match that of the adjoining units. To the rear (facing Scours Lane), and the north side, the proposed development includes metallic sheeting in contrast to brick as used on the adjoining building. The industrial nature of the development would suit a variation of material from that originally built, and due to the tree cover from Scours Lane would not harm the character and appearance of the area by virtue of this change in appearance. Similarly, the introduction of entrances to the rear of the building would not be considered harmful and would provide some more activation of the rear area, and Scours Lane.
- 7.4 The previous use of the rear of the unit, facing Scours Lane, resulted in a large amount of storage (pallets, lorry trailers etc.). The proposed use of the hardstanding to the rear for car parking, bin storage, loading etc. would be a positive change for the appearance of Scours Lane. As such, the proposal is considered acceptable in terms of policy CC7.

### **Transport Matters**

- 7.5 Transport officers are satisfied that the conclusions of the supporting transport statement in terms of traffic generation being the same as the previous use, the on-site manoeuvring areas, provision of suitable parking, cycle parking, and EV charging points are acceptable, and that the proposal would not result in any highway safety concerns. The Council’s transport officers have requested an additional tracking diagram and information to demonstrate that there would be no conflict between LGV’s and parking spaces. An update report will be provided to clarify this.

### **Employment skills and training**

- 7.6 As the scheme falls within the Major category it would be required to provide an Employment Skills and Training Plan for the ‘Construction Phase’, or equivalent financial contribution. In this instance the applicant has specified their intention to provide a site specific ESP. The exact form is, at the time of writing, under discussion with Reading UK CIC (who delivers ESPs on the behalf of the Borough Council). It is proposed in this instance, as it will not require a financial contribution to be secured, for this to be secured by a suitably worded condition rather than secured through s106 legal agreement.
- 7.7 The project is expected to have a relatively short construction phase, and as such the ESP terms will include:

#### Notifying of

- all apprentices on site
- skills delivery during time on site
- numbers and details of local employees

#### Delivery of

- work experience for 1 young person (18+) currently out of work
- work experience for 1 adult on the local CSCS course

### **Sustainability**

- 7.8 Policy CC2 of the Local Plan (2019) states that: *“All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible”.* The supporting text of the policy (4.1.4) states: *“some types of development, such as industrial uses,*

*warehouses and schools might find it more difficult to meet these standards. In these cases, developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard."*

- 7.9 The applicant has explained that a BREEAM 'Excellent' standard may not be possible due to the recent site history and the commercial nature and location within a dated employment area. The applicant has provided an energy and sustainability statement in support of this application. The sustainability statement includes a number of design considerations, and industrial unit specific measures for reducing the energy usage of the building including: building fabric specifications, energy efficient lighting etc., energy efficient fixtures/fittings (water heating); extraction and ventilation details. The alternative approach is considered to respond to and provide a suitable alternative to a full BREEAM assessment in this specific instance relative to the scale of the site and specific constraints (i.e. large void/ceilings). As such, the proposal would comply with policy CC2. A condition is recommended to ensure that the sustainable construction measures that can be achieved are delivered.

### **Other Matters**

#### **Amenity of nearby occupants**

- 7.10 The proposed development is located within an industrial complex, with the closest dwellings being on the Southern side of Oxford Road approximately 140m from the nearest end of the site. The application will not result in any additional impacts as the use of the building will be similar to that of the previous unit. However, the noise and dust caused by construction may impact neighbours. As such, conditions will require details of noise and dust control measures to be in place during construction, and control over construction hours will also be implemented.

#### **Flood risk assessment**

- 7.11 The application site is located partially within flood zones 2 and 3 as identified on the environmental agency mapping. The applicant has provided a detailed flood risk assessment. The proposed use is considered a 'less vulnerable' use which, in accordance with EA advice, is an acceptable development within the flood zone.
- 7.12 The EA has been consulted and an update report will provide any response.
- 7.13 The proposal would replace the now demolished building, and the flood risk assessment includes measures to address the vulnerability of the location. A condition is recommended to ensure the development is carried out in accordance with the recommendations of the flood risk assessment.

#### **Natural Environment**

- 7.14 The Council's natural environment officer has been consulted. It has been confirmed that with conditions attached to ensure no ground works are undertaken without an arboricultural method statement (near the TPO trees) the development would be acceptable in terms of policy EN14 (Trees, hedges and woodland).

#### **Ecology**

- 7.15 The Council's Ecologist consultant has been consulted. The proposal may require external lighting around the premise. As the site is adjacent to a green link and the railway, which is also an important wildlife corridor, it has been advised that any new external lighting should require approval from the LPA. A condition is recommended to secure full details of any external lighting to be approved prior to occupation of the units to ensure the scheme is acceptable in terms of policy EN12

(Biodiversity and the green network).

**Sustainable urban Drainage (SUDs)**

7.16 The applicant has submitted a drainage strategy, this is currently insufficient and would need to be amended. However, a suitably worded condition could be attached to the permission.

**CIL**

7.17 CIL would apply to the proposals, subject to the usual reliefs or exemptions set out in the CIL Regulations. In this respect, although the proposed scheme would be CIL liable development, because industrial premises attract a zero CIL charge in the Borough there would be no CIL payable for this scheme.

**Equalities Impact**

7.18 When 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 this 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. All units will provide at grade access and accessible parking.

**8. CONCLUSION**

8.1 The proposed development would provide a range of units of varying size within the existing established and identified core employment area. Subject to the conditions mentioned above, the replacement units are considered acceptable and the recommendation is to grant.

Case Officer: Anthony Scholes  
Plans:

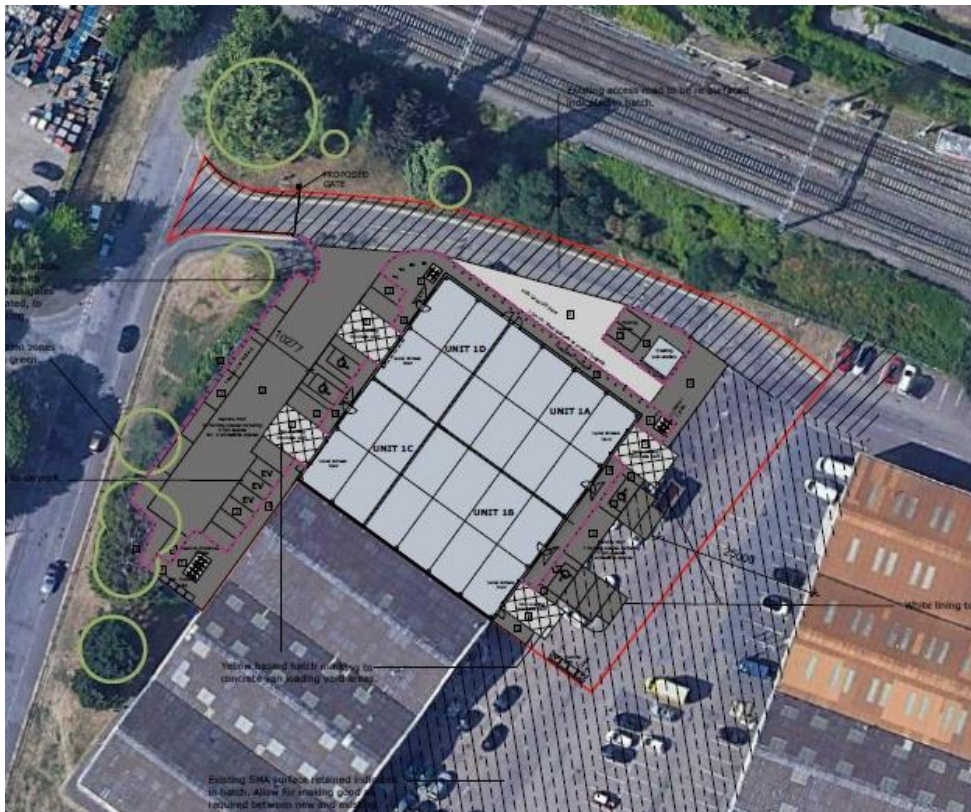


Figure 1 - Site Plan



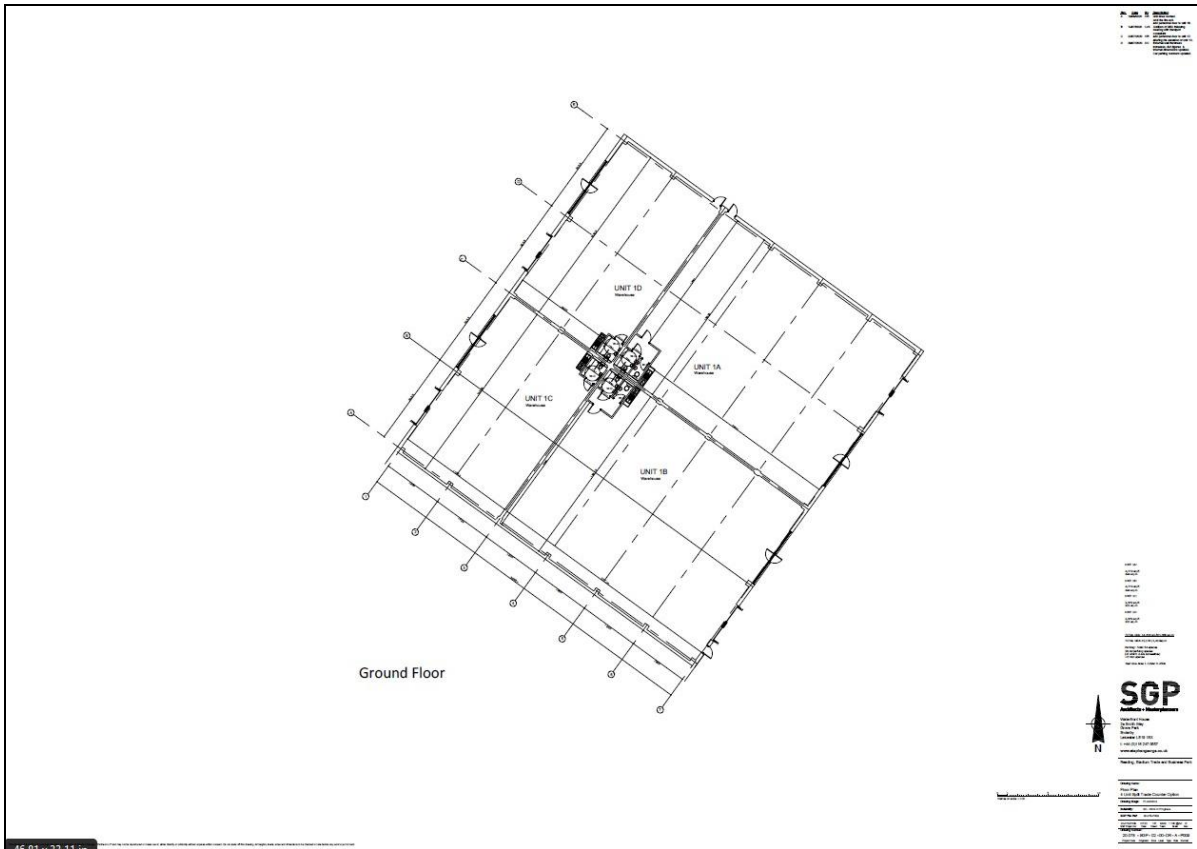


Figure 2 - Floor plans

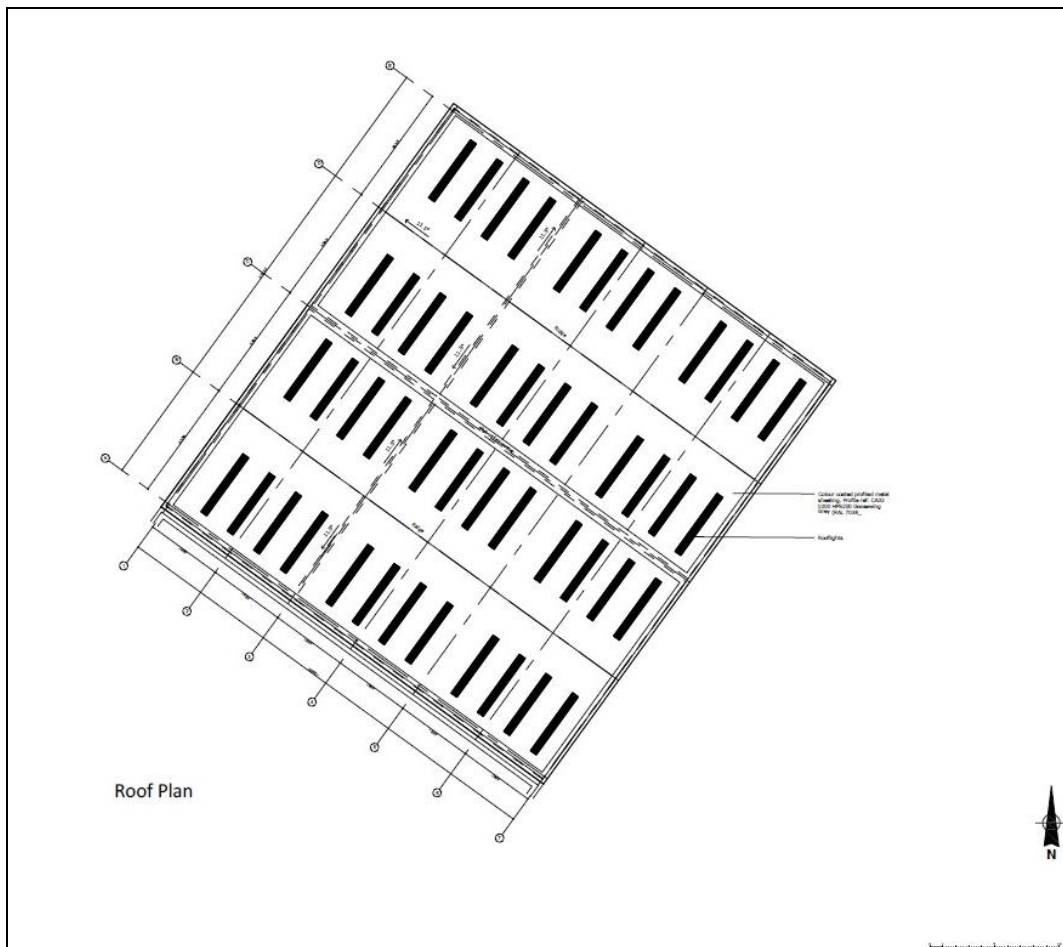
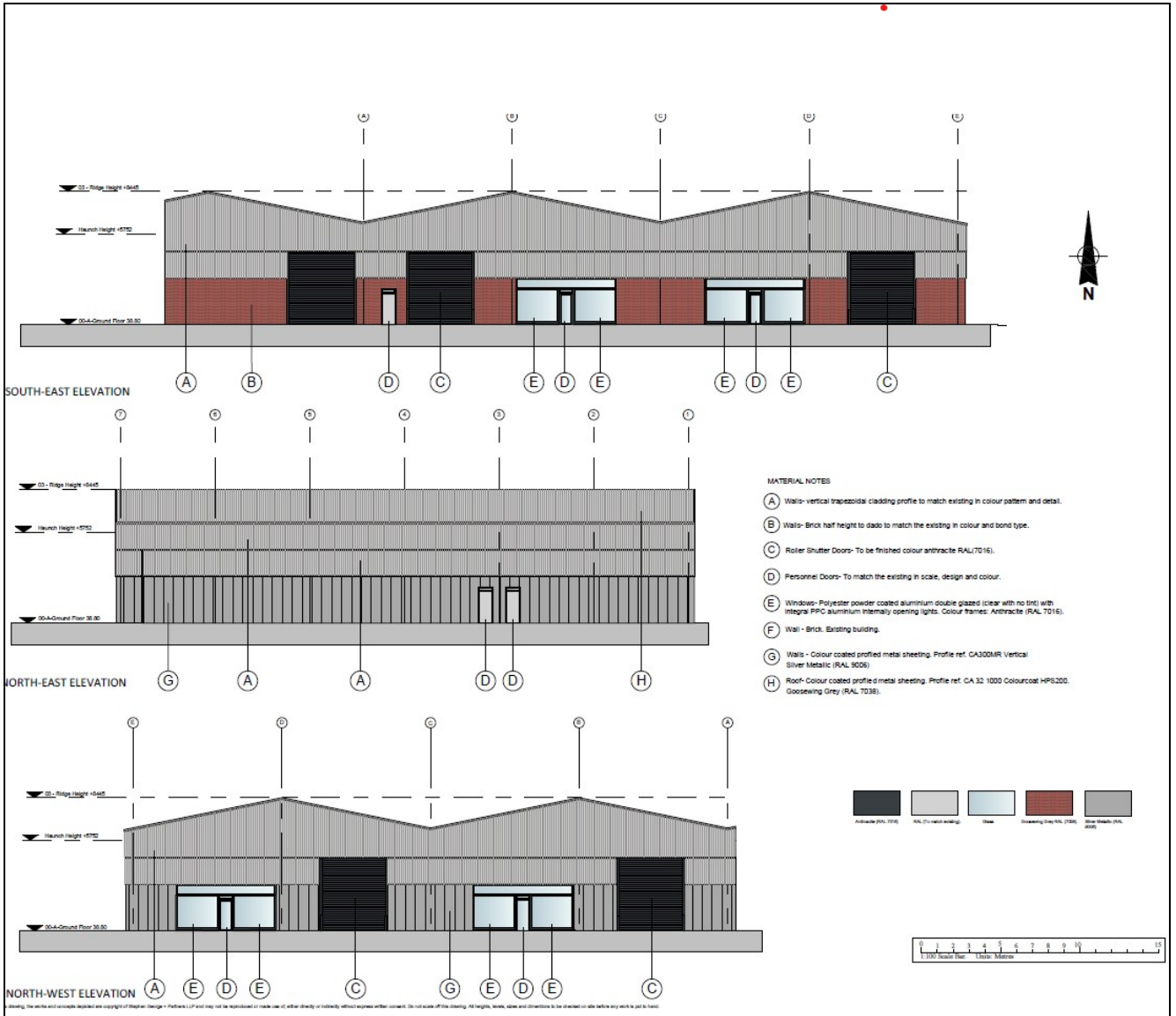


Figure 3 - Roof plan





**Figure 4 - Proposed elevations**

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## COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 7<sup>th</sup> October 2020

Ward: Whitley

App No.: 191265

Address: St. Pauls, Whitley Wood Lane, RG2 8PN

Proposal: Redevelop the site, creating a new Church Centre building, comprising Cafe, Worship Area, Meeting Rooms, two one bed residential flats and also a Health Centre Building.

Applicant: The PCC of St. Paul's Church, Whitley

Deadline: 3/6/20

Extended Deadline: 27/11/20

Planning Guarantee 26 week target: 2/9/20

### RECOMMENDATION:

**Approve** Planning Permission subject to conditions and informatives and subject to the satisfactory completion of a S.106 legal agreement.

**OR Refuse** permission should the legal agreement not be completed by the 27<sup>th</sup> November 2020 unless a later date is agreed by the Head of Planning, Development & Regulatory Services.

**The Section 106 Legal Agreement to Secure the Following:**

#### ***Affordable Housing***

Either:

Financial Contribution of £20,000 towards the provision by the Council of Affordable Housing in the Borough, index-linked from the date of permission and payable pre-occupation of the development OR

Financial Contribution of £10,000 towards the provision by the Council of Affordable Housing in the Borough, index-linked from the date of permission and payable on commencement of the development AND

Retention of one flat as ancillary to the use of the site as a church and community use, and health centre.

To enter into a S278 legal agreement with the council to make permanent alterations to the public highway. All associated costs to be met by the applicant. The S278 works include:

- Relocation of the traffic calming measures (speed cushions) on Whitley Wood Lane as illustrated on Proposed Site plan (Drawing no 1861/P01 Rev E) prior to construction of the bellmouth access.
- Construction of the bellmouth access as illustrated on the Proposed Site Plan (Drawing no: 1861/P01 Rev E).

Financial contribution of £3,800 for mitigation tree planting (11 no.) on the highway verge adjacent to Imperial Way (RBC owned land), subject to survey for suitability, or an alternative publically prominent site within Whitley Ward.

Employment Skills and Training Plan - Construction - preparation and delivery of an ESP or financial contribution of £4,357.50

**CONDITIONS TO INCLUDE:**

- 1) TL1 - standard time limit 3 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) L2 - Landscaping - to include suitable permeable surfaces for access and parking areas
- 5) L3 - Boundary treatment, including mammalian access, and acoustic fencing
- 6) L10 - Habitat Enhancement Scheme
- 7) Vegetation clearance outside of nesting season
- 8) L11 - License for bats.
- 9) SU3 - SAP Assessment Minor - Design Stage.
- 10)SU4 - SAP Assessment - Minor - As Built.
- 11)DC1 - Vehicle Parking as specified
- 12)DC3 - Vehicle Access as specified
- 13)DC5 - Cycle Parking as approved
- 14)DC7 - Refuse and Recycling to be approved (to be vermin proof).
- 15)DD1 - Access closure with reinstatement
- 16)DD3 - Roads to be provided
- 17) Facilities Management Plan - including car parking, refuse, landscape and overall site management
- 18)DD9 - Travel Plan
- 19)DE1 - Annual Review of Travel Plan
- 20)DE6 - EV Charging Points
- 21)The parking spaces for disabled people as illustrated on the Proposed Site Plan Drwg no. 1861/P01 Rev E should be properly marked as per the detailed design specifications set out in Traffic Advisory Leaflet 05/9524 and in Inclusive Mobility.
- 22)CS1 - Hours of Construction
- 23)CS2 - Construction Method Statement to be submitted and approved (including dust control)
- 24)C4 - No Bonfires
- 25)N2 - Mechanical Plant - noise assessment required
- 26)N9 - Noise Assessment and Mitigation Residential to be submitted and approved
- 27) Noise assessment of the proposed\_church hall and church premises to be submitted and approved which is to ensure that there will be no break-out noise emanating from the premises likely to give rise to disturbance to surrounding residents; to include mitigation to be installed and maintained thereafter.
- 28)N16 - Hours of Opening/ Operation - 7:00-22:00 Mondays to Saturdays and 7:30-21:00 Sundays or Bank Holidays (with the exception of church services and activities, which are related to the primary church and community uses, infrequently required to take place outside of these hours). The use of any

part of the outside space surrounding the approved buildings, within the application site boundary, shall not be used outside the hours of 8am-9pm Monday to Saturday and 8am to 8pm on Sundays and Bank Holidays, apart from for the purposes of setting up and clearing down, and accessing and departing the overall site within the curtilage of the application site.

- 29) No Amplified sound outside
- 30) Development to be undertaken in accordance with the principles set out in the approved Sustainability Statement and evidence provided post-construction to demonstrate which measures have been undertaken.
- 31) SU6 - BREEAM Post construction
- 32) SU7 - SUDS to be approved
- 33) PD8 - Use restriction, i.e. no other (D1 or D2 or subsequent uses)
- 34) External Lighting to be implemented as approved
- 35) PD3 - Obscure glazing to be implemented and retained.
- 36) Ancillary café use

#### **INFORMATIVES TO INCLUDE:**

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I10 - Noise between residential properties - sound insulation of any building - To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.
- 5) I11 - CIL
- 6) IF4 - S106
- 7) IF3 - Highways
- 8) I29 - Access Construction
- 9) IF7 - Complaints about Construction
- 10) IF1 - Positive & Proactive.

## **1. INTRODUCTION**

- 1.1 The site is located on the eastern side of Whitley Wood Lane and is a prominent plot. The St. Paul's parish owned portion of the site currently comprises two detached single storey buildings - a church and play barn (soft play area for toddlers and their parents/ carers) to the rear of the site, and a church hall to the northern side of the site. The Oxford Anglican Diocese, of which St. Pauls is a part, owns the pair of semi-detached houses to the frontage, no.1 Whitley Wood Lane is vacant and has been for a significant period of time.
- 1.2 There is amenity space, landscaping/ hedging to the boundaries, and a large parking area. There is an existing TPO (Ash) set well back on the site.

1.3 The area comprises largely residential uses with the rear gardens of Greenfields Road to the east and Whitley Wood Lane to the south. There are two commercial shop units, with residential above, to the north and a Lidl supermarket. Opposite the site is the Grade II listed St. Paul's Mews, the former church hall, now residential accommodation.



Location Plan



## 2. PROPOSAL

2.1 The proposal is to demolish all buildings and redevelop the site for the following:

### Church centre

2.2 New part 1 and part 2 storey church centre of 708sqm comprising - worship space (main hall), community café, downstairs office, a separate hall, 4 upstairs offices/ meeting rooms and 2x 1 bed flats, all equating to approximately double the size of the existing.

2.3 The meetings rooms for voluntary and community organisations are proposed to be available for meetings, office facilities and for one-to-one counselling for advice and support on a wide range of issues.

2.4 The community spaces and community café would provide for flexible meeting areas for small groups up to larger community events and celebrations.

2.5 The proposal is that the multi-purpose worship space would be available for community hire for meetings, group activities and celebrations. In addition, a small chapel/ prayer room is proposed.

2.6 The submission documents also refer to the proposed hall space being available for independent use from the café, church and meeting rooms, e.g. for a nursery or other commercial care provider. In addition, first floor rooms are identified as providing the potential for small social enterprises and that support could be available for small business start-ups.

2.7 The table below is the applicant's indicative activities, based on current usage of the site and their vision for suggested future use for community focussed activities and worship.

Activity	Day	Time	Frequency	Where
Mencap	Tue-Fri	9am-4pm	Regular	Separate hall
Play barn	Mon, Wed, Fri	9am-12noon	Term time	Main hall
Pensioners Lunch Club	Tue	12noon-4pm	Regular	Main hall
Cafe	Mon-Fri	10am-12, 2pm-4pm	Regular	Cafe
	Mon-Fri	12-2pm	Regular	Cafe
	Sat	11am-2pm	Regular	Cafe
Parish office work	Mon-Fri	9am-5pm	As required	Office
SYC	Mon-Fri	9am-5pm, occasional evenings /weekends	Regular	2 small offices
Small business use	Mon-Fri, occasional Saturdays	9am-5pm, occasional evenings	Regular	1 small office
Counselling, small group teaching	Occasional evenings, Saturdays	7pm-9pm evening, 10am-12 & 2pm-4pm Sat	Occasional	Larger office
Brownies, Youth Groups etc	Mon-Fri Evenings	6pm-9pm	Twice per week	Separate Hall
Church meetings	Evenings: 1-2 per month. Saturday: 3-4 per year	7pm-10pm Mon-Fri, 10am-5pm Sat	Occasional	Larger office, main or separate hall
Parish church services (10-30 children may attend some services)	Sunday	8am-9am	Twice a month	Chapel or main hall
		10am-12noon	Weekly	Main Hall
		10am-12noon	Twice a year	Main Hall
		5pm-6pm	4 times a year	Chapel or Main Hall
Other churches' services	Sunday	2pm-4pm	Regular	Main hall
Children's parties	Saturday	2pm -9pm	Once a month	Separate Hall
Other events, eg Saturday school	Saturday	9am-12noon	Term time	Separate Hall
		1pm-5pm	Occasional	Separate Hall

### GP health centre

- 2.8 1035sqm space including rooms for: Consulting, GP Training, Waiting, Nurses, Offices, Minor Operations, Treatment, Records, Staff, Reception, Ancillary facilities

It would be a replacement for the South Reading surgery on Whitley Wood Road and for the Whitley Wood Lane surgery which has closed. At the time of submission the practice had a list size of 7500 patients and was due to increase by around 5000 patients as residential developments within the catchment were completed. The catchment extends from southern parts of Reading to Swallowfield to beyond Grazeley Green to the west, beyond Sonning to the east and up to the outskirts of Winnersh and Wokingham.

The Health Centre would provide the following services: full GP and nursing services, minor operations, joint injections, patient group consultations, physio, counselling, out-patient clinics, ultra-sound



scans, blood tests, training for junior doctors and medical students, paramedics, pharmacists etc.

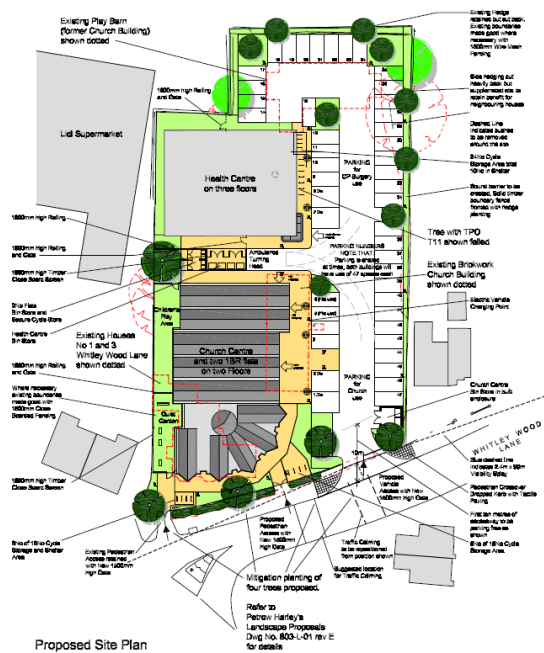
Hours of operation would be 8:00-20:00, Saturday mornings and some Sunday mornings (on a rota so not every surgery would be open until 20:00 through the week or weekend). Normal working hours would be 8:00-18:30 M-F.

Other

2.9 Comprising:

- A garden area to the north behind the church divided for Children’s play area and a quiet siting area. The Health centre would also have a garden area to the rear (north);
- 47 no. car parking spaces;
- 42 no. cycle spaces;
- Bin storage;
- Trees and other landscaping; and
- Ambulance/servicing turning head.

Proposed site plan



2.10 Submitted plans and documentation received 5<sup>th</sup> August 2019, unless otherwise stated (including amended details) is as follows:

- Existing Site Plan and Location Plan - Drawing no: 1861/P EX01
- Existing Site Elevations - Drawing no: 1861/P EX02
- Existing Plans and Elevations [houses]- Drawing no: 1861/P EX03
- Existing Plans and Elevations [hall] - Drawing no: 1861/P EX04
- Existing Plans and Elevations [church building] - Drawing no: 1861/P EX05
- Proposed Site Plan - Drawing no: 1861/P 01 Rev E, received 23<sup>rd</sup> September 2020
- Proposed Street Elevation - Drawing no: 1861/P 02

- Proposed Site Elevation [Church] - Drawing no: 1861/P 03
- Proposed Church Building Plans - Drawing no: 1861/P 04 Rev A, received 23<sup>rd</sup> September 2020
- Proposed Church Building Elevations - Drawing no: 1861/P 05 Rev A, received 23<sup>rd</sup> September 2020
- Proposed Plans [Health Centre] - Drawing no: 17/136 03 Rev A, received 1<sup>st</sup> July 2020
- Proposed Elevations [Health Centre] - Drawing no: 17/136 04 Rev B, received 23<sup>rd</sup> September 2020
- Proposed Church Building Lighting Elevations - Drawing no: 1861/P 06 Rev A, received 23<sup>rd</sup> September 2020
- External Lighting Details, received 12<sup>th</sup> February 2020
- Landscape Proposals - Drawing no: 803-L-01 Rev E, received 23<sup>rd</sup> September 2020
- Planting Plan - Drawing no: 803-L-02, received 12<sup>th</sup> February 2020
- Residential/Dwelling Units - Supplementary Information Template
- Town and Country Planning (Development Management Procedure) (England) Order 2015 Notice under Article 13 of Application for Planning Permission
- Affordable Housing Statement, prepared by DLK Architects, received 12<sup>th</sup> February 2020
- Air Quality Assessment, dated January 2020, Document ref: 19-6409, prepared by Syntegra Consulting, received 12<sup>th</sup> February 2020
- Application Statement, received 4<sup>th</sup> March 2020
- Arboricultural Implications Assessment, Tree Protection Plan and Method Statement, dated January 2020, prepared by David Archer Associates, received 12<sup>th</sup> February 2020
- Community Infrastructure Levy - Additional Information Requirement Form, received 12<sup>th</sup> February 2020
- Design and Access Statement, dated July 2019, prepared by DLK Architects
- Drainage Impact Assessment, Document Ref: 47270/4001, dated October 2019, prepared by PBA, received 7<sup>th</sup> October 2019
- Ecological Survey Report (Bats), dated 30/7/20, Document ref: SPH/ESR-20/15.07, prepared by Urban Tree Experts, received 3<sup>rd</sup> August 2020
- Noise Impact Assessment, dated January 2020, prepared by Syntegra Consulting, received 12<sup>th</sup> February 2020
- Preliminary Ecological Appraisal report, dated December 2019, Document ref: 19-6409, prepared by Syntegra Consulting, received 12<sup>th</sup> February 2020
- Site Survey as Existing - Drawing no: 01
- Sustainability and Energy Statement, dated January 2020 Document ref: 19-6409, prepared by Syntegra Consulting, received 12<sup>th</sup> February 2020
- Tree Survey, dated 28/4/17, Document ref: SPH/5837-01/28.04, prepared by Tree Surveys

- Transport Statement, dated January 2020, Document ref: 19-6409, prepared by Syntegra Consulting, received 12<sup>th</sup> February 2020
- Travel Plan - Appendix 3 of DAS
- Typical Week usage for Church, received 6<sup>th</sup> August 2020
- Church Centre Typical Week usage (including health centre), received 6<sup>th</sup> August 2020
- Typical usage of St Paul's Church Centre, received 6<sup>th</sup> August 2020
- Cycle Storage, received 23<sup>rd</sup> September 2020

2.11 Community Infrastructure Levy (CIL): the applicant has duly completed a CIL liability form with the submission. The estimated amount of CIL chargeable from the proposed scheme would be £13,200. Demolition is proportionally offset against the floorspace created, so there is a proportional charge against the new flats.

### 3 PLANNING HISTORY

**140381** - To redevelop the existing church site, to construct a new church and community facility (645 sq m), a clinic to house a GP practice (500 sq m) and two houses to the rear - Observations sent 8/7/14

**171443/PREAPP** - Pre-application for proposed redevelopment of site, creating a new community building, comprising cafe/worship space, meeting rooms, nursery and residential accommodation and a new GP practice facility - Observations sent 12/10/17

### 4 CONSULTATIONS

#### Statutory

4.1 None

#### Non-statutory

##### Clinical Commissioning Group

4.2 No comments were received during the course of the application, but comments were provided at the pre-application stage and these are included below for context:

*"In the wider context, NHS England has set out a strategy to transform primary care across the country and is described in the document General Practice Forward View (GPFV) published in April 2016. This sets out a national approach to improving investment, workforce, workload, infrastructure and care design. Using this guidance, plus access to additional funding, primary care (GP services) will be future proofed to meet the needs of a growing and ageing population with complex multiple health conditions by offering population- orientated primary care.*

*In response to this national direction of travel, South Reading CCG has developed a local primary care strategy and action plan that sets out how we will develop primary care in our locality to meet the needs of our population and ensure long-term sustainability.*

*University Medical Group is not able to keep pace with the month on month increase to its registered patients list which currently stands at 27,433 [31<sup>st</sup> May 2017]. In addition, the CCH is aware of future housing developments planned by Reading Borough Council which will have a further impact on the registered list. Despite this, the surgery provides a full range of services to its patient population including additional services outside of core contract. This supports the joint Reading Borough Council and CCG Health and Wellbeing Strategy 2017/20 of which one priority is: Supporting people to make healthy lifestyle choices - dental care, reducing obesity increasing physical activity, reducing smoking.*

*The Berkshire West Accountable Care System (ACS - the combined local health economy) has recently been awarded 'exemplar status' in the refreshed GP Forward Next Steps (published March 2017). One of the work streams within the development of the ACS will review the current configuration of Outpatients with a view to move more clinics into the community, in line with the diabetes model of care. This will ensure that services re 'wrapped around' the patient and release capacity from hospital. The proposed new build will provide additional clinic and training capacity to support consultant-led clinics and reduce the need for multiple hospital appointments for patients with chronic conditions such as heart disease, diabetes and hypertension.*

*The CCG supports any activities and services that will help people keep well and managed in the community and avoid unnecessary attendance to Royal Berkshire Hospital. The CCG is therefore fully supportive of the plans and the approval of this new build will provide a key enabler for the delivery of our primary care strategy."*

#### **Ecology**

- 4.3 The Ecology officer comments as follows: An ecological assessment ("Preliminary Ecological Appraisal Report - Syntegra Consulting" has been submitted with the application. This reads:

*"The play barn and dwellings had notable features providing crevice roosting opportunities and potential access points. The play barn was deemed of low potential and the dwellings are of moderate potential for roosting bats. Of the trees onsite, only one ivy clad ash tree was deemed as low potential for use by roosting bats."*

*and*

*"- The play barn and dwellings noted potential features suitable for roosting bats, it is recommended that given the location one dusk or*

*dawn echolocation survey is carried out to determine likely absence or confirmed presence.*

*- One mature ash tree within the southern boundary had notable features suitable for roosting bats, should any works be required to this tree or require removal to facilitate the development, then a further echolocation survey will be required during the active survey season (May to August inclusive);”*

i.e. to determine if the site hosts roosting bats further surveys of the building and tree would need to be undertaken.

The results of the survey would need to be provided before the application is determined. This is because paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) reads:

*“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”*

#### Further survey requirements

The Bat Conservation Trust’s Bat Survey Guidelines state that to determine the presence or absence of bats where the building has been assessed as having “moderate” suitability for use by roosting bats (as is the case for the dwellings) two dusk emergence / pre-dawn re-entry bat surveys need to be carried out. For buildings with “low” suitability one survey needs to be undertaken.

Surveys need to be carried out between May and the end of August (sub-optimally)

#### Summary

The outbuilding, dwelling and ash tree have features potentially suitable for use by roosting bats. Further surveys would, need to be undertaken determine if these buildings and tree host a bat roost. The application should not be determined until the surveys have been carried out and the results, including a mitigation plan, submitted to the council. If this information is not provided, the application would need to be refused on the grounds that insufficient information has been provided for the council to determine the likely impact of the proposals upon bats, which are a protected species and material consideration in the planning process.

**Planning Officer note:** Following the submission of a bat survey report, Ecology provided the following further comments:

The bat emergence survey report (Urban Tree Experts, July 2020) has been undertaken to an appropriate standard and concludes that the building 1 Whitley Wood Lane hosts a day roost for a common pipistrelle bat, and that bats may use features within all buildings on site opportunistically. The report therefore recommends that works be undertaken under licence to Natural England.

As such, a licence for development works affecting bats will need to be obtained from Natural England - for derogation from the provisions of the Habitat Regulations - before works which could affect the roosts can commence. The report includes a mitigation strategy to ensure that the favourable conservation status of bats can be maintained.

A condition should be set to ensure that the licence is obtained.

#### A planning authority's duty under The Habitat Regulations

Planning Authorities have statutory duties under The Habitat Regulations. It needs to be satisfied that a licence for development works affecting bats is not unlikely to be granted by Natural England.

[The courts have considered the application of a planning authority's duty under the Habitat Regulations e.g. *Morge vs Hampshire County Council* (2010). In the *Morge* case the supreme court has ruled that it cannot see why planning permission should not be granted unless the proposed development would be unlikely to be licensed as a derogation from those provisions.]

#### Consideration of The Habitat Regulations

In this case it is considered that as long as a mitigation plan such as that given in the bat survey report is provided the proposed works would pass the three tests of The Habitat Regulations, and as such receive from Natural England a licence, because:

1. The development is for an imperative reason of overriding public interest of an economic nature as the development will contribute to a social and economic need of the local community (this is assuming that it is in compliance with other planning policy) - therefore Regulation 55(2)(e) can be met
2. There is no satisfactory alternative to the development as without carrying out the works the aforementioned need would not be met - therefore Regulation 55(9)(a) can be met.
3. Appropriate mitigation can be provided which will ensure that there will not be a detrimental impact to the favourable conservation status of the bat species concerned - therefore Regulation 55(9)(b) can be met.

Planning policy

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (NB this document has not been revoked by the National Planning Policy Framework) states that:

*“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the procedure set out in section C below.”*

As such, subject to condition, there are no objections to this application on ecology grounds.

**Environmental Protection & Nuisance (EP&N)**

4.4 Noise impact on development

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

The noise assessment data should also include noise events (L<sub>A</sub>Max) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night, as this is linked with sleep disturbance.

***Internal noise criteria (taken from BS8233:2014)***

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB L <sub>A</sub> eq,8hour	

Living rooms (07:00 - 23:00)	<35dB LAeq,16hour	
Gardens & Balconies	<50dB LAeq,T	<55dB LAeq,T

The submitted noise assessment shows that recommended internal noise levels can be met for the new residential properties, and recommendations are made for suitable glazing. The proposed ventilation strategy has not been decided however, as the assessment suggests either acoustic trickle vents or alternative ventilation. Trickle vents may not provide adequate cooling. A condition is recommended.

#### Noise arising from development

I have concerns about the potential for noise disturbance due to the use of the church and church hall and impacts for existing and new residents, in particular internal transfer from the church hall to the flats above. Although the submitted noise assessment makes brief mention of this element there is insufficient detail to determine likely noise levels and to ensure that no noise emanates from the buildings, e.g from music. Ideally such an assessment should be provided before determination.

Restrictions on opening hours may be required, but in the absence of a noise assessment it is also difficult to suggest appropriate hours of use, but I would suggest no use outside of 7 am to 11 pm as a minimum.

#### Noise generating development

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology. The health centre and church are likely to require mechanical plant such as air conditioning units.

A noise assessment of plant has not been submitted with the application and therefore I cannot determine the likely noise impact of the proposal and whether the proposals are acceptable. I therefore recommend refusal unless a noise assessment can be submitted and considered by us before the application is determined.

Alternatively, a condition could be attached to consent, however it is possible that the criteria would not be met with the plant specifications proposed in this application and a new application may need to be made at a later date for alternative plant / location.

#### Air Quality - Increased exposure

The air quality assessment concludes that the new receptors will not be exposed to levels of NO<sub>2</sub> above the EU limit values therefore no mitigation measures are required.



#### Air Quality - Increased emissions

The air quality assessment concludes that the development will result in a slight worsening of air quality at existing receptors, however these will remain below the EU limit values therefore no mitigation is required.

#### Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Recommended conditions - CMS, hours of construction/demolition, no bonfires.

#### Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels, 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. I recommend a condition.

***Planning Officer Note:*** Some further detail was provided by the applicant with regard to noise reduction measures, however EP&N requested a condition be included requiring the submission and approval of a specific noise assessment addressing noise generated from the use of the church building, which is included in the recommendation above.

#### Heritage

- 4.5 The proposed replacement buildings consist of 2 and 3 storey buildings with car park, which would be located across the road from the Grade II Listed St Pauls Church. The church centre building includes large areas of glazing with multi-pitch roofs.

The proposed re-development would remove the existing on-site buildings consisting of two Edwardian brick houses along the front, a brick church hall, and a corrugated iron Church at the rear of the site together with a large car park area. The Edwardian cottages and iron church hall have some local heritage interest. It is uncertain the

date of the corrugated church which could be of interest, but this is not explored in the supporting documentation.

Whilst the Grade II Listed Church Hall building would lose some historic context with the loss of the cottages, church hall and church opposite, it is already separated by the intervening road and does not relate well to these buildings which are of a different style. The development of the Lidl supermarket opposite has also eroded much of the remaining historic setting.

In view of the separation of the proposed site from the Grade II Listed Hall and the loss of the existing historic setting, there are no objections in principle to the proposals subject to conditions regarding the submission of further details and samples for the proposed materials.

**Natural Environment (tree officer)**

4.6 *The original comments were as follows:*

St Pauls Church is prominently located at the junction of Whitley Wood Lane and Basingstoke Road a potential treed corridor as identified in the Borough's adopted Tree Strategy. The site is located in an area of the Borough identified as an Air Quality Management Area where retention of large canopy trees is of greater importance and an area of the Borough identified as having less than 10% tree cover. The borough council looks to use new development in such areas as an opportunity to encourage new tree planting to enhance the appearance and environment of identified residential areas with very low levels of tree cover.

There is one protected tree on site, an Ash tree (T11 of the report) which is to be removed. The applicant has again made reference to the threat to the species from Chalara Ash Dieback (*Hymenoscyphus fraxineus*) in support of their application to remove the tree.

Current guidelines from Forest Research advise that:

*'With the exceptions of felling for public safety or timber production, we advise a general presumption against felling living ash trees, whether infected or not. This is because there is good evidence that a small proportion will be able to tolerate H. fraxineus infection. There is also the possibility that a proportion of ash trees can become diseased, but then recover to good health. These, too, would be valuable for our research, although it is still too early to know whether there are such trees in the British ash population.'*

*However, by keeping as many ash trees standing as possible, we can identify individuals which appear to survive exposure to the fungus and which can be used for breeding tolerant ash trees for the future.'*

Certainly, the Borough Council would not accept Chalara Ash Dieback as a justification to support the removal of otherwise healthy protected trees in the borough and permitting the removal of this tree for this reason alone would set an unacceptable precedent when it came to our consideration of similar applications in the future.

This proposal appears to require the removal of all 29 trees surveyed on and around the boundary of the site including 7 category B trees with only 8 replacement trees, 10 less than proposed in the initial pre-application scheme layout. I would note here that there appears to be some discrepancy between the trees shown to be retained and those which are to be removed in the Arboricultural Report and site plan. But in both plans, the application represents an overall loss and impoverishment of tree cover within the site which, coupled with the removal of the protected Ash is unacceptable in principle given the sensitivity of this urban area.

I appreciate that the scheme would be of benefit to the local area by improving the appearance and functionality of a currently substandard community site, however it must not be overlooked that trees in the area also offer significant benefits to the wider community. With this in mind, there may be scope for the removal of the protected tree within the site in order to achieve the best potential layout. However, as I advised in the pre-application discussion for the site, in order for the removal of this protected tree to be considered acceptable in arboricultural terms we would expect a suitable scheme to achieve the following:

- substantial new planting with a minimum of 1:1 replacement planting of all felled trees with better specimens.
- consideration given to the retention and protection of trees off site whose roots may be within the development site with no-dig pathways / parking spaces where appropriate.
- adequate space for new trees to grow to maturity without necessarily coming into contact with property or other trees on or off the site - as shown the future growth of canopies of the new trees along the frontage of the site and between the buildings will be restricted by the proximity of the new building.
- There should be a presumption in favour of planting trees in areas of soft landscaping. If it is essential that trees be planted around areas of hard standing and parking areas then an engineered rooting structure must be provided which allows for the predicted growth of each tree so that the trees can grow without foreseeable damage to areas of hard standing. Linked / connected tree pits where trees are to be planted in close proximity to each other and connected to SUDS for irrigation and to improve site sustainability.
- No trees planted within 5m of existing or proposed lamp columns.

New areas of close board fencing would need to incorporate mammalian access holes.

I consider that this application is contrary to policy EN14 of the adopted Local Plan which requires that Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The application is also contrary to the objectives within the Boroughs adopted tree strategy and the Revised Sustainable Design and Construction SPD which states that *Development will not be permitted which would undermine current levels of tree cover as this is likely to be damaging to climate change adaptation strategies*'.

**Planning Officer note:** Following a number of further discussions with the landscape consultant and receipt of amended plans, a final landscape plan was submitted and considered acceptable by the Natural Environment officer who provided the following comments and recommended conditions and informatives.

*"The revised landscaping scheme is acceptable in principle.*

*I note that the neighbouring property owner has raised concerns regarding the planting of large trees along this boundary and the issue with roots damaging the adjacent mains water pipe. The current landscape layout proposes only smaller specimen trees and hedges along these boundaries in order to reduce potential conflict in these areas.*

*The original site held in the region 26 trees. The current layout includes 15 trees reasonably spaced, in locations where they can grow to a maturity without inevitable conflict with property. Tree species have been specified in order to take into account the space available and Planes along the frontage will be pollarded when they reach early maturity in order to allow for potentially large amenity trees along the frontage which will enhance the verdant character of Whitley Wood Lane.*

*Policy EN14 of the adopted Local Plan which requires that Reading's vegetation cover will be extended. The Boroughs adopted tree strategy and the Revised Sustainable Design and Construction SPD which states that Development will not be permitted which would undermine current levels of tree cover as this is likely to be damaging to climate change adaptation strategies*'.

*Recognising that this application would be of significant benefit the local community, I would accept a reduction in the net number of trees on site provided that a minimum of 10 additional trees can be planted elsewhere within the Whitley Ward. Having spoken to Parks, this is acceptable in principle and costs should be included within any a S106.*

*We will need to agree information on planting sizes and density if planning permission is granted. Also boundary fencing will need to*

*include small mammal holes in order to allow hedgehogs and other small mammals to access and forage the site etc.”*

### Transport

- 4.7 Following initial comments from Transport the applicant prepared amended information and provided details of usage and likely numbers. Transport’s amended comments were as follows:

#### Access

The site is situated on one of the Borough’s Main Transport Corridors classified as the C403, all proposals should comply with Reading Borough Council’s Design Guidance for Commercial Accesses on to Adopted Roads. Therefore, the proposed access modifications are assessed with particular care to ensure good design standards are achieved, especially with the respect to layout and visibility.

The existing vehicular access into the site is from Whitley Wood Lane in the form of a dropped kerb footway crossover. Access to the site will be provided in the general location of the existing access but upgraded to a bellmouth junction. It is stated that the proposed site access measures 7.0m in width allowing two-way movement with 6.0m radii.

In order to facilitate the upgraded access, the existing speed cushion will need to be relocated. This will need to be covered under a S278 agreement of the Highways Act which is separate to the planning process. All costs associated with this would be fully met by the applicant.

Adequate provision must be provided for pedestrians and cyclists. A separate pedestrian access is provided into the site, separate to the vehicular access. However, the proposed bellmouth junction should be provided with tactile crossing points for both pedestrians and cyclists. This should be illustrated on the final revisions to the proposed site plan.

Upon vehicular entry to the site, car parking is provided on either side of the internal road which measures 6.0m in width. New car parking bays will be introduced at the site entrance allocated to the church. However, no junctions with other roads or accesses to parking areas should be provided along the first 10 metres of the access road. Therefore, these parking bays must be relocated within the site. This has been addressed on the suggested revision to the site plan received 16/07/2020 - to be formally submitted.

Visibility splays of 2.4m x 90m are also required as Whitley Wood Lane is a classified road.

#### Parking

The site is located within Zone 3, Secondary Core Area, of the Council’s adopted Parking Standards and Design SPD. Typically these

areas are within 400m of a Reading Buses high frequency ‘Premier Route’, which provides high quality bus routes to and from Reading town centre and other local centre facilities. In accordance with the adopted SPD, the development would be required to provide a parking provision in line with the standards below;

**Table 1 – Car and Cycle Parking Standards**

Site Use	Zone 3 Car Parking Standards	Minimum Cycle Parking Standards
D1 Clinic/ Health Centre	3 per consulting room + 1 per FTE staff	1 per 2 staff & 1 stand per consulting room
D1 Places of Worship (including crematoria chapels/ Church Hall/ Community Hall	1 per 8 fixed seats and/ or 1 per 16m <sup>2</sup> open hall	1 space per 50m <sup>2</sup>
C3 Dwelling Flat 1-2 Bed	1.5 space per unit	0.5*

The adopted Parking Standards SPD states *“Where comprehensive and mixed-use development schemes are likely, developers are encouraged to provide shared parking facilities which are likely to generate peak parking levels during different periods of the day.”*

In order promote good design and efficient use of land, we support proposals which share parking facilities but there needs to be a detailed analysis to demonstrate that the peak periods will not coincide. Given that the health centre will be open 8am to 6.30pm plus some evenings, the applicant has submitted additional information to assess the parking demand for the different uses at different times of the day.

A total of 47 car parking spaces and 42 cycle parking spaces will be provided within the site.

The proposed Health Centre will replace South Reading Surgery on Whitley Wood Road, located 650m from the site. It will also provide services for Whitley Wood Surgery (located 320m away) which closed in January 2018. The Health Centre will be provided with 30 car parking spaces, of which two will be provided for disabled use.

The Health Centre will be open 8am-6:30pm Monday-Friday, some evenings, alternate Saturdays and some Sundays. Peak times will be weekday mornings and afternoons (clinics usually run from 8.30-11.30 and then 2.30-18.00), with a reduction in appointments over lunchtimes and at weekends. The anticipated staffing levels at the Health Centre will be 3-4 GPs and 1-2 nurses per main shift plus a Practice Manager, 3-5 Receptionists/administration staff and up to 4-6 other clinical professionals. It is indicated that this will create no more than 20 face to face appointments per hour. The Health Centre is planning for at least 50% of patients’ queries to be managed remotely which will not require a face to face appointment.

During the week, it is anticipated that staff parking will require up to 16 spaces with the demand for patient parking varying subject to appointment times. It is indicated that the Health Centre will be

able to remain within its 30 parking space allocation at peak times although it is recognised that at peak times, on occasion, up to an extra 4 car parking spaces may be required.

The Health Centre will not be open every Saturday (probably alternate Saturdays), and when it is open, it will be morning only, with likely only 1 GP and no nurse. Approximately 18-20 patients would be seen, some of whom would be managed remotely. The anticipated demand for parking on Saturdays is significantly lower requiring 2-3 staff car parking spaces and 6 patient spaces at any one time.

The Health Centre is likely to be open occasional Sunday mornings, always with very reduced staffing. Staffing and face to face sessions are expected to be similar or reduced compared to Saturday openings.

The proposed Church Centre (D1 Use Class) will be constructed over two floors, with a total of 708m<sup>2</sup> GFA for the entire building (508m<sup>2</sup> on the first floor and 200m<sup>2</sup> on the second floor). The proposed Church Centre will effectively replace the existing on-site buildings and will provide more space for community uses. The proposed Church Centre will be 416m<sup>2</sup> GFA larger than the existing buildings on the site. The Church Centre will provide 17 car parking spaces.

The site is located within Zone 3, Secondary Core Area, of the Council's adopted Parking Standards and Design SPD. In accordance with the adopted SPD, the development would be required to provide 1 space per 8 fixed seats and/or 1 space per 16msqm open hall.

It is stated that the proposed Church Centre would be just over double the size of the existing buildings providing additional facilities and meeting rooms. The Church Centre comprises a main hall, a café area, a downstairs office, a separate hall, and 4 upstairs offices/meetings rooms (3 small, one larger).

On weekdays, the main hall will be used for Playbarn (which currently operates from the existing building) and children's holiday clubs etc. It is anticipated that this will generate demand for 6 parking spaces. Given that this is an existing facility, I assume this is an accurate prediction of the parking demand. The café area will be available for people to drop in for informal social contact. It is expected that during the mornings and afternoons, it will mainly be used by those on site for other reasons (and so already counted for car parking purposes), or by local people on foot or on bicycle. At lunchtimes, it is hoped to be busier, with people dropping in from local businesses. It is anticipated the peak demand for parking associated with the café use will be at lunchtimes generating a demand for 8 parking spaces. It is stated that the use of the 4 upstairs offices/meeting rooms are not yet finalized but they are

intended for 1:1 counselling, small group meetings, small local business use, or small community uses etc. The demand car parking has been estimated (as the end users are not yet confirmed) but it is stated that the applicant would need to restrict their use to activities involving fewer cars at peak times if parking becomes an issue.

It appears that the anticipated weekday usage for the Church Centre will generate a peak demand for 19 parking spaces which exceeds the allocated number of spaces by 2. However, these peaks occur during the lunch period when the Health Centre has a reduction in appointments.

At weekends, the church centre it will be used for worship purposes to accommodate up to 60 chairs for formal worship. It is indicated that on rare occasions (eg annually) that we would expect to tidy away the soft play area to enable 100-150 seats to be put out. Given that the Health Centre would generate demand for significantly fewer parking spaces, shared parking facilities would not cause a shortfall of parking spaces for the combined uses at weekends.

A significant amount of detail has been provided regarding the anticipated demand for parking spaces across the two uses. It is noted that the applicant has estimated the demand for parking for some users as the end user has not been finalised, however, the applicant has stated that it is planned that the Doctors and the Parish will have quarterly meetings to manage the joint use of the site. At these meetings, review of parking will be a standing item on the agenda, and any emerging problems will be addressed. In addition, I would suggest that a Car Parking Management plan is conditioned to ensure that an agreed approach is submitted in respect of use of shared spaces.

For the residential element, 2 car parking spaces are proposed; one per dwelling which is slightly below (1 space) the required provision. However, this is deemed acceptable considering the flats are one-bedroom units.

#### Layout

The internal layout of the site is generally deemed acceptable aside from the parking bays located too close the access. Each car parking space measures 2.4m x 4.8m in accordance with RBC's guidance. A total of 4 spaces have been provided as suitable for disabled persons located within 10m of the entrance of the Church Centre and Health Centre.

The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public



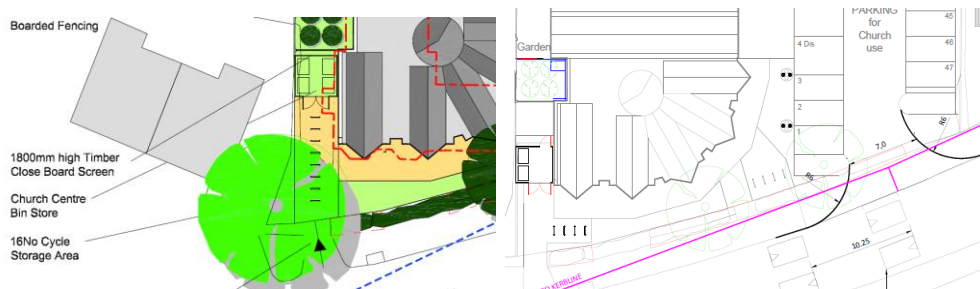
transport. Policy TR5 of the Local Plan also states any developments of at least 10 spaces must provide an active charging point (1 space for every 10 spaces). Five electric vehicle charging points will be provided, between parking bays to serve a total of 10 bays which exceeds the Council's standards.

The refuse store for the Church Centre is provided at the western corner of the site, providing space for two large Eurobins. However, the position of this bin store would cause the collection to occur on the carriageway close to the Basingstoke Road/Whitley Wood Lane/Imperial Way Roundabout. Therefore, it should be relocated within the site to ensure all refuse collection occurs off the highway - This has been addressed on the suggested revision to the site plan.

A separate store is provided for the Health Centre, providing space for four large Eurobins. A further store is provided for the flats, comprising two standard size bins for each flat.

Swept-path analysis has been undertaken to demonstrate a refuse vehicle, ambulance and delivery vehicle turning on-site. A turning head is located between the Health Centre and the Church Centre. The turning head has been designed to accommodate a delivery vehicle turning, whilst an ambulance (or similar vehicle) is waiting within the turning head (or vice versa).

A total of 42 cycle parking spaces will be provided within the site. The two flats will be provided with their own private bin and cycle storage areas. It is stated that 12 stands (to accommodate 24 cycles) are provided outside the proposed Health Centre, 4 stands (to accommodate 8 cycles) are provided adjacent to the main pedestrian entrance to the site and a further 4 stands (to accommodate 8 cycles) are proposed to the western corner of the site. However, this layout differs from the layout on the proposed site plan (drawing no. 1861/P01). The proposed cycle parking layout as illustrated on drawing no. 1861/P01 will obstruct access to the bin store which is unacceptable - I will relook at this once the suggested revision to the site plan is formally submitted.



In addition, it does not appear that these spaces are under a covered enclosure. This is particularly important for all day parking or staff cycle parking.

### Trip Generation

The proposed Church Centre will replace the existing buildings on the site and will provide more space for community uses. It is stated that the church uses are likely to continue to operate similar uses to the existing site and will remain open throughout the week and weekends, as well as in the evenings. Therefore, it not anticipated that the church facilities will significantly increase vehicular trips to site during the AM and PM peak hours.

In terms of the proposed Health Centre building, the new GP Contract will require Hub practices to open 08.00 to 20.00 Monday to Friday, Saturday morning and also some Sunday mornings. The Transport Statement calculates that the proposed new health centre will generate in the region of 55 two-way vehicle trip in the AM peak, 44 two-vehicle movements in the PM peak and 636 two-way vehicle trips across a 12-hour period.

Whilst there is currently no health centre located on the site, the proposed health centre will replace the current South Reading Surgery and will also provide services for displaced patients of the recently closed Whitley Wood Lane Surgery, therefore, it is determined that the net impact of the total proposed development is likely to generate an additional 461 two-way vehicle trips across a 12-hour day, including 29 two-way vehicle trips in the AM Peak and 47 two-way vehicle trips in the PM Peak.

In view of this, it is therefore considered that the proposed development would not have a detrimental impact on the surrounding road and transport networks, and no further junction assessments are required.

Conditions: CMS, vehicle parking, vehicular access, cycle parking, refuse and recycling, access closure with reinstatement, roads to be provided, car parking management plan, travel plan, annual review of the travel plan, electric vehicle charging points.

S106 Requirements: Relocation of the traffic calming measures (speed cushions) on Whitley Wood Lane as illustrated Proposed Site plan (Drawing no 1861/P01) prior to construction of the bellmouth access.

**Planning Officer note:** Following the submission of amended plans and showing the following: Bellmouth illustrated; parking bays moved to a minimum of 10 m for the access road; re-siting of refuse so that collection would be off the highway; and revised location for cycle storage and the details of the cycle storage shelter, Transport confirmed that the proposal would be acceptable from a transport perspective. This would be subject to conditions and informatives and S106 as included in the recommendation above.

#### 4.8 Public

Nos. 1-6 St. Paul's Mews, Whitley Wood Lane, Nos. 25-31 (odd) Whitley Wood Lane, Nos 1-3 Whitley Wood Lane, Nos. 55-63 (odd) Greenfields Road, Lidl, 579 & 581 Basingstoke Road were consulted and a site notice was displayed.

3 no. objections and 12 no. support were received. These are as follows:

##### *Noise and disturbance*

- We have had noise and disturbance issues with the Church's lettings over a long period of time. This will only get worse with the proposed development.
- One of the major noise disturbances we have to endure is the constant banging of car doors both upon entry and exit to the site, waiting in cars with engines running, music blaring etc. This used to happen at the side of our house, but now thanks to the car park extension, extends to our back garden. The summer months can be unbearable when the hirers are in. They leave their cars running and we have to retreat indoors.

##### *Loss of Privacy*

- A loss of privacy from the southern side of the building from overlooking. The health centre will overlook our property and all surrounding properties.

##### *Transport and Parking*

- The proposed carpark is intended to extend further resulting in more noise, higher emissions! I am at a loss to understand why the car park constantly needs extending if it is in fact a hub for the local community. Does the local community really need to drive there? Should the council not be encouraging the reduction of CO2 emissions and the use of more environmental friendly methods of transport?
- Located on the very dangerous junction of Basingstoke Road and Whitley Wood Lane. People speed up the road in spite of the speed humps. There is a shop 2 doors away from the planned development. Customers park over dropped kerbs of the nearby houses and park outside the shop, visibility is restricted when leaving the site of St Paul's and even our houses. How can there be safe access going/leaving the development? It's dangerous currently so adding vehicles coming/leaving the planned facilities will increase problems. Cyclists use the pavements as cycle paths and many times 'near misses' have happened because of restricted visibility.
- The proposed development will be a 7-days a week operation with a vastly extended carpark! Access to and from the development will be from a busy main road (Whitley Wood Lane) that has seen traffic calming measures introduced over the years. The entrance/exit will be in fact just metres from a very busy junction with neighbouring Basingstoke Road.

### *Security*

- The site has not been secure for several years. The vicar used to live on site and church warden next door and things were very peaceful. Since both have left it is now down to us to either report the anti-social behaviour or tolerate it! There have also been several break-ins, some we have witnessed and reported to the Church. I would strongly recommend that any proposed development would need some form of security, especially if a Health Centre is indeed part of the development.

### *Design*

- Design of the Church is very pleasant and you can appreciate the time, effort, skill and imagination undertaken. The Health Centre looks like a prison block. Little time or imagination used there. Overbearing and totally out of character in terms of appearance.

### *Need*

- Why is there a need for a health centre? There are 6 and the Whitley Health Clinic all within a three mile radius.
- If we are in need of a health centre in Whitley Wood why was/is the recent much larger development across the road at Worton Grange not considered a more practical option instead of the empty industrial/retail units currently sited there

### *Trees*

- I am also very concerned about the mature Ash tree covered by a TPO being destroyed. The tree is in good condition and I am amazed Reading Borough Council are even entertaining this!

### *Use*

- We, Reading Mencap, are current users of the existing St.Pauls church hall for 4 days a week 52 weeks a year for a Reading Borough Council commissioned day service for people with learning disability. We feel this is not properly reflected in the submission from the vicar. We will certainly need to use the hall following any redevelopment.

### *Support comments*

- It will provide a valuable local resource for the area, local health care and a space for people to meet. An excellent resource to build community; These plans help serve the young people and community of Whitley Wood and wider Whitley very well, building on the many years community engagement that has taken place there so far.
- Local facilities for families with young children is poor - the Playbarn has been very popular amongst the locals, and a lifeline for many, and often isolated young mums in the area, but the life of the building it is currently held in, is limited and very difficult to heat. I understand this will be rehoused in the new church centre, which will be excellent.

- Whitley Wood needs a cafe to which local people can walk and get a decent cup of reasonably priced coffee. A place to sit down, meet and talk provides a heart in a community. It will bring community cohesion.
- Whitley Wood's only civic building is the community centre in Swallowfield Drive; built by the people themselves it has served the community well over many decades. A new well-designed visible centre on the St Paul's site will foster civic pride and be an uplift for the whole area.
- This area is in need of a health facility and this plan is a comprehensive one; it will provide essential facilities for residents of the newer developments in the area. The current premises of South Reading Surgery is not suitable for a doctor's practice, as it is too small, and without sufficient parking for patients. The new building will be purpose-built and provide suitable access for patients, some of whom are disabled.
- The proposed development will be a real boost to this deprived part of Reading. The redeveloped centre would provide a much needed focal hub in this area.

Comments from Alok Sharma MP

*“In September I met with Rev Sue Cady of St Agnes with St Paul and St Barnabas, based in my constituency. During our meeting, Rev Sue informed me of plans to redevelop the site of St Paul’s on Whitley Wood Lane. The proposals seek to create a new community building to include a cafe, multi-purpose community areas, meeting rooms, two one-bed residential flats, along with a health centre. A new church facility will also be built and the proposed site layout is enclosed. Rev Sue explained that the redevelopment will deliver improved primary care and much needed new homes in the local area whilst also providing space for community usage and church activities. During my visit in September, I was impressed with the outreach work the church undertakes and the fact that the redevelopment delivers new homes and a healthcare facility should be welcomed. Therefore, I would be grateful if you could please take this letter of support into consideration as part of your deliberations about the above 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) (2019) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.
- 5.2 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Policy CC1: Presumption in Favour of Sustainable Development  
 Policy CC2: Sustainable Design and Construction  
 Policy CC3: Adaptation to Climate Change  
 Policy CC5: Waste Minimisation and Storage  
 Policy CC6: Accessibility and the Intensity of Development  
 Policy CC7: Design and the Public Realm  
 Policy CC8: Safeguarding Amenity  
 Policy CC9: Securing Infrastructure  
 Policy EN1: Protection and Enhancement of the Historic Environment  
 Policy EN6: New Development in a Historic Context  
 Policy EN12: Biodiversity and the Green Network  
 Policy EN14: Trees, Hedges and Woodland  
 Policy EN15: Air Quality  
 Policy EN16: Pollution and Water Resources  
 Policy EN17: Noise Generating Equipment  
 Policy EN18: Flooding and Drainage  
 Policy H1: Provision of Housing  
 Policy H2: Density and Housing Mix  
 Policy H3: Affordable Housing  
 Policy H5: Standards for New Housing  
 Policy H7: Protecting the Existing Housing Stock  
 Policy H10: Private and Communal Outdoor Space  
 Policy H11: Development of Private Residential Gardens  
 Policy TR1: Achieving The Transport Strategy  
 Policy TR3: Access, Traffic and Highway-Related Matters  
 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging  
 Policy OU1: New and Existing Community Facilities

- 5.3 Relevant Supplementary Planning Documents (SPDs) are:
- Employment, Skills and Training (April 2013)
  - Sustainable Design and Construction (December 2019)
  - Revised Parking Standards and Design (October 2011)
  - Affordable Housing (July 2013)
  - Planning Obligations Under Section 106 (April 2015)

## 6 APPRAISAL

The main matters to be considered are:

- **Principle of Development**
- **Design and Effect on the Character and Appearance of the Area**
- **Housing Mix**
- **Residential Amenity**
- **Transport**
- **Landscaping and Ecology**
- **Sustainability**
- **Environmental Matters**
- **S106**

- Other Matters Raised
- Equalities impact

### Principle of Development

- 6.1 In order to achieve sustainable development the NPPF identifies three overarching objectives: economic, social and environmental. As part of the social objective development should “*support, strong, vibrant and healthy communities, by ensuring that ..... accessible services and open spaces ... reflect current and future needs and support communities’ health, social and cultural well-being.*”
- 6.2 Paragraphs 91 and 92 of the NPPF require planning policies and decisions to promote social interaction and provide the facilities and services for community uses and to support the delivery of local strategies to improve health.
- 6.3 One of the key objectives (para 2.2.2 part 3) of the Reading Borough Local Plan (RBLP) is to “*Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to..... services and facilities (such as....., healthcare services, social and community facilities, ...) to meet identified needs.*”
- 6.4 The requirement for health infrastructure is identified as a high priority within Policy CC9: Infrastructure, and the RBLP also includes an Infrastructure Delivery Plan. This identifies infrastructure required to support sustainable growth and this includes new surgeries, in particular, in the south of the Borough.
- 6.5 Policy OU1 states that “*Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan.*”
- 6.6 The supporting text in para 4.7.1 states that “The provision of sufficient good quality community facilities is crucial to ensuring that Reading is a place in which people want to live and continue living. This includes health facilities, community centres, meeting places and places of worship.
- 6.7 The provision of a new health hub would clearly meet this objective, and in light of the Covid pandemic there is an increased priority for improving and extending healthcare provision.
- 6.8 The principle of the proposed redevelopment and enlargement of the community provision both with respect to the church building, but also the health centre, providing a broader range of services and improved access, and for the health centre with outpatient services

to reduce the demand for these at the hospital, would comply with Policy OU1 in providing an enhanced community use over and above the existing. Although acceptable in principle this would need to be subject to meeting other policy considerations as set out below

- 6.9 The proposal includes the loss of two family homes and replacement with two 1 bed flats as part of the overall mix of development. Policy H2 states that *“wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms.”* It should be noted that although these would be within the building envelope of the Church, the submission does not implicitly state that it is the intention that they would be ancillary to the church use. However, there is further discussion, as set out below, regarding the potential for this to be formalised, which would form part of the overall S106 legal agreement.
- 6.10 Although the proposal would mean the loss of two family units this needs to be balanced against the overall benefits of the proposal. It would provide a significant enhancement to the quality and overall size of community facility along with a health provision, the positive impacts of which are considered to outweigh the loss of family sized accommodation in this case. However, in light of this weight given to the proposed use of the two buildings it is appropriate and reasonable to remove any permitted development rights to change the use to any allowed as permitted development. The recent amendments to the Use Classes Order (UCO) sets out that *“If prior to the commencement of the material period, a relevant planning application was submitted, or was deemed to be submitted, to the local planning authority which referred to uses or use classes which applied in relation to England and were specified in the Schedule to the Use Classes Order on 31st August 2020, that application must be determined by reference to those uses or use classes”*. Therefore, a condition is recommended to remove permitted development rights to change the use under either the use class system before 1st September or after it.

#### **Design and Effect on the Character and Appearance of the Area**

- 6.11 The NPPF (Para 124) sets out that good design is a key aspect of sustainable development. The National Design Guide identifies 10 key components for good design and of particular note are the characteristics of Context and Identity; *“well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones.”* *“Responding to local character and identity”*.
- 6.12 Policy CC7 requires all development to be *“of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* The components of design include: Layout: Urban structure and urban grain; Landscape; Density and mix; Scale: height and massing; and Architectural detail.



- 6.13 The existing church buildings on site are modest scale single storey structures with pitched roofs. The hall, closest to Whitley Wood Lane is a simple rectangular shape with pitched roof and is brick built. It is set well back from Whitley Wood Road and is side on. The church building is constructed of corrugated iron and sits further back to the rear of the plot, it also has a pitched roof and a rectangular form with a small gable ended forwarded projection. The two houses similarly have pitched roofs and gable feature bays, with some more recent extensions and are also brick built. The remainder of the site is given over to parking areas and garden/landscaped areas.
- 6.14 It is a big plot, but there is no strong presence of the buildings on site, no effective relationship with surrounding development, it does not represent an efficient use of the land, nor does it provide a suitable presence to the streetscene.



Looking towards the north

- 6.15 The proposed site would include two main buildings. The church building would comprise a high single storey part, with void over, serving the worship space, increasing to two storeys behind. It would have large areas of glazing and multi-pitch roofs with a feature roof to represent a church steeple type form. The materials would be traditional, including brick and tiled roofs, but with a variety, with the use of two tone brick and some stone detailing.
- 6.16 The health centre building behind would increase to 3 storeys. The overall mass has been broken down by the proposed use of panels of brick and self-coloured render, with visual interest created in the curves of the brickwork and fascia. The shallow roof minimises the overall height, whilst enabling sufficient height for the lift and services.



- 6.17 The overall scale of the buildings is very different to what is there at present. The current site is very under-developed and the purpose of redeveloping is to enable a more effective use of the site area. The proposal would enhance community facilities, and bring a new health centre to the site, providing a range of services. This understandably necessitates an increase of overall floor space on the site, and in order to achieve the required space, whilst still providing sufficient supporting parking, bin and cycle storage, and outside space. This has meant it would be required for the height, in parts, to be taller than the surrounding context.
- 6.18 Comments received include that the health building is considered to be overbearing and totally out of character in terms of appearance. However, the health building would be located on the northern boundary, as far as possible from the residential houses, and directly behind the church, which seeks to minimise the visual impact as far as is feasible. Although it would be very different in scale to the existing buildings on site it would be sited ca 20m from the boundary with no. 25 Whitley Wood Lane (front to side boundary relationship) and ca 17m from the boundary with the houses on Greenfields Road (side to rear relationship).
- 6.19 This is considered to be sufficient distance to limit any overbearing effects and that the overall scale of the proposed buildings would be appropriate within the context. In terms of amenity considerations these are addressed in the section below.
- 6.20 With respect to the overall design of the health centre it is accepted that it is a very simple functional form. Its simplicity is considered to ensure that it does not detract from the frontage church building, which is intended as the main focus for the site.

- 6.21 The church building would be visually prominent from the street frontage and would reflect the overall height of the adjacent properties. The large areas of glazing would provide a much more welcoming appearance than the existing building, more consistent with its community function as a church. It is considered that it would be more ecclesiastical in appearance than the existing church building, which is considered to be wholly acceptable. The repeated steep triangle roof outline is intended to reflect the design of the Listed Building opposite, and helps to break up the mass and appearance of the scheme.
- 6.22 Policy EN6 requires new development within the historic environment to contribute to the historic character of the area “*by respecting and enhancing its architectural and visual qualities.*” The supporting text, at para 4.2.23, also recognises the need for new development in the vicinity of historic assets to be sympathetic. They should reflect the local historic environment which could include footprint sizes, setbacks, landscaping, window placement and size, prevailing building or architectural features.
- 6.23 The Heritage officer was consulted and notes that the Grade II listed church hall would lose some historic context through the redevelopment of the overall site, and that the Edwardian cottages and iron church have some local heritage interest. However, because the Listed building is separated from the site by the road, does not relate well to the buildings which are a different style, and the development of Lidl, which has eroded much of the remaining context, there were no objections in principle to the proposal, subject to conditions regarding the submission of further details and samples for the proposed materials.
- 6.24 In terms of layout, the built form has been focussed away from the boundaries with the existing main residential units, and there would be clear and separate access for vehicles/cyclists and pedestrians. The accesses to the building, although not facing towards the road, would be clear and legible within the site, and also clearly visible from the street.
- 6.25 It is considered that a tandem form of development in this instance provides the best option to maximise the development plot, whilst seeking to limit detrimental impacts in terms of neighbouring amenity and would retain an element of openness to the frontage, which would avoid a dominant form adjacent to no. 25 Whitley Wood Lane and a gap in building form long associated with this site.
- 6.26 It is considered that the overall scheme would not be harmful to the character and appearance of the road and would consolidate the site and use it more effectively and give it some street presence, that it currently lacks. It would, therefore, accord with policies CC7 and H9 and EN6. It is recommended that a condition be included requiring

the submission and approval of details and samples of materials to be used.

### **Housing Mix**

- 6.27 Policy H2 addresses density and housing mix and states that this will be informed by character and mix of the area; accessibility; the need to achieve high quality design; maximise efficiency of land; need to minimise the environmental impacts including detrimental impacts on the amenities of adjoining occupiers. The supporting text (para 4.4.7) states that, *“wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms.”* It is however, accepted in para 4.4.13 that *“Inevitably, even with this policy requirement in place, Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation”*.
- 6.28 The site currently has two family homes, although the applicant has advised that only one of these is currently rented out due to the state of repair of the other. During pre-application discussions officers advised that there would likely be acceptability of the loss of the dwellings based on the overall community benefit of the proposed scheme. The submitted scheme, however, does still include two residential units, albeit two one bed flats. Although not family sized units, consideration has been given to the other aspects of Policy H2 and the overall scheme benefits. There is a mix of unit sizes along Whitley Wood Lane. Higher densities are encouraged in accessible locations and this is an accessible location with frequent bus services to Reading.
- 6.29 The provision of good quality one - bedroom units, for which there is a need and the development of enhanced and expanded community facilities on the site, is considered to provide an exceptional case to not meeting the requirement for family sized units in this instance. Additionally, it is not considered that two one bed units would have a significant detrimental effect on the overall mix and balance of housing in this area.

### **Residential Amenity**

- 6.30 Policy CC8 requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety.

- 6.31 With respect to noise and disturbance considerations the proposal would include an increase in the number of vehicular movements and the intention is that the use of the church buildings - halls, meeting rooms and café/entrance foyer would be intensified compared to current operation.
- 6.32 The applicant submitted a noise assessment which concluded that due to the relatively high noise levels present at the site, habitable rooms would not be able to achieve required standards with windows open. As the proposed ventilation strategy has not been decided Environmental Protection & Nuisance (EP&N) recommended the inclusion of a condition requiring the submission and approval of details.
- 6.33 As the proposal includes for a café there would also need to be a noise assessment of any extraction equipment before it was installed and a condition is included.
- 6.34 The Assessment does not include sufficient detail with respect to measures to ensure that there would be no noise emanating from the building during its use, including to protect the amenity of the flats above one of the halls. The Environmental Protection and Nuisance (EP&N) Officer, therefore requested additional detail be submitted.
- 6.35 Further information was subsequently provided of the insulation and other measures which would be implemented. EP&N confirmed, that a further assessment in this regard would be required, and a condition covering this and other Environmental Protection matters are included in the recommendation above.
- 6.36 Additionally, that there would need to be a control on hours of operation both in terms of internal and external use. Also, there would need to be good quality landscaped boundaries. The proposed scheme includes for a mix of hedging and fencing. A condition is included requiring the submission of further boundary details which include for any of the fencing to be acoustic fencing.
- 6.37 In terms of privacy and overlooking of existing residents, as set out above, the buildings are located ca 17m from the eastern boundary and 20m from the southern boundary, which are those adjacent to residential gardens. The original submitted plans showed that the second floor windows of the health centre as obscure glazed with top hung windows on restrictor openings to restrict the view from these windows. An issue was raised during consultation that there would be a loss of privacy from the windows on the southern elevations. Although it is considered that there would be an acceptable distance to the boundary with no. 25 there is also the issue of a perception of overlooking, and as there would be no part of the private amenity space not being faced by the proposed buildings, further to discussion with the applicant amended plans were submitted, which include obscure glazing and openings restricted for all first and second floor windows on the southern elevation of the Health Centre

and partial obscure glazing for the windows of the south facing flat. It is considered that this would minimise overlooking and perception of overlooking. It is noted that a number of the health centre windows would serve consulting rooms where internal privacy would be required in any case.

- 6.38 The submission included details of proposed external lighting, which comprises wall/eaves mounted leds for the church and wall lights, first floor floodlights and security lighting on the side and rear of the building. It is proposed that there would be linked to a photo cell and time clock. A condition is recommended to control this. In addition, there would be bollard led lighting.
- 6.39 In addition, Policy H5 sets out standards for new housing, which must be adhered to unless it can be clearly demonstrated that this would render a development unviable. Such standards include (relevant to this scale of proposal): *“...a. All new build housing outside the Central Area....will comply with the nationally-described space standard. b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations<sup>79</sup>. .... d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. e. All new build housing will be accessible and adaptable in line with M4(2)<sup>1</sup> of the Building Regulations....”*
- 6.40 Policy H10 deals specifically with private and communal space and in Para 4.4.87 identifies a previous minimum provision that the Council previously sought, which is considered to be a useful guide, and for 1-2 bedroom flats outside the Central Reading this would be 25sqm per flat.
- 6.41 The proposal does not include private garden space for the two flats, however occupants would have access to the church’s quiet garden space as and when it was not being used by the church. In addition, there is public open space within walking distance of the site and a play area within the new residential development on Imperial Way/ Basingstoke Road development.
- 6.42 The internal floorspace of the flats would be in accordance with the minimum standards for one bed units as set out within the national space standards (as replicated in Policy H5).
- 6.43 The applicant has agreed in writing that the flats would have access to a lift and other measures would be incorporated for full accessibility in accordance with Policy H5, an amended plan to show this is awaited.

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<sup>1</sup> Part M4(2) of the Building Regulations is for accessible and adaptable dwellings, and relates to relatively straightforward design measures that can allow homes to be adaptable as the needs of the occupier change (similar to Lifetime Homes, although not identical).

- 6.44 In terms of water efficiency and sustainability standards these form conditions as recommended above.
- 6.45 The proposed scheme is therefore considered to accord with the relevant policies, which are CC8, H5 and H10.

#### Transport

- 6.46 The proposed scheme includes a shared parking area with a vehicular access from Whitely Wood Lane in largely the same position as currently but would introduce a separate pedestrian access and pathways within the site.
- 6.47 There would be 47 no. car parking spaces in total with 30 proposed for use by the Health Centre and 17 by the church with 2 spaces for the flats. As part of this there would be 4 no. disabled spaces, closest to the buildings, and 5 no. Electric Vehicle Charging Points (EVCP) to serve 10 spaces.
- 6.48 Transport made it clear that any scheme would need to justify the level of proposed car parking, which is below adopted standards. Following a review of further detail provided by the applicant on usage Transport confirmed that this level of provision would be acceptable and that the spaces could be shared effectively between the two sites, subject to the submission and approval of a car parking management plan, further details of the design of the disabled spaces, along with standard conditions, as set out in the recommendation above.
- 6.49 A speed cushion would need to be moved and this would obligation for a S78 agreement would be included within the S106.
- 6.50 With respect to alternative modes there would be the provision of 42 no. cycle spaces, with stands within different parts of the site serving the different users; the church building, residential units and the health building. Transport has confirmed that the location and number are acceptable, but that these need to be covered, so a condition has been included requiring further details to be submitted and approved.
- 6.51 Although the site is well served by buses, potential for walking and cycling, the supporting text to RBLP Policy OU1 (supporting text 4.7.5) makes it clear that health care facilities should also have facilities for the car.
- 6.52 A turning head is included on site, which would serve ambulances and other service vehicles including for off-road refuse vehicles. An amendment was made to the location of the bin storage for the church so that it was not behind cycle storage. Detail was provided of the proposed cycle storage which Transport confirmed is acceptable.

- 6.53 Subject to attaching a number of conditions including with respect to car parking management, as part of an overall site wide facilities management and maintenance plan, the scheme is considered to accord with the requirements of policies TR1, TR3, TR4 and TR5.

**Landscaping and Ecology**

- 6.54 Policy CC7 requires developments to be assessed to ensure, amongst other things, that they *“Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.”*
- 6.55 Policy EN14 states: *“individual tress, group of trees, hedges and woodlands will be protected from removal or damage where they are importance and Reading’s vegetation cover will be extended... New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”*
- 6.56 The original proposed scheme was to remove the protected Ash Tree (T1) and a further 25 trees and replace these with 17 trees. It was made clear to the applicant that this would be unacceptable unless the benefits of the scheme in terms of community benefit and the net tree/ landscape cover could go some way to justifying the loss of the TPO and that on balance the application would therefore be acceptable in planning terms.
- 6.57 As the site is within an area of low canopy cover, and an Air Quality Management Area it was important that, with the loss of the TPO tree that any scheme, as a minimum, did not lead to an overall reduction in trees. In particular, there was the need for large canopy trees to the frontage with space to achieve their full potential as well as ensuring the provision of other trees within the site and, if required, beyond the site.
- 6.58 Discussion has been ongoing during the course of the application as to how a satisfactory scheme could be achieved. It is inevitable that the proposal requires the removal of the TPO tree so it is even more important that it should present an acceptable scheme to comply with the Council’s Tree Strategy with respect to tree coverage and ensure good quality tree planting to improve the appearance of the site and providing landscaping buffers to surrounding residential properties.
- 6.59 Due to the limited space, once parking and buildings are sited, it has not been possible to develop a scheme which would enable a 1-1 replacement of all lost trees. However, a scheme which is supported



by Natural Environment has been devised which includes four large trees in prominent locations adjacent to the highway and others in the parking areas.

6.60 This has to be balanced against the significant benefits that this co-located community scheme would offer specifically to Whitley and South Reading, an area with the largest concentration of deprivation in the Borough and many neighbourhoods within the 20% most deprived in England (Para. 6.1.5 of the RBLP) in the Borough. This is considered to outweigh the reduction in tree cover on site and provide an exceptional case for not wholly meeting the policy in this case.

6.61 As a means to improve overall tree cover within this part of the Borough, which experiences below average tree cover, the applicant has agreed to contribute to 11 no. trees within the Imperial Way/ Basingstoke Road verge as mitigation and to make the landscaping scheme acceptable. This would be included as an obligation within the S106.

6.62 Landscaping conditions are recommended including one regarding the submission and approval of boundary treatments.

6.63 With respect to ecology Policy EN12 requires that all developments do not *“result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:*

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

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

6.64 The submitted Ecological Appraisal concludes that the proposed scheme *“will result in a minor negative impact upon surrounding habitats, protected species and wildlife in general, which can be compensated for with further surveys, mitigation and precautionary measures along with recommendations for enhancement.”*

- 6.65 The Report identified that a further bat survey was required, which was submitted during the course of the application, and which was confirmed by the Ecology Officer as having been undertaken to a suitable standard. A condition is included requiring a bat licence to be obtained from Natural England and a copy provided to the Council, with mitigation measures detailed in the licence to be maintained in accordance with approved details.
- 6.66 In addition the Appraisal recommends that *“any new planting uses a mixture of wildlife friendly and native species to compensate for the loss of foraging grounds. Within the boundaries of the site and within the buildings to compensate for the loss of shelter sites, insect hotels/bug boxes, bat boxes and nesting boxes will be placed. The future lighting on site must ensure a lighting plan that is direct, low light spill, low lux and have hooded designs, it is recommended that no light spill is directed on boundary tree lines given the potential for traversing and foraging bats.”* A condition is included requiring the submission and approval of measures. With respect to landscaping the scheme includes for a mixture of species.
- 6.67 Subject to conditions and informatives the proposal is considered to accord with relevant Policies, CC7, EN12 & EN14.

#### **Sustainability**

- 6.68 Adopted Local Plan Policy CC2 requires new development to reduce the consumption of resources and materials by using designs and site layouts which use *“energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change”*. It specifically includes:
- “All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible”* and that *“Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 6.69 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change. Supporting text in para 4.1.8 states that *“The design of developments therefore needs to more carefully consider matters such as shading, insulation and ventilation, surface water runoff and storage and the use of appropriate tree and other planting.”*
- 6.70 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 6.71 Policy H5 sets out the expectations for the performance of new build homes in terms of emission and this is addressed through recommended conditions above.

- 6.72 The submitted Sustainability Statement includes a BREEAM Pre-Assessment which shows that the scheme could achieve 'Excellent'.
- 6.73 The proposed residential units would achieve a 20% carbon reduction and the non-residential 35%, through proposed energy efficiency measures and on-site renewable technologies: Measures include:
- Windows - U-values and air permeability above Building Regulations Part L 2013;
  - Natural ventilation with extract fans in wet rooms;
  - 100% low energy lights;
  - Low water consumption through the use of water efficiency fittings;
  - High efficiency communal Air Source Heat Pumps (ASHPs) for heating and hot water; and
  - PV panels of 1.0 kWp on the roof (approximate 4 panels with 250 w/p are required).
- 6.74 Such measures are considered to accord with Policies CC2, CC3 and H5 and conditions are included regarding the submission and approval of post construction BREAAAM to meet minimum 50% Good and 50% Excellent and a minimum 19% improvement in the dwelling emission rate as defined in the Building Regulations.

#### **Environmental matters**

- 6.75 **Noise:** The key issues for the proposal are with regard to noise from any plant, breakout noise from the use itself, noise from the use of outside spaces, and the effect of ground floor activities and the residential flats above. Policy EN16 requires development to not be damaging to the environment and sensitive receptors through land, noise or air pollution. Policy EN17 specifically addressed noise generating equipment requiring such plant to be at least 10dBA below existing background level. Noise issues are discussed in the amenity section above.
- 6.76 **Air Quality:** Policy EN15 requires developments to “*have regard to the need to improve air quality and reduce the effects of poor air quality*”. The submitted Air Quality Assessment concludes that air quality exposure or increased emissions are not of concern as a result of the proposed development apart from with regard to dust emissions from the site. Assuming good practice dust control measures the residual significance would be ‘not significant’. A construction method statement including dust control measures is recommended.
- 6.77 **Drainage:** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions. The submitted Drainage Impact Assessment identifies that the site currently drains to soakaways, although with increased built up areas on the site this

may be insufficient, and as the site is currently operational, further intrusive testing would need to be undertaken prior to the detailed design stage. If infiltration rates were insufficient to discharge the runoff from the site then surface water would need to be discharged to the public surface water sewer network at a controlled runoff rate. Within the report it is recommended that the proposed surface water drainage strategy consists of lined permeable pavement beneath the car park and external hardstanding around buildings, and a controlled discharge to the existing public sewer manhole within the site at 3.6 l/s, resulting in a reduction of over 65% in peak runoff rates from the site for a range of rainfall events. This is considered to accord with Policy EN18 and a condition is included for the submission and approval of a sustainable drainage plan and maintenance and management plan

### Section 106

- 6.78 In addition to Community Infrastructure Levy, and in accordance with Policy CC9 and H3, the following S106 obligations would be sought:
- Affordable Housing provision within the Borough
  - Employment, Skills and Training - construction and end user
  - Provision of 11 no. trees as mitigation
  - Relocation of the traffic calming measures (speed cushions) on Whitley Wood Lane as illustrated on Proposed Site plan (Drawing no 1861/P01 Rev E) prior to construction of the bellmouth access.
- 6.79 The Applicant has confirmed that they agree to a policy compliant affordable housing contribution. Valuations suggest a total GDV of £200k per unit and therefore a financial contribution of £20k (5%) has been agreed with the applicant. However, the applicants are still discussing whether indeed they would wish for one of the flats to be retained as ancillary to the use of the church and health centre in perpetuity. If this were the case it is considered that this would form an obligation within the S106 and would be offset against the Affordable Housing contribution, i.e. this would reduce to £10k. therefore, both options are set out in the recommendation above.
- 6.80 For construction skills the applicant will have the option of either developing an Employment Skills Plan in conjunction with Reading UK CIC or providing a financial contribution.
- 6.81 In terms of the end user requirements Reading UK CIC has confirmed that this would be covered as the health centre would be set up as a training centre amongst its other work. The applicant has provided the following information regarding frequency and type of training which would be delivered at the site.

*“The Medical Practice will be a registered training practice taking in and training various Health professional as part of the new NHS GP Contract.*

*These will include Clinical Pharmacists, Paramedics, Nurse Practitioners and Physios. These professional will require GP supervision, mentoring and attendance at local educational courses. They will also provide training to Registrars, F1 and F2 doctors as well as Medical Students.*

*A wide range of training and apprentice opportunities within the Administration Team will also be provided.*

*This is vocational training so this will be daily supervision, teaching and mentoring of these health professionals.*

*The medical students and junior doctors are with us for periods of 12 weeks at a time and they must pass an end of placement assessment via a GP trainer.*

*The Clinical Pharmacists get a half day weekly to study.*

- 6.82 This is considered acceptable in meeting their obligations in this regard.

#### **Other Matters Raised**

- 6.83 One of the objectors raised the issue of site security. A condition is included requiring the submission and approval of a joint management plan to include car parking, landscaping, refuse and other site management and maintenance issues.

#### **Equalities Impact**

- 6.84 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. The health centre and the church buildings are proposed to be fully accessible. There would be level access to all entrances and within the health centre the doors would be automated, with disabled WCS on all floors, corridors and doorways wide enough for wheelchair access. The habitable rooms would be well lit by natural light and the corridors would have good artificial light for clear orientation. The reception area would be well lit for lip reading and a portable hearing aid loop system available on the front desk, which would also be dual height. buildings are proposed to be fully accessible. 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

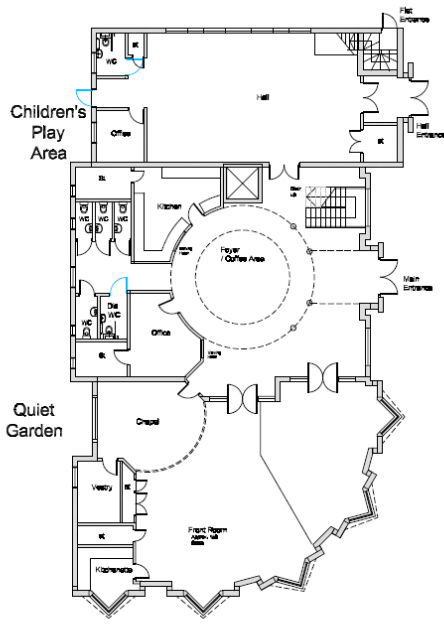
- 7.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019 and previous planning history. It would provide for enlarged and enhanced community facilities and a health centre, which would meet national and local policy objectives including co-location of two key community buildings.
- 7.2 With respect to the proposed housing the provision of two one bed flats and the loss of two family houses would not be wholly policy compliant. However, in this instance, with a proposal which includes for re-provided, enlarged and enhanced community facilities both with respect to a church, other community provision and a health centre, it is considered that the benefits of the overall proposals far outweigh the limited policy infringement in this case and that an exception to the policy is justified.
- 7.3 Officers have worked positively and proactively with the applicant on this scheme, and amendments have been secured, which are considered to satisfactorily address policy issues and overall officers consider this to be a supportable scheme. It is therefore, recommended for approval subject to conditions and the completion of a S106 legal agreement for the provision of a contribution towards affordable housing, and obligations for tree planting, an employment, skills and training plan for construction and relocation of a traffic calming cushion.

Case Officer: Alison Amoah

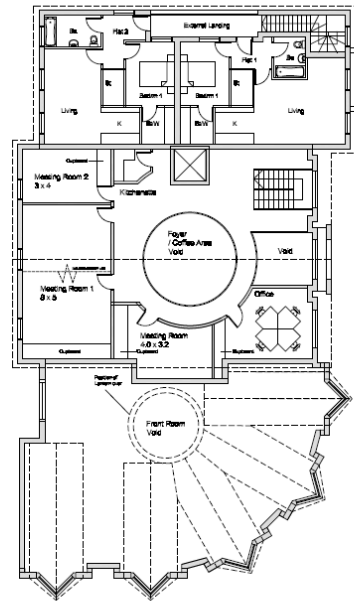


# Floor Plans

## Church Building

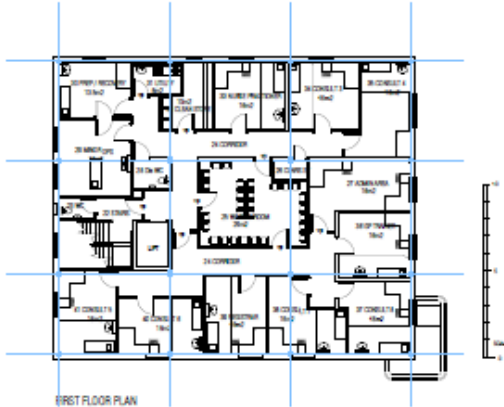


Church  
Ground Floor Plan

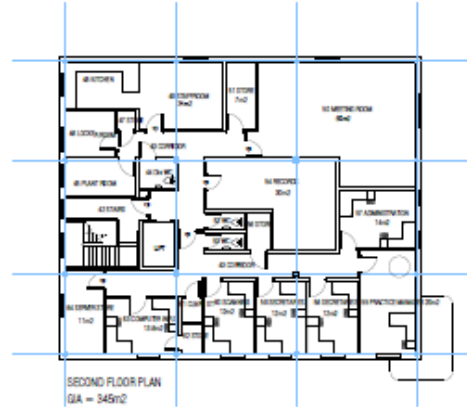


Church  
First Floor Plan

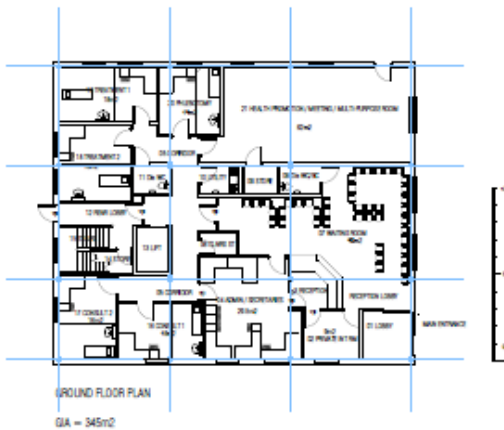
## Health Centre



FIRST FLOOR PLAN  
GIA = 345m<sup>2</sup>



SECOND FLOOR PLAN  
GIA = 345m<sup>2</sup>



GROUND FLOOR PLAN  
GIA = 345m<sup>2</sup>





# Elevations

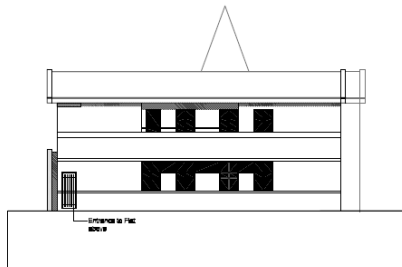
## Church Building



Church  
West Elevation (along Whitley Wood Lane)



Church  
South Elevation (along Site)



Church  
East Elevation



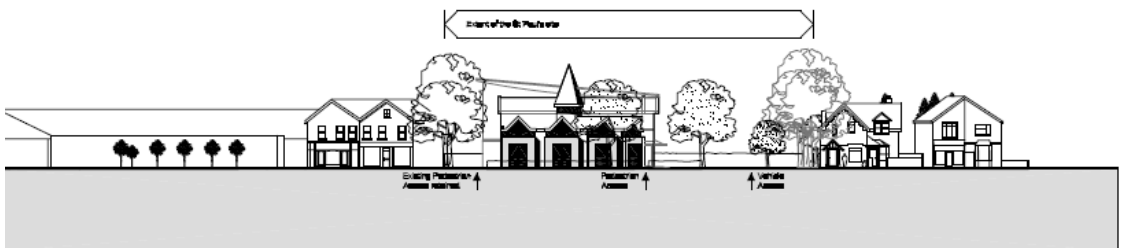
Church  
North Elevation

## Site Elevation looking north (church to left, medical hub to right)



Site Elevation

## Street Elevation



Outline Street Elevation along Whitley Wood Lane





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