

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

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23 March 2021

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

NOTICE OF MEETING - PLANNING APPLICATIONS COMMITTEE 31 MARCH 2021

A meeting of the Planning Applications Committee will be held on Wednesday, 31 March 2021 at 6.30 pm via Microsoft Teams. The Agenda for the meeting is set out below.

AGENDA	ACTION	WARDS AFFECTED	PAGE NO
1. MINUTES	-		9 - 16
2. DECLARATIONS OF INTEREST	-		
3. QUESTIONS	-		
4. PLANNING APPEALS	Information	BOROUGHWIDE	17 - 20
5. APPLICATIONS FOR PRIOR APPROVAL	Information	BOROUGHWIDE	21 - 26

PLANNING APPLICATIONS TO BE DETERMINED

6.	201585/FUL & 201586/ADV - 109A OXFORD ROAD	Decision	ABBEY	27 - 38
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201585/FUL
Proposal

Change of use from an estate agent use class E to a restaurant and hot food takeaway sui generis use class
Application Permitted

Recommendation

201586/ADV

Proposal

Fascia and a projecting sign.
Application Permitted

Recommendation

CIVIC OFFICES EMERGENCY EVACUATION: If an alarm sounds, leave by the nearest fire exit quickly and calmly and assemble on the corner of Bridge Street and Fobney Street. You will be advised when it is safe to re-enter the building.

7.	200142/FUL - 109B OXFORD ROAD	Decision	ABBEY	39 - 50
	Proposal	Change of use from sui generis (betting shop) to A3 restaurant with ancillary A5 takeaway and replacement shopfront (Part retrospective)		
	Recommendation	Application Permitted		
8.	200188/FUL - 55 VASTERN ROAD	Decision	ABBEY	51 - 164
	Proposal	Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road		
	Recommendation	Application Refused		
9.	201734/FUL - RIVERMEAD LEISURE COMPLEX, RICHFIELD AVENUE	Decision	ABBEY	165 - 222
	Proposal	New replacement leisure centre including a 25m 8 lane competition pool and diving, with associated parking and landscaping, followed by demolition of existing centre.		
	Recommendation	Application Permitted		
10.	200979/FUL - 18 PARKSIDE ROAD	Decision	MINSTER	223 - 280
	Proposal	Demolition of detached house and annex and erection of 3 storey building for 3x3, 3x2, and 6x1 bed flats, with undercroft parking, landscaping and bin stores (amended)		
	Recommendation	Permitted subject to Legal Agreement		
11.	201735/FUL - PALMER PARK SPORTS STADIUM, PALMER PARK, WOKINGHAM ROAD	Decision	PARK	281 - 354
	Proposal	Leisure centre extension to include a 25m 6 lane pool, fitness suite, cafe, activity room, parking spaces and landscaping, and the refurbishment of the existing grandstand to include demolition of the existing entrance lobby, internal works and roof works.		
	Recommendation	Application Permitted		
12.	210237/ADJ - NORTH LAKE, CAVERSHAM LAKES, HENLEY ROAD	Decision	OUT OF BOROUGH	355 - 362
	Proposal	Change of use of an established lake for recreation and sports purposes		
	Recommendation	Observations sent		
13.	(WEST BERKS REF 19/00113/OUTMAJ) - LAND EAST OF PINCENTS LANE, TILEHURST	Decision	OUT OF BOROUGH	363 - 368

Proposal

A hybrid application comprising the following elements: Outline application for up to 265 dwellings on the western part of the site and a mixed use building comprising 450sqm (GIA) of floorspace in use class D1 to provide a community healthcare hub and residential above (included in the 265 dwellings); Engineering operations on the area covered by the outline application to create suitable gradients for internal site roads and development platforms for the residential development; and FUL application for change of use of the eastern part (7ha) of the site for use as public parkland, to be protected from development in perpetuity. All matters except for access to the site are to be reserved. Matters for which detailed approval are sought are: The detailed design of the vehicular access to the site from Pincent's Lane and associated turning area, the location emergency vehicular access to the site and the locations of pedestrian and cycling accesses to the site.

Recommendation

Observations sent - No Objection

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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), Carnell, Duveen, Ennis, Lovelock, McEwan, Page, Robinson, Rowland, Stanford-Beale and J Williams

Apologies: Councillors DP Singh and R Williams

RESOLVED ITEMS

76. MINUTES

The Minutes of the meeting held on 3 February 2021 were agreed as a correct record and would be signed by the Chair.

77. PLANNING APPEALS

(i) New Appeals

The Executive Director for Economic Growth and Neighbourhood Services submitted a schedule explaining that no notifications had been received from the Planning Inspectorate regarding planning appeals.

(ii) Appeals Recently Determined

The Executive Director for Economic Growth and Neighbourhood Services submitted details of two decisions that had been made by the Secretary of State, or by an Inspector appointed for the purpose, which were attached as Appendix 2 to the report.

(iii) Reports on Appeal Decisions

None submitted.

Resolved -

That the outcome of the recently determined appeals, as set out in Appendix 2, be noted.

78. APPLICATIONS FOR PRIOR APPROVAL

The Executive Director for Economic Growth and Neighbourhood Services submitted a report giving details in Table 1 of ten prior approval applications received, and in Table 2 of four applications for prior approval decided, between 25 January and 18 February 2021.

Resolved - That the report be noted.

79. 191848/FUL - GREYFRIARS CHURCH, FRIAR STREET

Demolish Existing Church Centre, Construct New Three Storey Church Centre with Plant Enclosure on Roof and Single Storey Glazed Link at Ground Floor Level. Associated hard and Soft Landscaping and External Works

Further to Minute 131 of the meeting held on 4 March 2020, the Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application, following a request from the applicant to amend the proposed external material finishes and BREEAM standard for the new church centre building.

Comments were received and considered.

Resolved -

That the proposed changes to materials, design and BREEAM level be agreed and the wording of conditions 2 (approved plans), 3 (materials) and 23/24 (BREEAM) be amended accordingly.

80. 200656/FUL & 200657/LBC - 9 CASTLE STREET

200656 - To convert the existing building from commercial office use to residential comprising 2 x 2 bed apartments and 3 x 1 bed apartments and to provide a rear pedestrian access from Simmonds Street via the rear garden of the property.

200657 - Listed Building Consent for the proposal above

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above applications. An update report was tabled at the meeting which provided additional information on window materials and corrected a typographical error in the original report.

Comments were received and considered.

It was proposed at the meeting that the condition relating to archaeological work be amended to require a detailed assessment of the boundary wall and the retention of salvaged bricks and material from the wall to allow further investigation on their origin. The Committee were also advised that the grant of planning permission would be subject to the pre-commencement conditions having been agreed by the applicant as required by regulations.

Resolved -

- (1) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to grant full planning permission for application 200656/FUL, subject to completion of a section 106 legal agreement by 10 April 2021 (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 original

report, and subject to agreement of the recommended pre-commencement conditions;

- (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 recommended in the original report, with the amended archaeological work condition as proposed at the meeting;
- (4) That Listed Building Consent for application 200657/LBC be granted subject to the conditions and informatives set out in the original report.

81. 210017/FUL - HUNSAKER, ALFRED STREET

Replacement of the external façade and timber decking to balconies to the building housing flats at Hunsaker, Hermitage, Halcyon and Haywards in Chatham Place, Alfred Street

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which explained that a satisfactory Construction Management Plan and details of the proposed materials had been submitted. Amendments to the relevant conditions were proposed.

Comments were received and considered.

Resolved -

That planning permission for application 210017/FUL be granted, subject to the conditions and informatives as recommended in the original report, with the amended conditions as set out in the update report.

82. 201532/VAR, 201536/VAR, 201533/REM, 201537/REM, 201534/NMA & 201535/NMA - STATION HILL

201532/VAR - Plot E s.73 Outline

Outline application under s.73 of the Town & Country Planning Act 1990 with all matters reserved for mixed use redevelopment of Plot E of the Station Hill site and neighbouring Telecom House site (48 to 51 Friar Street & 4 to 20 Garrard Street) to comprise the demolition of existing buildings and erection of new buildings/ structures to provide residential units (Use Class C3), a range of town centre uses, including retail and related uses (Use Class E (a),(b) and (c); Drinking establishments (sui generis) and Hot food takeaways (sui generis)), and leisure uses (Use Class E (d), (e), and (f); Class F.1; Class F.2; and Theatres; Cinemas; Concert Halls; Bingo Halls; Dance Halls (sui generis)), associated infrastructure, public realm works and ancillary development as permitted by planning permission 190442 granted on 6 December 2019 (as amended).

201536/VAR - Plot F and North Site s.73 Outline

Outline application (pursuant to Section 73 of the Town & Country Planning Act 1990) for mixed use redevelopment of the site through the demolition and alteration of existing buildings and erection of new buildings & structures to provide Offices (Use Class E (g)(i) and (g)(ii)), a range of town centre uses including retail and related uses (Use Class E (a),(b) and (c); Drinking establishments (sui generis) and Hot food takeaways (sui generis)), leisure and community (Use Class E (d), (e), and (f); Class F.1; Class F.2; and Theatres; Cinemas; Concert Halls; Bingo Halls; Dance Halls (sui generis)), and residential units (Use Class C3), associated infrastructure, public realm works and ancillary development (all matters reserved) as permitted by planning permission 190441 granted on 6 December 2019 (as amended).

201533/REM - Plot F Reserved Matters

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) and submission of details (Conditions 12, 13, 15, 16, 17, 18, 20, 21, 22, and 67(i)) for Plot F within the development site known as Station Hill, submitted pursuant to the Outline Planning Application ref. 201536/VAR. The proposals comprise the construction of a 13 storey, plus basement storey, building comprising 184 Build to Rent residential units, 762 sqm (GEA) of flexible retail, leisure and business floorspace (Use Class E (a),(b) (c),(d),(e),(f), (g)(i), and (g)(ii), Use Class F.1 and Use Class F.2); the following sui generis uses: Drinking establishments; Hot food takeaways; Theatres; Cinemas; Bingo Halls and Dance Halls; together with cycle storage; car parking; servicing; plant areas; landscaping; new public realm and other associated works.

201537/REM - Plot E Reserved Matters

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) and submission of details (Conditions 12, 13, 15, 16, 17, 18, 30, 34 and 62(i)) for Plot E within development site known as Station Hill, submitted pursuant to the Outline Planning Application ref. 201532/VAR. The proposals comprise the construction of a 12 storey building, plus basement storey, comprising 415 Build to Rent residential units, 722 sqm (GEA) of flexible commercial and leisure (Use Class E (a),(b) (c),(d),(e),(f), (g)(i), and (g)(ii), Use Class F.1 and Use Class F.2); the following sui generis uses: Drinking establishments; Hot food takeaways; Theatres; Cinemas; Bingo Halls and Dance Halls; cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works.

201534/NMA (Plot E)

Non material amendment to planning permission 190442/VAR to amend land uses within description of development and amend Use Classes described in Conditions 6 and 11 and 60.

201535/NMA (Plot F and North Site)

Non material amendment to planning permission 190441/VAR to amend land uses within description of development and amend Use Classes described in Conditions 6, 54 and 55 and 63.

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above applications. An update report was tabled at the meeting which set

out information on the Amended Plot E Ground Floor, Sustainable drainage (SUDS), comments from Transport, Section 106 legal agreement procedure and affordable housing. Additional SUDS conditions were recommended for applications 201533/REM and 201537/REM. The update report also set out a revised drawings list.

It was report at the meeting that officers were satisfied that the recommended heads of terms could be secured by way of a deed of variation to the existing 2019 S106 agreement on the basis that certain parts of that agreement, where they related to the heads of terms described in the recommendation, no longer served a useful planning purpose. This was because the existing 2019 version of the S106 agreement did not secure the increased amount of Affordable Housing and other changes described in the recommendation and therefore required variation to reflect the changes.

Comments were received and considered.

Resolved -

- (1) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to grant full planning permission for application 201536/VAR (PLOT F & Northern Site), subject to approval of application 201535/NMA and to completion of a section 106 legal agreement by 2 April 2021 (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 original 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 recommended in the original report;
- (4) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to grant full planning permission for application 201532/VAR (PLOT E), subject to approval of application 201534/NMA and to completion of a section 106 legal agreement by 2 April 2021 (unless a later date be agreed by the Deputy Director of Planning, Transport and Regulatory Services) to secure the Heads of Terms as recommended for application 201536/VAR (PLOT F & Northern Site) above;
- (5) 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;
- (6) That planning permission be subject to the conditions recommended in the original report;

PLANNING APPLICATIONS COMMITTEE MEETING MINUTES - 3 MARCH 2021

- (7) That reserved matters approval for application 201537/REM (PLOT E) be granted, subject to the conditions recommended in the original report and the additional SUDS condition recommended in the update report;
- (8) That reserved matters approval for application 201533/REM (PLOT F) be granted, subject to the conditions recommended in the original report and the additional SUDS condition recommended in the update report;
- (9) That application 201534/NMA (Plot E) for non-material amendments to permission 190442/VAR be approved and the description and conditions be amended as recommended in the original report;
- (10) That application 201535/NMA (Plot F and North Site) for non-material amendments to permission 190441/VAR be approved and the description and conditions be amended as recommended in the original report;
- (11) That the Assistant Director of Legal & Democratic Services and Deputy Director of Planning, Transport and Regulatory Services be authorised to make such changes to the conditions and obligations, as might reasonably be required in order to complete/issue these permissions/approvals, having regard to the obligations secured in respect of the extant permissions 130436/190441/190442;
- (12) That all the applications listed above be subject to informatives as recommended in the original report.

83. 201843/FUL - 39 BRUNSWICK HILL

Conversion of existing dwelling and two storey side and part three/part single storey rear extensions to provide 8 flats with associated parking and amenity space and demolition of existing garage

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

Comments and objections were received and considered.

Resolved -

- (1) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to grant full planning permission for application 201843/FUL, subject to completion of a section 106 legal agreement by 31 March 2021 (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 in the report;
- (4) That material samples (Condition 3) be agreed in consultation with Battle Ward councillors and the Lead Councillor for Culture, Heritage and Recreation.

84. 201694/HOU - 8 THE BEECHES, TILEHURST

Relocation of Boundary Fence and Removal of Shared Access

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which made a correction to the original report and set out: additional photos, a statement from the objector and comments from the objector on the original report, and an appeal decision that was referred to in the statement and relevant to the application.

Comments and objections were received and considered.

It was proposed at the meeting that the condition relating to the planting and maintenance of the new hedge be amended to require the hedge to be maintained to a set height to prevent it becoming a nuisance.

Objector Neville Florey, Jeremy Butterworth the applicant's agent, and Ward Councillor Jenny Rynn attended the meeting and addressed the Committee on this application.

Resolved -

That planning permission for application 201694 be granted subject to the conditions and informatives recommended in the original report, with the amended landscape condition as proposed at the meeting.

85. 200979/FUL - 18 PARKSIDE ROAD

Demolition of detached house and annex and erection of 3 storey building for 3x3, 3x2, and 6x1 bed flats, with undercroft parking, landscaping and bin stores

The Executive Director of Economic Growth and Neighbourhood Services submitted a report on the above application. An update report was tabled at the meeting which set out further information on transport, site levels, residential amenity, affordable housing, ecology and sustainability. The recommended Heads of Terms relating to Affordable Housing had been amended and an additional condition regarding windows was recommended. The report also set out statements from objectors.

Comments and objections were received and considered.

Objectors Chris Dodson and Mark Ashton, the applicant's agent Edward Mather and Ward Councillor Liz Terry attended the meeting and addressed the Committee on this application.

It was proposed and agreed at the meeting that the application be deferred for a site visit to consider various issues. The Committee had previously agreed to cease in-person site visits when social distancing measures had been introduced at the beginning of the COVID-19 pandemic (Minute 142 of the meeting held on 29 April 2020 refers) and officers were therefore authorised to devise and put in place a revised procedure that was compliant with the current COVID-19 related legislation and guidelines.

Resolved -

- (1) That consideration of application 200979/FUL be deferred for a site visit to consider issues including ground levels, the siting and bulk of the proposed building within its plot, boundary issues and parking;
- (2) That the Deputy Director of Planning, Transport and Regulatory Services be authorised to investigate and implement a revised site visit procedure that was compliant with current COVID-19 related legislation and guidelines.

(The meeting started at 6.30 pm and closed at 9.59 pm)

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

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	31st March 2021		
TITLE:	PLANNING APPEALS		
AUTHOR:	Julie Williams	TEL:	0118 9372461
JOB TITLE:	Planning Manager	E-MAIL:	Julie.Williams@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

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

2. RECOMMENDED ACTION

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

3. INFORMATION PROVIDED

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

4. CONTRIBUTION TO STRATEGIC AIMS

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

5. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

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

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

6. COMMUNITY ENGAGEMENT AND INFORMATION

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

7. EQUALITY IMPACT ASSESSMENT

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

8. LEGAL IMPLICATIONS

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

9. FINANCIAL IMPLICATIONS

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

10. BACKGROUND PAPERS

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

APPENDIX 1

Appeals Lodged:

WARD: KATESGROVE
APPEAL NO: APP/E0345/W/20/3265679
CASE NO: 200639
ADDRESS: Hazelwood, 13 Kendrick Road
PROPOSAL: Erection of single-storey bow roofed garden house comprising two 2-bed flats. Revised private amenity space and parking layout.
CASE OFFICER: Ethne Humphreys
METHOD: Written Representation
APPEAL TYPE: REFUSAL OF PLANNING PERMISSION
APPEAL LODGED: 24th February 2021

APPENDIX 2

Appeals Decided:

WARD: WHITLEY
APPEAL NO: APP/E0345/D/20/3261929
CASE NO: 200807
ADDRESS: 69 Blanford Road
PROPOSAL: Proposed first floor rear extension with internal alterations
CASE OFFICER: Natalie Weekes
METHOD: Written Representation
DECISION: DISMISSED
DATE DETERMINED: 02.03.2021

WARD: REDLANDS
APPEAL NO: APP/E0345/W/20/3257209
CASE NO: 191042
ADDRESS: 13 Addington Road
PROPOSAL: Conversion of guest house to 3x1 bed flats and 3x2 bed flats
CASE OFFICER: Tom Hughes
METHOD: Written Representation
DECISION: DISMISSED
DATE DETERMINED: 11.03.2021

APPENDIX 3

Address Index of Planning Officers reports on appeal decisions.

No reports available this time. The appeal decision letters can be seen in full on the Council's website on the application pages.

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Agenda Item 5

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

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	31st March 2021		
TITLE:	APPLICATIONS FOR PRIOR APPROVAL		
AUTHOR:	Julie Williams & Richard Eatough		
JOB TITLE:	PLANNING MANAGER (acting) & Team Leader	E-MAIL:	Julie.williams@reading.gov.uk Richard.eatough@reading.gov.uk

1. PURPOSE AND SUMMARY OF REPORT

- 1.1 To advise Committee of 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 £1,401,906.

(Office Prior Approvals - £1,269,245: Householder Prior Approvals - £80,672: Retail Prior Approvals - £16,474: Demolition Prior Approval - £4,331: Storage Prior Approvals - £5716: Shop to Restaurant Prior Approval - £6026: 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 - £22446: 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 18th February 2021 to 18th March 2021

Type:	How many received since last report:	Loss in possible fee income:
Householder Prior Approvals	3	£330
Office Prior Approvals	2	£22446
Shop to Restaurant Prior Approval	0	0
Retail Prior Approvals	1	£366
Demolition Prior Approval	0	0
Solar Equipment Prior Approval	0	0
Light Industrial to Residential Prior Approval	0	0
Prior Notification	0	n/a
Shop to Assembly & Leisure Prior Approval	0	0
Telecommunications Prior Approval	0	n/a
Dwellings on detached block of flats	0	0
TOTAL	6	£23142

Table 2 - Applications decided since 18th February 2021 to 18th March 2021

Type:	Approved	Refused	Not Required	Withdrawn	Non Determination
Householder Prior Approvals	3	0	1	0	0
Office Prior Approvals	2	0	0	0	0
Shop to Restaurant Prior Approval	0	0	0	0	0
Retail Prior Approvals	1	0	0	0	0
Demolition Prior Approval	0	0	0	1	0
Solar Equipment Prior Approval	0	0	0	0	0
Light Industrial to Residential Prior Approval	0	0	0	0	0
Prior Notification/ Other	1	0	0	0	0
Shop to Assembly & Leisure Prior Approval	0	0	0	0	0
Telecommunications Prior Approval	1	1	0	0	0
TOTAL	8	1	1	1	0

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COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

Ward: Abbey

App No.: 201585/FUL

Address: 109a Oxford Road, Reading, RG1 7UD

Proposal: Change of use from an estate agent use class E to a restaurant and hot food takeaway sui generis use class

App No: 201586/ADV

Proposal: New fascia and projecting sign

Applicant: ARA FT Investment Ltd t/a Fat Twins Reading

Deadline: 12/03/2021 Extended to 7th April 2021

RECOMMENDATION:

Grant planning permission for 201585

Conditions to include:

- Implement within 3 years
- In accordance with approved plans
- Material samples to be approved
- Opening times for public limited to 9am - 11:30pm
- Delivery times/waste collection times limited to 8am - 18:00pm
- Noise Assessment to be submitted before any conversion works commence
- Kitchen Equipment to be installed strictly to the specifications as approved and thereafter so maintained to manage ventilation and extraction
- Litter management plan adhered to

Informative to include:

HSHAZ advice and completion of public realm works

Grant Advertisement Consent for 201586

Conditions to include:

- Details and materials as approved
- Standard advert conditions

1. INTRODUCTION

- 1.1 The application site is on the corner of Zinzan Street and Oxford Road in the Central Reading area as defined in the Local Plan. The property is not a listed building but lies in the Castle Hill/Russell Street/Oxford Road Conservation Area and within the High Street Heritage Action Zone.
- 1.2 The last use of the building at ground and basement floor was as an estate agency. There is residential use on the upper floors access via Zinzan Street.
- 1.3 The application has been called in by Councillor Rowland due to concerns for neighbour amenity.

Site Location Plan



Photo of site - 109a on the corner.

2. PROPOSAL

- 2.1 The proposal seeks planning permission to change the use of the ground floor from estate agents to a mixed use of restaurant and takeaway with space for 17 customers to eat in with take-away service provided. Basement to be used for storage.
- 2.2 Under the provisions of the new Use Classes introduced in September 2020 the existing estate agency would fall within Use Class E(c) which is the same use as a restaurant (Use Class E (b)) so subject to a number of conditions being satisfied that element of the proposed change is permitted development. It is because of the proposed

mixed use with take-away offered (sui generis use) and the proposed external changes that planning permission is required.

- 2.3 A new shop front is proposed and signage - application 201586 is the application for advertisement consent. Further to discussions with the Conservation & Urban Design Officer amended plans were provided to change the shop front appearance and advertisement design to be more in keeping with the conservation area designation.
- 2.4 The shopfront would be constructed from timber painted dark grey with a 500mm high stall riser and timber door and window frame. The fascia panel will also be timber painted black with name also in timber and applied to the fascia. The projecting sign would also be made of timber with external illumination.
- 2.5 The proposed opening hours of the premises have been amended from as originally proposed (to open at 7am and to close by 2am) to open at 9am and to close at 23:30 Monday to Sunday with all deliveries during opening hours.
- 2.6 *Submitted Plans and Documentation:*
 - A.02.01
 - A.02.03
 - A.02.4 Existing Elevations
 - A.02.5 Proposed Elevations as received 1st March.

Heritage Statement

Design and Specification For Kitchen Ventilation

Litter management statement

- 2.7 Community Infrastructure levy (CIL):

In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form with the submission. The proposed development would not be liable to make a CIL contribution.

3 PLANNING HISTORY

920740(92/00554/ADV)-Internally Illuminated sign. Refused 9/9/1992
920741(92-00555)- New cashpoint to side elevation. Refused 9/9/1992

990554 (00/00004) - Erection of 2 blocks of garages. Granted 11/2/2000

990966 (00/00041/ADV) - Fascia signage. Granted 25/2/2020

101773 (10/01947) - retrospective permission for change of use of upper floors from A2 use to residential use - Withdrawn 15/02/2011

100968 - (10/01261) retrospective change of use from B1 to residential. Declined. 4/10/2010

110985 (11/00437) - Certificate of Lawfulness for residential use of upper floors. Refused. 12/07/2011

120218 (12/00764) - Conversion of upper floors from two flats to three 2-bed and three 1-bed flats and 1 studio. Including rear

extension and alterations to both shop fronts and boundary wall.
Withdrawn 13/7/2012

120588 - Conversion of upper floors from two flats to three 2-bed and three 1-bed flats and 1 studio. Including rear extension and alterations to both shop fronts and boundary wall (resubmission of 12/00764/FUL) - Approved

140365/CLP - Proposed use as 2 x 2 bedroom flats. Refused 15/5/2014

140959 - Rear extensions and associated external works. Permitted 17/12/2014.

4 CONSULTATIONS

Non-statutory

Environmental Protection

Noise - delivery hours / waste collections/ opening hours

I had concerns about the potential for noise disturbance due to deliveries, waste collections and commercial operations on occupants of nearby residential properties, particularly late at night and early morning. The proposed opening hours were originally until 2 am and were a concern as this is significantly later than the opening hours of the existing use and there may not be sufficient sound insulation between the ground and first floor to enable this late night use, as there is residential at upper floor levels.

The applicant has now agreed to reduce the opening times to close by 23:30pm. A noise assessment is still required to be submitted to demonstrate that the insulation will be sufficient to protect first floor occupiers from late night noise in the ground floor use, or that suitable mitigation can be put in place. But with the reduction in opening times I can recommend a condition is used to require submission of a satisfactory assessment before the new use starts. Also, if permission is given, I recommend that hours for deliveries and waste collections are restricted.

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 noise data submitted is not sufficient so a noise assessment identifying the risks and proposing mitigation is needed.

However as noted above with the reduced opening times I am satisfied that a noise assessment can be submitted before the use starts. It should be noted that dealing with the noise assessment by condition rather than as part of the determination means that there is some risk that suitable noise mitigation may mean that changes need to be made to the design of the system which may mean that the permission needs to be altered from the plans that are approved.

Kitchen Extraction - odour

In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide a risk assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005) or more recent EMAQ version. The information submitted is detailed but needs to be submitted alongside a risk assessment showing that the odour controls proposed are sufficient based on the location of the extract and type of cuisine. A ventilation and extraction condition is recommended.

It should be noted that the purpose of the risk assessment is to ensure adequate odour controls are in place taking into account the height of the discharge and the proximity of residents.

Conservation & Urban Design Officer

Planning issues and other matters

Any new development of the site needs to comply with the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular Section 72 (1), which requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Proposals must also address Section 16 of the NPPF. Reading's Local Plan 2019 contains policies that require new development in a conservation area to be an enhancement to the character and significance of conservation areas. Relevant policies are EN1.

Conservation comments

The site was visited on 26 February 2021. The building shop is within a Conservation Area, and part of a Heritage Action Zone project to upgrade Oxford Road and other streets in the town centre. The NPPF, gives guidance that proposed works in areas like this should be an enhancement to the character and significance of the property.

- There are no objections to the proposed change of use for the building from office to restaurant.
- The agent has modified the application drawings to ameliorate the impact of the changes on the character and significance of the conservation area for:
 - a. the internal changes for use as a restaurant;
 - b. the exhaust duct has been amended so that it is mainly on the interior with filters contained within the building, reducing the need for a large external circular metal duct on the rear wall;

- c. the shop front has been designed to replace existing with more sympathetic timber framed shop front with stall riser;
- d. The signage has been amended to more sympathetic and appropriate for a conservation area and has a non-internal hanging sign as well.

Summation

The amended application is now supported as shown in the attached drawings and approval is recommended.

Public

The Conservation Area Advisory Committee have objected.

In summary:

- *Improvements to the shop front in the amended plans are welcomed however we note that in terms of overall improvement of the streetscape they fall very far short of those in the 2014 consented application 140959. That application would also have improved the adjacent shop front. For such a significant corner location and one of the two gateposts to Zinzan Street more significant improvement is required and the adjacent shop front should be similarly upgraded.*
- *In our opinion the height of the fascia board, just below first floor window level, is excessive and detracts from the heritage features of the frontage.*
- *The boundary treatment agreed in application 140959 has still not been fully implemented. The impact of that, should this change of use be approved, will be even greater as the quantity of waste and the type of waste produced by a restaurant differs considerably from that of an estate agent.*
- *It is questionable whether this section of Oxford Road needs yet another restaurant/takeaway. Given that there is a restaurant/takeaway in the adjacent shop unit and on the opposite corner of Zinzan Street (109b) another similar offering does not enhance the diversity of the high street offering in this section of the town centre.*
- *The restaurant/takeaway at 109b followed a change of use application from a betting shop in 2018 (180273). Consequently, there is a risk that the living environment of local residents on Zinzan Street will be damaged by the noise, waste and odours of three restaurant/takeaways if this application is approved. They also noted the opening hours as originally proposed to be unacceptable for local residents.*

Adjacent properties were consulted, a site notice displayed and a notice placed in local paper. No comments received at time of drafting report.

5 RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

- 5.1 The development plan for this Local Planning Authority is the Reading Borough Local Plan (November 2019). The relevant policies are:

CC7: Design and the Public Realm
CC8: Safeguarding Amenity
EN1: Protection and Enhancement of the Historic Environment
EN3: Enhancement of Conservation Areas
EN6: New Development in a Historic Context
EN17: Noise Generating Equipment
RL1: Network and Hierarchy of Centres
RL3: Vitality and Viability of Smaller Centres
OU4: Advertisements
OU5: Shopfronts and Cash Machines
CR7: Primary Frontages in Central Reading
CR8: Small Shop Units in Central Reading

- 5.2 Relevant other documents are:
Castle Hill/Russell Street/Oxford Road Conservation Area Appraisal
Revised Parking Standards and Design SPD (2011)

6 APPRAISAL

Principle of development - the new use

- 6.1 The matter for consideration is a new planning application for the use of the ground floor and basement as a restaurant and takeaway outlet with storage. In the comments provided above by CAAC reference is made to application 140959 for “Rear extensions and associated external works”. However, it needs to be stated that that was a different application by a different applicant. The fact that the works as authorised were not completed in full should not influence how this application is considered. Planning permissions have a “to be begun by” condition but not a “to be completed by” condition.
- 6.2 This stretch of Oxford Road is within the boundary of Central Reading as shown on the Local Plan Proposals Map but is not in the primary

shopping area and not designated as being a primary frontage. As such the site is not subject to the same restrictions on the number of take-away uses being introduced to the street. The unit is currently vacant and the proposed new use would make a contribution to the local economy. The loss of the existing estate agency premises raises no in-principle land use concerns and there would be no in-principle land use policy objection to its replacement with a mixed use of restaurant and takeaway.

Design considerations and effect on Conservation Area

- 6.3 The relevant policies to be considered are OU4, OU5, EN1 and EN3.
- 6.4 Policy OU4 requires advertisements in conservation areas to respect or enhance the building or area and Policy OU5 also requires new shopfronts in conservation areas to respect or enhance the building or area and will respect the key features of special historic interest. The fascia boards should be lower than any first floor windows and reflect the height of historic fascia boards in the area. The changes to the materials of the advertisement and use of external lighting are positive responses by the applicant to show consideration for the property location in a conservation area. Policies OU4 and OU5 are complied with.
- 6.5 Policy EN1 requires that historic features, areas of historic importance and other elements of the historic environment will be protected and where possible enhanced.
- 6.6 Policy EN3 then focuses on conservation areas by requiring that development proposals within these areas should make a positive contribution to local character and distinctiveness. This may include removing inappropriate additions to buildings; Improving signage and street furniture; restoring of appropriate paving etc.



PROPOSED FRONT ELEVATION

- 6.7 By reference to the existing shopfront (see photo in introduction section above) the proposed new shopfront will better respect the age of the building and will reveal the features of the shopfront. The new signage fits within the fascia board below the first floor window cill. The case officer has discussed the objectives of the High Street

Heritage Action Zone with the agent and how, if planning permission is granted, we would be looking to the new occupier to play an active part in the project. The applicant would be a tenant at the site with no control over the area outside the red line of the application site so it would be unreasonable to impose a planning condition to require that they carry out improvements to the pavement outside as included in the 2014 approved plans. However, that permission stays extant so the HSHAZ project team are keen to engage with the owner to secure these improvements to the public realm.



- 6.8 The comments from CAAC are noted but in terms of the application being considered and with the benefit of the amended plans submitted Officers are satisfied that the proposed new shop front and advertisements in this conservation area comply with policies EN1 and EN3. Relevant conditions recommended.

Impact on residential amenity

- 6.9 The relevant policies are CC8 and EN17. Policy CC8 tries to prevent development from having a detrimental impact on the living environment of existing residential properties through noise and disturbance, dust, smells, fumes and vibrations. In this regard the applicant's agreement to reduce their opening times and to reduce their delivery times is positive. Policy EN17 requires that any noise generating equipment should be designed to read at least 10dBA below the existing background level as measured at the nearest sensitive receptor.
- 6.10 The applicant has changed the extraction unit/flue from as originally proposed to be at the rear of the building (closest to residents living above and in Zinzan Street) to an extract system based on low level discharge and air supply system. The submitted specifications for the equipment show how the noise and odour will be controlled with all

of the equipment inside the building so external noise will be limited to air blowing out only and no machinery noise. The freezer units are proposed to be in the basement to minimise vibrations being felt by residents living above and a silencer is proposed to further reduce the noise inside by 15dBA.

- 6.11 Environmental Protection officers have considered the information provided and are satisfied that the proposed changes and the equipment specifications are acceptable and should adequately protect the amenities of those living nearby. Conditions are recommended, if permission is granted, for a noise assessment to be carried out based on the proposed equipment and measures and to ensure that the equipment is installed as approved and thereafter maintained to continue to perform to required standards.

Transport

- 6.12 The proposed change from one commercial use to another does not raise any concerns. The property lies close to public car parking areas and public transport services. There is lay-by parking nearby too.
- 6.13 Oxford Road and the surrounding road network all have extensive parking restrictions preventing on-street parking. A residents' permit parking scheme operates in the area thereby restricting and monitoring unauthorized parking.
- 6.14 Using the Council's adopted Parking Standards and Design SPD, the proposed use would generate a parking demand in excess of the current use. However, there is no off-street parking associated with the site and therefore any parking demand generated by the proposal would have to be accommodated within the short stay parking bays on Oxford Road or nearby public car parks.

Equalities impact

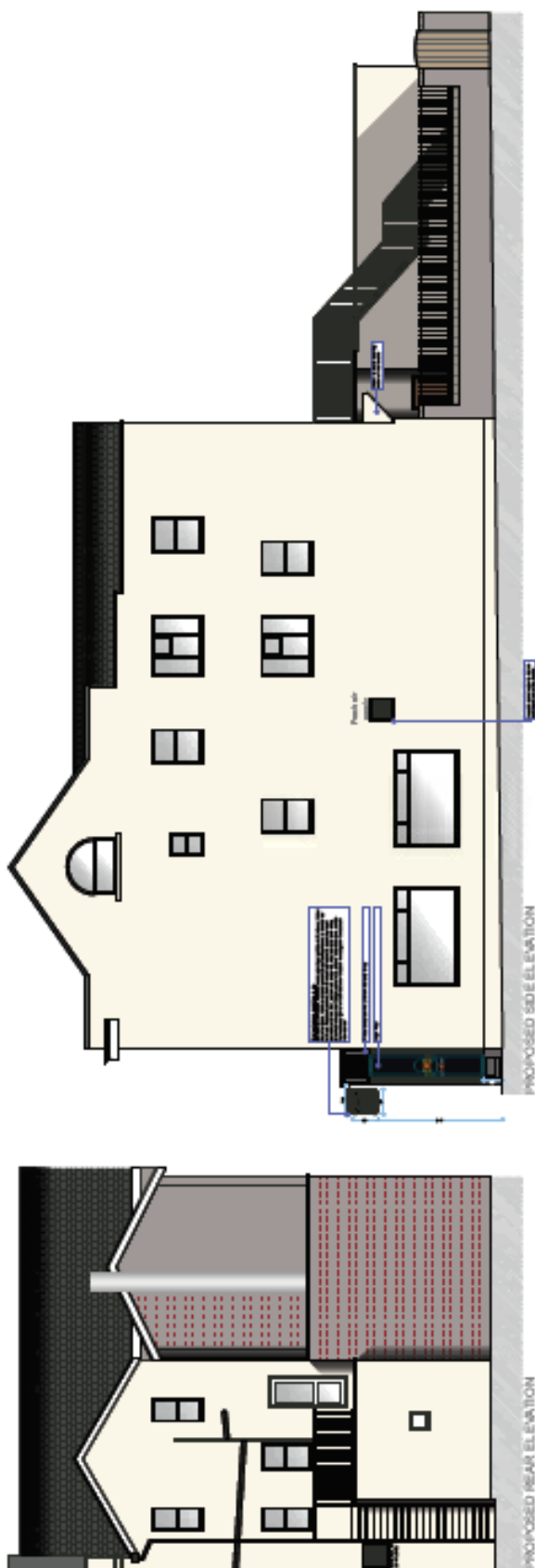
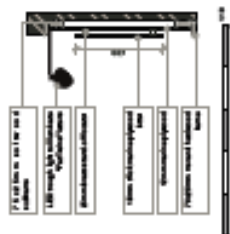
- 6.15 When determining an application for planning permission the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups as identified by the Act have or will have 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.

7 CONCLUSION

- 7.1 These proposals have been carefully considered in the context of the Reading Borough Local Plan 2019 and supplementary planning documents. The recommendation is to grant planning permission and advertisement consent with conditions as shown above.

Case Officer: Julie Williams

Proposed Chemical Bond on



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COMMITTEE REPORT

**BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021**

Ward: Abbey

App No.: 200142

App Type: FUL

Address: 109b Oxford Road, Reading, RG1 7UD

Proposal: Change of use from sui generis (betting shop) to A3 restaurant with ancillary A5 takeaway and replacement shopfront (Part retrospective)

Applicant: Express Team Ltd

Deadline: Extended to 9th April 2021

RECOMMENDATIONS

Grant full planning permission, subject to conditions and informatives:

Conditions to include:

- 1) Approved plans implemented and unauthorised removed within 5 months
- 2) Details and Samples of all External Materials (including pavement treatment) submitted within 1 month
- 3) Extraction System details submitted within 1 month
- 4) Hours of Use: 11:30-23:00 Sun - Thurs and 11:30 - 23:30 Fri - Sat
- 5) Construction Hours - no noisy works outside hours of 08:00 - 18:00 Mon - Fri and 08:00 - 13:00 Saturdays. No work shall take place Sundays or Bank Holidays
- 6) Delivery Hours/Waste Collections: 08:00 - 20:00 Mon - Sat and 10:00 - 18:00 Sundays and Bank Holidays
- 7) Bin Storage and Litter Management Plan Details - as per details

Informatives to include:

- 1) Terms and Conditions
- 2) Building Regs
- 3) Damage to Highway
- 4) Works Affecting Highways
- 5) Separate advertisement consent required; No signage is approved as part of this application
- 6) Positive and Proactive

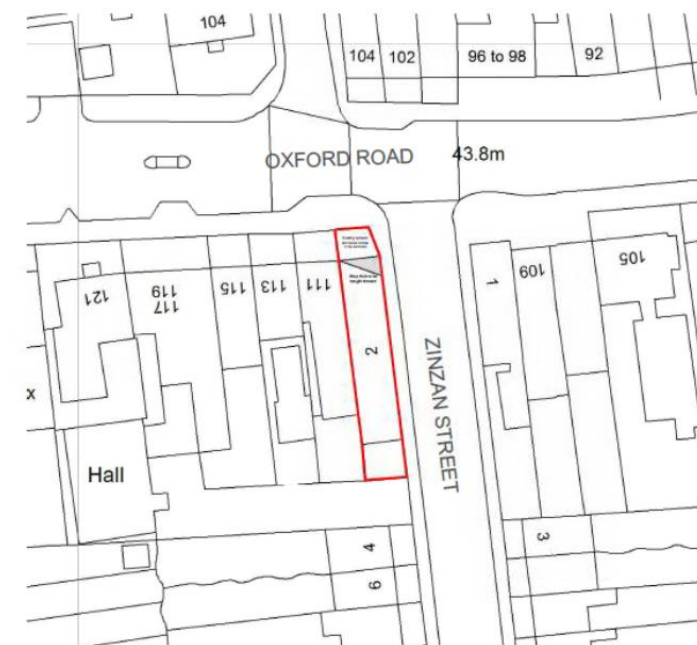
1. INTRODUCTION/BACKGROUND

- 1.1 The application relates to the ground floor of an end of terrace property located on the south side of Oxford Road, on the corner with Zinzan Street. Until 2018, the ground floor was occupied by a vacant betting shop 'Ladbrokes' as a Sui Generis use. The upper floors are in residential use.
- 1.2 This part of Oxford Road is characterized by retail/commercial activity at ground floor, with residential ancillary uses (to the ground floor use) on the upper floors. Within the vicinity of and backing on to the site are residential properties which are predominantly Victorian terraces. Oxford Road is a

busy shopping street and a major route into and out of Reading town centre for vehicles and pedestrians alike.

- 1.3 Although not listed, the application site is located within Castle Hill/Russell Street/Oxford Road Conservation Area. The site is located within the defined Reading Central Area, but outside of the central core, primary shopping area and office core areas. In addition, the site is also within an air quality management area.
- 1.4 The application was called in by Councillor Page and Councillor Rowland due to concerns regarding the impact on heritage assets and odour/noise disturbance.

Location Plan



Not to Scale

The application site as seen from Oxford Road:



2. PROPOSAL AND SUPPORTING INFORMATION

- 2.1 Application 180273 granted planning permission for “Change of use from sui generis (betting shop) to A3 restaurant with ancillary takeaway and replacement shopfront”. This was approved subject to pre-commencement conditions intended to control the materials used in the new façade and the construction and control of kitchen extraction/ventilation equipment. No such details were submitted and, furthermore, works commenced on site

which were not undertaken in accordance with the approved plans. Given that the change of use and associated development occurred without the discharge of conditions, the works are unauthorised.

2.2 In response and given the level of concern raised over the works that had taken place, Enforcement action was taken which looked to serve an Enforcement Notice. In response, this applicant has submitted this application for retrospective planning permission to regularise the works on site.

2.3 The following plans and supporting documents have been assessed:

Exiting Site and Location Plan 2017 0176
Existing Plan/Elevations 2017 0176
Proposed Plan/Elevations 2017 0176 Rev 3
Standard Block Paving Specification
Received 29th January 2020

Design and Access Statement Rev A
Received 27th July 2020

Odour Control Equipment Specification
Received 29th January 2020

Noise Assessment
Received 21st August 2020

Litter Management Details
Received 29th January 2020

3. RELEVANT PLANNING HISTORY

180273/FUL Amended Description: Change of use from sui generis (betting shop) to A3 restaurant with ancillary takeaway and replacement shopfront (revised elevation details). Permitted.

181755/ADV Externally illuminated fascia sign to Oxford Road and Zinzan Street shopfronts and externally illuminated projecting sign fronting Oxford Road. Permitted.

181785/APP CON Application for discharge of conditions 3,4 and 9 of Planning permission 180273. Split Decision.

4. CONSULTATIONS

(i) Statutory

4.1 None

(ii) Non-statutory

4.2 Highways: No comments received.

Environmental Protection: No objection subject to conditions and informatives.

Heritage Officer: No objection subject to material details to be submitted and agreed.

(iii) Public/ local consultation and comments received

Conservation Area Advisory Committee: No comments received.

Reading Civic Society: No comments received.

Consultation letters were sent to 17 nearby occupiers (site notice and notice in local paper) and no neighbour letters of representation received at the time of writing this report.

5. LEGAL CONTEXT

- 5.1 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).
- 5.3 In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).
- 5.4 Accordingly, the National Planning Policy Framework 2019 and the following development plan policies and supplementary planning guidance are relevant:

National Planning Policy Guidance
National Planning Policy Framework (NPPF)

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development
CC7: Design and the Public Realm
CC8: Safeguarding Amenity
EN1: Protection and Enhancement of the Historic Environment
EN3: Enhancement of Conservation Areas

EN6: New Development in a Historic Context
EN17: Noise Generating Equipment
TR3: Access, Traffic and Highway Related Matters
TR5: Car and Cycle Parking and Electric Vehicle Charging
RL1: Network and Hierarchy of Centres
OU5: Shopfronts and Cash Machines
CR1: Definition of the Centre
CR2: Design in Central Reading

Supplementary Planning Guidance/ Documents:
Revised Parking Standards and Design SPD (2011)

Castle Hill/Russell Street/Oxford Road Conservation Area Appraisal

6. APPRAISAL

Principle of development

- 6.1 Planning permission was granted at the Planning Applications Committee 30th May 2018 for “Change of use from sui generis (betting shop) to A3 restaurant with ancillary takeaway and replacement shopfront” (application 180273). This application was granted with conditions attached to include material samples and extraction/ventilation details to be submitted prior to commencement of works. The change of use itself from Sui Generis to A3 restaurant with ancillary A5 takeaway was considered acceptable in principle and that remains the case.
- 6.2 At the time of the application, Officers worked hard with the applicant to get to a point where a recommendation of approval could be made (subject to conditions) and planning permission granted and it is therefore disappointing that works commenced without discharging the conditions. Furthermore, the works were not undertaken in accordance with the approved plans, resulting in a poor visual appearance and with concerns over cooking emissions (discussed elsewhere in this report).
- 6.3 Given the above, the works that have taken place are unauthorised and therefore this current application seeks planning permission for largely the same as that approved under application 180273 but this time the applicant’s agent has undertook to ensure that the development is carried out and changes made as needed to enable the development to be in accordance with the approved plans and conditions appropriately discharged.

Design considerations and impact on character of the conservation area

- 6.4 The works undertaken have resulted in a poor-quality visual appearance, and unacceptable for a building within the Castle Hill/Russell Street/Oxford Road Conservation Area. It was considered under application 180273 that the proposals as shown and approved represented an opportunity to improve the appearance of the building which was not considered to positively contribute to the Conservation Area. This has not happened and in terms of its detailed design, the specific areas of concern are highlighted as follows:

- The main front door of the shopfront has been installed centrally rather than to the left-hand side (viewed from the street) as shown on the previously approved drawings;
- The corbel moulding shown on the previously approved drawings is missing from the pilasters;
- The timber panel above the pilaster corbel shown on the previously approved drawings (at fascia level) is missing;
- A coated metal infill panel has been installed under the fascia in place of the transom light glazing shown on the previously approved drawings;
- The timber shopfront panelling shown on the previously approved drawings is missing from much of the shopfront and a painted render finish with pinned-on timber beading has been applied instead;
- The 'ornate panelling' as annotated on the previously approved drawings, where installed, consists of a manufactured timber board which grooves routed out and painted;
- The surfacing materials for the front forecourt are not the same as that shown on the previously approved drawings;
- The opening on the flank elevation shown on the previously approved drawings to be closed off with brickwork remains in use for extraction;
- Two air conditioning condensers have been mounted to the rear elevation, the position of one obstructs the installation of the air supply system acoustic louvre grille as previously approved.

- 6.5 The proposed plans largely seek to address the above and revert to what was originally granted permission. It is proposed to keep the front door centrally as installed rather than revert to the side and this is considered acceptable and similar to other shopfronts along this part of Oxford Road.
- 6.6 It is also not now proposed to block up the opening on the flank elevation adjacent Zinzan Street. The applicant has stated that this is only for fresh air intake and this is the same as that for application 201585 at 109a Oxford Road. Given this and that this is an existing small-scale opening, this is not considered unacceptable.
- 6.7 It is proposed to move the air conditioning unit to a lower position on the rear elevation. This would allow for the installation of the air supply system and it would also further minimise its impact visually. Whilst it would be visible when viewed directly from the rear of the site (when looking through to the rear yard), it would not be so readily visible from Zinzan Street.
- 6.8 Under application 180237 it was considered that the proposals represented an opportunity to improve the appearance of the building (previously 'Ladbroke's' betting shop). As above, it is acknowledged how disappointing it is that the works that have taken place fall short in meeting expected standards for design within a Conservation Area. This is acknowledged by the applicant who has confirmed during the course of this application that the head office of the franchise has employed a store build project manager whose role is to ensure all works are done in accordance with the approved plans. The applicant has stated that should planning permission be forthcoming, the project manager would be regularly on site to ensure that the works are done to comply with the drawings and details to a satisfactory level.

- 6.9 The above does offer a certain level of comfort. However, to be confident in the scheme moving forward it is considered appropriate and necessary to attach the same 'material details to be submitted' condition as under application 180237 and for the Council's Conservation and Urban Design Officer to be directly involved when these details have been submitted. This is to be certain of the quality of materials and owing to the finished visual appearance of the development being considered to be of key importance.
- 6.10 Should the proposals be constructed in accordance with the plans with an appropriate level of detail and quality of material then the proposals do still represent an opportunity to enhance this building, with the ground floor colours sympathetic to the upper floor and the shopfront framed in a suitable manner. Similarly, the proposal to replace the tarmac with a charcoal colour paving would also improve the appearance when viewed from Oxford Road.
- 6.11 An informative will be attached to the decision notice stating that this proposal is without prejudice to any future application for advertisement consent.

Impact on neighbouring amenity (including environmental protection matters)

- 6.12 The relevant policies are CC8 and EN17. Policy CC8 tries to prevent development from having a detrimental impact on the living environment of existing residential properties through noise and disturbance, dust, smells, fumes and vibrations. Policy EN17 requires that any noise generating equipment should be designed to read at least 10dBA below the existing background level as measured at the nearest sensitive receptor.
- 6.13 As per application 180273, the proposal does not seek to enlarge the property such that no undue loss of light or overbearing impacts would occur. No additional windows are proposed and as such there would be no loss of privacy.
- 6.14 The main issue in terms of residential amenity is noise and odours from the extraction equipment associated with the use. It is not uncommon for restaurants and hot food takeaways to be located close to residential accommodation and for fumes and smells to be dealt with by means of extraction equipment. It is noted that in this regard, whilst planning application 180273 included a specific condition requiring further ventilation and extraction details to be submitted prior to works commencing, these details were not provided. Furthermore, there are concerns that the system that has been installed does not satisfactorily control odour emissions.
- 6.15 The current proposals seek to address the situation. An odour risk assessment has been submitted which the Council's Environmental Protection Officer has confirmed has been carried out in accordance with the correct guidance. The report recommends carbon filtration and electrostatic precipitation as the main methods of odour control. This is a better system than that which is currently in place and the Environmental Protection Officer is satisfied that if properly installed and maintained, that

this would appropriately and satisfactorily control odour to protect against neighbour amenity in this respect.

- 6.16 Further to the above, a noise assessment has also been submitted. This currently shows the level is 20dBA above the required level. However, they have recommended an indoor or external silencer which the Environmental Protection Officer considers should reduce the level sufficiently to meet the Council's stringent plant noise criteria - and be significantly quieter than the existing system. To ensure satisfactory noise levels it is recommend that a condition is attached to any planning permission requiring verification by an acoustic specialist to be carried out and submitted to the Council for approval.
- 6.17 To confirm, the Environmental Team are satisfied that, subject to conditions as stated, this would be acceptable from an Environmental Protection perspective, that they are satisfied that the noise levels generated by the proposed extraction equipment would meet the required criteria for noise and that abatement measures proposed would prevent any undue harm to the amenity of surrounding occupiers by way of odour.
- 6.18 It is considered that, if properly installed and maintained (matters than can be controlled by conditions) cooking fumes and odours could be limited to an acceptable level, with a suitable and effective extraction system achieved at the site. Subject to successful approval of details under this condition, it is not considered that the proposals would result in any adverse harm to the amenity of the surrounding occupiers in accordance with Policies CC8 and EN17.
- 6.19 The proposed hours of use of the premises remains as previously approved under application 180273: 11:30-23:00 Sunday - Thursday and 11:30 - 23:30 Friday-Saturday. This is not considered unreasonable given the operating hours of other nearby establishments and this would again be secured by way of a suitably worded condition.
- 6.20 The use of the premises incorporating hot food takeaway might generate additional usage over and above the current use, especially in the evening hours, however, it is not considered that this would be so significant as to be detrimental to neighbouring residential properties especially in view of the existing hot food takeaway businesses nearby in this parade of shops together with the noise generated by the traffic on this busy road.
- 6.21 In overall terms, and with the above conditions secured, the proposals are considered to comply with Policies CC8 and EN17.

Impact on parking/highways

- 6.22 This site is situated on A329 Oxford Road which is a main transport corridor in and out of Reading and is a busy public transport route between central Reading and the west. It sits within a conservation area and is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading.

- 6.23 Oxford Road and the surrounding road network all have extensive parking restrictions preventing on-street parking. A residents' permit parking scheme operates in the area thereby restricting and monitoring unauthorized parking.
- 6.24 In accordance with the Council's adopted Parking Standards and Design SPD, the proposed A3 use would generate a parking demand of 1 space per 5sqm whereas the proposed A5 use would generate a parking demand of 1 space per 40sqm. However, there is no off-street parking associated with the site; therefore, the parking demand generated by the proposal would be accommodated within the short stay parking bays on Oxford Road and nearby public car parks as it does currently.
- 6.25 There are no transport objections to the proposals.

CONCLUSION

- 6.26 These proposals have been carefully considered in the context of the Reading Borough Local Plan 2019 and supplementary planning documents. Having regard to the material considerations and all matters raised, the Local Planning Authority considers that the balance of considerations therefore weighs in favour of granting planning permission, subject to conditions and informatives.

Case Officer: Ethne Humphreys

Proposed Floor Plan and Elevations



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COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

Ward: Abbey

App No.: 200188/FUL

Address: 55 Vastern Road, Reading, RG1 8BU

Proposal: Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road

Applicant: Berkeley Homes

Deadline: Originally 15/06/2020 - Extended to 18/01/2021

RECOMMENDATION:

REFUSE planning permission for the following reasons:

- Failure to provide a high quality north-south link through the site and related public realm, safety and directness concerns largely due to the alignment of the site/buildings primarily contrary to Policies CR11ii and CR11g and the RSAF, but also policies EN11, CC7, CR2, CR3 and TR3 and TR4.
- The combination of the proposed height and proximity of Blocks D & E to the Thames Path will harm the setting and character of the path and The River Thames and thus harm the quality of the public realm in this area to the detriment of the value of this part of the Thames, an identified Major Landscape feature and leisure and tourism destination and therefore is contrary to Policies CR4, CR11v and CR11g and the RSAF, but also policies CC7, CR2, CR3 and EN11.
- By virtue of its height, massing and proximity to the river, the development will shade the River Thames and impact on its marginal habitats. There would also not be sufficient space within the riverside buffer for a sustainable long-term relationship between the riverside buildings and the proposed new large canopy trees. The proposed development is therefore contrary to Policy EN11 in particular, and also EN12, CC7 and CR2, EN13, EN14, para 175 NPPF and objectives of the adopted and revised the adopted Tree Strategy and Biodiversity Action Plan
- The proposed development has failed to demonstrate that a suitable quality of accommodation can be provided for all future occupiers as the mitigation measures submitted would not be sufficient to minimise the impact of nearby noise pollution thereby contrary to policies CC8, EN16, CR6.
- The proposal would result in the complete loss of 55 Vastern Road, a Non-Designated Heritage Asset and building of local significance. The proposal has failed to demonstrate adequately that retention and reuse of the building has been explored fully. In this regard, the benefits of the proposal are not considered to significantly outweigh the harm caused to the asset's identified significance. Therefore, the development is contrary to Policy EN1, EN4 and Section 16 NPPF.
- Lack of a section 106 legal agreement for affordable housing, ESP, open space contribution, various transport related works, ecological mitigation contrary to Policy CC9, EN9, EN11, EN12, H3, TR1, TR3, TR5.

1. INTRODUCTION

- 1.1 The application site measures 0.76 ha and is part of an allocated site in the Reading Borough Local Plan 2019 (Site CR11g - Riverside) for residential redevelopment and leisure uses. The application site, as existing, is mainly hard-surfaced open car-parking, which serves the part-two, part-three storey office building, most recently occupied by Southern & Scottish Electricity Networks (SSE). The buildings front onto Vastern Road, with vehicular access from Lynmouth Road. The entrance building is designated (as of 22/05/2017) on the RBC List of Locally Important Buildings. There are also two energy storage systems within the application site. One is next to the building and adjacent to the vehicular access off Lynmouth Road. The other is in the north-west corner of the site, as part of a grassed area in this area of the site. The site is unusual in shape and is most easily described as akin to a dumbbell.

Site Location Plan



- 1.2 Immediately to the north of the site is the southern bank of the River Thames, which is a public right of way. Christchurch Bridge provides a pedestrian and cyclist link to the north side of the river and Christchurch Meadows at this point. To the east of the application site is the remaining Southern & Scottish Electricity transfer station, which serves Reading. Beyond this are the 4-storey Thames Court (Norman Place) residential flats, which front onto the river, and the predominantly 3-storey (and roofspace) Sovereign House office building, which fronts onto Vastern Road.
- 1.3 To the south of the site is Vastern Road, which forms the northern element of the town's Inner Distribution Road (IDR). Beyond this is Vastern Road Retail Park and associated buildings leading to Reading Station. To the west of the site are the 2-storey terraced properties of Lynmouth Road, with the 3-storey Lynmouth Court properties closest to the river. No's 1-6 Lynmouth Court front onto the river, with No's 7-12 a continuation of the Lynmouth Road terrace and parking spaces between the two blocks.
- 1.4 As already mentioned, the site is part of Policy CR11g sub-area allocation. Accordingly, the site is also within the designated wider CR11 Station/River Major Opportunity Area. This overarching element of this policy specifies a

vision and a set of principles which apply to all sites within the major opportunity area, stating as follows:

Station/River Major Opportunity Area

VISION: The station/river area will be a flagship scheme, extending the centre and providing a mixed use destination in itself and centred on the new station and public transport interchange. It will integrate the transport links and areas northwards towards the River Thames and into the heart of the centre.

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

Development in the Station/River Major Opportunity Area will:

- i) Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix;***
- ii) Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;***
- iii) Provide developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces;***
- iv) Safeguard land which is needed for mass rapid transit routes and stops;***
- v) Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;***
- vi) Give careful consideration to the areas of transition to low and medium density residential and conserve and, where possible, enhance listed buildings, conservation areas and historic gardens and their settings;***
- vii) Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;***
- viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space; and***
- ix) Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.***

1.5 More specifically in relation to the application site, this forms the western part of the Riverside sub-area, with the sub-area policy stating in full:

CR11g, RIVERSIDE:
Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.

Site size: 1.24 ha
Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices.

1.6 These characteristics and requirements are all reflected within the Station/River Major Opportunity Area Strategy, as specified at figure 5.3 of the Local Plan.

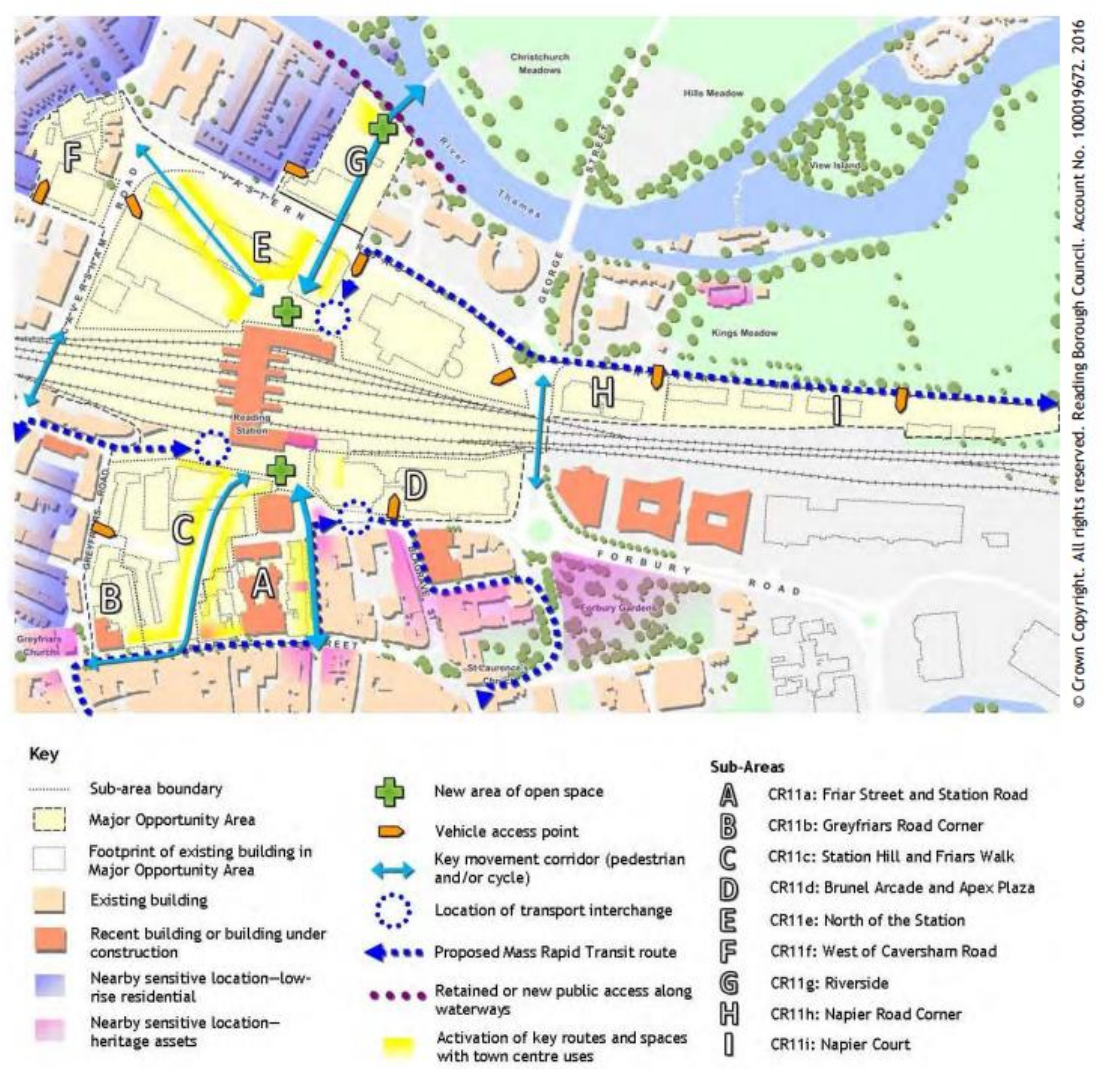


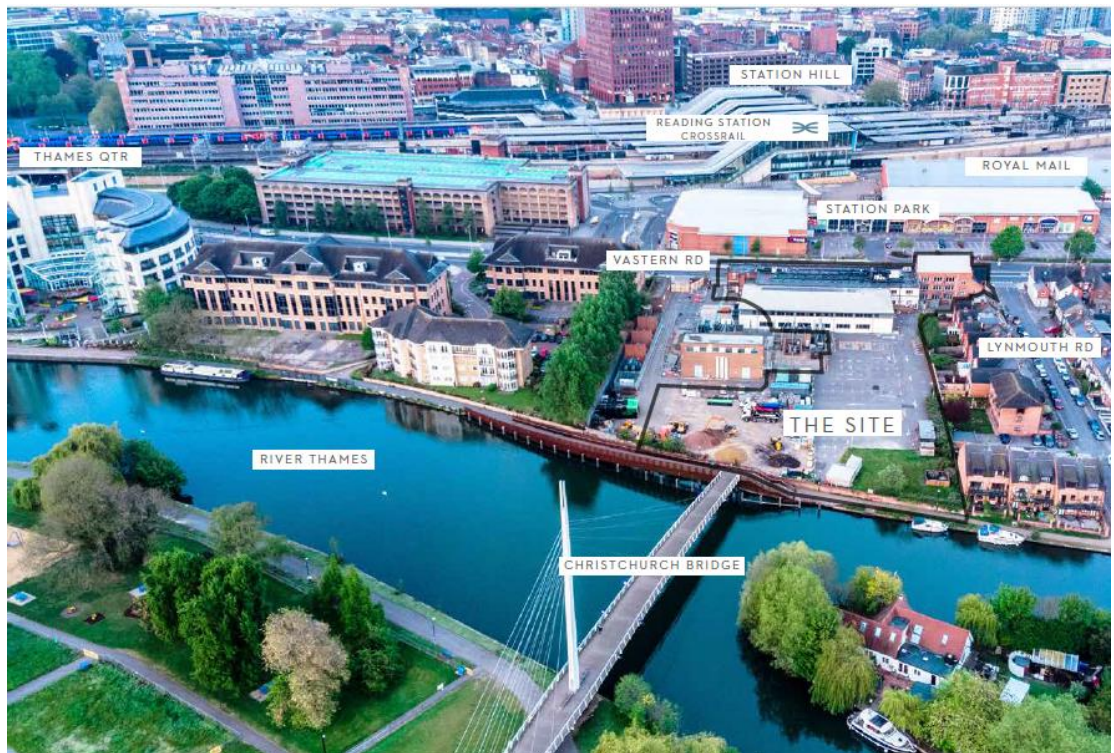
Figure 5.3: Station/River Major Opportunity Area Strategy

1.7 In addition to the site allocation and local listing described above, there are also a number of other site constraints / designations / nearby designations:

- Within the Office Core
- Within the Central Core
- Within Flood Zone 2 & 3
- Within an air quality management area
- Within a smoke control zone
- Includes contaminated land
- Adjacent to a public right of way along the river
- The River Thames, Christchurch Meadows, Kings Meadows and Hills Meadow are major landscape features
- Christchurch Meadows, Kings Meadows and Hills Meadow are important areas of open space
- From an ecological perspective the site backs on to the River Thames which constitutes a Priority Habitat 'Rivers' (as per the NPPF)
- The River Thames is an existing green link
- There are mature Plane trees on the Vastern Road frontage
- Neighbouring Lynmouth Road is a nearby sensitive location - low-rise residential
- Within the North of the Station cluster identified in the Sustainable Design and Construction SPD as being potentially suitable for heat network schemes.



Extract from Applicant's Brochure



Site as appears now (extract from The Old Power Station Brochure)

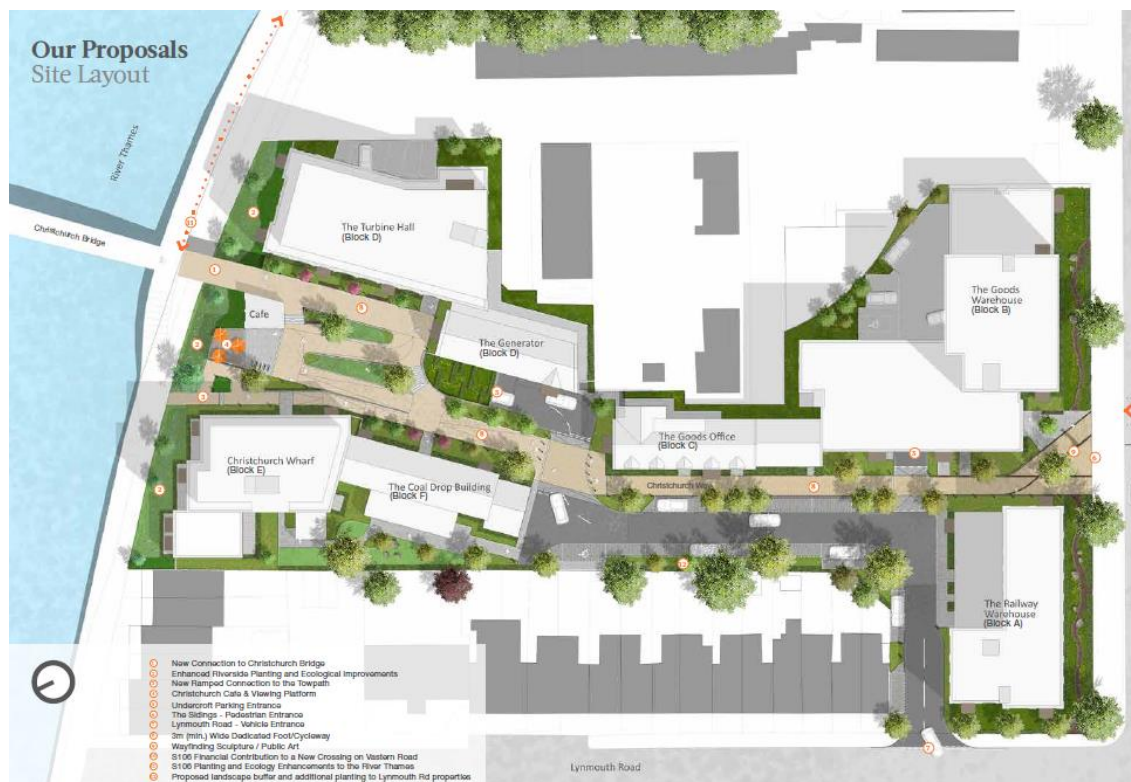


When power station was on site (extract from The Old Power Station Brochure).

2 PROPOSAL

- 2.1 The proposal is seeking full planning permission for the demolition of all buildings and structures on the site. Most prominently this comprises the existing office buildings on the site and the locally listed entrance building, which are located along the south boundary of the application site on Vastern Road itself.

- 2.2 Following this, it is proposed to erect a series of buildings that in total will create 209 residential units (a mix of 1, 2 and 3 bedrooms) all but one of the dwellings provided as apartments in 6 blocks of flats plus one house - see layout plan below. The residential density would be 275 dwellings per hectare.



Block	Number of bedrooms per residential unit			Total units
	1	2	3	
A (6 floors)	8	19	0	27
B (11 floors)	29	49	0	78
C (4 floors)	3	7	0	10
D (10 floors)	8	35	12	55
E (8 floors)	13	19	0	32
F (3 floors)	0	6	0	6
G (house)	0	1	0	1
Total	61	136	12	209

- 2.3 More specifically, Block A (referred to as “The Railway Warehouse”) is located on the south-west corner of the application site. It comprises a 6 storey block of 27 apartments all with one or two bedrooms fronting onto Vastern Road. There is some landscape setting to the front and sides proposed. To the north of this block is the existing terraced housing on Lynmouth Road on the far side of the proposed enlarged vehicular access to the rest of the site.



Block A

- 2.4 Block B, “The Goods Warehouse” also lies on the Vastern Road frontage. It comprises an 11 storey block of 78 apartments again all one or two bed units with landscaped setting on the Vastern Road boundary.



Block B



Street view from Vastern Road of Blocks A & B.

- 2.5 Block C, “The Goods Office”, is orientated north south and is a four storey block of 10 one and two bed apartments with some landscaped setting to front and rear of the building. It lies directly adjacent to and behind Block B.



Block C



Block C

&

Block B as seen from west

Block D is a combination of two blocks of 55 apartments with a mix of one, two and three bedrooms. The part referred to as “The Generator” is to the south would be 7 storeys high with rooms in the with pitched roof and the taller “The Turbine Hall” with mainly 8 storeys with a further 2 set back from the eaves adjacent to the Thames and tow path.



Block D



View from north

- 2.6 Block E is referred to as “Christchurch Wharf” and is on the north west corner of the site close to the Thames. With 32 apartments it has 6 main storeys with 2 storeys set back from the eaves.



Block E

- 2.7 Block F (referred to as “The Coal Drop Building”) is the final apartment block with 6 apartments in a 3 storey building located to the south of Block E and partially backing on to houses in Lynmouth Road. On the right of this block is plot G - an attached 2 bedroom house.



Block F & Plot G

- 2.8 There is also a small café proposed with outdoor seating area and landscaping close to and overlooking the Thames.



- 2.9 A route through the site for pedestrians and cyclists is proposed leading from the Caversham Bridge to Vastern Road.



- 2.10 The vehicle access to the site will be from Lynmouth Road with the existing junction proposed to be improved and widened to allow two-way vehicle movements. The development is proposing a total of 55 car parking spaces (0.26 parking spaces per dwelling), of which 5 will have EV charging facilities, and 61 Sheffield stands (122 spaces) are proposed for bicycle parking for residents. Stands are also proposed outside the café.

- 2.11 During the course of the application a number of revisions have been made to the proposed development, including:

Affordable Housing

- The introduction of on-site affordable housing (the offer at the outset of the application was 0% affordable housing), comprising 43 units within Blocks B1 and B2. In terms of overall units, this equates to 20.57% on-site provision (43 / 209).
- In terms of tenure breakdown, 19 of these units will be affordable rent (within Block B2) and the remaining 24 units would be shared ownership. This equates to a tenure split of 44.19 / 55.81. The March 2021 adopted Affordable Housing SPD specifies a minimum 62% 'Reading affordable rent' / maximum 38% shared ownership split. Accordingly, the proposed tenure split does not accord with either the newly adopted SPD, nor the 70 / 30 split referenced in the supporting text to Policy H3.
- More specifically, the affordable rented units comprise 9x1-bed east facing (towards the boundary of the SSE site) units at first to third floor level and 10 x 2-bed west-facing (towards Block A and the vehicular access from Lynmouth Road) units at ground (1 unit) and first to third floor level (3 units each floor). The upper floor units will be served via a separate core/lift/entrance.
- The shared ownership units comprise 2x1-bed and 1x2-bed single aspect north-facing (towards the SSE site boundary) at first to eighth floor level, totally 16x1 and 8x2-bed units. These units will share a core/lift/entrance with market units which face south towards Vastern Road.
- The predominance of 1 and 2-bed affordable units aligns with figure 4.6 of the supporting text to Policy H2.
- The applicant has specified that the affordable housing units will be provided in an early phase of the scheme, but despite a request for a phasing plan during a meeting in December 2020, no phasing plan has been submitted by the applicant.

- The applicant has been explicit that no deferred review mechanism will be entered into by the applicant.
- Furthermore, the applicant has stated that “should officers still be minded to refuse the application, in an appeal scenario, our affordable provision will be as our submitted viability position of 0%, with the inclusion of a deferred mechanism”.

Revisions to improve day/sunlight levels for future occupiers

- Removal of projecting balconies on the south elevation of Block A (fronting onto Vastern Road)
- Increased glazing at Block B on west elevation at ground floor level and east elevation at first floor level
- Removal of projecting balconies on the south elevation at first to ninth floor level
- Removal of balconies on the west elevation of Block C at first and second floor level
- Massing of cycle and waste stores on west elevation of Block F rearranged and two additional windows proposed at ground floor level

Addressing transport consultation response (10th June submission):

- Change to the access at Lynmouth Road, associated with the kerb alignment on the western side of the junction, with this amended be set back further to ensure there is an appropriate width for a refuse vehicle and large car to pass on the entrance road and then track around onto Lynmouth Road. The red line boundary has been marginally increased to accommodate this change.

Off-site mitigation planting and biodiversity proposals

- Off-site options submitted for consideration

Energy Strategy

- Submission of an alternative energy strategy which includes an Air Source Heat Pump (ASHP) led heat network which utilises low carbon electricity. The altered strategy also future proofs connection to enable future building operators to consider connecting into a wider heat network, inclusion of photovoltaic panels across the scheme and a green roof on the proposed café.

- 2.12 Various other revisions to seek to address consultee feedback have also been provided, such as updated technical reports in support of matters such as day/sunlight, wind/microclimate, energy, landscaping and tree planting and various other transport related components.
- 2.13 Discussions and negotiations were on-going with the applicant until the applicant advised on 19th January 2021 a request to “draw matters to a close” and “determine the application in its current form” by 22nd January 2021. This was considered by officers to be a somewhat surprising and disappointing turn of events, given that only three working days earlier the applicant had submitted further information for consideration and confirmed their position regarding a number of other matters. In addition, just a week previous to this a further review of a revised energy strategy had been agreed by the applicant, with the timeframes for this to be undertaken going well beyond the date by which the applicant then sought for the application to be determined by.

- 2.14 Officers advised the applicant that their request for the application to be determined in its current form was accepted on 21st January. In the intervening time prior to the reply to the applicant, in responding to a request from elected member Cllr Page, seeking an update on the application, the application was subsequently called into committee for determination regardless of the officer level recommendation. Accordingly, the applicant was advised on 21st January that the application would be progressed to the next available committee meeting after the already instructed energy review had taken place.

Community Infrastructure levy (CIL):

- 2.15 In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form with the submission. Based on the 2021 residential CIL rate of £156.71 per square metre and the proposed residential floorspace of 13,930.3 square metres the current broad estimate is £2,183,017.31 (this also deducts the existing office floorspace at the site). However, under the current scheme to provide onsite affordable housing the applicant could qualify for a reduction to the levy based on the affordable housing floor area being deducted at a later date.
- 2.16 Submitted numerous drawings and documents. Please refer to lists appended to this report.

3. RELEVANT PLANNING HISTORY

3.1 Application site (or part of the application site)

030902 - Application of render finish to front elevation and replacement windows. Granted 30/07/2003.

050310 - Development of existing garage/warehouse to form office accommodation (re-submission of planning application 05/00030). Granted following completion of s106 legal agreement 11/07/2005.

061219 - Erection of roof mounted wind turbine. Granted 02/01/2007.

182212 - Request for an EIA Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 with regard to the proposed redevelopment of land at Vastern Road, Reading. Positive screening opinion issued 01/02/2019.

190451 - Request for an EIA Scoping Opinion in accordance with Regulation 15 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) with regard to the proposed redevelopment of land at Vastern Road, Reading, involving demolition of a number of structures on the site and the erection of a new residential scheme (up to 210 units), with a max height of 11 storeys (up to 36m above ground level) including a new north south pedestrian link, connecting Christchurch Bridge to Vastern Road towards the station as well as drainage infrastructure and landscaping. Scoping Opinion issued 09/05/2019.

3.2 Close-by the application site:

51 Vastern Road

191165 - Change of use of ground floor from Class A1 (shops) to C3 (dwellinghouses) to comprise 2 x studio flats. Prior Notification under Class M, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). Prior Approval Notification - Approval 08/10/2019.

55 Vastern Road

191678 - Installation of substation enclosure and associated electrical equipment fronting Vastern Road. Withdrawn 24/02/2020.

80 Caversham Road

182252 - Outline application considering access, landscaping, layout and scale involving the demolition of all existing buildings and structures (Classes B1a&B2) & erection of new buildings ranging between basement and 2 - 24 storeys in height, providing 620 (74 x studio, 194x1, 320x2& 32x3-bed) residential units (Class C3), office accommodation (Class B1a), flexible ground floor Class A1-3 uses, a community centre (ClassD1), health centre uses (Class D1) & various works including 94 car parking spaces, servicing, public & private open space, landscaping, highways, pedestrian & vehicular access & associated works. This application is accompanied by an ES (amended description) Current application under consideration.

Vastern Court, Caversham Road

200328 - Outline planning permission for Demolition and redevelopment to comprise up to 115,000 sqm GEA in one or more land uses comprising Residential (Class C3 and including PRS), Offices (Use Class B1(a), development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), C1 (hotel), D1 and D2 (community and leisure), car parking, provision of new plant and renewable energy equipment, creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting, and for the laying out of the buildings. Current application under consideration.

4. CONSULTATIONS

- A) Planning Policy
- B) Historic consultant
- C) Design South East
- D) Access Officer
- E) Crime Prevention Design Advisor
- F) Reading Uk CIC
- G) Berkshire Archaeology
- H) Leisure
- I) Flood Authority
- J) Infrastructure monitoring Officer
- K) Royal Berkshire Fire & Rescue
- L) Historic England
- M) Sustainability/energy
- N) Transport comments
- O) BRE Daylight
- P) BRE Microclimate and wind
- Q) Valuations

- R) Housing
- S) Environment Agency
- T) Natural Environment
- U) Ecologist
- V) Landscape Services Manager
- W) Environmental Protection

A) Planning Policy

- 4.1 These comments from the Planning Policy team on application 200188 at 55 Vastern Road relate wholly to the north-south pedestrian and cycle link through the site and respond in particular to the Policy Assessment Note from Barton Willmore dated 24th September 2020. No comments are provided relating to any of the other planning policy aspects of the proposal.

Relevant Local Policy

- 4.2 The key local policy documents relevant to the link are the Reading Borough Local Plan (adopted November 2019) and Reading Station Area Framework (adopted December 2010).

Reading Borough Local Plan

Design

- 4.3 Policy CC7 of the Local Plan provides general design policy across the Borough (including in the centre), and states that five components of development form, including “layout: urban structure and urban grain” should be assessed to ensure that a positive contribution is made to urban design objectives including “Quality of the public realm and provision of green infrastructure and landscaping”, “Quality of the public realm and provision of green infrastructure and landscaping” and “Legibility - clear image and easy to understand”.
- 4.4 Policy CC7 also states that developments will be assessed against other criteria including that they:
- “Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
 - Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;
 - Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.”
- 4.5 Policy CR2 includes additional policy for design of schemes in central Reading, which should be considered in addition to CC7. This emphasises the importance of the grid structure and ease of movement in criterion a, well designed public realm and convenient linkages in criterion b and the incorporation of green infrastructure in criterion c.

Open space and public realm

- 4.6 The town centre is a high-density area with an increasing residential population and limited open space within its core. The site represents an opportunity to improve access to the riverside open spaces for those living in, working in or visiting the centre. Policy EN10 deals with the issue of access to open space, and states that:

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

- 4.7 Policy EN11 deals specifically with waterspaces, and highlights that developments in the vicinity of watercourses will:

“Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;”

- 4.8 Policy CR3 specifically relates to public realm in central Reading. It states that all sites of 1 ha will be expected to incorporate new public open space or civic squares. Criterion iii is also particularly relevant to this site, because it highlights the vital nature of legible links to the watercourses:

“Development proposals adjacent to or in close proximity to a watercourse will retain and not impede existing continuous public access to and along the watercourses, and will provide legible continuous public access to and along the watercourses where this does not currently exist;”

Cycling

- 4.9 Policy TR4 deals with cycling and expects that “Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities.”

Central Reading Strategy

- 4.10 The importance of north-south links through the centre, of which this site is an absolutely vital part, are clear in the strategy for central Reading. Among the key principles referenced in 5.2.1 are:

“f. Access to the centre by foot, cycle and public transport will be improved.

g. Access within the centre by foot and cycle will be improved and barriers to this improved access will be overcome, particularly in a north-south direction through the core.”

- 4.11 Paragraph 5.2.3 develops this further, identifying the need to overcome barriers to movement, particularly a need to emphasise a north-south link through the centre, linking to the Thames and adjacent parks, and

Caversham. Figure 5.1 shows the strategy, and shows a clear, strategic north-south improved pedestrian and cycle movement through the middle of the site.

Site-Specific Policy

- 4.12 This site is identified as part of CR11, the Station/River Major Opportunity Area. The vision for this area includes that “it will integrate the transport links and areas northwards to-wards the River Thames and into the heart of the centre.”

- 4.13 The overall policy criteria for the whole area provide further emphasis of this point, stating that development in the area will:

“ii. Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;”

“v. Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;”

- 4.14 The site forms sub-area CR11g, and specific policy for the site includes that:

“Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside.”

- 4.15 The supporting text includes additional wording that is relevant, in particular when considering how a link should appear.

“In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre. If visual links are also provided, this will help change the perception of the area north of the station as a separate entity.” (paragraph 5.4.6)

- 4.16 Paragraph 5.4.6 also gives clear instruction on how the link should be weighed in determining applications on this site:

“In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management.”

Reading Station Area Framework

- 4.17 The Reading Station Area Framework was adopted in 2010 and applies to the wider station area including this site.

Status of the Framework

- 4.18 The Local Plan makes clear that the Reading Station Area Framework (adopted 2010) continues to carry weight. It states in paragraph 5.4.9 that:

“A Station Area Development Framework was prepared for most of this area in 2010 to provide more detailed guidance, and a Station Hill South Planning and Urban Design Brief covering sites CR11a, b and c dates from 2007. These documents continue to apply, alongside any future Supplementary Planning Documents.”

- 4.19 The Policy Assessment Note, albeit acknowledging that the RSAF is afforded ‘some’ weight by the Local Plan, suggests in paragraph 2.1 that it has been ‘superseded’ by the NPPF and Local Plan, and also refer in paragraph 2.10 to it being based on an outdated policy context. For clarity, I would reject any assertion that the weight of the RSAF has in any way decreased since its adoption. There is nothing specifically in the NPPF that I would identify as having rendered its contents out of date, and, as discussed, the Local Plan makes absolutely clear that it will continue to apply. The most relevant policies to this issue are continuations of previous policy in the Reading Central Area Action Plan. For instance, relevant criteria (ii) and (v) of policy CR11 are slightly amended versions of (ii) and (v) of RC1 of the RCAAP, whilst the description of sub-area CR11g is clearly derived from the corresponding RC1g of the RCAAP.

- 4.20 In her Report on the Examination of the Reading Local Plan (September 2019), the planning inspector referenced that there was clearly a continuation of the overall strategy for central Reading in paragraph 86:

“The strategy is a continuation of the partly implemented Central Reading Area Action Plan, and the overall approach for the Central Reading strategy is justified.”

Overall priorities

- 4.21 The RSAF recognises the importance of north-south connections from the outset of the document. In paragraph 2.18, it is recognised as one of the key challenges:

“The major barriers to pedestrian movement include the rail tracks and the limited number of rail crossings, the Station Hill site, the large retail and post office sheds to the north of the tracks, the significant level differences across the area, and the enclosed electricity board site which blocks direct access from the Station to the riverside footpath and cycle way.”

- 4.22 This is further emphasised within the Principles section, in paragraph 3.6:

“The redevelopment of large sites provides the opportunity to secure landscaped public space and to extend public access. The layout of these will incorporate east-west and north-south routes to enhance movement and linkages across the area, whilst the construction of a pedestrian/cycle bridge linking the Area to Christchurch Meadows will further integrate and ensure good accessibility to adjoining open spaces.”

Public realm

- 4.23 Chapter 5 on Public Realm deals with the issue of north-south connections across the site. The aims of the section include “‘Stitching’ together the various development sites within the Area both visually and physically” and “Creating more opportunities for sustainable forms of transport, particularly walking and cycling, by enhancing the connectivity and legibility of the area” (paragraph 5.4).
- 4.24 Paragraph 5.5. recognises the challenges of enhancing connectivity due to changes in level across the area, but nevertheless states that it should be achieved insofar as is possible.
- 4.25 Paragraph 5.6 (and Figure 5.1) identify the Kennet-Thames spine as being one of the public realm priorities. Specific guidance on this spine is set out in paragraph 5.9:

“A major ‘city spine’ - a direct pedestrian route - is proposed through the historic core, the Station Area and through to the Thames. This spine is based on the north-south link which is the most significant movement corridor in the RCAAP, and is vital to the success of development in this area. The spine will extend across the Thames with a new footbridge(s) and new riverside parks, which can act as amenity space for new residents. The spine will include enhancements including wider pavements and greater pedestrian priority in Station Road. North of the railway, the spine will incorporate a ‘green link’ towards the river. Buildings will face onto the spine rather than away from it, and, on all parts of the spine south of Vastern Road, the frontages will be enlivened with active uses including retail and leisure.”

- 4.26 Chapter 5 also deals with the pedestrian grid, and, in paragraph 5.17, once again refers to the importance of the north-south connections. Figure 5.5 shows the proposed pedestrian grid, and shows a direct link through this site from the station to Christchurch Bridge. Paragraph 5.20 states that the Riverside site should be a location for pedestrian priority measures.

Views

- 4.27 Chapter 7 on Views is not referred to in the Policy Assessment Note, but is nevertheless significant for consideration of the North-South route. In the section on shorter-distance views, paragraph 7.10 states that:

“The new development will result in new views being opened up within the Station Area itself. Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight.”

- 4.28 Two specific views are identified, and shown on Figure 7.2 as follows:

- 62 - Station Square north looking north
- 63 - New public space on Thames looking south

- 4.29 The RSAF therefore clearly anticipates that there will be a high-quality visual link between the station and Thames, crossing this site.

Urban Design Framework

- 4.30 In setting out an overall urban design framework, the RSAF identifies five key concepts, and once again the north-south connections are emphasised: “Creating permeable development that strengthens north-south links and improves connectivity across the area” (paragraph 8.3).
- 4.31 Figure 8.5, the Framework structure, shows the north-south link as the only ‘major path/pedestrian link’, and shows a direct link across this site linking two public spaces or important intersections at either end of the site, and then beyond across the Thames to the north and south to the station. This high-quality direct link is further developed in Figure 8.6, the Framework diagram.
- 4.32 In dealing with the Northside area in more depth, the three key elements of the public realm are identified as being the “north-south spine between the station and Thames (and across the river), and two public spaces along the spine - a new Station entrance square, and a public space on the southern bank of the Thames” (paragraph 8.16).
- 4.33 In paragraph 8.21, the Riverside site is identified as one of seven key sites in achieving the urban design framework.

Transport

- 4.34 Chapter 11 deals with Transport, and this further emphasises the importance of the north-south connections, in this case for cycling. Paragraph 11.24 states that:
- “In particular, the development of the Northside area can provide new cycle links approaching the northern Station entrance, potentially separated where necessary. These should link in with the route network shown on the map accompanying the Cycling Strategy, and improve north-south crossing of Vastern Road.”
- 4.35 Figure 11.11 shows that a new cycle route along this north-south axis directly through the site is expected.

Summary

- 4.36 In summary, the following are the clear takeaways from local policy relating to the north-south link within the site:
- That the link is essential to the wider strategy and is the main priority for this site (LP CR11 ii, CR11g, paras 5.2.1, 5.2.3, 5.4.6, Figures 5.1, 5.2; RSAF paras 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.5, 8.6)
 - That it should be high-quality (LP EN11, CR11g)
 - That it forms an important part of overall public realm (CR3, CR11 v, paras 5.6, 5.9, Figure 5.1)
 - That it is direct and legible (LP CC7, CR3, CR11 v, Figure 5.1; RSAF paras 5.9, 7.10, Figures 5.5, 8.5, 8.6),

- That it provides visual links (LP para 5.4.6; RSAF para 7.10)
- That it is landscaped (LP CR2, CR11 v, CR11g; RSAF para 5.6)
- That it provides enhanced cycling through the site (LP TR4, CR11 ii, paras 5.2.1, 5.4.6, Figure 5.1; RSAP para 11.24, Figure 11.11)

Proposed link in context of local policy

- 4.37 It is recognised that the proposals represent an improvement over the current situation, where there is no access through the site at all. However, the development of this site is a one-off opportunity to secure a truly high-quality link through the site that must be seized. It is important to state that the quality of this link is not simply one of a number of competing priorities that must be weighed on this site, but, as Local Plan paragraph 5.4.6 makes clear, the main priority for the site, and must be considered accordingly.
- 4.38 The artificial division of the site into two ownerships and the retention of the electricity equipment clearly compromises the ability of the site to meet these priorities. However, even within the proposed site boundary, it is my view that not enough emphasis has been placed on the importance of achieving this high-quality direct link to reflect local policy, and this element of the proposal does not therefore comply with the policy on this link.

Directness

- 4.39 The proposed link is not the most direct link possible, even when accounting for the shape of the application site.
- 4.40 The main problem is the presence of the 'Goods Office' plot, and the need to bring the route around this building and then further bend round to meet the end of the Christchurch Bridge. The northern end of this building protrudes into the proposed route, and creates additional deviation. In my view, the presence of the Goods Office building in this location is not compatible with achieving the most direct link through the site possible.
- 4.41 The extent of the Goods Warehouse also accentuates this issue, as it also extends westwards into the most direct route and presents a particular issue with directness for those crossing Vastern Road.
- 4.42 The switchbacks at the northern end of the site also contribute to the lack of directness. Planning Policy are not best placed to comment on how this will work for cyclists from a technical point of view, but the presence of steps onto bends in the cycle route seem to lead to potential for pedestrian-cycle conflict. Wheelchair users would also be required to use the less direct cycle route. It is recognised that there is an issue with changes of level to land directly onto the footbridge, which is clearly a desirable outcome, and that an elevated walkway through much of the site would create issues in terms of relationship with building frontage, but a gentle, direct, DDA-compliant slope through the site would be easier to achieve, once again, without the Goods Office building.

- 4.43 Paragraph 4.14 of the Policy Assessment Note makes the comparison to the northern end of Christchurch Bridge, and rightly points out that there are indirect routes as it lands on Christchurch Meadows. However, there are important distinctions at this end of the bridge. Firstly, the Local Plan CR11 policies and RSAF do not apply here. Secondly, once north of the Thames, the desired routes start to fragment - north towards Gosbrook Road, northwest towards Caversham centre and west and east along the riverside. This compares to a single clear desire line on the south side of the bridge, towards the station and centre. Finally, even if the paths on the northern side are not direct, they are at least clear visually due to the open nature of the meadows, and pedestrians would not be prevented from taking the most direct routes across the meadows if they choose. This is not the case on the application site.

Visual link

- 4.44 Contrary to paragraph 4.3 of the Policy Assessment Note, a visual link through the site and beyond was indeed envisaged by the Local Plan and RSAF, as highlighted in Local Plan paragraph 5.4.6 and, in particular, RSAF paragraph 7.10. The wider issue of legibility of the route is highlighted throughout both documents.
- 4.45 A consequence of the subdivision of the site is that it appears that a single visual link from the Station to the Thames would be very difficult to achieve. However, even if this is not achievable in full, efforts should certainly be made to keep visual fragmentation of the route to an absolute minimum. On the basis of the current layout, there seems to be at least three visual 'stages' between the station and Thames - from the south side of Vastern Road it appears that a pedestrian would be able to see into the site about as far as the Goods Office; once entering the site, visual links would extend to the southern edge of the Coal Drop Building; and only when approaching the crossing of the vehicular route might the Thames start to become visible. Once again, the main issue affecting visual links will be the Goods Office building, particularly its northwestern corner, although this also relates to the western extent of the Goods Warehouse.
- 4.46 Regardless of signage and wayfaring, for the route to be successful, the visual links should be as clear and direct as possible. Without such links, the route will be less attractive and therefore less successful.

Quality

- 4.47 The comments on directness and visual links above also relate to the quality of the route. However, there is one additional point Planning Policy would wish to make on the quality of the link.
- 4.48 Planning Policy's main concern is width. The Policy Assessment Note emphasises that a minimum 3m width has been specified, and this appears to be the width through much of the site. It is worth comparing the proposed link with other pedestrianised town centre streets. Chain Street, for example, although 2.7m wide at its northern entrance, for most of its length exceeds 4m in width. Most of Union Street is up to 4m wide. Both of these streets have a distinct 'alleyway' feel, despite the buildings on either side being only 2-3 storeys, and cycling along them would be actively dangerous. Other town centre shared pedestrian/cycle routes, such as

Kennetside, are also wider than 3m. None of these are regarded as key through routes in the town centre. Christchurch Bridge itself is more than 4m wide, so the route would narrow from that point as it enters the site. A 3m width may fulfil technical specifications, but it does not recognise the vital, strategic nature of this route.

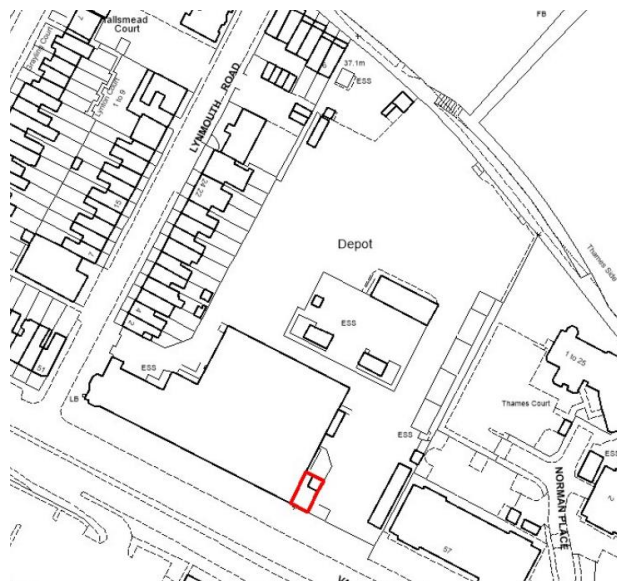
- 4.49 The narrowness of the site also very much limits the potential of the route to be anything other than a through route, and will not help it to be a useable part of the public realm for example sitting.

Summary

- 4.50 The link as currently proposed in the application does not comply with the Local Plan (in particular policy CR11) or the Reading Station Area Framework.

B) RBC Historic Buildings Consultant

- 4.1.1 Policy context - National Planning Policy Framework (NPPF) - In March 2012, the Government published the National Planning Policy Framework (NPPF), which was subsequently updated in 2019.



Extent of the Locally Listed Building

- 4.1.2 The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '...protecting and enhancing our...historic environment' (DCLG et al, 2018).
- 4.1.3 The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2018, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2018, Annex 2: Glossary).
- 4.1.4 The associated Planning Practice Guide (PPG) identifies heritage assets as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

4.1.5 The glossary annexed to the PPG defines the setting of a heritage asset as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

4.1.6 The NPPF (paragraph 189) requires that:

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

4.1.7 Significance is defined by the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest'. This significance or value may be related to a heritage asset's archaeological, architectural and artistic or historic elements and can derive not only from its physical presence but also from its setting (DCLG et al, 2012, para 56). The NPPF details the main policies regarding heritage assets in Section 12, Conserving and enhancing the historic environment (DCLG et al, 2012).

4.1.8 Paragraph 197 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.

4.1.9 Planning Practice Guide (PPG) - PPG states that local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).

4.1.10 The PPG states under 'Why is 'significance' important in decision-taking?' that:

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

- 4.1.11 Under the discussion of ‘How to assess if there is substantial harm?’ the PPG offers:

What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.

- 4.1.12 Reading Borough Planning Policies - The Reading Local Plan Adopted 2019 is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It replaces the three previous development plan documents - the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015). It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. Reading, has launched a 2050 vision for the town as a smart and sustainable city by 2050. The vision entails:

6. Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design, and capitalise on these assets to contribute to quality of life and economic success;

EN1: Protection and Enhancement of the Historic Environment - Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- Listed Buildings;
- Conservation Areas;
- Scheduled Monuments;
- Historic parks and gardens; and
- Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.

- 4.1.13 All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

- 4.1.14 Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.
- 4.1.15 Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.
- 4.1.16 Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.
- 4.1.17 The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.
- 4.1.18 Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
- 4.1.19 EN4: Locally Important Heritage Assets - Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.
- 4.1.20 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. 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. 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.
- 4.1.21 EN6: New Development in a Historic Context - In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:
- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
 - b. Sensitivity to historic context;

- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);
 - d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.
- 4.1.22 Proposals - The proposed re-development of the former SSE site on Vastern Road, involves the demolition of a number of structures, including the locally Listed No. 55 Vastern Road, and the erection of a series of buildings to form a residential scheme from between 1 and 11 storeys with a dwellings for 209 residents, approximately 17.9sqm of leisure floorspace (café), and a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road and on towards Reading Station.
- 4.1.23 The proposed industrial-style residential blocks fronting onto Vastern Road would be up to 11 storeys high. The design for these proposed buildings are considered to be good quality, and encompass a variety of local architectural motifs from the Victorian and Edwardian housing and industrial structures in the vicinity. These features would include a mix of red with grey brickwork detailing, especially at ground floor level, arched window openings with stone coloured arches, external metal balconies and brick arched headers, set with recessed panels. Further windows would include flat stone coloured arches and stone coloured sills, a multi-coloured arched feature-window and corbelling at the upper storeys. All of these features are well designed and harmonised and based on distinctive local features and would help to reduce the bulk and mass of these multi-storey blocks.
- 4.1.24 Within the main body of the proposed scheme would be a central street with smaller linking buildings, again based around local architectural precedent. This would include a 2 storey element (Coal Drop Terrace), designed to sit alongside the existing 2 storey residential housing and 3 and 4 four storey buildings, based on the designs of the smaller scale warehouses and office structures, with slate pitched roofs. Again the bespoke designs are considered to work well within the historic context.
- 4.1.25 The design of the proposed multi-storey blocks alongside the river are of a different character to those alongside Vastern Road. These reflect the differing context of these buildings and would consist of buff brickwork, with some light stone-coloured detailing forming banding and window arches, with external metal balconies and glazed roof top extensions.
- 4.1.26 The proposals also include a feature footbridge over the Thames alongside the scheme to provide more direct access to Reading station and the town centre.
- 4.1.27 Discussion - The existing Locally Listed No. 55 Vastern Road within the proposed site is an example of an early 20th century office building built as part of the former industrial depot complex on Vastern Road. The building is clearly architecturally separately identifiable and distinct from the adjacent buildings and was built in connection with an electric works and was designed by the locally prominent architectural practice of Albury & Brown. F W Albury also designed the Grade II Listed Caversham Free Public Library. This is particularly reminiscent of 55 Vastern Road and is designed

in what has been termed in the listing as an "irregular red brick and stone sub-Voysey style with tiled roof".

- 4.1.28 The Heritage Statement states the building at the eastern end of the present No. 55 Vastern Road was probably built as a new entrance for the Electric Works, with the eastern side of the building accommodating a carriage arch. The 1894 share issue prospectus for the Reading Electric Supply Co. Ltd shows that Albury was one of the company's directors, reinforcing this association and likelihood that his firm was responsible for the design of all of its buildings. The new stores for the Reading Electric Supply Company were built at Vastern Road in 1903, and that these were designed by the architect Frederick William Albury (1845-1912). Albury was therefore working at the site and had many connections with the company. The locally listed building at 55 Vastern Road, which is reminiscent of his style, is therefore likely to have also been designed by Albury.
- 4.1.29 As part of pre-application meeting it was recommended that options to retain the Locally Listed building were examined together with the re-directed pedestrian link-path. Façade retention was examined and a range of options for façade retention are illustrated in the Design and Access Statement (pp. 34-35 and pp. 40-43). These options were discounted due to the constraints of the site and instead the industrial heritage of the site has been used to inform the scheme design, to be branded as the "Old Power Station".
- 4.1.30 Conclusions - In conclusion, the bespoke design proposals are considered to be a good quality response to the historic context of the proposed development. Whilst the mass and scale of the buildings is extensive, the historic setting is not especially sensitive to change and the quality of the design would go some way to mitigate these impacts.
- 4.1.31 However, the proposals would result in the loss of the locally listed building at 55 Vastern Road, which is a well-designed and good quality building built by a locally renowned architectural practice.
- 4.1.32 As stated in the NPPF, local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions, but which are not formally designated heritage assets (DCLG et al, 2014, para. 39). As stated in paragraph 197 of the NPPF:
- 4.1.33 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.
- 4.1.34 The proposed justification for the demolition of the locally listed building, therefore, rests on the benefit of the proposals in relation to the wider public benefits of the scheme against the heritage value of the non-designated heritage asset in the planning balance.

- 4.1.35 However, should RBC be minded to grant planning permission for this development appropriate conditions are recommended.

C) Design South East

- 4.2.1 At pre-application stage the emerging development proposals were twice considered by Design South East (DSE), in April and November 2019. For contextual purposes, a summary of the feedback during the second meeting (which took place on 20th November 2019, with written feedback provided on 5th December 2019), together with the key recommendations at that juncture, is detailed below:

Summary

- 4.2.2 The panel broadly supports the scheme and has no major issues with use, quantum, height and massing. The attention given to the points made at the previous review is welcome and have gone some way to meeting our concerns, but there is further to go.
- 4.2.3 The panel's key observation, as at the first review, concerns the pedestrian and cycle link through the site. The route is now more of a street through the development but is not yet a clear and palpably public route to and from the footbridge. Points of conflict between motor vehicles and cyclists and pedestrians continue to be a concern. The buildings and public realm in the middle of the scheme are not fulfilling their role as way markers or giving a strong character. The landscape design approach could help more in making the route attractive and well-defined.
- 4.2.4 The scheme now relates better to the river and the connection at towpath level is welcome in principle but could be more inviting.
- 4.2.5 The architectural language has improved but the panel encourages a more contemporary approach to help the scheme to be assimilated into Reading and to be manifestly residential.
- 4.2.6 We support the proposal for a café and its location, but its design could contribute more to the scheme.
- 4.2.7 Key recommendations
1. A more legible gateway to the river from Vastern Road should be formed.
 2. The route for cyclists and pedestrians needs to be clearer and safer and developed as a series of spaces.
 3. The buildings on the route in the middle of the scheme should be stronger and more distinctive.
 4. The connection at 'towpath' level could be reinforced.
 5. A more contemporary approach should be taken to the architectural language.

6. The café presents an opportunity for an exciting and more distinctive design.

7. The consideration of how the scheme would relate to development on the remainder of the SSE site is welcome.

8. Environmental sustainability should be more evident in the design of the scheme.

9. The consideration and description of the broader relationship to the Reading Station Area Framework is essential to relate the scheme to Reading strategically.

D) Access Officer

4.3 A number of initial questions and queries were raised by the Access Officer, in relation to matters such as:

- Colour contrasts between materials within the public realm
- Need for informal play facilities to be away from main paths/routes to avoid conflicts
- Queries regarding disabled people using the shared spaces
- Query over disabled parking spaces
- Query over the siting of any gateway sculpture/wayfinding signs, needing to avoid accidents and trip hazards

4.3.2 Following correspondence, the access officer confirmed contention with the responses provided by the applicant.

E) Crime Prevention Design Advisor at Thames Valley Police

4.4.1 The Crime Prevention Design Advisor was engaged at pre-application stage, whereby a number of matters were relayed and incorporated within the application submission. Accordingly, comments received at application stage focused primarily on matters which remained unresolved. A summary of the initial comments received were:

- The inclusion of secure residential lobbies with postal services is welcomed.
- Concerns that (access control) compartmentalisation may not be fully achieved within each block. The proposed design (open fire egress stairwell / lack of pedestrian pass door to carpark) or a secondary fire escape could allow individuals access onto and between all the residential floors within a block. The possibility of free movement (excessive permeability), will not only negatively impact on the privacy of residents - by create opportunity for crime, ASB and raise the fear of crime. For large Town Centre developments such as this it is critical that the design and layout of each block supports the implementation of robust access control). This is a fundamental concern.

- Comment that Physical security will be critical in creating and sustaining ‘Safe and accessible environments where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion’.
 - Once the above is resolved it was sought for a condition be placed on any approval seeking a written strategy for access control to be submitted to, and approved by the authority.
- 4.4.2 Subsequent to the reply by the applicant on 20th July 2020, the CPDA noted and appreciated that the design and layout could achieve compartmentalisation. However, to ensure that this opportunity is not missed, the CPDA respectfully asked that the following Secured by Design planning condition be placed on any approval:
- 4.4.3 Prior to commencement of works above slab level, written details as to how the development will achieve the Secured by Design Award shall be submitted to, and approved by the authority. The development (and subsequent access control system) shall be carried out in accordance with the approved details, and shall not be occupied or used until confirmation of that said details has been received by the authority.
- 4.4.4 The applicant replied detailing that whilst SBD does play a significant part of their design process as it is incredibly important to the applicant that their customers remain safe, they do not have the full detail to know whether or not they will be able to achieve SBD on all aspects of the proposals. Accordingly, the applicant sought for the condition to simply refer to a Security Strategy to be submitted/approved, rather than one which specifically achieves the Secured by Design Award.
- 4.4.5 The CPDA replied advised that the SBD award element of the condition should be strongly recommended, to ensure the physical security and access control of a significant development within the town centre.

F) Reading UK CIC

- 4.5.1 Discussions took place with Reading UK CIC in October 2020 regarding the content and nature of any Construction Stage Employment Skills and Training Plan, or alternative financial contribution.
- 4.5.2 Reading UK CIC, which acts as the Economic Development Company for Reading, advise that under the Council’s Employment Skills and Training SPD the applicant is required to commit to a local Employment and Skills Plan (ESP), or financial contribution for employment and training projects in the borough. Whether this is a formal plan or a financial contribution, it shall be secured via legal agreement. This is in respect of the construction phase only, owing to the nature of the proposed scheme (predominantly residential). In line with the ESP SPD formula, any financial contribution would equate to £46,487.50 (£2,500 x Gross internal floor area of the proposed residential component of the scheme (18,595m²) / 1000m²).

G) Berkshire Archaeology

- 4.6.1 Berkshire Archaeology previously responded to a pre-application enquiry for this site and the archaeological desk-based assessment (CgMs, March 2019) submitted with that enquiry is now submitted with the current application.

Berkshire Archaeology's previous comments remain valid, summarised as follows:

4.6.2 CgMs' archaeological desk-based assessment is a fair and reasonable assessment of the site's archaeological potential, namely it has some potential to contain prehistoric deposits and remains that will be impacted by the development proposal. However, the site has undergone considerable past development which will have had some impact on below ground deposits.

4.6.3 Further archaeological investigation is therefore merited but can be undertaken post-consent if the proposal is permitted. The following condition is therefore recommended:

'No development, other than demolition to ground level and excluding the breaking up and removal of floor slabs, foundations and other below ground obstructions, shall take place within the application area until the applicant, their agents or successors in title have secured and implemented a programme of archaeological field evaluation in accordance with a written scheme of investigation, which has been submitted by the applicant and approved in writing by the Local Planning Authority. The results of the evaluation will inform the preparation of a mitigation strategy which will be submitted by the applicant and approved in writing by the Local Planning Authority prior to the commencement of the development'.

4.6.4 The condition (planning officer note: which in practice would need to be discharged in two parts) will ensure the mitigation of the impacts of the development on buried archaeological remains so as to record and advance our understanding of any heritage assets to be lost in accordance with national and local planning policy.

4.6.5 As regards field evaluation, CgMs recommends a staged programme of investigation commencing with geo-archaeological investigations and concluding with targeted trial trenching. This is an appropriate strategy. The field evaluation will establish if there are any areas of archaeological interest that require further investigation either prior to or during development and which will be subject to a mitigation strategy for agreement with the Local Planning Authority. If no areas of archaeological interest are identified, no further investigation will be required.

H) Leisure

4.7.1 Leisure Services has no in-principle objection to this proposal.

4.7.2 Leisure Services note the decision to retain and protect the London planes on Vastern Road. This is important. We also note the extent of tree planting and landscaping proposed, in outline, for the development, and are encouraged to see the extent of soft landscaping. Leisure Services also note the integration of the pedestrian bridge, and the link with Vastern Road. It would be good to have a safe link all the way to the station forecourt, and would like to see this include a secure pedestrian crossing.

4.7.3 Leisure Services have also looked at the notes about CIL/S.106, and agree that the park that is most likely to be used by residents in the new

development is Christchurch Meadows. It is also important that resources be secured to upgrade the riverside path for pedestrians and cyclists, so please ask to have this included as a specific item in the S.106 negotiation.

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

- 4.8.1 The SuDs proposals provide a 50% reduction in run off along with a suitable management / maintenance regime. Therefore, no objections are raised subject to the following condition, in the event permission is granted.

SU8 SUSTAINABLE DRAINAGE (AS SPECIFIED)

Prior to first occupation of the development hereby permitted, the sustainable drainage scheme for the site has been completed in accordance with the submitted and approved details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.

REASON: To reduce the risk of flooding onsite or elsewhere in accordance with Policy EN18 of the Reading Borough Local Plan 2019.

J) Infrastructure Monitoring / CIL Officer

- 4.9.1 Initial comments made to assist in the estimation of the future CIL requirement (as reflected in viability-based discussions). In terms of the CIL plans submitted there are a number of areas where future discussion will be required concerning areas to include/exclude from the calculation. Future estimations will depend on whether the existing floorspace can be deducted from the liability and any allowance for affordable housing relief.

K) Royal Berkshire Fire and Rescue Service

- 4.10.1 A proforma response has been provided, summarised as follows:

- In terms of Building Regulations, the documents submitted with the application have been retained and the application should be advised of the requirement to provide fire safety information imposed by Regulation 38.

- The premises (once occupied) will be subject to the requirements of the Regulatory Reform (Fire Safety) Order 2005. It is commented that The Responsible Person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the general fire precautions which need to be taken. There is no period of grace for the Responsible Person to produce the assessment. The documentation and any necessary safety measures must be in place on the first day that the building is occupied. The Department for Communities and Local Government (CLG) has developed a set of guides which explain what you have to do to comply with fire safety law, help you to carry out a fire risk assessment and identify the general fire precautions you need to have in place.

- Advisory matters not enforceable under legislation - It is strongly recommended that the applicant takes appropriate measures to reduce the likelihood of arson. Further guidance can be found in the various guides

produced by the insurance industry, the Arson Prevention Bureau and the Arson Control Forum.

L) Historic England

- 4.11.1 On the basis of the information available to date, Historic England advised that they did not wish to offer any comments. Historic England suggested that the local planning authority seek the views of our specialist conservation and archaeological advisers, as relevant.

M) Sustainability / Energy

- 4.12.1 The sustainability / energy credentials of the proposals, owing to the highly technical nature of the information submitted, were subject to independent review on behalf of the local planning authority by Element Energy. Two substantive reviews were required, owing to the deficiencies identified in the first review necessitating the submission of an updated strategy during the course of the application. The executive summary of the final Energy Review received by the Local Planning Authority in March 2021 is reproduced in full below:
- 4.12.2 Reading Borough Council (RBC) commissioned Element Energy to provide a critical review of Hodkinson's proposed energy strategy for the Vastern Road redevelopment by Berkeley Homes (the Applicant). This review was completed in June 2020, finding that the proposed energy strategy was not compliant with RBC energy and carbon policy, as well as not meeting wider council aspirations, for the following reasons:
- The thermal energy systems were not decentralised and did not use ground source heat pump (GSHP) or air source heat pump (ASHP) as a primary heating source;
 - There was no decentralised hydraulic heating system proposed, therefore the development was not "connection-ready" for any future DH networks that may be deployed in the area around the development.
- 4.12.3 A revised energy strategy was completed by Hodkinson in December 2020, which employed a hydraulic heating system and heat pumps as the primary low-carbon heat source and natural gas boilers for top-up heat. It has been found however that the development remains non-compliant with RBC energy and carbon policy guidance, as well as not being future-proofed for incoming national policy, for the following reasons:
- Insufficient evidence to discount open-loop GSHP, which is identified in the RBC Sustainable Design & Construction Supplementary Planning Document (SPD) as the preferred heat pump technology over ASHP;
 - Reliance on natural gas boilers for heat top-up in winter periods is not future-proofed for the expected national Future Buildings Standard policy, which are currently at the consultation stage.
- 4.12.4 The energy strategy does comply with Local Plan energy and carbon policies. It is recommended that the Applicant complete the following to address the concerns regarding non-compliance with policy guidance and future-proofing of the energy strategy:

- Provide evidence on open-loop GSHP to confirm justifications for discounting the technology are valid:
 - A site investigation to confirm the ground is contaminated to the extent that boreholes cannot be safely installed;
 - A desktop survey by a hydrogeological expert to demonstrate the lack of sufficient aquifer groundwater to satisfy the heat demands of the development;
- Should this evidence show that open-loop GSHP is technically viable for the development, this should replace the ASHP + gas boiler approach currently employed within the energy strategy;
- Should this evidence show that open-loop GSHP is not technically viable for the development, a fully ASHP-supplied heating system should replace the ASHP + gas boiler approach from the current strategy.

N) Transport

- 4.13.1 The Old Power Station on Vastern Road forms part of the former SSE office and depot. It is bounded by the River Thames to the north, retained SSE electrical transformers and associated works to the east, Vastern Road to south and residential properties fronting Lynmouth Road to the west.
- 4.13.2 The development seeks permission for the ‘Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys including residential dwellings (C3 use class) and leisure floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road.’
- 4.13.3 Table 3.1 sets out the development schedule for the site for the proposed 209 new homes and Café.

Table 3.1 Indicative Development Schedule

Unit Type	Number of Homes
1 Bedroom Flat	60
2 Bedroom Flat	137
3 Bedroom Flat	12
Total	209

Leisure	Size (sqm)
Café	17.9 sqm

- 4.13.4 To accompany the planning application a Transport Statement has been submitted and The Highway Authority comment on this as follows:

Accessibility

- 4.13.5 The site is located within extremely close proximity to Reading Station and the surrounding bus interchanges that provide access to extensive public transport alternatives to the private car.

- 4.13.6 Given the excellent location of the site, walking will form a widely available and attractive method of travel for residents.
- 4.13.7 The site fronts onto Vastern Road which provides pedestrian footways on both sides connecting the Caversham Road / Great Brighams Mead roundabout to the west and to the Reading Bridge roundabout to the east.
- 4.13.8 There are currently three signalised crossings along Vastern Road all of which are of a staggered arrangement providing north/south connections.
- 4.13.9 South of Vastern Road, Trooper Potts Way provides access to the northern station entrance and the station underpass which leads to the main station entrance on the southern side and in turn the town centre.
- 4.13.10 To the north of the site, the Thames Path lines the southern side of the River Thames which leads to Reading Bridge, Kings Meadows, Tesco to the east and Caversham Bridge to the west. Christchurch Bridge is located centrally along the northern boundary of the site and provides a pedestrian and cycle connection to the northern side of the river.
- 4.13.11 The site has a range of existing cycling facilities available to the future occupiers of the site with access to local on and off road routes and the national cycle network.
- 4.13.12 Locally to the site, the northern footway on Vastern Road provides a shared footway / cycleway facility past the southern site boundary from Lynmouth Road to Reading Bridge to the east.
- 4.13.13 Norman Place to the east of the site currently provides the off-road cycle link from Vastern Road to the Christchurch Bridge over the River Thames which in turn leads to the cycle routes through Christchurch Meadows and Hills Meadow.
- 4.13.14 National Cycle Network (NCN) 5 is directly accessible from the northern boundary of the site along the Thames Path. This route connects the site with Caversham to the west via Christchurch Bridge, and Thames Valley Business Park to the east. To the east NCN 5 joins NCN 4 where the River Thames and Kennett meet. NCN 4 dissects the Reading area connecting Theale in the west through to Sonning and Charvil in the east.
- 4.13.15 The site fronts onto Vastern Road which forms part of Readings Inner Distributer Road (IDR). This section of Vastern Road is a two way dual carriageway with a 30mph speed limit. A kerbed central island separates each direction of traffic therefore requiring all vehicle access to the site to be from the west and all exiting traffic from the site required to travel east along Vastern Road.
- 4.13.16 At the western end of Vastern Road is the roundabout with Caversham Road. This junction provides the connections to Caversham to the north and west Reading and the A33 to the south. To the east of Vastern Road the Reading Bridge roundabout has five junction arms that provides access to Caversham to the north, Tesco supermarket to the east, A329 Forbury Road (continuation of IDR) to the south, and the Station Car park to the west.

- 4.13.17 The IDR links Reading town centre with the major corridors of A33, A329, A4 which in turn give access to the M4 at Junctions 10, 11 and 12.

Access and Internal Layout

Pedestrian

- 4.13.18 A key consideration of the site is to enhance the pedestrian and cycle connection between Christchurch Bridge and Reading Northern interchange, which via the Station underpass also connects the site with the Town Centre Area. This link is identified in RBC Local Plan (adopted in November 2019) Figure 5.3 as a key movement corridor (shown at para 1.7 above).

- 4.13.19 Reference is made to Paragraph 5.4.6 of the Local Plan which states:

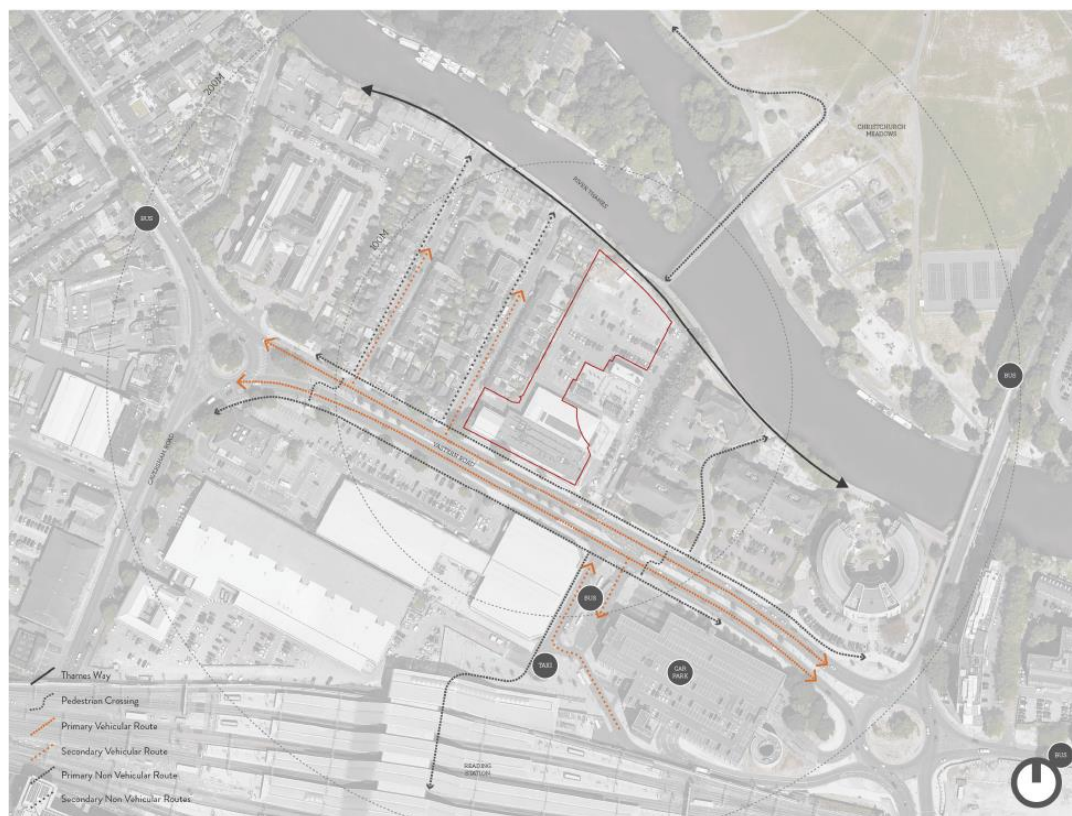
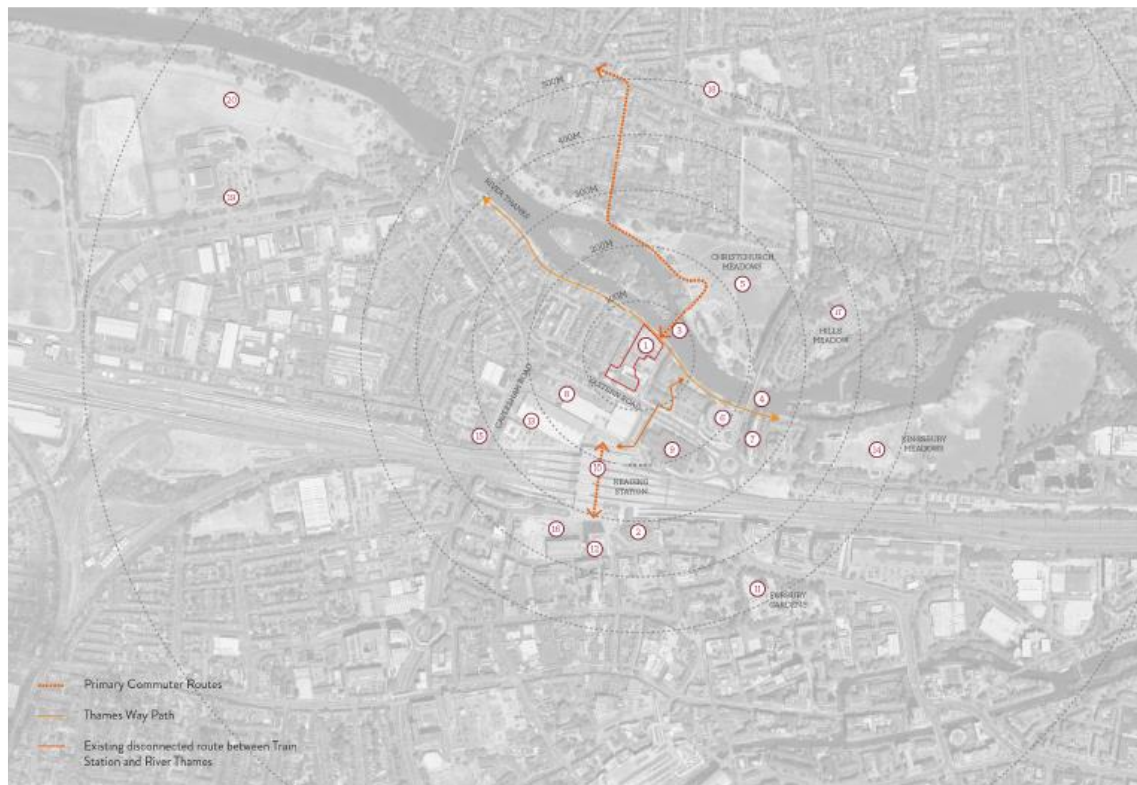
The successful development of this area hinges on improved accessibility by public transport, and improved permeability for pedestrians and cyclists. In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre. If visual links are also provided, this will help change the perception of the area north of the station as a separate entity. The opening of the underpass under the station and the provision of a new pedestrian and cycle bridge over the Thames have recently helped to achieve this vision, but further improvements can still be made. Ensuring active frontages along these routes will assist these to become attractive links, as will the provision of new areas of open space. This is particularly important on the route between the shopping core, the station and the Thames. In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management.

- 4.13.20 It is therefore clear from Figure 5.3 and Paragraph 5.4.6 from the Local Plan (both above) that an acceptable design of the north south route through the site is fundamental to any development of the site.

- 4.13.21 The application scheme comprises of the following components in designing the pedestrian / cycle route through the site:

- Podium level connection to existing Christchurch Bridge across River Thames;
- A new 1:21 ramp from the podium level to the ground level of the new development;
- A 1:21 ramp allowing pedestrian access to the River Thames towpath; and
- 3.0m dedicated footway/ cycleway on the eastern side of the internal access road linking the podium ramp to Vastern Road;

- 4.13.22 However, it is clear that the proposed scheme does not provide a direct pedestrian cycle route as has been requested during the pre-application discussions. This is to ensure that the route is as clear, legible and as convenient as possible. Reference is made to the two images below from the Design and Access Statement which in themselves highlight the importance of the route through the site.



4.13.23 A Technical Note has been submitted that aims to address the Highway Authorities concerns regarding the proposed pedestrian and cycle connection to Christchurch Bridge. It is acknowledged that this provides some level of justification for the proposed layout; however this has not provided sufficient justification for the Highway Authority to alter its view and The Highway Authority comment on this Technical Note as follows:

- 4.13.24 The applicant has stated that during the design consultation for the bridge it was agreed with Reading Borough Council (RBC) Officers and later endorsed by Members at planning committee that the associated connections and bridge would provide a shared pedestrian / cycle facility. This was to ensure that the route provided a free low speed connection suitable for all users, which reflected the sub-urban to urban environment which the bridge connects. Design rationale was to create a new piece of public realm with a traffic free connection suitable for all users, which reflected the wide range of people using the facility; from families with children and buggies, to wheelchair users and commuter pedestrians and cyclists.
- 4.13.25 Although the design does meet with some of these principles the scheme albeit traffic free from vehicles travelling along the route itself does include two points at which vehicles would have to cross the pedestrian / cycle route.
- 4.13.26 The Highway Authority are happy that access to The Goods Warehouse is acceptable given that vehicles entering and exiting the site would be doing so in forward gear however the access to The Turbine Hall car park is also a turning head for refuse and service vehicles.
- 4.13.27 The updated tracking information illustrates the turning head at the northern end of the site would require refuse and delivery vehicles to drive and reverse over the dedicated footway / cycleway. As stipulated at the pre-application stage the Highway Authority have concern over this movement given the importance of this pedestrian / cycle route and the potential for conflict with service vehicles.
- 4.13.28 The submitted drawings confirm that the proposed turning area to the north of the site can accommodate large cars, 4.6t light vans and food delivery type vehicles which would provide the majority of internet deliveries without impeding the pedestrian / cycle route and are therefore acceptable.
- 4.13.29 The movements for refuse collection will be weekly and as identified by the applicant deliveries by HGVs may be required, the applicant has stated that these will be infrequent with the applicant stating within Stantec Technical Note TN005, RBC Highway 2nd Response that between 0 and 1 HGVs per day might be expected, this includes refuse collection. Extrapolated this would equate to between 3 and 4 per week, again this includes refuse collection.
- 4.13.30 It has also been stated as part of Stantec Technical Note TN006 RBC Highway 3rd Response & Vastern Road Crossing that a larger 10-12m long 'white goods type' HGV delivery lorry will be able undertake the turn forwards across the foot/cycleway, so will in fact easily be able to check the path is clear prior to crossing it. It will then be 'sat' in the foot/cycleway momentarily before reversing into the turning head to complete the manoeuvre. This will occur for a matter of seconds and is a 'forward facing' manoeuvre in terms of visibility of the foot/cycleway.
- 4.13.31 However, following a review of the tracking diagrams provided it is noted that no tracking has been provided for a 12m HGV, given that the applicant

has now stipulated that vehicles of this size would serve the site this tracking would be required.

4.13.32 Irrespective of the above it is envisaged that a proportion of the delivery vehicles will wish to have the rear of the vehicle adjacent to the north south link for ease of transporting goods to and from the vehicle. In order to facilitate this the vehicle would have to undertake the opposite operation to that specified by Stantec which would result in vehicles towards the footway cycleway.

4.13.33 It is also noted that for a refuse vehicle to serve that to serve Blocks D and then E, F and G a refuse vehicle would have to drive / reverse over the pedestrian cycle route numerous times to get to the optimum position to serve each building.

4.13.34 Reference is made to the following points from Manual for Streets below, to which the application would be at odds with.

6.8.8 Reversing causes a disproportionately large number of moving vehicle accidents in the waste/recycling industry. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. BS 5906: 2005 recommends a maximum reversing distance of 12 m. Longer distances can be considered, but any reversing routes should be straight and free from obstacles or visual obstructions.

7.10.3 Routeing for waste vehicles should be determined at the concept masterplan or scheme design stage (see paragraph 6.8.4). Wherever possible, routing should be configured so that the refuse collection can be made without the need for the vehicle having to reverse, as turning heads may be obstructed by parked vehicles and reversing refuse vehicles create a risk to other street users.

4.13.35 Officers appreciate that the number of servicing movements maybe low but the interaction of vehicles reversing over the pedestrian / cycle route which would be utilised by commuters and leisure users including children would be detrimental to highway safety and cannot be supported.

4.13.36 The applicant has also referred to the development of Colliers Way as a comparison to this application however, the servicing arrangements for that site did not include any reversing movements over the pedestrian / cycle route and a dedicated off carriageway turning head within the development car park was provided.

4.13.37 The submitted information therefore does not provide suitable tracking information for all vehicles the applicant has stated would serve the site and what has already been submitted would be contrary to both Local Policy and the NPPF and cannot be supported by the Highway Authority. As identified at the pre-application stage a layout must be provided that does not result in reversing or parking on the pedestrian / cycle route through the site.

4.13.38 The scheme also does not provide a route that is as direct as possible by including the switchback at the northern end of the site. I refer to Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020, which does not recommend such facilities, see extracts below:

18) Cycle routes must flow, feeling direct and logical.

Users should not feel as if they are having to double back on themselves, turn unnecessarily, or go the long way round. Often, cycling schemes - when crossing a main road, for instance - require cyclists to make a series of ninety-degree turns to carry out a movement that a motor vehicle at the same location could do without turning at all. Schemes should be based on a proper understanding of how people actually behave rather than how they might be expected to behave.

4.2.2 When people are travelling by cycle, they need networks and routes that are:

- a Coherent;
- b Direct;
- c Safe;
- d Comfortable; and
- e Attractive

4.2.7 Directness is measured in both distance and time, and so routes should provide the shortest and fastest way of travelling from place to place. This includes providing facilities at junctions that minimise delay and the need to stop. **Minimising the effort required to cycle, by enabling cyclists to maintain momentum, is an important aspect of directness.** An indirect designated route involving extra distance or more stopping and starting will result in some cyclists choosing the most direct, faster option, even if it is less safe. (emphasis added by officers)

4.13.39 The proposed design would be harder to cycle up given the switch back arrangement than if a straighter more direct route were provided and therefore cannot be supported. Transport Officers agree that the switch back design may aid in reducing speeds travelling south down the ramp however this could be achieved through various different designs as was identified at the pre-application stage. It should also be stated that the route would be used by significant numbers of pedestrians and cyclists whether they are residents, commuters or those travelling through for leisure purposes and that level of use will aid in reducing speeds of cyclists as is the case on the bridge itself.

4.13.40 The applicant has suggested within the Policy Assessment Note: North/South Shared Pedestrian Cycle Route (dated 24th Sept 2020) that the proposal would be safer than a direct route through the site but to date no evidence or design criteria has been provided that would confirm this view. As previously stated the creation of a direct ramp to the bridge would reduce conflict with vehicles within the site and also the potential for conflict between pedestrians and cyclists. It has been confirmed in writing and at meetings with the applicant that Christchurch Bridge already includes straight ramps on either side and the Highway Authority have no knowledge of any speeding cyclists, conflicts or concerns along this existing route and therefore do not believe that any conflicts would arise from providing a direct / straighter route within the site.

4.13.41 Although it is acknowledged that the development will increase the density of pedestrian movements given residential flows attributed to the

proposal however, Local Transport Note 1/20 Cycle Infrastructure Design states the following on shared use design:

6.5.9 Research shows that cyclists alter their behaviour according to the density of pedestrians - as pedestrian flows rise, cyclists tend to ride more slowly and where they become very high cyclists typically dismount. It should therefore rarely be necessary to provide physical calming features to slow cyclists down on shared use routes, but further guidance on this, and reducing conflict more generally, is given in Chapter 8, section 8.2. (emphasis added by officers)

4.13.42 It has also been advised to the applicant that there could be other design features that could aid reducing speeds if this was necessary, including the alignment of the route on the podium in the same way as the 90° turn does on the southern side of the bridge and as was included within the initial designs at the pre-application stage.

4.13.43 The Highway Authority are therefore not provided with any justification to suggest that the proposed route has any greater safety benefit than a more direct route which is specified by Policy

4.13.44 The applicant has stated within the Policy Assessment Note: North/South Shared Pedestrian Cycle Route (dated 24th Sept 2020) that by providing a route through the development site and removing the existing barrier of the existing SSE buildings that it is complying with Policy CR11g and the RSAF and continues at paragraph 4.3 to state:

Wayfinding will be an important element to the strategic route as pedestrians and cyclist journey from the station to Christchurch Bridge. It is not possible to look down the entire route from the station given the urban form across the two development sites and such a route was not envisaged as part of the RSAF or Local Plan. Therefore, clear and visually legible wayfinding will be provided as a key element of the proposals, increasing permeability in the area.

4.13.45 However, the Reading Station Area Framework includes numerous illustrative diagrams that clearly illustrate what can only be described as a straight visual link between the station and the river and officers explicitly refer to paragraph 7.10 which states the following:

The new development will result in new views being opened up within the Station Area itself. Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight. (emphasis added by officers)

4.13.46 It is therefore clearly evident that the RSAF required a straight route to help facilitate clear and legible wayfinding to the Christchurch Bridge and beyond.

4.13.47 It should be added that given the application is not for the whole site and is of a complex shape it already makes the legibility of any route through the site to the bridge difficult. The proposed design to include the switch back at the rear of the site and the building along the eastern boundary of the site worsens this legibility and does not provide a clear visible destination, which is referred at Paragraph 5.4.6 of the Local Plan and 7.10

of the Reading Station Area Framework referenced above. The image below clearly identifies this and would be contrary to Policy in this regard.



4.13.48 It is noted that a new additional route has been provided between the site and the towpath as identified during the pre-application discussions. The Highway Authority had previously identified that a 1:21 gradient (4.7%) was proposed for this link and clarification was requested that the actual distance complied with the Table below taken from the CD 195 Designing for cycle traffic.

Longitudinal gradients

E/3.9 Cycle track gradients shall be provided in accordance with Table E/3.9.

Table E/3.9 Maximum length for gradients

Gradient	Maximum length of gradient (metres)
2.0%	150
2.5%	100
3.0%	80
3.5%	60
4.0%	50
4.5%	40
5.0%	30

4.13.49 The applicant has however stated that the route would be dedicated for pedestrians only. As such, the proposed gradient of 1:21 is seen as acceptable for the future uses and that to achieve the level change from the site down to the river a small number of steps are needed. However, an alternative step free route is conveniently provided for those who may have impaired mobility.

4.13.50 The Highway Authority do not agree that this route should be pedestrian only as it will provide cycle access from the cycle route along Vastern Road to the Towpath along the River Thames, which to the east is National Cycle Network Route 5. This route will become the desire line to NCN Route 5 and the towpath from the town centre and as such must accommodate cyclists. It should also be noted that the Local Cycling and Walking

Improvement Plan (LCWIP) identifies the Towpath as being dedicated as a cycle route and therefore it is imperative that this link is suitable for cyclists. It is also anticipated that once the route through the site is opened it will form the strategic route as opposed to the existing route along Norman Place, whether this is to travel further north or to link to the Towpath itself.

- 4.13.51 The Technical Note also contradicts the applicants Strategic Shared Cycle Footway document as it stipulates the route to the Towpath as being for cycles. An extract below of the document identifying this, for ease of reference, is provided below.





Access and Movement

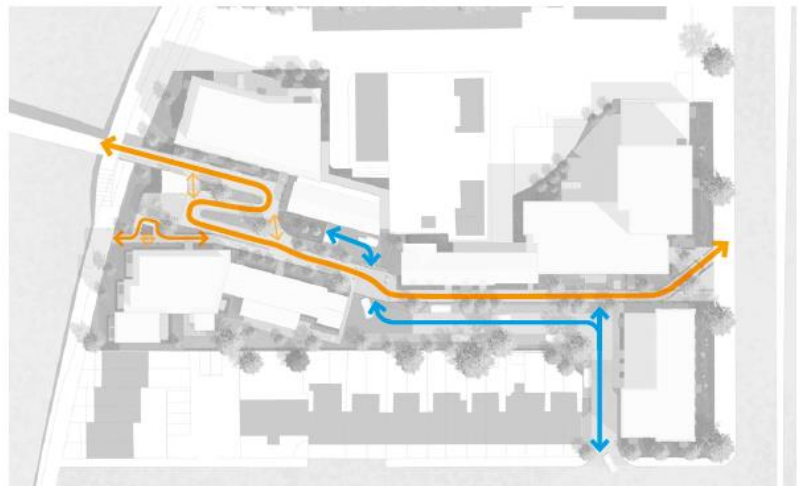
Through the central part of the site sits a dedicated 3m wide cycle footway, flanked by landscaped elements and tree planting. This route connects the town centre from Vastern Road, through to the Thames Towpath and Christchurch Bridge to the north.

With the changes in level between the site, towpath and Christchurch Bridge, gentle deviations are introduced to the routes to maintain a DDA-compliant route at 1:21 or less throughout the site. This is supplemented through the introduction of shorter and more direct, stepped pedestrian routes that provide a more convenient pedestrian journey. These more direct pedestrian routes, should also reduce the number of pedestrians using the cycle footway through the meandering section.

As the dedicated cycle footway runs through the centre of the scheme, we have introduced a switchback as a speed calming measure for cyclists. The switchbacks themselves widen to 4m to provide safe manoeuvring space for all users.

Vehicles access the site through Lynmouth Road.

-  3m wide Foot / Cycleway to / from Christchurch Bridge
-  Foot / Cycleway to / from the Thames Towpath
-  Additional stepped routes
-  Vehicular Route



- 4.13.52 On reviewing the latest drawing within the Technical Note it is noted that the section of ramp that has a gradient of 1:21 would be within the maximum length specified in the table above. The revised drawings have however indicated that the gradient to the south of this particular link would be at a gradient of 1:14 approx. instead of the 1:21 previously illustrated. Given that the route should accommodate cyclists a gradient of 1:14 cannot be accepted. In response to the gradient of 1:14 Section 3.2 of DfT document Inclusive Mobility states the following:

These figures may be regarded as a counsel of perfection as the terrain in many places imposes steeper gradients than 2.5 per cent, but the standard of 5 per cent should be borne in mind when designing new footpaths and pedestrian areas. (emphasis added by officers)

- 4.13.53 Although lesser gradients are accepted within Inclusive Mobility this is a comprehensive redevelopment of the site and not alterations to an existing development where there is less scope to alter levels, therefore the gradient of 1:21 should be adhered to throughout the site and should not extend further than the specified lengths.

4.13.54 Overall the proposed scheme does not comply with Policy with regards the pedestrian / cycle route through the site which Policy regards as the main priority for the site as stated within paragraph 5.4.6 of the Local Plan, below:

In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management. (emphasis added by officers)

4.13.55 The Highway Authority therefore cannot support the proposal in this respect.

4.13.56 The applicant has proposed a contribution of £200,000 towards the provision of a toucan crossing on Vastern Road this will provide the continued link between Christchurch Bridge through the application site and towards Reading Station. A design has been submitted that provides a dedicated cycle crossing facility along side a pedestrian crossing however The Highway Authority note the following:

- DfT Cycle Infrastructure Design LTN 1/20 states that the cycle crossing should be shared with pedestrians where a shared use path leads to the crossing as is the case in this instance. It is also stated that should a separated facility be provided the cycle track be on the approach to the crossing should be of a different material / level to pedestrians. See paragraphs below:

10.4.17 Toucan crossings should be used where it is necessary to provide a shared facility, for example when there are space restrictions or where there is a shared use path or area leading to the crossing.

10.4.23 The design of the cycle crossing should make it clear that it is not to be used by pedestrians. The footway and cycle track on the approach to the crossing should be paved in contrasting materials and preferably at different levels, separated by a kerb.

4.13.57 As such the proposed crossing design does not comply with the relevant design criteria.

- It is also noted that the central island for pedestrians is only 2.64m in width however DfT Cycle Infrastructure Design LTN 1/20 states the refuge area should be a minimum of 3m in long and should be wide enough to cater for the number of people who would typically wait on them, as specified below:

10.4.7 Refuges can be used to divide the crossing movement into stages (Figure 10.4). Refuges should be free of clutter, and at least 3.0m long (in the direction of travel for the cyclist) to protect users, including the cycle design vehicle, wheelchairs and mobility scooters. The refuge should be wide enough to accommodate the cycle design vehicle, and the number of people who may typically wait on them, including pedestrians at toucan and other shared crossings.

Given that the central island is not wide enough and no information has been provided to confirm that the number of pedestrians could be

accommodated the proposed design would again not comply with the relevant design criteria.

- The pedestrian crossing facility would be located too close to the existing street tree on the northern side of Vastern Road which would result in conflict between pedestrian and cyclists crossing and those travelling along the footway.

4.13.58 However regardless of the above concerns the Highway Authority are content for a proposed contribution of £200,000 towards the design and delivery of a crossing on Vastern Road to provide an improved link between Reading Station and the application site. This will be secured via Legal Agreement in the event of permission being granted.

4.13.59 It is noted that along the southern boundary of the Coal Drop Building an east west path is provided that circumvents the building, following previous comments this path has been extended further east to connect to the north south route given that residents will wish to use this as their desire line.

Vehicular

4.13.60 The primary vehicle access to the site will be via Lynmouth Road. The existing junction which currently only accommodates vehicles exiting the site will be improved and widened to 6m and reduced to 4.8m once 17m into the site to accommodate two-way vehicle movements.

4.13.61 Visibility splays of 2.4m x 17m have been illustrated at the proposed junction in line with Manual for Streets (MfS) for 15mph roads which the applicant considers an appropriate road speed for Lynmouth Road. However, as per Manual for Streets should a reduced visibility splay be proposed this would need to be evidenced by speed surveys. In this instance I would not require speed surveys as this is an existing access where the number of movements to and from the site are to reduce, the proposal is therefore not worsening the existing situation and therefore is acceptable.

4.13.62 Vehicle swept path analysis has been undertaken and include the following vehicles:

- Large Car
- RBC approved refuse collection vehicle (length 8.75m); and
- Heavy goods vehicle (length 10m).

4.13.63 Tracking diagrams have been provided to address the revised access layout and officers are happy that these identify an acceptable route through the site. This does not remove the concerns highlighted above regarding the turning of vehicles within the site.

4.13.64 Given that the access is to now take the form of a bellmouth tactile paving has been provided on the footway.

4.13.65 The existing vehicle access off Vastern Road is to be retained as per its current arrangement but will only be for access to the retained SSE infrastructure adjacent to the eastern boundary of the site. This has been accepted as this allows for a separation between the uses on the wider SSE site.

- 4.13.66 The 3.0m shared footway/cycleways runs adjacent the internal road and has two crossing points to allow for vehicle access into the parking courts.
- 4.13.67 At both of the vehicle cross over points pedestrians are to be given priority through managed vehicle speeds, signage, markings and materials. The vehicle cross overs are there to provide the required access into the parking areas and as such the vehicle trip generation is estimated to be low given the parking areas comprise of 30 spaces to the north and 13 in the southern area.
- 4.13.68 In principle this is deemed acceptable subject to the servicing comments found previously within this consultation response.

Trip Rate / Traffic Impact

- 4.13.69 The applicant undertook traffic surveys when the site was occupied by SSE on Tuesday 18th October 2016. Manual classified turning counts were carried out at each of the three vehicle access points into the site for a 12-hour period between 07:00 to 19:00. In addition, the occupancy of the existing parking was recorded across the same 12-hour period. I am happy that this is an acceptable form of reviewing the existing trip generation at the site.
- 4.13.70 The resulting network peak hour vehicle trip generation for the existing site is summarised in Table 5.1 below.

Table 5.1: Recorded Site Trip Generation (Existing Passenger Car Units)

Time Period	Vehicle Trip Generation		
	Arrive	Depart	Two Way
AM Peak (08:00 to 09:00)	85	5	90
PM Peak (17:00 to 18:00)	1	64	66
Daily (07:00 to 19:00)	238	228	466

- 4.13.71 The traffic survey identifies that the existing use generated 90 and 66 two-way vehicle trips in the AM and PM peak hours respectively. Across a daily period (0700 to 1900), 466 two-way vehicle trips were recorded.
- 4.13.72 It is acknowledged that the substations and associated kit that will be retained on the SSE owned site which has approximately 20 car parking spaces. Vehicle trips associated with the remaining SSE kit will be minimal and associated with maintenance and storage only. Officers are therefore happy that no assessment is required to calculate the retained SSE element on the site.
- 4.13.73 The proposed trip generation has been calculated based on surveys of comparable sites within the TRICS database. Table 5.2 provides the total person trip rates and predicted people generation for the AM (08:00-09:00), PM peak hours (17:00-18:00) and Daily (07:00-19:00).

Table 5.2: Proposed Residential Total People (-OGV) Trip rates and Trip Generation (209 homes)

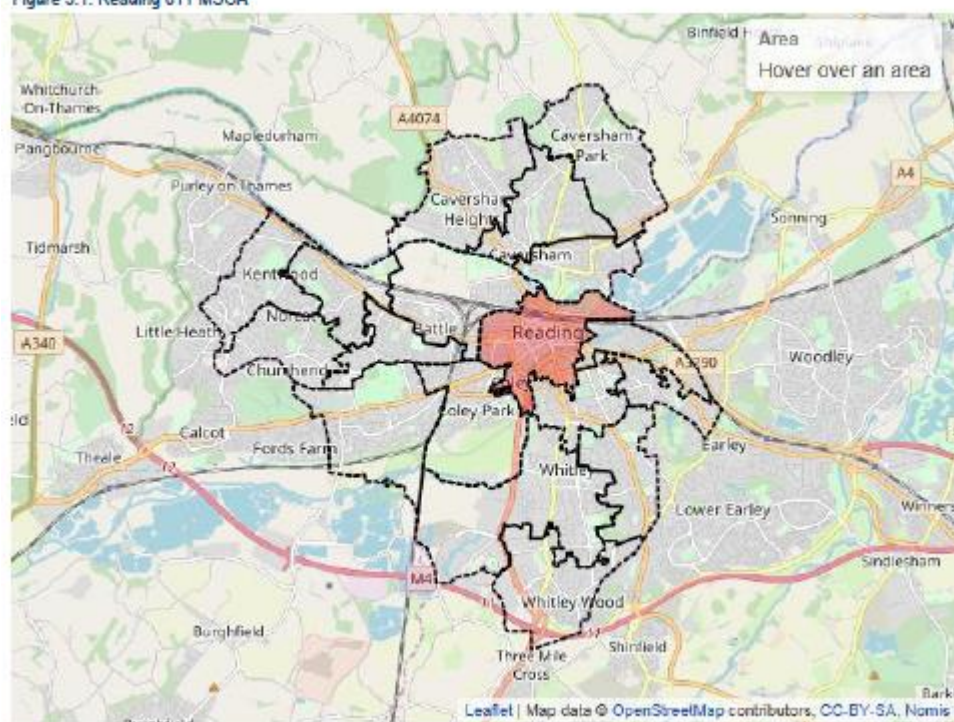
Time-Period	Trip Rate (per home)			Trip Generation (209 homes)		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
AM Peak (08:00 to 09:00)	0.094	0.477	0.571	20	99	119
PM Peak (17:00 to 18:00)	0.364	0.200	0.564	76	42	118
Daily (07:00 to 19:00)	2.476	2.560	5.036	515	532	1,047

4.13.74 Table 5.2 (above) summarises that the proposed development of 209 homes will generate approximately 119 and 118 total person trips in the AM and PM peak period respectively. Across the daily period it is forecasted that 515 arrivals and 532 departures would be generated.

4.13.75 As agreed during the pre-application discussions the proposed leisure trips will be predominately pass-by or/and link trips and therefore Officers are happy that no further analysis is required for this land use.

4.13.76 To understand the modal split of the development people trips the 2011 Census Travel to Work Data has been used for the 'Reading 011' E02003399 Middle Super Output Area (MSOA) which is shown on Figure 5.1.

Figure 5.1: Reading 011 MSOA



4.13.77 Table 5.3 (below) shows the modal split breakdown of trips generated by the proposed development.

Table 5.3: 2011 Census Modal Split and Multimodal Trip Generation

Time Period	Modal Split (%)	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
		Arrive	Depart	Two Way	Arrive	Depart	Two Way
Underground, metro, light rail	0.4%	0	0	0	0	0	0
Train	20.4%	4	20	24	15	8	24
Bus/ Coach	11.5%	2	11	14	9	5	13
Taxi	0.3%	0	0	0	0	0	0
Motorcycle	0.4%	0	0	0	0	0	0
Driving a car or Van	30.4%	6	30	36	23	13	36
Passenger in a car or van	3.2%	1	3	4	2	1	4
Bicycle	3.5%	1	3	4	3	1	4
Foot	29.5%	6	29	35	22	12	35
Other	0.5%	0	0	1	0	0	1
Total	100%	20	99	119	76	42	118

*May be some rounding errors

4.13.78 Due to the sustainable location of the site, sustainable transport modes (car share, train, buses, walking, and cycling) accounts for 68.5% of trips. Of these sustainable modes walking (29.5%) is predicted to be the most common method of travelling to work with 35 two-way walking trips to/from the site in both peak periods.

4.13.79 Table 5.4, below, presents the net comparison of car trip generation of the existing SSE office and the proposed residential development.

Table 5.4: Net Difference Trip Generation

	AM Peak (8:00-9:00)			PM Peak (17:00-18:00)		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
Existing	85	5	90	1	64	65
Proposed	6	30	36	23	13	36
Residual Impact	-79	+25	-54	+22	-51	-29

4.13.80 As summarised in Table 5.4, the redevelopment of the former SSE site is predicted to result in an overall reduction of two-way car trips across both the AM and PM peak hours and therefore the principle of the development is acceptable.

Parking

4.13.81 RBC's Parking Strategy SPD was adopted in October 2011, and contains residential parking standards, along with standards for cycle and motorcycle parking provision. The parking standards in Reading are based on RBC's zonal scheme. The site is located within Zone 2 however on the edge of Zone 1, therefore it was agreed with applicant during the pre-application stage that Zone 1 should be used given the sites high accessibility.

- 4.13.82 Based upon the accommodation mix the required car parking provision allowed on site is 111 spaces; based on all 1 and 2 bed flats having 0.5 spaces and 3 bed flats having 1 space each.
- 4.13.83 The development is proposing a total of 55 car parking spaces which equates to a provision of 0.26 parking spaces per dwelling which is below the required standard within the SPD. However, given the parking restrictions surrounding the application site and the good alternative transport links Officers are happy to accept the reduction in this case. This is also subject to the development not being eligible for parking permits.
- 4.13.84 It should however be noted that the application drawings illustrate a provision of 56 spaces with the car parking layout including the provision of tandem spaces. In principle officers have no objection to this subject to these tandem spaces being allocated to a 3 bed unit. This has been agreed by the applicant and will be dealt with by way of a condition in the event of permission being granted.
- 4.13.85 In line with RBC parking standards, all developments providing up to 200 spaces are required to provide 3 disabled spaces or 5% of total capacity, whichever is greater. In accordance with this, it is stated that the development will provide a total of 3 disabled spaces. The submitted drawings illustrate this provision and therefore this is acceptable in principle.
- 4.13.86 These spaces are to the correct dimensions but it is noted that the two on street bays will be provided with hardstanding to the west to aid access and egress to the vehicle, similar to the arrangement identified below and this is identified on drawing BHOC.448.LA.101 Landscape General Arrangement plan.
- 4.13.87 However, the revised plan does not include the provision of any dropped kerbs on both sides of the surrounding carriageways to provide suitable access to and from the disabled parking bays and it is noted that the route for the southern bay does not send pedestrians to a suitable footway location but towards a vehicle access point. This is contrary to DfT document Manual for streets which states the following at Paragraph 6.3.30:
- Vehicle crossovers are not suitable as pedestrian crossing points. Blind or partially sighted people need to be able to distinguish between them and places where it is safe to cross. Vehicle crossovers should therefore have a minimum upstand of 25 mm at the carriageway edge. Where there is a need for a pedestrian crossing point, it should be constructed separately, with tactile paving and kerbs dropped flush with the carriageway.*
- 4.13.88 The proposed pedestrian access to and from these bays is therefore not compliant with design standards and is not supported by the Highway Authority.
- 4.13.89 It is stated that the provision of electric parking will be in accordance with the Reading Borough Local Plan adopted in November 2019, which states the following;
- Communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point."

4.13.90 A provision of 6 car parking spaces has now been proposed to be electric charging spaces with four electric vehicle charging points provided in the northern undercroft car park and a further two charging bays in the southern car park. This is deemed acceptable and although a drawing has not been submitted Officers are happy for this to be dealt with by way of a condition in the event permission is granted.

4.13.91 The proposed development will provide cycle parking in accordance with RBC's Revised Parking Standards and Design SPD, 2011. It had initially been proposed that 61 Sheffield stands (122 spaces) were to be provided in secure, covered and lit cycle stores within the proposed buildings, which is in excess of the Councils requirement of 105 cycle spaces. This was to be alongside an additional 4 stands (8 spaces) provided adjacent to the proposed café and outside seating area for visitor use.

4.13.92 However, it had previously been stipulated that the submitted cycle stores would only be sufficient to accommodate a provision of 40 cycle spaces should Sheffield type stands be used and 98 cycle space should a josta two tier cycle storage be used. This has subsequently been confirmed within the Technical Note. Either of these scenarios would result in a provision below the required standard.

4.13.93 Updated information has been provided on the cycle storage provision and it has been confirmed that each block would be provided within the following level of cycle parking, Officers can confirm that this provision would comply with Policy.

Building Ref	Accommodation Schedule	RBC Cycle Parking Requirements	Previous Cycle Parking Provision	Revised Cycle Parking Provision
Building A:	8 x 1 bed 19 x 2 bed	14 spaces	14 spaces (7 josta stands)	14 spaces (7 josta stands)
Building B:	29 x 1 bed 49 x 2 bed	39 spaces	30 spaces (15 josta stands)	40 spaces (20 josta stands)
Building C:	3 x 1 bed 7 x 2 beds	5 spaces	6 spaces (3 josta stands)	6 spaces (3 josta stands)
Building D:	8 x 1 bed 35 x 2 bed 12 x 3 bed	34 spaces	28 spaces (14 josta stands)	34 spaces (17 josta stands)
Building EFG:	13 x 1 bed 26 x 2 bed	20 spaces	20 spaces (10 josta stands)	20 spaces (10 josta stands)
Overall	209	112 spaces	98 spaces	114 spaces

4.13.94 Each Block has been reviewed and Officers have confirmed that all appears acceptable apart from the cycle parking arrangements for Block C. The cycle store positions/access points have been revised for Block C following previous comments and these are illustrated on drawing 448.PL.BC.100C. Having reviewed this drawing it is however noted that access to this store is through the bin store and would not be desirable and therefore dedicated external access doors should be provided.

4.13.95 It should also be stressed that Block C provides a provision of 22 cycle spaces when this block only requires a provision of 6 cycle spaces. This layout should be altered to reduce the cycle parking numbers and provide a dedicated access route. Officers would however be happy for this to be

dealt with by way of a condition in the event permission is granted. The proposed cycle parking provision is therefore acceptable subject to conditions.

Servicing and Emergency Access

- 4.13.97 It has been stated that the delivery and servicing strategy for the proposal has been developed in accordance with RBC guidance and MfS and that all servicing and delivery requirements will be undertaken internally within the site boundary.
- 4.13.98 It had previously been commented that the Design and Access Statement appeared to illustrate at least one of the refuse stores to be located in excess of 10m from where a vehicle would collect. Clarity was therefore requested to ensure that refuse storage areas are in line with MfS.
- 4.13.99 The applicant has responded to state that the arrangement of the internal roads and shape of the site has meant that some of the bin stores are located outside of the recommended 10m carry distance for refuse operatives. Stantec drawing 47500/5500/005 Rev A provides a swept path strategy for refuse collection from the 6 bin stores on site and the route between the store and collection vehicle.
- 4.13.100 The distance to the bin stores at building EFG and B (south) are only 1m over the recommended distances for operatives. Given that this is a minimal difference from the 10m carry distance this has been deemed acceptable.
- 4.13.101 The fire strategy for the site includes the requirement of a fire tender accessing beyond the bollards to the northern section of the dedicated footway / cycleway. Tracking diagrams have now been provided to confirm that a fire tender could get to and from the area in question and this is deemed acceptable.
- 4.13.102 Given the above the Highway Authority objects to the proposal on the following grounds.

The proposed development does not comply with the Local Planning Authority's standards in respect of a direct and legible footway/cycleway provision through the site and, as a result, is in conflict with Local Plan Policies TR3, TR4 and CR11g and the Reading Station Area Framework.

The layout does not comply with the Local Planning Authority's standards in respect of vehicle parking for those with disabilities and is in conflict with Local Plan Policy TR5.

- 4.13.103 In the event the application is approved, the following elements will be required to be secured via Legal Agreement. In the event the application is refused, these should be referenced within the reason for refusal relating to the development being in the absence of a Legal Agreement:
- Provision of a new north-south link connecting Vastern Road to Christchurch Bridge and associated infrastructure/signage
 - Financial contribution of £200,000 towards a new crossing on Vastern Road

- Provision of a new direct link from the site onto the River Thames towpath
- A S278/38 Agreement towards footway improvements and an upgraded site entrance onto Lynmouth Road
- Provision of transport mitigation measures to include:
 - o Residential Travel Plan
 - o On-site car club

O) BRE - daylight and sunlight

4.14.1 BRE were instructed by the LPA to undertake an independent review of the daylight and sunlight report submitted in support of the application. The Executive Summary of BRE's initial report (April 2020) included the following:

The existing residential properties most likely to be affected by the proposals have been assessed. Other nearby residential locations would be less affected.

42 windows at 2-28 Lynmouth Road would have a loss of daylight characterised as minor adverse. Some of these are secondary windows, and some of the losses would be only marginally outside the guidelines. The windows affected are principally on the end of the rear additions, with some on the main rear elevations. Number 2 and number 24 are more affected than the other properties in the terrace and would have larger losses of light which could be characterised as major adverse. These have overhangs which limit the amount of daylight they can receive, which would be a mitigating factor.

There would be losses of winter sunlight outside the guidelines to three properties in the terrace. We would consider the impact on sunlight to be minor adverse.

There would be a minor adverse loss of daylight to just one window at 6 Lynmouth Court. Loss of sunlight would be within the guidelines.

7-12 Lynmouth Court is the building which would be most affected by the proposals. This building would have a moderate adverse loss of daylight. Some of the rooms have less affected windows on other elevations, which would be a mitigating factor. Loss of sunlight would be largely within the guidelines.

51 Vastern Road would have a minor to moderate adverse impact to windows on its side elevation. However, drawings submitted as part of a recent planning application suggest that none of them are main windows lighting habitable rooms which would be covered by the BRE guidelines.

Gardens at 2, 4 and 8 Lynmouth Road, and at 3 Lynmouth Court, would have a loss of sunlight outside the guidelines. The losses would be major for 2 Lynmouth Road, moderate for 4 Lynmouth Road and 3 Lynmouth Court, and minor with mitigating factors for 8 Lynmouth Road. 2 Lynmouth Road would be particularly affected. It would lose all of its area capable of receiving the recommended amount of sunlight, though the garden is small and has walls around it which limit sunlight.

There are some living rooms within the proposed development which would have average daylight factors well below the recommended minimum, going as low as 0.3%. These will be extremely gloomy, particularly in the cases where they would not receive any sunlight either. In some case, the windows are subject to low levels of external obstruction and the poor daylighting is therefore a consequence of the development's own design.

We disagree that the very poor results should be accepted as isolated deviations and suggest that the design should be revisited to see if rooms which fall well short of the recommended amount of daylight can be improved through measures such as changes to window design or room arrangement.

Some south facing windows in Block A fall only marginally short of the recommended amount of daylight, but their design renders them vulnerable to substantial future loss of light from an emerging development proposal for the Vastern Road retail park. Where an increase in future obstruction is likely, the design could protect the future occupants by not rendering their windows dependent on an area of the sky which is likely to be blocked, for example by providing additional glazing which is not located underneath a balcony.

74% of the living rooms in Block A, 52% of Block BC, 42% of Block D and 68% of Block EFG would have a window facing within 90° of due south. Blocks D and EFG have living rooms with views of the River Thames, which is likely to be equally acceptable. Living room windows facing within 90° of due south generally receive the recommended amount of sunlight. The exception is ground floor windows in Block EFG, which are heavily obstructed by other blocks in the development.

All of the amenity areas in the proposed development would receive the recommended amount of direct sunlight.

4.14.2 This advice was provided to the applicant for comment. The applicant duly submitted a response, also incorporating revisions to the proposed scheme (some removal of balconies and fenestration changes for the proposed dwellings). Furthermore, the applicant also considered the proposed scheme within the context of the under consideration (by the local planning authority) outline application opposite the site to the south at the Station Retail Park. This was subject to a further review by BRE on behalf of the LPA. The conclusion being that while some existing properties on Lynmouth Road would suffer an adverse impact this would not be throughout the year or day. Concerns still remained for the impact on Lynmouth Court Properties. For the proposed dwellings the removal of balconies that had created shadow for apartments below was an improvement and where properties in Block A & B might be affected by the proposed development on the south of Vastern Road, as this application was still under consideration this impact could still be addressed.

4.14.3 Subsequent to this the applicant submitted a further letter, providing additional clarity in terms of: loss of light to 7-12 Lynmouth Court (moderate adverse effect, but should be considered within the context of unusually high existing daylight levels); a number of steps were incorporated to seek to mitigate the impact on the garden at 2 Lynmouth

Road; comment on room BC09 in the proposed scheme. BRE provided a succinct follow up response, summarised as largely agreeing Eb7's comments.

P) BRE - wind/microclimate

- 4.15.1 BRE were instructed by the LPA to undertake an independent review of RWDI Pedestrian Level Wind Comfort Assessment report submitted in support of the application. BRE's initial report (April 2020) raised a number of technical issues, summarised below:

Several relatively minor issues have been identified with the RWDI report as noted above. However, the main issue is that the assessment methodology only presents mean wind speed results and therefore does not comply with the Lawson methodology which requires an assessment of both mean and gust (GEM) wind speeds. The omission of a gust wind speed analysis could result in an underestimate of the wind conditions in relation to both pedestrian comfort and pedestrian safety. An analysis of gust wind speeds must be included. This is not possible with the CFD modelling methodology used; therefore this could be a qualitative assessment in a similar way to the qualitative assessment of wind safety used in the RWDI assessment.

- 4.15.2 This was fed back to the applicant, together with advice from officers that consideration should be given to current nearby applications at Vastern Court (ref 200328) and 80 Caversham Road (ref 182252). When a response was received, a further review was undertaken by BRE, with a summary of the further BRE review (June 2020) being as follows:

BRE are satisfied with the majority of the RWDI responses to the points raised. However, for completeness, the RWDI report should be updated to include the RWDI responses as suggested in the table in Appendix A.

There are three outstanding residual issues. These are:

i, The failure by RWDI to consider the upper 20m/s safety threshold. If this threshold is not considered then appropriate mitigation measures cannot be developed. Without this, it will be necessary to carry out a full quantitative assessment of mitigation measures. This could potentially be conditioned by Reading Borough Council.

ii, The use of a limited seasonal approach to wind conditions on balconies. This matter results from a fundamental disagreement between BRE and RWDI on best practice. The appropriateness of the RWDI approach needs to be considered by RBC and the developer.

iii, The RWDI response indicates that the wind conditions at the entrance to Sovereign House will remain unsuitable for entrances. This is unacceptable. Appropriate mitigation measures need to be developed to reduce the wind speeds in this area.

- 4.15.3 The applicant provided a further response, which facilitated some initial comments from officers (and a subsequent further response from the applicant), prior to a further review by BRE. A general summary of BRE's report (August 2020) was:

Policies CC3 and CC8 of the Reading Borough Local Plan (Adopted November 2019) state:

CC3: Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and **reducing exposure to wind** and other elements.

CC8: 4.1.36 One of the key concerns of planning is to ensure that new development **does not reduce the quality of the environment for others**, particularly where it would affect residential properties. At the same time, **ensuring that new development creates a quality living environment for future residents is also critical**. The policy aims to ensure that existing and **additional residential properties provide an acceptable living environment**, which is a key element of a high quality of life. It is applicable to any type of development.

It is BRE's opinion that the proposed development at 53-55 Vasten Road, Reading, RG1 8BU falls to comply with the above clauses of the Reading Borough Local Plan (Adopted November 2019) for the following reasons:

- The wind conditions in the existing public realm near to Sovereign House in Configuration 3 are shown to be unsuitable for entrances, sitting, standing and strolling and have the potential to blow pedestrians and cyclist over. No adequate mitigation measures are proposed.
- The wind conditions on several balconies are shown to be unsuitable for sitting throughout the year. Whilst balconies fall outside of the Lawson Criterion, BRE would expect balconies to be suitable, as a minimum, for sitting during the summer months.

It is a CC8 requirement '*that new development creates a quality living environment for future residents is also critical*'. No mitigation measures are proposed by RWDI for these balconies, despite their assessment that they are not suitable for long-term sitting in any season (including summer). If further wind mitigation measures are not provided at these balconies (such as those suggested earlier), an approach suggested in the footnote 1 might be considered by the developer.

The wind conditions at the open-air café are unsuitable for sitting in one area. No specific mitigation measures have been proposed or assessed.

Until the above issues are adequately addressed, it is BRE's recommendation that planning approval should not be granted.

4.15.4 Further to the August 2020 BRE review, the applicant submitted further information in September 2020, summarising the remaining outstanding issues as:

- A. Walking use wind conditions west of the existing Sovereign House entrance in the context of the cumulative surrounding buildings;
- B. Standing use conditions on private balcony spaces; and
- C. The lack of quantitative evidence of mitigation for an area of standing use conditions in the café seating space.

4.14.5 The additional information submitted was again independently reviewed by BRE. A summary of the further response from BRE confirmed: The only outstanding matter of dispute between relates to the windy balconies/roof terraces. We have laid out the arguments, and we have provided RBC with our opinions and position; having done this, we believe that this matter is now down to RBC to resolve with the Applicant. Officers fed this into the applicant, advising that further information was required to be submitted in terms of balcony/terrace conditions. This was as lockdown has only gone to emphasise the value and importance to be placed on individual balconies, external terraces or wider upper level communal amenity spaces within blocks of flats, in assisting the overall quality of accommodation for future occupiers (and the need to ensure that the development will not cause unacceptable living conditions for new residential properties, in line with Policy CC8). Accordingly, officers recommended further results to be presented, to enable further consideration and analysis of this by the local planning authority.

4.14.6 Further to this correspondence, the applicant submitted further information on 6th and 14th October, which officers considered was sufficient in these regards (without the requirement of further input from BRE).

Q) Valuations

4.16.1 At the outset of the application the applicant submitted a Viability report seeking to justify a 0% affordable housing contribution. This was subject to independent review by BPS on behalf of the LPA, in conjunction with RBC Valuations. BPS provided a report to RBC Valuations to inform the Council's position in discussing the affordable housing element with the applicant. RBC Valuations provided feedback to the applicant on 4th and 6th August 2020. The applicant submitted a response on 2nd September and followed this up with an initial affordable housing offer on 14th October, with a further more detailed offer on 12th November 2020, as described in the proposals section above. In itself, this represents a suitable approach based on the considered negotiations which have taken place. In the event of the application being refused however, this should include the scheme being in the absence of a S106 to secure the proposed 20% on-site contribution towards affordable housing and the option of a deferred mechanism in accordance with prevailing policy and guidance.

R) Housing

4.17.1 Initial verbal comments to the Planning Officer, at the outset of the application, noted significant disappointment with the complete lack of affordable housing proposed on a major development. It was however recognised that the lack of provision was based on a viability submission, which would be subject to review.

4.17.2 Upon the submission of an on-site affordable housing proposal on 12th November 2020, RBC Housing naturally welcomed this within the context of the previous offer (0%). Although it is noted that the units are not the best available at the site, it is also appreciated that the recognised practicalities of securing a rented offer in a single block (to avoid service charges and assist management) limits the options in these regards. In terms of the shared ownership units, it is considered unlikely that a RP will

be concerned that this is mixed in with private sale units. Although the tenure split is not compliant with policy H3 or (at the time of writing) emerging SPD guidance, there is a reasonable tenure split and, in overall terms, this is broadly supported by RBC Housing.

S) Environment Agency

- 4.18.1 Initial response 14 April 2020: Environment Agency position
- 4.18.2 The Environment Agency object to the development proposed as part of this planning application due to its likely effect on the River Thames. This habitat (Rivers) is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. Insufficient information has been provided to assess the risks posed by this. We therefore recommend that planning permission is refused.
- 4.18.3 Reason(s) - England's Biodiversity strategy identifies those priority habitats which are also listed as being of 'principal' importance under section 41 of the NERC Act 2006. This Act states that local planning authorities must consider these habitats in their decision-making, because of their duty to conserve biodiversity (section 40).
- 4.18.4 In this instance, the proposed development may have a detrimental effect on a priority habitat that we have a role in protecting. The application does not include adequate information about the measures proposed to assess and address the risk to ensure protection of the river in this location. In particular the application fails to address adequately the issue of tall buildings shading the river and its marginal habitat.
- 4.18.5 This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.
- 4.18.6 The Design & Access Statement (DAS) refers in paragraph 2.8.5 to an Environment Agency No Build Zone 8m from the river edge and a Reading Borough Council Policy Buffer 10m from the river edge. It should be noted that the 8m buffer refers to the Land Drainage Byelaws, but for ecological purposes, this buffer should be a minimum of 10m, and depending on the site and circumstances, could be more.
- 4.18.7 Paragraph 2.8.4 of the DAS shows building heights along the river on either side of the application site as being three or four storeys tall, with the anomalies of Clearwater Court and Reading Bridge House on either side of Reading Bridge being taller. The illustration on page 90 of the DAS show the two buildings closest to the river being 10 storeys and 8 storeys high, much taller than those on either side. Being on the southern bank of the river, these tall buildings would cast shade over the river and, in particular, the marginal planting established along this southern bank as part of the mitigation measures for the construction of Christchurch Bridge.

- 4.18.8 In Appendix 5 (Transient Overshading) of the Daylight/Sunlight Report (EB7, 19 December 2019), the diagrams appear to suggest significant shading of the river/river banks throughout much of the year, although the full width of the river is not shown. The Ecological Assessment (Ecoconsult, December 2019) deals with shading in paragraphs 7.2.2 to 7.2.5 stating that not all parts of the river will be shaded throughout the day and that shading will be less in summer than in winter, but does not address the issue of shading of the marginal vegetation on the southern bank. This report states in paragraph 7.2.4 that the River Thames in Reading has been greatly modified, has hard banks and lacks natural riparian habitat (such as woodland, marsh, swamp, individual trees and marginal vegetation). This gives additional value to the marginal vegetation that has been established on the southern bank. Arguing that other buildings already cast shade, does not make it acceptable to cast more shade, particularly on one of the very few areas of marginal vegetation on the Thames through Reading. Referring to maps from over a hundred years ago saying that there were once trees here, and trees cast shade, is a tenuous excuse for allowing such an extent of shading now.
- 4.18.9 In our responses to previous consultations from the applicant and from Reading BC, we stated that the marginal vegetation in this location should not be impacted by shading and that the tallest part of the development should be towards the road in order to minimise the impacts, but this does not appear to have been taken on board.
- 4.18.10 With regard to the proposed green buffer between the development and the river, this should be free from built development, hard standing and formal landscaping and should be designed to provide a net gain in biodiversity. Additionally, planting should use locally native species of UK genetic provenance. Drawings 448.LA.101 Rev A (Landscape General Arrangement Plan) and 448.LA.102 Rev A show, however, that much of the buffer would have amenity grass rather than wildflower grass. Where a species rich grass mix is proposed, this uses a wet grassland mix and is further up the slope from the towpath than the amenity grass where it would be unlikely to get wet.
- 4.18.11 With regard to the stated 'native' riparian shrub mix, several species are not native, or not suitable. *Cornus alba* is non-native, *Cornus avellana* does not exist (perhaps *Corylus avellana* was intended) and *Salix lanata* is native to the UK, but is a mountain plant found in the uplands of Scotland and is not suited to this location. These should be removed from the planting mix. With regard to the trees proposed, *Quercus palustris* is non-native and should be replaced with one of the UK's native oak species and the proposed *Alnus glutinosa* can be affected by phytophthora root disease and planting them can run the risk of importing this to areas currently unaffected. Consideration should be given to substituting this species for another native riparian tree species. *Betula nigra* is again non-native and should be replaced with the native *Betula pendula*.
- 4.18.12 The buffer zone along the river is very narrow in relation to the height of the buildings, particularly as this has the existing towpath within it. To give a meaningful gain in biodiversity, this buffer should be wider and have a greater emphasis on native species. The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife.

4.18.13 It may be possible to overcome the EA objection by submitting:

- Detailed drawings showing the buildings nearest the river being significantly reduced in height or moved a greater distance from the river in order to reduce the impact of shading of the river and its margins.
- Details of an amended landscape plan for a greater width of buffer and a planting scheme using locally native species of UK genetic provenance.

4.18.14 Please note we also have issue with this application regarding flood risk and contaminated land. We will address these through recommended conditions if the above objection can be overcome.

4.18.15 Further response 16 October 2020: Environment Agency position - Biodiversity - We maintain our objection as set out in our original response dated 14 April 2020 (ref. WA/2020/127747/01-L01)

4.18.16 Reason: At this time, we would be unable to remove our objection with regard to the shading impact of the proposed development. It would not be acceptable for it to go ahead in its present form without mitigation, particularly due to the fact that there is very little marginal habitat through this section of the Thames.

4.18.17 Letter with Appendix from John Barnes (eb7 ltd) to Joe Harding (Berkeley Homes (Oxford & Chiltern) Ltd dated 14 July 2020. We received a copy of this letter from Joseph Harding in July 2020 and commented as follows:

“The scale indicated for the number of hours of sunlight on the river in the Appendix one graphics is too coarse to be useful. Looking back at the earlier Daylight & Sunlight Report (eb7, dated 19 December 2019) submitted with the application, this contained graphics showing transient overshadowing (Appendix 5). The use of this technique might give greater clarification of the impact of the shadowing that might result from the proposed development. We are unsure why this methodology was not used and why an hourly representation for a representative day (e.g. in April, June, August) was not included as was provided in the earlier report.

Given that shading looks to be increased it would also be useful at this stage to see a shade arc on representative days (e.g. in April, June, August). This would give an idea of the height of the shadow. Does it reach the other side? The sunlight hours and shade arc should also be done for a scenario where the building is lower in height next to the river and taller buildings set back from the river to see if that increase can be avoided.”

4.18.18 E-mail from Joseph Harding (Berkely Group) to Environment Agency, dated 03 September 2020 with attached documents relating to the sunlight assessment. We received additional information with regard to the sunlight and shadowing assessment our comments were as follows:

“Having reviewed the additional information supplied relating to the transient shadow paths from March-September, the issue of shading of the river and the marginal planting along the river bank adjacent to the development has been clarified.

Comparing the shading between the existing situation and the proposed development it would appear that there would be a significant reduction in sunlight reaching this area, from our interpretation. With no development, it would appear that this area receives 6 to 7 hours of sunlight per day, but with the proposed development, this would be reduced to between 2 and 3 hours, which is likely to reduce the vigour of this planting and may result in the loss of some species”.

- 4.18.19 Overcoming our objection - Option 1 would be to reduce the height of the buildings and/or set them back further from the river. This has been raised previously. The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank. While this is the best option for preserving the footbridge mitigation planting and riverbed habitat, we do realise this may not be the preferred option.
- 4.18.20 Option 2 would be to see additional marginal planting installed as a combination of mitigation and ecological enhancement in recognition of the impact of shading. We would also like to see shade tolerant plants added to the footbridge planting area to allow for succession to a shadier environment.
- 4.18.21 There are a number of locations that could be explored for this additional marginal planting on either side of the river. Ideally, upstream between the footbridge and Caversham bridge. We believe that much of this land is under the ownership/control of Reading Borough Council and so any discussions regarding this should include the relevant Reading BC representative. *Officer note - see the ecologist comments below.*
- 4.18.22 Environment Agency Position - Flood Risk - We are pleased to see that you have used the most up to date flood model data to inform your Flood Risk Assessment (FRA). We are also pleased that the FRA includes reference to the new (as yet not yet published) Thames Mapledurham to Hurley 2019 modelling.
- 4.18.23 We are satisfied that the FRA confirms a design flood level of 38.30mAOD based on the 1 in 100 plus 35%. This level is used to inform mitigation proposals in the form of compensatory floodplain storage. Fig 4.1 (Modelled extents with allowance for climate change) provides a really useful illustrative drawing of how the design flood event will impact the site presently. It uses modelled levels from the River Thames in comparison with detailed topographic survey data for the site. This shows that the site is impacted by the 1 in 100 plus 35% design event to the north of the site (adjacent to the river) and to a small portion to the South East of the site.
- 4.18.24 We are satisfied that there is a commitment to safety of the development within the FRA by proposing to set Finished Floor Levels (FFLs) of the new buildings at a minimum of 38.60 metres AOD thereby providing a degree of resilience above the design flood level.
- 4.18.25 In line with best practice, we would normally expect a developer carries out level for level compensation for any loss of flood storage up to the 1 in 100 plus 35% flood level. The compensation provides an additional volume

of floodplain storage at each 100mm depth band up to the final band as detailed on plan 47500/4001/003 Flood Storage Analysis. At this highest band we note a 'loss' of 6.7 m³. However, the overall benefit of the flood compensation being provided is 118 m³ and provides significant betterment at all water levels up to the final band. We also note that due to the topographic constraints within the brownfield redevelopment it has not been possible to offset this minor change in floodplain storage during the highest order floods. In this specific instance we are therefore satisfied with the compensation provided.

- 4.18.26 The report notes that proposals to reduce the impacts of flooding in north Reading and Caversham are being developed. These design proposals take account of potential future flood alleviation works. This follows discussions with the developer and their consultant to ensure that the development proposals allow for integration of future works to a pre discussed design standard.
- 4.18.27 The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if planning conditions are included.
- 4.18.28 Environment Agency Position - Contaminated land - Given that the site investigation found relatively low levels of contamination it is expected that limited remedial works will be required from the perspective of controlled waters. In addition, as the proposed drainage solution is not proposing to use infiltration there is unlikely to be any mobilisation of contaminants within the soils. There is still a slight uncertainty that the cable oil leak that affected the adjacent site may have impacted the margins of proposed development site. *Officer note: The EA made recommendations for relevant conditions if permission was granted.*

T) Natural Environment

- 4.19.1 Original comments in April 2020: Any development on this site should meet various landscape design principles (as will current applications the retail park and former Royal Mail sites to the south), as follows:
- 4.19.2 Various Local Plan policies and the Sustainably Design and Construction SPD support the use of green walls and roofs and EN14 refers to the need for tree retention and planting. Policy EN15 (Air quality) applies as the site is within the AQMA and therefore greening is important to help filter pollution. The existing 2010 Tree Strategy and the emerging Tree Strategy (Planning officer note: 2021 Tree Strategy now adopted and replaces the 2010 strategy) all support tree planting, particularly a net gain in tree number (the sites are in a 10% or less canopy cover area and Abbey ward is a low canopy ward - less than 12%), planting of large canopy trees due to the multiple environment benefits they provide; priority retention and planting on 'treed corridors' (this includes Vastern Road), improving the diversity of species to make the tree population more resistance to pest & disease impacts and effects of climate change and ensuring tree species (and other planting) has beneficial wildlife value to meet the aims of the existing and new Biodiversity Action Plan (BAP) Planning officer note: 2021 BAP now adopted and replaces the 2010 strategy).

- 4.19.3 The RSAF states (in relation to Vastern Road) that *‘Potential changes to Vastern Road could reduce the dominance of speeding traffic and transform the character of the road from a by-pass at the edge of the town centre into a tree lined avenue as a central element of the town centre public realm, by planting in the central reservation and creating planted verges’*. Paragraph 5.22 states (in relation to Landscaping) that *‘There should be new tree planting along Vastern Road, for instance, including the central reservation. Landscaping may also incorporate green roofs, living walls and sustainable drainage systems (see Chapter 10). The biodiversity value of landscaping is particularly significant where the elements of landscaping form green corridors that connect with existing open spaces, waterspaces and areas of biodiversity significance’*.
- 4.19.4 Chapter 8 (Urban Design Framework) refers to *‘Promoting high quality buildings, streets and spaces; Creating permeable development that strengthens north-south links and improves connectivity across the area; Integrating public spaces and active frontages to establish vibrant, safe and enjoyable areas and create a focus to the sites*. Figure 8.2 provide guidance on where the major & minor paths and public spaces should be with figure 8.3 indicatively showing landscaping within the desired framework. 10.8 (within the Sustainability chapter) states that *‘Green roofs should be considered for all developments with flat roofs in the Station Area’* 10.11 (Living walls) states: *‘High quality designs for ‘green walls’ incorporating vegetation over a majority of a building’s vertical surfaces should be considered, particularly where living roofs are difficult to achieve’*
- 4.19.5 Given the above, landscaping will be an integral part of any of the three current application sites to provide the ‘in principle’ features indicated in the RSAF and to meet local plan policies and the aims of our Tree Strategy (along with the BAP, Reading Climate Change Action Plan, to respond to Reading climate emergency and aim for a carbon zero Reading by 2030). In addition, there should be a landscaping link between the three sites through use of species. Whilst a complete repeat of species from one site to the next should be avoided in order to improve species diversity, a selection of a few common species between sites is desirable to provide a link.
- 4.19.6 The following principles should be applied across the three sites:
- Retention of good quality established trees where feasible
 - A net gain in tree number across the sites - preferably 3 for 1
 - Species link through the sites (each applicant will have to be aware what the other is proposing)
 - Species selection to respond to the microclimate, e.g. shady areas, windy locations, polluted frontages
 - Species selection as way-finding
 - Species selective to provide diversity (including avoiding over-represented species in the Borough, e.g. Prunus and Tilia)
 - Species selection to provide wildlife value
 - Creation of ‘avenue’ planting, particularly along the north-south route which should aim for a double row
 - Use of large canopy species
 - Perimeter planting along the Vastern Road and Caversham Road frontages

- Defensive planting to respond to secure design concerns
- High quality tree pits, including use of root cells to provide sufficient rooting volumes within hard landscape areas
- Use of green walls and roofs

4.19.7 In addition, a number of natural environment related policies are applicable too. Policy EN11 Waterspaces states: *'Reading's waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor'*

4.19.8 Policy EN12 Biodiversity and the Green network states: *'On all sites, development should 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'*

4.19.9 The River Thames is designated in the Local Plan as a Major Landscape Feature under policy EN13: Major landscape features and areas of outstanding natural beauty. The policy states that: *'Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The following areas, as shown on the Proposals Map, are defined as Major Landscape Features'*

4.19.10 Policy EN14: Trees, hedges and woodlands states 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 quality of waterside vegetation will be maintained or enhanced. 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.'*

4.19.11 The site is within the AQMA, therefore Policy EN15 Air Quality applies which states: *'Development should have regard to the need to improve air quality and reduce the effects of poor air quality'* EN18: Flooding and sustainable drainage systems states *Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS*

4.19.12 Policy CR11g, RIVERSIDE relates specifically to this site, stating: *Development should maintain and enhance public access along and to the*

Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.

- 4.19.13 The Sustainable Design and Construction SPD, amongst other things, reiterates the importance of considering incorporation of brown and green roofs, green walls and natural SUDs. The Tree Strategy 2021 details that the site is within a 10% or less canopy cover area and on a designated 'treed corridor' hence tree retention and planting is vital, especially on the frontage and should provide an increase in canopy cover overall on the site. The Strategy also expects a net gain in tree number, particularly as the site is in Abbey Ward which has a lower than 12% canopy cover; 12% being the minimum target for all wards by 2030.
- 4.19.14 Initial comments: A 'treed avenue' (or more accurately, a route with sporadic tree planting) has been provided but there is no direct visual link from Vastern Road to the river as a result of building layout. It is appreciated that the shape of the site does make this more difficult but it would appear that some measures, such as the 'shaving off' of corners of Blocks B & C could assist this. The EA comment that *'The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife'* hence there is work to be done on this route.
- 4.19.15 When viewed from both Vastern Road and Christchurch Meadows, the proposal presents a large scale of building frontage that is not in scale with adjacent houses or office buildings. The visuals provided within the DAS illustrate how imposing the proposal is from those viewpoints, albeit the design is much improved on the Vastern Road frontage in terms of appearance by omission of the originally proposed upper story building link between Blocks A & B (as originally proposed at pre-app stage). It is noted that the EA have expressed concern about the height of the buildings and detrimental impact on the river. Whilst an offset has been provided from the river this has only resulted in a 5m buffer strip in front of the buildings which limits meaningful tree planting in terms of large canopy species, which is what should be provided in this location to be in line with objectives of the Tree Strategy (the river being a designated treed corridor) and to enable planting to adequately soften the buildings. The EA's comments emphasise the need to increase the width of this buffer to include the 10m from the river edge and greater space for landscaping which the Natural Environment officer agrees with.
- 4.19.16 The landscape design principles include the need to consider green walls and roofs. It appears that, with the exception of the café, these are not included on any of the buildings. Even with the café, it is unclear as visuals in the DAS indicate a green roof but the roof plan does not. It is noted the inclusion of PV on the roof of Block A, D and somewhere on Blocks E, F & G and it is acknowledged that these also have a place on developments. However, given the policy backing for green roofs, it would be helpful to have a statement as to why these have been omitted and why green walls are not proposed anywhere. In terms of responding to the Council's climate emergency and global biodiversity loss, maximum greening of every site is

vital and is especially important for this site for the reasons mentioned at the outset of these comments.

- 4.19.17 At pre-application stage it was indicated (in view of biodiversity and maximum greening) that natural SUDs provision should be the default position and I note that the Landscape GA plan (Rev A) mentions potential 'rain gardens' in one location, that being in front of Block C. However, the plan associated with the submitted drainage strategy shows only cellular storage tanks, which should be the last resort. Tree pits and water storage can be designed together to be mutually inclusive and in turn provide biodiversity benefits. Further thought on this is required in view of Policy EN18 and the Sustainable Design & Construction SPD.
- 4.19.18 With reference to Landscape Planting Framework Plan 448.LA.102 A, there have been some changes to tree species proposed as a result of comments given at pre-app - It is noted that the key and plan do not match in terms of tree species included. In relation to the species proposed there are some changes required (EA comments noted on this):
- 4.19.19 *Prunus* should be avoided due to over-representation in the Borough, large canopy trees should be considered in front of the café (riverside), the internal *Betula nigra* should be substituted with a native Birch and instead of the riverside *Q.palustris* proposed a *Q.robur* should preferentially be considered if waterlogging is not likely to be a significant issue or a Swamp cypress could be considered as that would complement those planted on the riverside at Thames prom. Whilst the latter would not meet the EA's native requirements, there is sometimes also a place for ornamental planting on development sites. The EA's concern about the use of Alder in terms of disease spread is noted and it is understood that planting Alder on river banks that are liable to flooding and where the disease occurs presents a high risk of the disease spreading. *Betula pubescens* could be utilised and *Populus nigra* (native Black poplar) both of which are native and moderately tolerant of waterlogging. The EA's comments on other planting proposals (non-tree) should be taken into account. Detailed landscaping could be secured via condition, but it is appropriate given the extent of concerns for amended details to be provided prior to a decision.
- 4.19.20 The tree pit provision and design will be extremely important on this site to ensure long term successful establishment of tree planting. Given the level changes through the site and the inevitable need for services, demonstration of the provision of suitable underground space (soil volume provision) for tree planting should be provided now. This should include indicative service routes. Both the Transport and Natural Environment Officers emphasised at pre-application stage the need to ensure that tree planting within the development would not conflict with vehicle movement, particularly larger vehicles (refuse trucks, emergency vehicles, delivery lorries). This is presently unclear.
- 4.19.21 The Contents of the Tree Survey and AIA document are acceptable. As is recommended, an Arboricultural Method Statement will need to be secured to ensure appropriate protection of off-site trees.
- 4.19.22 Whilst the principle of redeveloping the site is supported and there are no existing tree issues that can't be addressed, there are a number of concerns that need further consideration in order for the application to be supported in tree and landscape terms.

4.19.23 Further response May 2020 - Responses to these comments were provided in May 2020 by the applicant, facilitating the summarised following further comments in May 2020 by the Natural Environment Officer:

- Buffer - The EA, GS Ecology and Natural Environment Officer are specifically seeking the buffer between the path and buildings to be increased, i.e. so that the buildings are set back further to allow a greater landscape buffer (within the site) and allow for more meaningful tree planting. The applicant is however consistently taking reference to the buffer to mean the distance from the river and their response is just to repeat that they've provided the 10m required by the EA. The applicant considers that meaningful tree planting can be provided within the actual landscape strip of approx. 5m - a point on which we disagree, which may be as a result of a difference in interpreting what 'meaningful' tree planting is.
- The justification for the lack of green roofs appears to be a competing question of green roof versus PV panels. No comment is given on the lack of green walls.
- In response to the request to increase natural SuDs across the site, the applicant has stated that they have 'included SuDs where possible' - as per previous comments, this is confined to 'potential rain gardens in one location' - this is disappointing and it can only assume that the drainage strategy gives full justification for the drainage strategy proposed.
- It is noted that tree species are being updated and will be submitted in due course.
- The tracking drawing has now been located, which demonstrates that careful consideration is going to be required for species choice and/or clear stem height for trees alongside the road otherwise there will be conflict between canopies and high sided vehicles (anything more than a car) during first 5+ years following planting, e.g. until the trees can be practically crown lifted to above vehicle height.
- Confirmation was requested of soil volume provision; the applicant's response is that this will be dealt with via condition. This is not an acceptable response. Whilst full details can be agreed via condition, the applicant should submit a basic plan now showing the likely service route corridors and areas allocated for soil root provision, i.e. that can be allocated to roots either as soft landscape beds or under hard surfaces - those unimpacted by structures (above and below ground).

4.19.24 Further response August 2020: The applicant responded to the above comments in July 2020, including Landscape Planting Framework Plan 448.LA.102 D. A summary of the further comments by the Natural Environment Officer is:

- In terms of tree species, the changes are considered to be positive, albeit the still included *Prunus* should be omitted. It is useful to have the canopy spread after 25 years shown on the plan. This helps to demonstrate that the buffer planting strip adjacent to the river is too narrow for large canopy trees - future conflicts, hence the need to prune, can be seen. It was previously stated that large canopy trees were required on the river frontage and that a greater set-back was required to achieve this. The application has provided the former but not the latter.
- The size of trees (at planting) proposed will help to provide a greater clear stem height adjacent to road access, i.e. to allow vehicles to pass underneath. Greater stock size does, however, come with a need for greater aftercare.

- The other changes to non-tree landscaping, as explained in Berkeley Homes' Joe Harding's email of 15 July to the EA, sound positive, but the EA and GS Ecology will be commenting on this.
- It is noted that the applicant is further considering their energy strategy; It is hoped that green roofs will be factored in as required by policy to improve biodiversity on the site. It will be disappointing if the development (and potentially others in the Borough) come to the conclusion that they can only be energy efficient OR maximise biodiversity. It is appreciated that both are important but it is hoped a balance is achieved.
- It does not appear that previous comments regarding services and landscape provision have been answered.

4.19.25 Further response in October 2020: The applicant responded to the August 2020 comments in October 2020, with commentary and a series of revised/additional information (Landscape General Arrangement plan 448.LA.101 E; Illustrative Masterplan 448.PL.SL.002 E; Planting Framework Plan 448.LA.102 E; Tree Rooting Volume Plan 448.LA.103; Tree Rooting Volume Table 448.LAND.TN.001). A summary of the further comments by the Natural Environment Officer is:

- Tree species / sizes - A reduced number of Prunus is noted, albeit disappointing to have them included still. The change of species along the riverside is noted - all native and large canopy. Whilst the projected 25 year canopy just about avoids direct conflict between buildings and canopies, the trees will live considerably longer and get bigger during theirs and the buildings lifespan. Close proximity requires pruning to give reasonable clearance and can result in future pressure from occupants to prune to e.g. 1) alleviate perceived safety fears, 2) to avoid direct contact, 3) improve views. It is maintained that a greater buffer for tree planting should be (and have been) provided and is justified by the need to successfully accommodate large trees, long-term, in line with the objectives of the Tree Strategy.
- In summary, the current proposals do not allow a long-term sustainable relationship between the riverside buildings and large canopy trees and therefore this can reasonably be included in an overall condition dealing with the detrimental impact on the Thames environs. Suggested that any future reason for refusal include the following: The development, by virtue of its size and proximity to the river, allows insufficient space for a successful long-term relationship with large canopy trees within the riverside buffer. This is contrary to Policies EN13, EN14 and objectives of the adopted Tree Strategy.
- In terms of trees/ clear stem heights adjacent to road accesses, any Landscape Maintenance condition will secure this.
- No revised energy strategy has been forthcoming; the location of green roofs should be agreed prior to any positive decision as part of the landscape strategy.
- In terms of servicing/landscaping, the additional information is useful. It is assumed that the applicant is satisfied that service routes can be accommodated outside all the rooting areas indicated. Query raised over the extent of the rooting provision for trees on the riverside landscape buffer.

4.19.26 Further comments November 2020: Following the submission of further information and comments by the applicant on 12th November, a summary of the further comments from the Natural Environment Officer is:

- This does not specifically respond to the issue with lack of space for larger canopy trees, but it is gleaned from the response that no change in design is proposed. The objection, as detailed most explicitly in the October 2020 comments, is therefore not overcome.
- Regarding green roof provision, it is noted that the letter states: *“we can confirm it is possible to introduce green roofs alongside the PV panels as per your request. We would welcome the finer details of this to be agreed through condition”*. This is taken as a firm commitment to the provision of green roofs hence if the application is approved, specific reference should be made to the green roofs in condition L2.
- In terms of the other landscape issues (off site mitigation), this should be led by GS Ecology and the Landscape Services Manager, but the Natural Environment Officer considers that off-site mitigation is NOT the default option, which should be sufficient and appropriate planting on site through a development design that allows this.

U) Ecology Consultant for RBC (GS Ecology)

4.20.1 Initial comments in June 2020: The application site comprises an office block and car park directly adjacent to the River Thames. It is proposed to construct a series of buildings with the taller buildings fronting the River Thames.

4.20.2 The River Thames is a “priority habitat” as per the NPPF and is of considerable importance for wildlife.

4.20.3 The EA - The EA have objected to the application due to the impact of the proposals on the River Thames. Their letter does not refer to the Lighting Assessment. The applicant has provided additional information to try and address their concerns.

4.20.4 Ecological Assessment - This report concludes that the site is unlikely to host a bat roost and that other than the River Thames, there are unlikely to be any major ecological constraints to the proposals.

4.20.5 Bat Activity Survey Report - The surveys were undertaken to an appropriate standard. These found that:

“4.1.1 Five species of bats were recorded foraging or commuting on the River Thames near to the Site.

4.1.2 Most bats recorded were common and soprano pipistrelle bats with smaller number of Daubenton’s and individual Nathusius’ pipistrelle and noctule bats.

4.1.3 The River Thames provides a wildlife corridor between countryside to the west and east of Reading. Data suggests that this section of the River Thames is of county importance for commuting bats and of borough importance for foraging bats.”

4.20.6 Lighting Assessment - The appendices B to F appear to be missing and as such full comments on the document cannot be made. However, the preliminary comments are as follows:

- The site is assessed as being in Zone E3 - "Small town centres or suburban locations". However this should be E2 - "Village or relatively dark outer suburban locations" and the assessment would need to be updated accordingly (the report reads: "RBC were also contact after the baseline survey to agree the Environmental Zone classification for the site" but have not provided details of these communications).

- The report reads: "At this time a detailed lighting design is not available, however given the scale and nature of the proposed development and lighting requirements, it is anticipated that the site will remain as E3 (medium district brightness)." As no detailed design has been provided this statement appears unfounded and anticipating that the site will "remain as E3 (medium district brightness)" is not sufficient to assess the impacts of the scheme.

4.20.7 This report is therefore insufficient to assess the impacts of that the lighting scheme will have on the river and its wildlife.

4.20.8 Massing and location of the proposals next to the river - The EA have objected to the proposals due to the impact that the tall buildings will have on the river. The applicant has provided some additional information to rebut the EA's comments. These do not appear to address the comments and it is considered unlikely that a series of very tall buildings directly adjacent to the river, with a narrow strip of planting would comply with Policy EN11, EN12 and EN14 of the council's Local Plan. As per the EA's comments it may be possible to overcome this by reducing the height of the buildings nearest to the river significantly or moving them further from the river.

4.20.9 Landscaping - The Ecology Consultant concurs with the Natural Environment officer's comments on this and note that there are ongoing discussions. It is suggested that if the development is approved a condition be set to ensure that detailed updated landscaping plans be provided.

4.20.10 It is very disappointing that green roofs have not been included, apparently because the applicant believes that green roofs and solar PVs are incompatible. This is not the case, indeed they can actually complement each other, and green roofs can result in higher energy output from the PV panels. Provision of green roofs on the buildings could help mitigate some of the impacts of the scheme on the River Thames by providing additional wildlife habitats next to the river.

4.20.11 Further comments in October 2020: The proposals will result in an increase in shading, light pollution and built form adjacent to the River Thames. The River Thames is a "priority habitat" as per the NPPF and is of considerable importance for wildlife. Policies EN11 and EN12 refer to the importance of the River Corridors for wildlife and how these will be protected from the adverse impacts of development.

4.20.12 The EA have objected to the proposals because it will result in the shading of marginal vegetation along the river and their most recent correspondence (letter dated 16 October) reads:

“At this time, we would be unable to remove our objection with regard to the shading impact of the proposed development. It would not be acceptable for it to go ahead in its present form without mitigation, particularly due to the fact that there is very little marginal habitat through this section of the Thames.”

4.20.13 The EA have stated that their objection could be overcome if the buildings were set further back from the river or reduced in height (their Option 1) or to provide “additional marginal planting installed as a combination of mitigation and ecological enhancement in recognition of the impact of shading” (their Option 2).

4.20.14 The applicants have opted for Option 2 and provided an aerial photo showing a red line to the north of the Thames. The line is approximately the same length as area that would be shaded and the accompanying text reads:

“Proposed area between Christchurch Bridge and Caversham Bridge to create additional marginal planting which is within the ownership of Reading Borough Council.”

4.20.15 No further information has been provided about the type of marginal planting, how it will be installed, who will be responsible for its management etc. Furthermore, the RBC Landscape Services Manager thinks this area will be unsuitable for marginal planting as it would restrict access to the river by the boat club whose premises is located nearby.

4.20.16 At paragraph 175 the NPPF refers to the Mitigation Hierarchy as follows:

“When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”

4.20.17 The proposals will result in harm to the River Thames. The applicant has conceded this and hence has proposed mitigation. As the River Thames is a significant ecological asset - i.e. a “priority habitat” or Habitat of Principal Importance for the Conservation of Biodiversity in England as per Section 41 of the 2006 Natural Environment and Rural Communities (NERC) Act - the harm may be considered “significant” (although there is no definition of “significant harm” in the NPPF, or NPPG).

4.20.18 As such the mitigation hierarchy comes into effect, i.e. Avoid, Mitigate, Compensate. In relation to the Mitigation Hierarchy the NPPG reads:

“Avoidance - Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?”

- 4.20.19 It is clear from our discussions that officers feel there are better alternatives to the scheme, i.e. lower buildings that are set back from the river. As such the harm to wildlife can be avoided. The proposals therefore do not comply with the mitigation hierarchy. If the local planning authority are minded to refuse the scheme then reference should be made to policies EN11, EN12, the adverse impact of the proposals on the River Thames and the Mitigation Hierarchy in the reason for refusal.

V) Landscape Services Manager

- 4.21.1 Initial comments in October 2020 responding to proposed mitigation strategy for the River Thames submitted by the applicant on 13th October 2020 (shade tolerant planting by Christchurch Bridge & marginal planting on the northern bank adjacent to Reading Boat Club): The Council does not own any land on that stretch of the south bank of the Thames. There is a PROW across the land, but it is not ours. The Council owns the stretch between Caversham Bridge and Thames Avenue, but then nothing until Reading Bridge. That is as may be; as managers of the PROW, we would have concerns about future overhang, as the path is not wide along that stretch. Even so, I agree that the problem is the overall density and positioning, which isn't addressed by this proposal.
- 4.21.2 Further comments summarised in conversation with the Planning Officer and fed into the applicant on 22nd October 2020: The off-site location proposed on the northbank of the Thames by Reading University Boat Club would not have been suitable in any event, given the need to maintain the launching station for the boat club to the river at this point. It is also noted, for information, that based on the single initial plan submitted, it is unclear whether the proposed planting would have been in the river itself (floating option), or whether the intention would have been to provide planting on the land (riverbank) element, or indeed alter the alignment of the riverbank at this point.
- 4.21.3 Further response in November 2020 responding to the response from the applicant dated 12th November 2020 (included a River Thames Mark Up plan specifying EA and RBC owned land, according to the applicant): River Thames mark-up plan: as far as Officers are aware, RBC does not own the stretch of towpath directly to the north of the development site.
- 4.21.4 Towpath proposal: we see the ecological value of the seeded coir roll along the canalised bank of the river, but are opposed to any effective narrowing of the towpath by the proposed planting along it. There is already some vegetation along that route, so either the ecological value of the surface planting will be minimal, or there will be encroachment. This is a very busy off-road route, and needs to accommodate bicycles, as well as pedestrians, buggies and wheelchairs.
- 4.21.5 Suggestion by the applicant for mitigation on the south bank of Christchurch Meadows: Given the density of trees and undergrowth on most of the areas marked in red on the 'River Thames Mark-up', Officers do not see much scope for enhancement at almost all of the red-lined locations. The Council values marginal vegetation for its wildlife importance, but needs to balance its management of river banks with the requirement to keep views of the river open for people using the parks for recreational walking. The Council therefore have a mix of open views and reeds/coppice

vegetation, which is managed on a three-yearly cycle (one third each year). While there is scope for some additional planting along both the south bank of Christchurch Meadows and the north bank of King's Meadow, Officers are reluctant to plant up large sections of the bank to further close out views. What officers have attempted to achieve is a series of closing and opening views, so that one's experience changes as one walks along the route. It is unlikely that these stretches can be relied on to provide sufficient mitigation for the whole development at 55 Vastern Road. Officers would be interested to see specific proposals.

W) Environmental Protection (EP)

4.22.1 Initial Observations - There are potential EP concerns relating to: Noise impact on development; Noise arising from development; Noise transmission between dwellings; Air Quality impact - increased exposure / new receptors; Air Quality impact - increased emissions; Contaminated Land; Odour and noise - kitchen extraction; Construction and Demolition phase; Bin storage - rats. Accordingly, each matter is considered below.

4.22.2 Noise impact on development - The noise assessment (24 Acoustics, Jan 2020) has been assessed and the following comments/queries are raised:

1. The noise assessment has assumed a noise limit for noise from the SSE transformers and cooling fans of 5 dB above the L90 background for the external private amenity areas (and presumably façade of the development). The RBC policy is as follows:

The predicted specific sound level (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise-sensitive facade shall be at least 10dB below the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The predicted rating level, LAr,Tr (specific sound level plus any adjustment for the characteristic features of the sound) as measured at a point 1 metre external to the nearest noise-sensitive façade (habitable window of a dwelling) shall not exceed the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation.

It is appreciated that this is a slightly atypical situation in that the application is not for new mechanical plant but for new residential in the vicinity of existing mechanical plant, however it is my view that this policy still applies in order to protect the amenity of the new residents. There is the opportunity to design the development such that noise impacts from the plant can be minimised - layout of the development or additional mitigation at source to reduce the plant noise and to enable more of the residents to be able to open their windows without being affected by the noise.

2. Has the glazing specification been designed taking into account the 100 Hz tonal noise from the transformers? Can further detail be provided on this please?

4.22.3 Noise between residential properties - sound insulation of any building - satisfactory subject to a standard informative relating to requiring to comply with Building Regulations Approved Document E.

- 4.22.4 Noise - delivery hours / waste collections/ opening hours - Concerns are raised about the potential for noise disturbance due to deliveries and/or waste collections and/or commercial operations of the café on occupants of nearby residential properties, particularly late at night and early morning, so restrictions on permitted hours for deliveries and more generally opening hours are recommended (via planning condition).
- 4.22.5 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 café is likely to require mechanical plant and there may be an externally ventilated plant room associated with the ventilation for the residential development. Accordingly, a condition requiring a noise assessment is recommended prior to any mechanical plant being installed.
- 4.22.6 Kitchen Extraction - odour - In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005). This will be secured via condition.
- 4.22.7 Air Quality - Increased exposure - The assessment concludes that for 2021 the NO₂ levels at the façade of the development will be below the objective levels. Clarification is required in terms of the modelling, whether the location of the Vastern Road diffusion tube was modelled as a receptor and whether that accurately predicted those measured levels? How close of the Vastern Road façade of the development to the main road compared to the diffusion tube location? These queries should be addressed.
- 4.22.8 Air Quality - Increased emissions - The information submitted states that there will be less road movements associated with the development than for the previous use. It is queried whether the number of residents less than the number of employees that were based on the SSE site?
- 4.22.9 Contaminated Land - A phase 1 and 2 contaminated land investigation has been submitted with the application. Some contamination has been detected which will require a remediation plan. There is also further investigation to be carried out: a gas risk assessment which is underway, and some further sampling in currently inaccessible areas: Areas below the existing building footprint on the southern extent of the site; Areas below the course of oil filled cables. Therefore the multi-stage contaminated land and land gas conditions are recommended.
- 4.22.10 Construction and demolition phases - EP 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. As such, the EP based Construction Method Statement condition is recommended, together with hours of works and no bonfires during demolition/construction.

4.22.11 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. A condition is therefore recommended.

4.22.12 Follow up responses to outstanding noise impact on development and air quality matters, further to the submission of responses by the applicant:

- It is disappointing that the site cannot be designed with the noise from the transformers controlled at source or the site layout adjusted so that the noise from the transformers does not meet the 10 dB below background criterion or even a more conservative 0 dB above background. The applicant should clarify whether any adjustment has been made for tonality in the assessment and if so how much? What is the rating level prior to adjustments? It is noted that the occupants most affected have been provided with acoustic glazing and ventilation, however, it would be much more preferable if they were also able to open their windows, and the noise is constant. Is there really no options for reducing the noise at source?
- Air quality - it is stated that the model is over predicting. This needs to be clarified, as to me it sounds as if it is under predicting as the modelled concentration is lower than the measured one. Does the model need further adjustment in that case? (The response states: Slight over-predictions of NO₂ concentration were recorded at the Vastern Road diffusion tube DT52 (34.6 µg/m³ compared to the measured annual mean concentration of 36.8 µg/m³)

4.22.13 Subsequent to this, the air quality matter was subsequently resolved, but despite the further submission of additional information from the applicant (summarised as Berkeley Homes having no control over the noise emission from the neighbouring substation and as such the applicant considers it cannot be controlled at the source. The applicant considers the site has been designed to ensure that the substation noise level is acceptable and acoustic glazing will be used in the most affected areas to ensure the comfort of future residents), EP officers continued to raise concerns with the implication that some of the residents are likely to be exposed to irritating tonal noise meaning they can't enjoy the external amenity area or open their windows.

4.22.14 More specifically, EP are concerned that although the applicant intends to use upgraded glazing, low frequency tonal noise is very difficult to attenuate and there is a risk it may not work - in addition, residents are likely to open their windows and then notice the noise and could raise a complaint. At which point SSE are vulnerable to being responsible for a statutory nuisance and the associated costs. At the present time it is considered that the quality of accommodation is going to be compromised significantly within the context of Policies EN16 and CC8, together with Paragraph 180 of the NPPF. In summary EP consider that this matter should form part of the reason for refusal.

X) Others

4.23.1 No responses have been received from the following:

RBC CCTV / Community Safety; Education; Emergency Planning; Licensing; Waste Services; Clinical Commissioning Group (CCG); Southern Gas Networks; SSE; Thames Water.

Public consultation responses

4.24.1 Site notices were erected on 14/05/2020, expiring on 04/06/2020. A press notice was published on 26/03/2020. Adjoining occupiers were formally consulted by letter, as produced on 18/03/2020. Two responses in support of the proposals and seventeen from individuals objecting have been received. One response (counted as an objection on the basis of the nature/extent of the response) also detailed a series of reasons for welcoming the development too (detailed below).

4.24.2 One response in support, from an occupier of Raglan Gardens, RG4, states:

Looks like a great addition to Reading and I am in favour of the latest design, improving a derelict site and making much better pedestrian access to the town centre / station from Caversham. Am sure cafe on the route will prove popular as will the public use of the riverside setting. Hope these are approved and brought forward!

4.24.3 A response in support from Rabbits Vehicle Hire in Wolsey Road, RG4, states:

I am all for these plans as feel the proposal provided will modernise the current site, a site which currently looks abandoned and out of keeping with the modernisation going on in and around that part of town.

More importantly, it will further improve the pedestrian link between Caversham and town centre, improving on the work the Council have already done when they put the new foot bridge in. This will further encourage people to walk into Reading town centre and Caversham rather than driving, a measure which benefits the environment and assists local business, shops etc in increasing footfall.

I note retail floorspace is also being applied for which will mean more jobs - Another huge positive.

4.24.4 The objector who also specified a number of welcome elements of the proposals stated: "Those objections aside, I certainly welcome development of the site, and support many aspects of the proposed development. Of particular note, I support:

- Use of the site to bring together the river and the station, including a cafe, such that it is of benefit to pedestrians, cyclists and the local community
- The bike and pedestrian paths, connecting Caversham to the station
- Landscaping, and the attention given to planting - although I'd certainly welcome more

- A heritage character in keeping with the local area, and the architectural connections to local history
- The growth in fibre optic infrastructure, and increased availability of fibre-to-the-home services. I'd especially highly support the possibility of a community fibre service provider (suggested in superfast broadband strategy section 5.3.7)

4.24.5 A total of 17 objections from the following addresses have been received:

2 from separate Lynmouth Road, RG1 addresses
2 from separate occupiers of the same Thames Side, RG1 address

1 from each of the following addresses:

Addison Road, RG1; Cardinal Close, RG4; Cromwell Road, RG4; Fairfax Close, RG4; Hemdean Hill, RG4; Lynmouth Court, Lynmouth Road, RG1; Main Road, Tadley, RG26; Meadow Way, RG4; Thames Court, Norman Place, RG1; Peppard Road, RG4; St Stephens Close, RG4; Stanton Close, RG6; Woodcote Road, RG4.

4.24.6 A summary of issues raised in the objections are as follows:

4.24.7 Overdevelopment / density

- The site is 0.76 hectares in size and excludes a large portion of the land that has been identified by policy CR11(g) (1.24 Hectares). This represents just over 60% of the land covered by CR11(g). The Policy outlines an indicative potential delivery of 250-370 dwellings which translates to approximately 202 to 298 dwellings per hectare on the entire site. The proposal seeks 275 dwellings per hectare, representing 92% of the upper density limit (at 298 dph). This is very close to the maximum indicative density based on the redevelopment of the site as a whole.
- Consequently, the applicant has designed a scheme that shoehorns large-scale buildings on the remaining land which abuts the two most sensitive boundaries. These are the Western boundary abutting the existing residential dwellings along Lynmouth Road and Lynmouth Court and the Northern boundary which overlooks Fry's Island and Christchurch Park.
- If the proposal covered the whole site allocation the proposed development could be more evenly spaced out, but the applicant has tried to apply the upper indicative density level. Even so, at 275 dwellings per hectare across the site as a whole would represent a significantly dense form of development. And in doing so, cramming a very high density scheme on 2/3rds of the site which impinges on the two most sensitive boundaries is a clear overdevelopment of the site.
- The overarching point is that the land outlined in CR11(g) is not subject to the planning application. It is only on part and the indicative density does not apply. Simply trying to conjure up a development based on a pro-rata calculation and point to policy CR11(g) as a valid reason for such an overdevelopment of the site is wholly unjustifiable.
- Considered that Policy H2 (Density and Mix) should apply and the proposal is contrary to Policy H2, as at 275 dwellings per hectare this is a 275% increase over the indicative level (100 dwellings per hectare) and a massive overdevelopment of the site.
- The development proposed is too large for the site available
- The riverside should be protected from a development of this scale and the application refused.

- The proposed development is too tall, and of too higher density for the site and surrounding infrastructure.
- 208 flats in that small area of land would appear to be overdevelopment of the site. The ex-Coopers site with its high rise development plus the possibility of more high rise on the ex Royal Mail building and the Station Development not to mention the Drews plans are changing the whole character of this area of Reading.

4.24.8 Design approach and height, scale and mass / impact on the river / character of the area

- Object to the height, scale and mass of the proposed buildings on **Policy CR1**. There is a clear policy objective to see a stepped reduction in building height from the Central Station Cluster to the fringes. The Tall Buildings Policy defines a tall building as 12 residential storeys or over 36 metres in height. The applicant has cunningly proposed an 11 storey building at 35.1 metres at the front of the site, one assumes to circumvent the Tall Buildings Policy.
- Paragraph 5.2.12 on page 129 RBLP 2019 clearly states that ***'Such new development should respect and enhance the character of the Central Area. It should build on the existing urban grid structure of streets and places in the centre...'*** Simply erecting large-scale blocks of flats close to existing low-storey residential dwellings adjoining, does not follow an established pattern, particularly where none exists at present. Lynmouth Road shares a historical context with De Montfort Road, Brigham Road and Thames Avenue and the way in which new-build developments, including both residential and commercial have been more successfully integrated and pay respect to the character of the local area; particularly in regard to the front-to-front and front-to-back relationships between new existing and new and the way in which the use of oblique angles and a stepped building approach has been taken. If there are instances of an over-dominant relationship between existing and new in the local area, it does don't follow that the mistakes should be repeated of course. The subject site offers a unique opportunity to get it right and not use examples of existing poor relationships locally to justify the proposed development at hand.
- The style of development is not in keeping with the current housing stock along the river front.
- Any development should fit in with other properties with its height limited to three storeys.
- The height of the proposed buildings fronting the river are not in keeping with the existing neighbouring buildings which are 3-4 storeys high. The height of the development will have a negative impact on the surrounding area & view across the river from Caversham.
- Whereas I support in principle the redevelopment of the land I object to the height proposed for the buildings adjacent to the river. They are out of character with other river-front buildings and will cast an excessively long shadow across the river, Christchurch Bridge and Christchurch Meadows, to the detriment of local amenity and potentially local environment.
- The character of the area will be completely changed with the current shops being closed and replaced with either offices or a small retail unit.
- Can see no justification for delivering an up to 11 story building in this location, it is totally out of character with all existing residential elements in the vicinity.

4.24.9 Impact on cyclists / north-south route & related matters

- The connection between Christchurch Bridge and Vastern Road is poor. This is the only traffic-free option for pedestrians and cyclists between

Caversham and Reading Station; as such it should be regarded as an arterial route, providing sufficient capacity and facilitating the most efficient path to encourage sustainable journeys. The two 180 degree turns, where cycle traffic will come into conflict with pedestrians and cafe customers are unnecessary and the council should insist on a direct route, keeping cyclists and pedestrians apart.

- The proposed ramp design, to and from the cycle / pedestrian bridge, is very poorly configured for use by cyclists. Two tight turns, and potential conflicting use by patrons of the proposed cafe sharing space during peak outside drinks demand (and peak cycle use) in the summer appear to be inevitable and undesirable consequences of the current proposal. This will be a particular issue for anyone trying to use bikes with trailers - transporting children or shopping in an environmentally friendly way; and this is the sort of transportation that the council should be planning to support, not to discourage in any new infrastructure.
- Inconvenient route for cyclists round site
- The switchbacks should be removed; the pandemic has shown that cycling offers health benefits, removes cars and makes for a better environment, one of the reasons for cycling is that its faster than walking , if we keep adding cycling prevention measures (switchbacks) then it removes the advantages.
- The proposal for the cycle route to have two 180 degree turns in and in front of a cafe does not constitute a quality cycle route. The amount of cycle traffic already crossing the Thames using Christchurch Bridge demands a better, safer for everyone, routing of the path.
- Safety impacts further emphasised: The decision to force cyclists to negotiate two 180 degree turns, one of which will share space with a cafe is ridiculous. It will only be a matter of time before someone is badly hurt
- I believe the north-south link to the pedestrian / cycle bridge has not adequately considered the needs and characteristics of cycle traffic. Bearing in mind the Council's ambitions for active and sustainable travel, Reading should not miss this chance to create a quality cycle link to the town centre, not one that twists and turns through hairpin bends as the applicant has proposed.
- Please reconsider those turns and find a solution which allows everyone to ride and walk safely from Christchurch bridge to Vastern Road.

4.24.10 Cycling access to the Thames Path

- Concern about access to the Thames Path footpath. Essential for public safety to restrict cycling access to the footpath (it is exclusively a footpath); the proposed ramp does not do that, as it is beyond the existing cycling access. Serious risk of cyclists and pedestrians colliding.

4.24.11 Traffic, parking and associated wider impacts

- There will be increase in traffic, thus an overall increase in air pollution & noise.
- There is also likely to be lots of people parking in Caversham if parking spaces are not provided but there is no restriction on owing cars.
- The only site access is via a quiet residential road. This will increase the pressure on Lynmouth Road, not only for traffic, but also for deliveries or visitors who park without a valid permit. Object to the issuing of new parking permits to the proposed site's workers, residents or visitors, which could be used for parking on surrounding streets (temporary or otherwise).
- During construction, concerned about impact to parking or access, due to works, truck access, and the fact that the only site access is via Lynmouth Road. Based on recent experience, it's also likely that short-term site

- 4-storey building “The Goods Office” looms over adjacent 2-storey residences, with balconies unacceptably overlooking back gardens, bedrooms and living areas.

4.24.14 Loss of daylight/sunlight and overshadowing

- The houses in Lynmouth Road are only two storey and will be overlooked and their light will be severely restricted by the height of the intended construction.
- The reduction to light within Lynmouth Court flats is significantly greater than the guidelines, where the daylight will be notably affected. The comment by the applicant that the new levels are still ‘considered reasonable in an urban context’ is an insult when compared against the splendid light and views to be enjoyed by apartments in this proposed development. The developers should redesign their skyscrapers to conform with the guidelines and cause less impact on neighbours.
- The height of the development will overshadow Thames Court
- Thames Court will be deprived of afternoon and evening sunlight and lounges placed in shadow
- Thames Court’s gardens will be placed in permanent shadow.
- Evening sunlight in a Thames Court lounge and across the river, with its positive impact on my well-being, will be permanently lost.
- Lynmouth Court will be completely overshadowed
- Changes which reduce the light entering or views from the windows of Lynmouth Road houses means there should not be a wall or fence constructed along the Western (W-NW) boundary that is any taller or more obstructive than the existing wooden fences.
- Of the 31 Lynmouth Road houses rooms, the vast majority (20, or 65%) will suffer a 20% or greater drop in sunlight (as measured by VSC or NSC). Assume this is largely because of the height of “The Goods Office” building - 4-storeys - and believe this aspect of the development would be far more palatable if it were 2- or 3-storeys.

4.24.15 Crime and fear of crime

- Despite the proposed dwellings providing an element of natural surveillance, exposing the rear boundary wall of the properties along Lynmouth Road to a newly formed public access will contravene Policies CR2 and CC8. The natural surveillance attributable will not compensate for the dramatic increase in the opportunity for crime. Residents currently enjoy a relatively safe environment; exposing rear boundaries will introduce an unnecessary and unjustifiable risk, in the section detailed in yellow below



4.24.16 Visual amenity

- Trees planned for the site will not screen the unsightly electrical substation on the site

4.24.17 Light pollution

- There will be an unacceptable level of artificial light generated which is contrary to Policy CC8. The height and scale of the proposed development is likely to have a strong detrimental impact on surrounding residents in Lynmouth Road and Lynmouth Court insofar as the sheer amount of artificial light generated from the scheme. The intrusive scale of artificial light will come from the residential dwellings as well as the street lighting which will be placed along the proposed vehicle access and public footpath running through the site. The poorly thought through layout combined with the over domineering height of the proposed buildings exacerbate the problem and lead to a near constant and unacceptable intrusion into the rear of the existing dwellings on the site's boundaries, contrary to Policy CC8.
- There will be considerable light pollution for Thames Court flats due to the number of dwellings and people it will house.

4.24.18 Noise pollution

- There will be considerable noise pollution for Thames Court flats due to the number of dwellings and people it will house.
- Enjoyment of what is a quiet and tranquil part of the river will be lost.
- During construction, while the government's COVID work-from-home advice remains in place, this could lead to local residents being locked down at home with no escape from construction noise. Request that special stricter measures are put in place, to prevent noisy works in the early mornings or on weekends, in the case of COVID restrictions continuing.

4.24.19 Public safety

- Concerned for public safety of a development so close to a high voltage facility
- Unsure still of the health problems connected with living by electrical and magnetic machinery.

4.24.20 Wellbeing of neighbours

- Builders are only interested in profit. The wellbeing of current homeowners should also be considered in this Application as their lives will be affected by the current plans for this development.

4.24.21 Air quality

- Our Council is trying to prohibit car journeys in Reading to improve air quality but we will be forced on the road because we have no local shops of consequence.

4.24.22 Affordable housing

- The developer states that the economics cannot justify delivering an affordable housing element for the project, so what does Reading and the existing residents get out of this project?

4.24.23 Wildlife

- Negative impact on wildlife

4.24.24 Green / play space

- There should be provision for additional green space and a children's play area to lessen pressure on existing play areas in the surrounding area. Currently on a sunny day the play areas in Christchurch Meadows very busy.

4.24.25 Flood risk

- The Environment Agency are reviewing flood risks and intend to put physical barriers along the Thames Path to reduce the risk of flooding in Reading. Surely all the high rise developments potentially being built along Vastern Road (There is a river running under Vastern Road) will increase the water table in the area.

4.24.26 Wider infrastructure

- This development needs to go hand in hand with finance and land for schools and doctors surgeries even if they are not built until demand has been proven.

4.24.27 Precedence

- Concerned about the precedent the scale of development would set for developments north of Caversham Road. (Officer note: all applications must be considered on their own merits).

4.25.1 Group Responses

4.25.2 Caversham and District Residents Association (CADRA) objects, as follows:

4.25.3 **1. Alignment, coherence and legibility of the new pedestrian and cycle route from the station to the river.**

The Reading Station Area framework and the Reading central area action plan allowed for a direct link both visually and in landscape terms through to the river from the station. Due to the need to retain SSE equipment, only part of the SSE site has come forward for development. Berkeley have thus moved the pedestrian and cycle route west from the route intended, whereas Aviva on the adjoining site have kept the original alignment. There is thus now an indirect route to the river and a dog leg along the way, and the possibility of taking advantage of the view from the new fully glazed first floor station concourse towards the river has been lost. This is a failure of urban design. The alignment of buildings along the route on the Berkeley site does not add to the directness of the route. There has not been liaison between developers on the alignment of the route. Co ordination of detailed design between developers along the route such as tree species, hard surfacing, street furniture etc would also be beneficial.

4.25.4 **2. Building heights directly adjacent the river.**

We previously raised the matter of heights of buildings and the skyline directly adjacent the river. The Thames is a major local and national landscape asset and public design guidance should be available for developers in respect of height and distance from the River Thames. The still applicable Station Area framework document gives indicative heights of 4 to 6 storeys. Even taking these as 'commercial' storeys, the 10 residential storeys proposed for the eastern block on the site is excessive and not in accordance with the framework. There will be significant new overshadowing of the River Thames as indicated in the applicants Daylight/ Sunlight report. The proposed 10 storey eastern block alongside the Thames

is also substantially higher than the successful Thames Water HQ building to the east. The skyline as viewed from the Thames itself and from Christchurch Meadows will be damaged.

4.25.5 3. General

There are a number of positive aspects to the proposals that can be highlighted. The direct connection of the Christchurch footbridge into the site is well handled, together with the provision of a cafe. The landscaping at footpath level adjacent the towpath alongside the river is welcome. We believe that the restrained ornamental brickwork to the riverside buildings together with the choice of a light coloured brick on these north facing buildings works well. Detailing on the proposed Vastern road buildings looks more forced and it's success will be dependent on detailing, the depth of reveals, shadow lines etc to avoid the bland.

4.25.6 Reading Cycle Campaign objects as follows:

4.25.7 This is a once-only opportunity to create a good quality cycle link from north Reading to the town centre by construction of a new southern ramp to Christchurch Bridge. Berkeley has proposed a new ramp with two 180 degree switchbacks, one of which is the area in front of a proposed cafe where people are likely to congregate. 180 degree turns are not easy to effect on a bicycle and the switchbacks will create poor 'forward' visibility of oncoming bridge users exacerbated by the proposed landscaping and change in levels on the ramp.

4.25.8 The Reading Cycle Campaign views this design as one that will cause unnecessary conflict and collisions between different user groups on this unsegregated facility. The existing northern ramp to Christchurch Bridge has no bends and the existing southern ramp has one 90 degree bend. As a minimum the new ramp proposed by Berkeley should not contain bends of greater than 90 degrees.

5 RELEVANT PLANNING POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".

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

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design and Construction
- CC3: Adaptation to Climate Change
- CC4: Decentralised Energy
- CC5: Waste Minimisation and Storage
- CC6: Accessibility and the Intensity of Development
- CC7: Design and the Public Realm

CC8: Safeguarding Amenity
 CC9: Securing Infrastructure
 EN1: Protection and Enhancement of the Historic Environment
 EN2: Areas of Archaeological Significance
 EN3: Enhancement of Conservation Areas
 EN4: Locally Important Heritage Assets
 EN6: New Development in a Historic Context
 EN7: Local Green Space and Public Open Space
 EN9: Provision of Open Space
 EN10: Access to Open Space
 EN11: Waterspaces
 EN12: Biodiversity and the Green Network
 EN13: Major Landscape Features and Areas of Outstanding Natural Beauty
 EN14: Trees, Hedges and Woodland
 EN15: Air Quality
 EN16: Pollution and Water Resources
 EN18: Flooding and Drainage
 EM3: Loss of Employment Land
 H1: Provision of Housing
 H2: Density and Mix
 H3: Affordable Housing
 H5: Standards for New Housing
 H10: Private and Communal Outdoor Space
 TR1: Achieving the Transport Strategy
 TR2: Major Transport Projects
 TR3: Access, Traffic and Highway-Related Matters
 TR4: Cycle Routes and Facilities
 TR5: Car and Cycle Parking and Electric Vehicle Charging
 RL1: Network and Hierarchy of Centres
 RL2: Scale and Location of Retail, Leisure and Culture Development
 OU5: Shopfronts and Cash Machines
 CR1: Definition of Central Reading
 CR2: Design in Central Reading
 CR3: Public Realm in Central Reading
 CR4: Leisure, Culture and Tourism in Central Reading
 CR6: Living in Central Reading
 CR11: Station/River Major Opportunity Area

5.3 Relevant Supplementary Planning Documents (SPD) are:

Topics

Affordable Housing (March 2021)
 Employment, Skills and Training (2013)
 Revised Parking Standards and Design (2011)
 Planning Obligations under Section 106 (2015)
 Sustainable Design and Construction (2019)

Sites

Reading Station Area Framework (2010)

5.4 Other relevant documents

Reading Borough Council Tree Strategy (March 2021)
 Reading Biodiversity Action Plan (March 2021)
 BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, 2nd edition (2011)

DCLG Technical housing standards - nationally described space standard (2015)
 Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)
 Historic England Advice Note 7 (2nd edition) Local Heritage Listing: Identifying and Conserving Local Heritage (Historic England, 2021)
 Natural Environment and Rural Communities (NERC) Act 2006
 Local Transport Note 1/20 Cycle Infrastructure Design dated July 2020 (Department for Transport)
 Manual For Streets 2007 (Department for Transport)
 CD 195 - Designing for cycle traffic (Standards for Highways 2020)
 Local Cycling and Walking Improvement Plan 2020-2030 (LCWIP) (November 2019)
 Inclusive Mobility (Department for Transport) 2005
 The Reading Climate Change Partnership's (RCCP) Reading Climate Emergency Strategy 2020-25 (November 2020)

6 APPRAISAL

The main issues raised by this proposal are considered to be:

Principle of development

Residential density, mix and affordable housing

Layout/scale/design/ north-south route

Residential amenity

Transport

Locally Listed Building

Landscape/ecology

Energy

S106

Principle of development

- 6.1 The application site forms part of an allocated site in the Local Plan (CR11g, Riverside), currently known as the Southern & Scottish Electricity (SSE) site. The site size for CR11g is given as approximately 1.24 hectares with an indicative potential of between 250 - 370 dwellings, 1,000 - 2,000 sq.m of leisure and no significant net gain in office floor space.
- 6.2 Policy CR11g (Riverside) states:
Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood risk assessment.
- 6.3 The allocation was made on the expectation that SSE would eventually vacate all of this site and the expected residential development potential reflects that. The plan below shows the extent of the allocated site including the area still occupied by SSE on the east with the application site area on the west of the site outlined in red.



- 6.4 The redevelopment of the application site for residential use with café area as proposed would be acceptable in principle subject to the main issues listed above being satisfied and the site allocation policy requirements being met, in particular the main priority for the site allocation, which is the north - south link.

Residential density, mix and affordable housing

Density

- 6.5 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 that offer an opportunity to accommodate a considerable amount of development at higher densities.
- 6.6 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 by sustainable means, the need to achieve high quality design and the need to maximise the efficiency of land use. Within the Local Plan, indicative densities for different areas are set out and this indicates that for sites 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 there is no upper limit is provided for the Town Centre.
- 6.7 Policy H2 makes clear that the densities indicated will not be applied as hard-and-fast rules, and appropriate densities will be informed by a variety of factors, including the character and mix of uses of the area, accessibility and the need to: achieve high quality design, maximise the efficiency of land use; and minimise environmental impacts. In this instance there is a strong case for achieving the best use of this allocated residential site when coupled with the significant need for housing in Reading and the need to maximise the efficient use of land, particularly brownfield land in such a

location close to facilities. Higher densities can also be justified when proposals achieve high quality design and minimises environmental impacts.

- 6.8 The proposed residential density for this development equates to 275 dph based on the whole of the application site area of 0.76 hectares - the gross area. The question of whether the proposed density is acceptable in this case is considered more fully later in this report, when the other relevant considerations are discussed. However, it can be stated here that the conclusion reached is that many of the problems identified with the proposed development could be addressed if some of the buildings were less high and in a different layout, made possible if fewer dwellings were proposed.

Mix

- 6.9 Policy CR6 (Living in Central Reading) 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. The proposed mix of units of 61 x 1-bed (29%), 136 x 2-bed (65%) & 12 x 3-bed (6%) is therefore acceptable in terms of Policy CR6 requirements.

Affordable Housing

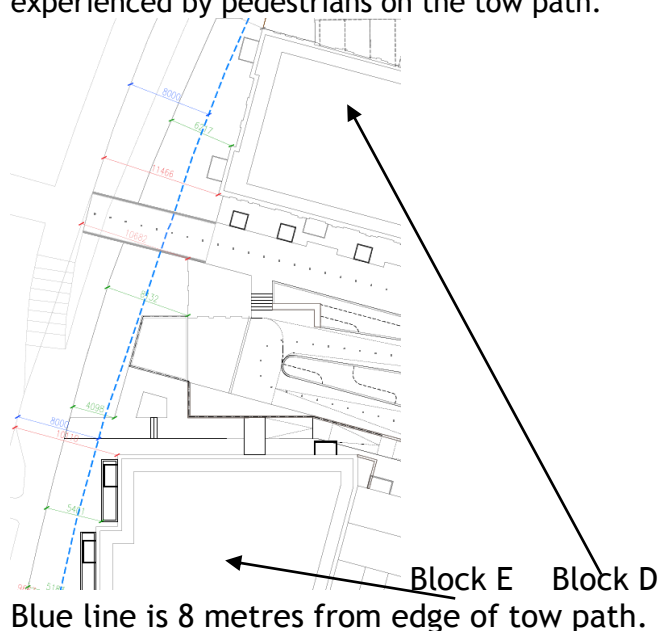
- 6.10 In terms of affordable housing, the applicant made clear from the outset of the application that the proposal would not be viable if a policy compliant affordable housing offer was made. However, further to negotiations during the application process an offer was made to provide 43 (20%) of units on site in the form of 24 shared ownership apartments and 19 affordable rent apartments. The shared ownership units are shown in Block B with a mix of 15 one bedroom and 9 two bedroom apartments. The affordable rent units are shown in Block C with a mix of 9 one bedroom and 10 two bedroom apartments with rents set at Target (social) Rent.
- 6.11 By reference to the comments provided by the viability offers and housing officers, while the proposed offer falls below the Policy H2 target the applicant has provided sufficient justification in their viability statement for the offer made and officers advise that, notwithstanding the negative concerns raised on other aspects of the proposed development, they do not recommend that the failure to provide policy compliant affordable housing should form a reason for refusing planning permission.

Layout / scale / design / north - south route

Layout

- 6.12 Providing an acceptable layout for this site is hampered by the many constraints on this site. Sufficient lay-off from the boundary with the Thames and the strong need to respect the character of the riverside applies on the north of the site. Having to deal with the often noisy or annoying and unattractive SSE plant impacts on the east of the site. The scale and proximity of houses backing on to the site to the west on Lynmouth Road and the need to protect the amenities for these residents is important. The location of a locally listed building on the southern boundary provides a further constraint while finally, the main priority for this site in town centre policy terms of providing a high quality north-south route through the site to link the station and town centre with the pedestrian /cycle bridge over the Thames.

- 6.13 By virtue of the number of dwellings proposed the layout is closely packed with the substantial blocks of apartments provided with barely any setting. For those blocks next to the Thames (Blocks D & E) it could be argued that the Thames provides the setting but this is at the cost of the impact of the tall buildings on the appearance and character of this part of the riverside for the many who come here to walk along either bank. From either direction passers-by currently enjoy low level buildings or buildings set so far back from the tow path that they do not compete with the character and appearance being dominated by the river. The plan below shows an 8 metres buffer from the side of the tow path closest to the application site and illustrates this point. From the proposed siting of Block D & E there is a clear risk that the proposed buildings will harm this character by being too high and too close to the tow path and dominating the view. The design accepts there is a risk and tries to mitigate it by setting back the top 2 storeys but officers consider that this will not prevent the harm as will be experienced by pedestrians on the tow path.



- 6.14 The blocks of buildings are laid out in an almost continuous terrace along the eastern boundary of the site and are designed to screen the SSE site beyond. The floor layout of the apartment blocks minimise any windows or habitable rooms looking eastwards for this reason. The purpose being to create a barrier to protect the new residents from the sight and sounds of this major electricity installation. However, this solution, by virtue of the height and massing of the proposed buildings (lowest is 52 metres) would result in an overbearing development for those passing through the site using the pedestrian/cycle route and particularly for the residents in properties on Lynmouth Road at about 24 metres to the west. Trees are proposed planted on the boundary to help screen views eventually but will be a significant change to the outlook for these residents. Therefore, by addressing the constraint on the east of the site the development would create an oppressive character and fails to address the constraint on the west boundary. Block F and the house at Block G have been designed to be small enough to not have an adverse effect on views from outside the site but in the context of the other new blocks proposed risk looking incongruous and out of place.

- 6.15 There is a pinch point of about 17 metres between Block C and F/G which when seen from either the north or south approach gives the development a cramped appearance and closes of views through.



- 6.16 There is also a concern that designing Blocks D & C to back on to the rest of the SSE site could make it difficult for the remainder of the allocated site to be developed in an acceptable way.
- 6.17 The height of Blocks A & B facing Vastern Road, while higher than anything else close by needs to be seen in the context of the width of Vastern Road itself and the height of buildings within view and anticipated by other sites allocated in the Local Plan. To the east lies Clearwater Court and Caversham Bridge Building and the nearly completed Thames Quarter building. To the south lies the rest of the Station/River major opportunity area as identified in the Local Plan where tall buildings are anticipated to achieve the redevelopment potential of these sustainably located sites. Officers are satisfied that in terms of appearance the proposed scale and design of Blocks A and B are acceptable.

Design

- 6.18 The proposed design in terms of appearance and seeking to refer back to the previous power station use and the proposed materials and details chosen to appear as Victorian industrial buildings is clever and interesting. Officers are happy with the approach taken. However, the constraints on the layout of the site, which had been highlighted to the applicants at pre-application stage, have not been addressed and a poorly designed public realm would result. To some extent the almost brutal design of the “industrial” buildings has made the problems of the layout worse due to the massing and scale of the proposed buildings.

North-south route

- 6.19 You are referred to the comprehensive comments provided at ‘A’ in the Consultations Section of this report with regards the important policy intention of this site allocation; the north-south route. For brevity, in an already lengthy report, they are not repeated here. Officers support the comments made and in particular the references to the impact on the public realm of the Thames and the quality of the public realm to be provided, which derives mainly from the area identified for the route proposed. The point made is that by being just 3 metres in width it will be narrower than the path coming from the crossing of the Thames and too narrow to form a major route through the site or create a sense of public realm. The position of Block C and its proximity to Block F closes off views through the site so is counter to the vision that Policy CR11g was seeking to achieve.

- 6.20 The overall conclusion reached is that the acceptable design approach and the acceptable scale and height of Blocks A, B, F & G do not overcome the problems identified with the layout and massing of the remainder of the site (Blocks C, D & E). Officers have therefore concluded that the site is not capable of accommodating 209 dwellings in the layout and form of development as proposed without causing significant harm to the character and appearance of the Thames on this area. Therefore, officers recommend that the proposed development should be refused planning permission for failing to comply with Policies EN11, CR2, CR3 and CC7 in terms of the layout and scale of the proposed development.

Impact on residential amenity

- 6.21 The preceding section leads on to consideration of residential amenity for existing and future residents. The residents most likely to be impacted by the proposed development live to the west of the site plus those living in the cottage on Fry's Island in the Thames. The applicant's Daylight and Wind Reports have been considered by the Council's consultants and the conclusion reached accepts that while there will be some change and impact for existing residents this is starting from an unusual situation for a town centre site with the existing site cleared of any substantial structures. The applicant, by dropping the heights of the blocks directly backing on to the houses in Lynmouth Road have made a reasonable attempt to reduce the impact. It also needs to be considered that the residential use is likely to be more acceptable in residential amenity terms than the previous general industrial use.
- 6.22 For future residents while the dwellings inside would provide acceptable living spaces there is very little outdoor amenity space provided. Many of the flat units are provided with balconies but other residents or those wanting to do more than sit will be able to make use of the Christchurch Gardens on the north of the Thames. The applicant has confirmed that £100k would be part of a \$106 package to be spent on play and leisure improvements here. This is welcomed but there remains a concern that a development on this scale with family size dwellings too should provide more on-site amenity space.
- 6.23 There are also strong concerns raised by Environmental Protection officers, as set out in the earlier Consultation Section. The applicant has failed to satisfy them that the new residents can be adequately protected from the noise and tonal disturbance caused by the equipment on the SSE site. They advise that their concerns are substantial and as it is not possible to address them through planning conditions, as the applicant advises that it is beyond their control to remedy the nuisance at source, the development should be refused planning permission for this reason. Officer agree and therefore the development should be refused for failing to demonstrate that it meets policies CC8, EN16 and CR6 by adequately mitigating the pollution from the adjacent site.

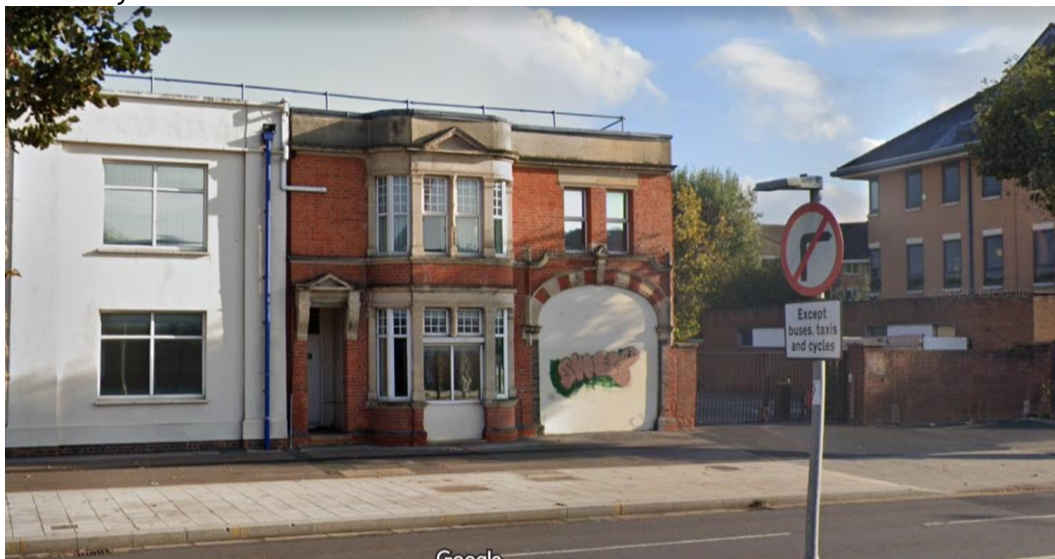
Transport

- 6.24 Officers do not intend to repeat here the detailed comments provided by the Transport DM Manager. Technically the parking provision and servicing details generally work and where there are questions remaining were planning permission being recommended these could have been clarified through planning conditions seeking details to be approved.

- 6.25 More importantly the comments provided endorse the Policy Team Leader's concerns that the opportunity to provide the north-south link envisaged when the Local Plan site allocation was made is being missed. The Transport Officer has gone to great length to explain the concept for this route and why it is so important to the vision of the town centre and its connectivity to the Thames and to Caversham by this route dedicated to pedestrians and cyclists. The failure of the proposed development to provide a direct and high quality route is contrary to Policies TR1, TR4, CR11 generally and CR11g in particular.

Locally Listed Building

- 6.26 Following an assessment under the Council's selection criteria, the original main entrance building at 55 Vastern Road was added to the Local List on 22 May 2017.



Front (south) elevation of the locally listed building as seen from Vastern Road

- 6.27 With the rows of terraces to the west along Vastern Road and the streets to the North, the locally listed building provides a link to the past and the building itself is the last remaining building from the original power station works. The entrance building with a defined archway and traditional, intricate styling makes an important contribution to the streetscene of Vastern Road and its architectural style is both good-quality and characteristic of Reading. In short, the presumption should be for this building to be preserved and if possible, included within any redevelopment proposal, perhaps as a feature building. This was the advice of officers during pre-application discussions with the (now) applicant. The proposal is to demolish the building in its entirety. It is therefore necessary to consider the development proposal - including the loss of the locally listed building - 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

- 6.28 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 onto 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”*.

Local Plan Policy

- 6.29 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 in a Heritage Statement.
- 6.30 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.
- 6.31 As the proposal results in the total loss of the locally listed building, 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
- 6.32 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.
- 6.33 The Council’s local list description for this building states:

Date of building looks to be around 1900, possibly 1903. Building is now integrated within the wider (architecturally later) office and industrial depot SSE complex on Vastern Road, but is clearly architecturally separately identifiable and distinct,

Building thought to be connected to the electric works. In 1903 the electric tramways also opened in Reading (Reading Corporation Tramways) and although this appears to be unconnected to this building, there was clearly an electric revolution in the town at that time, and it could mean that this may be the last original part of the original electric works.

The street directory entry for Vastern Road in 1933 suggests that it might have been an individual building as a John Edwards is listed at 55 Vastern

Road. The 1939 register lists him as the 'electric works superintendent', so there is the possibility that this was the caretaker's lodge to the electric works.

Main construction is orange brick in Flemish Bond with some grey/blue brick, which is characteristic of Reading. Liberal use of stone suggests a higher quality building. The style is an eclectic mix of a number of architectural styles, making use of polychromatic effects, including Neo-Gothic elements, appearing to be a Victorian building in a kind of Classical/Georgian revival, fashionable at the time.

There is use of stone in the string work, porticos, headers and pillars which gives this small building grandeur beyond its size.

The Local Studies Library has found an entry in Sidney Gold's book on local architects does say that the stores for the Reading Electric Co. on Vastern Road were built in 1903 or thereabouts, and the architect was Frederick William Albury (d.1912). Albury & Brown were a noted architectural practice in Reading.

- 6.34 To be included on the local list nominated buildings are considered against three main categories, historic interest, architectural interest and townscape value. In terms of historic interest, the building is connected to the electrification of the tramways in the early 1900s, which was clearly an important modern change to a thriving industrial town like Reading.
- 6.35 In terms of architectural importance, the style of the building is not 'standard' as might befit an industrial premises. It appears to have been a bespoke design, drawing from fashionable architectural styles and a well-known local architectural firm was brought in, Brown & Albury, who at that time produced a number of buildings in the town including the Heelas department store (John Lewis façade), Reading West Library (Grade II), Caversham Free Public Library (Grade II), Rising Sun pub (locally listed, ref. LL7), The Corn Stores (Forbury Road, Grade II), the former National Westminster Bank on Market Place (Grade II listed). Albury and his firm appear to have been involved with many other buildings and restorative/refurbishments around the same time, some of which still survive. In fact, the applicant's Heritage Statement indicates that Frederick William Albury himself was one of the founders of the Reading Electric Supply Company.
- 6.36 In terms of townscape value, the building has a more limited contribution. Located on the northern side of the Vastern Road (the A329, part of the IDR), one needs to almost know that it is there to spot it. Once seen however the detailing certainly marks it out as a building of interest in sound condition but requiring of enhancements to its townscape setting. The building was locally listed in 2017 on the basis of meeting the above criteria and therefore its significance established.
- 6.37 The applicant has sought to justify the loss of the building by the potential benefits of the proposed development as explained in the applicant's Heritage statement. The applicant's Heritage Statement is comprehensive both in terms of describing the evolution of the electric works site, but also the condition and importance of the locally listed building at 55 Vastern Road. It states:

In summary, the building's significance derives primarily from the inherent aesthetic value of the Vastern Road frontage, which also has some historical value for illustrating the building's original role (which remains legible) as the gateway to the works of the Reading Electric Supply Co. Ltd - despite the loss of the principal buildings of the Works. The rear parts of the building are of very limited interest in light of their ancillary nature and largely utilitarian design. The setting of the building has greatly changed and does not generally contribute to its significance, except that the position of the pavement and roadway help to explain the building's original role as an entrance to the site.

The building has until recently been in a use which may have been broadly similar to its original intended purpose. The condition of this last surviving building on the site is generally good. Buildings of this time tend to be brick in construction, with those exhibiting patterned brickwork being of note. Grander buildings would incorporate stone and coloured brick. The fact it constitutes one of the last physical remains of the town's industrial heritage, coupled with the building's good-quality architectural finish - which is increasingly at risk of being lost - adds to its importance locally and adds additional weight to its significance.

- 6.38 The applicant DAS examines a number of options to retain the locally listed building but these identify the building as a constraint to a route, or a frontage and also rule out residential use of the building due to flood risks. The DAS does not appear to discuss options for a viable re-use, however such as; could the former carriage arch have been adapted to form a pedestrian entrance. The DAS considers examples of façade retention options, but these are typically much larger facades and the DAS's conclusion is that these are poor design solutions and should be discounted. However, the retention of 55 Vastern Road is much smaller in scale and a faced option may have been workable. Given that the 'summary of significance' above identifies the façade as the primary element of value, officers consider that not enough thought has been given to this option.
- 6.39 The applicant's planning statement sets out seven public benefits of the application scheme and are described by them as 'significant'. An officer commentary is offered to each below:

Facilitation of strategic link from Central Reading to Christchurch Bridge and across the River Thames

This is a benefit, but not only is it required by adopted policies and the RSAF; elsewhere in this report, the quality and attractiveness of that link is questioned and it is not clear that the retention of the Locally Listed building, in whole or part, would not be possible in any other layout.

Contribution to Reading's housing need for the borough

The Borough has a healthy five year housing supply and there are other sites becoming available to help fulfil that need. This is not considered to be such a notable benefit of the scheme which weighs in its favour. A development proposal with half the number of dwellings would still have met the site allocation policy and may have enabled the locally listed building to be retained.

Provision of a range of housing types to accord with the needs of the borough and reflect adopted policy; in terms of housing mix
Any redevelopment of the site would be expected to meet local plan policies in terms of housing types and mix.

High quality and sustainable design to reflect the strategic objectives of the station/river major opportunity area and the vision with the Local Plan that this will be a 'flagship scheme'.

One key aspect of considering the proposed development against paragraph 179 of the NPPF and the Local Plan Heritage criteria would be understanding the general design merit of any redevelopment on site. 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. 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. 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.

The comments elsewhere in this report question whether the scheme will deliver a good quality and sustainable design. The route through the site is convoluted and not the direct route required policy CR11g. The design is not found appropriate or sustainable, as it is considered to be an overdevelopment, causing harm to the character of the area.

Significant biodiversity improvements when compared to the current use of the Site to accord and assist with the wider objectives of the Local Plan in relation to wildlife corridors and habitats

The density of the development leads to pressures for increasing biodiversity on the site and mitigating the urbanising effect of the development on site, hence the reason that the applicant has had to explore options for off-site biodiversity enhancements. It is not clear that there are such benefits which are of any significance to the overall planning balance.

Economic benefits as a result of the development, through job creation, job opportunities, supply chain and an increase in the residential population of Central Reading, for weekend trading

This is not a particular benefit of this scheme, it could be said of any residential scheme.

Contribution to the amenity value of Christchurch Bridge and strategic 'link' location of the Site, via the provision of attractive open space and a new riverside café.

Comments about the suitability of the route above and elsewhere in this report are relevant. The viability of the café would depend heavily on the attractiveness of this route.

- 6.40 Importantly, it is not clear that the benefits cited above would not be able to be achieved with the retention or part retention of the LL building. Given the design approach being based on the former power station use of the site one would have expected more effort to incorporate the façade to explain their vision for 'The Old Power Station' Vastern Road site as described in the brochure circulated to Members recently.

Conclusion on loss of locally listed building

- 6.41 Were the application otherwise acceptable in design terms it may have been possible for the planning balance to have argued that the loss of the locally listed building could have been outweighed by the quality of design and layout being proposed. There are some planning (public) benefits and these are discussed above. However, these have not met the test of being substantial enough, sufficient to outweigh the loss of significance - which in this case is extremely harmful, the total loss of the building - so as to provide a convincing planning balance. The applicant considers that the Locally Listed building cannot be meaningfully retained, but this is couched in the context of the development which is being proposed.
- 6.42 It is useful in concluding, to be reminded of the key message in Policy EN4: "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". In this case, it is not just harm, it is complete loss. The significance of the Heritage Asset is set out above. The efforts to include it in the redevelopment are not clear and the overall planning benefits of the scheme not sufficiently justified. In conclusion, the loss of the loss of the heritage building is not considered acceptable in the context of the benefits of this application scheme and this forms a reason for refusal above for a failure to comply with policies CC7, EN1, EN4 and the NPPF.

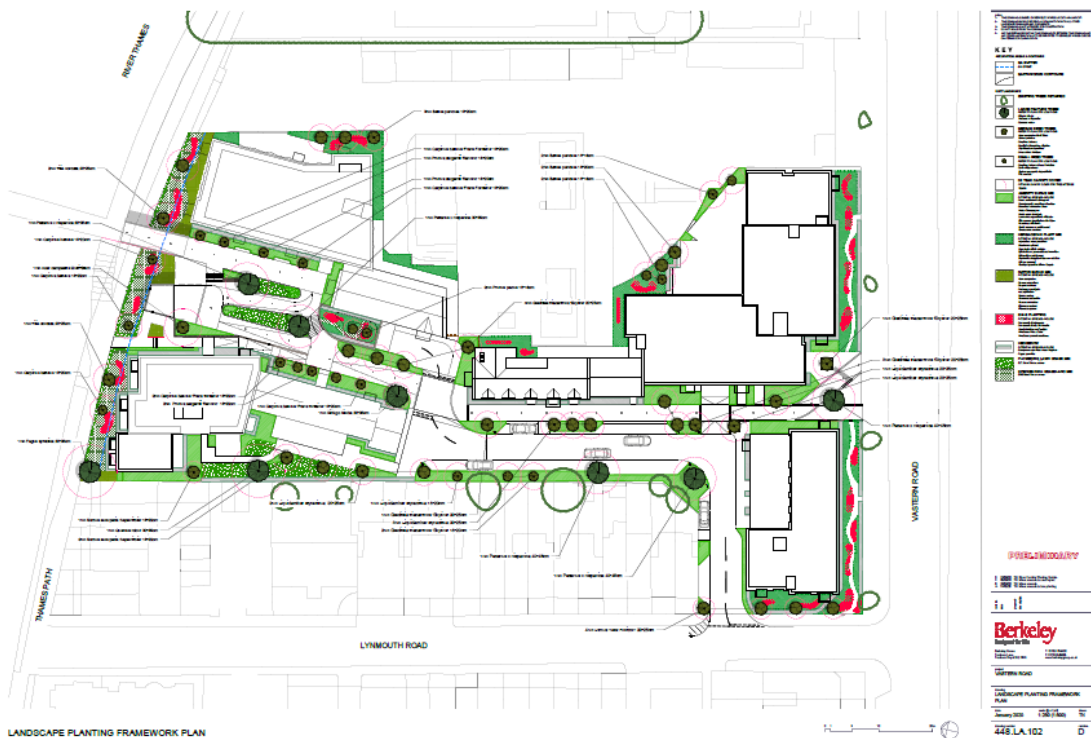
Landscape/ecology

Landscape

- 6.43 The Natural Environment officer's comments are provided in the consultation section (Part T) above. Reference is made to the policy considerations and in particular Policy EN11 which seeks to protect *Reading's waterspaces "so they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor"*.
- 6.44 The River Thames is designated in the Local Plan as a Major Landscape Feature under policy EN13 and policy states that: *'Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature'*.
- 6.45 Officers concerns for the impact on the Thames caused by the development are consistent with those raised by the Environment Agency and the Council's consultant Ecologist and public comments received. The Environment Agency helpfully offered two options to mitigate their

concerns - move the buildings back and reduce their height or provide compensation marginal planting elsewhere on the Thames nearby. The applicant went for the second option but the case officer considers that a combination of both should have been explored. The marginal planting deals with one of the impacts caused by the shadow cast by the new buildings on the Thames but does not deal with the impact on the Thames as a Major Landscape feature or the value of the pedestrian route on the tow path as part of the public realm.

- 6.46 The landscape officer also refers to Policy EN14: Trees, hedges and woodlands and while new planting is proposed there is a concern that the shading will prevent the trees from achieving their desired condition.
- 6.47 The landscaping plan below illustrates what has been proposed. As noted before given the scale of the development proposed in terms of the size and scale of the proposed buildings and number of residents one would normally have hoped for significant areas of landscape setting for the buildings and communal space on site. It is acknowledged that the site currently is devoid of landscaping and that any proposal for new landscaping is positive but with fewer dwellings and less land take by buildings so much better could have been provided to create a more pleasant area.



Ecology

- 6.30 The Council's consultant Ecologist has commented on the application. The conclusion reached is that the proposals will result in an increase in shading, light pollution and built form adjacent to the River Thames. The River Thames is a "priority habitat" as per the NPPF and is of considerable importance for wildlife. Policies EN11 and EN12 refer to the importance of the River Corridors for wildlife and how these will be protected from the adverse impacts of development.

- 6.48 The comments provided are again consistent with the concerns and objections raised by the Environment Agency about the shading of marginal vegetation along the river and thereby the potential for this to decline to the detriment of wildlife on the river.
- 6.49 These concerns have been discussed with the applicant as they could be mitigated by setting blocks D & E further back from the river and lowering their height. An alternative option of providing additional marginal planting elsewhere along the Thames was suggested by the EA and this is option the applicant preferred. However, it is not clear if the alternative location between Christchurch Bridge and Caversham Bridge is viable for the new marginal beds and whether other river users (boat owners and kayakers) might have objections.
- 6.50 The proposal has been considered in accordance with paragraph 175 of the NPPF, which refers to a mitigation hierarchy, and states “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”
- 6.51 That the proposals will result in harm to the River Thames has been conceded by the applicant hence the proposed mitigation. As the River Thames is a significant ecological asset - i.e. a “priority habitat” or Habitat of Principal Importance for the Conservation of Biodiversity in England as per Section 41 of the 2006 Natural Environment and Rural Communities (NERC) Act - the harm may be considered “significant” (although there is no definition of “significant harm” in the NPPF, or NPPG).
- 6.52 Given the earlier concerns caused by the height and massing of the proposed development on the character of the Thames as a recreational facility and significant visual asset to the town, which could be addressed by relocation and reduction of Blocks d and E officers consider it reasonable to conclude that the harm to wildlife should also be avoided in this way. The proposals therefore do not comply with the mitigation hierarchy and are in conflict with policies EN11, EN12 and should be refused planning permission for this reason.

Sustainable Development

- 6.53 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.
- 6.54 The applicant submitted a sustainability and energy report as part of the application. Two substantive reviews were required, owing to the deficiencies identified in the first. The executive summary of the final Energy Review received by the Local Planning Authority in March 2021 is reproduced in full in the Consultation Section at Para 4.

- 6.55 The first review found that the proposed energy strategy was not compliant with RBC energy and carbon policy, as well as not meeting wider council aspirations because the proposed thermal energy systems were not decentralised and did not use ground source heat pump (GSHP) or air source heat pump (ASHP) as a primary heating source. There was also no decentralised hydraulic heating system proposed, therefore the development was not “connection-ready” for any future DH networks that may be deployed in the area around the development.
- 6.56 A further revised energy strategy was completed by the applicant’s consultant in December 2020, which did propose a hydraulic heating system and heat pumps as the primary low-carbon heat source and natural gas boilers for top-up heat. In so far as the relevant policy applies the proposed energy strategy meets the policy requirements although lacks the ambition sought by RBC energy and carbon policy guidance, as well as not being future-proofed for incoming national policy, for the following reasons:
- Insufficient evidence to discount open-loop GSHP, which is identified in the RBC Sustainable Design & Construction Supplementary Planning Document (SPD) as the preferred heat pump technology over ASHP;
 - Reliance on natural gas boilers for heat top-up in winter periods is not future-proofed for the expected national Future Buildings Standard policy, which are currently at the consultation stage.
- 6.57 Officers are satisfied however, 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.
- 6.58 The proposal has also been confirmed that it would meet the requirements of sustainable drainage policies (see section I in the Consultation responses above).

S106

- 6.59 Were Members minded to disagree with the officer recommendation and decide to grant planning permission for the proposed development there are a number of obligations that the applicant would be required to commit to through the completion of a S106 legal agreement. The heads of terms would include:
- Affordable housing (43 apartments on site with the mix and tenure 45% affordable rent and 55% shared ownership as agreed) provided before private sale properties are occupied.
 - Employment & Skills Plan (construction phase) before works start
 - £200,000 financial contribution towards new crossing on Vastern Road before first occupation
 - £100,000 financial contribution towards play and open space facilities on Christchurch Meadows before first occupation
 - Provision of pedestrian/cycle route through the site connecting to Christchurch Bridge and Vastern Road before first occupation and associated infrastructure/signage

- New planting and ecological enhancements off site before first occupation
- Provision of a new direct link from the site onto the River Thames towpath
- A S278/38 Agreement towards footway improvements and an upgraded site entrance onto Lynmouth Road
- Provision of transport mitigation measures.

6.59 Officers can confirm that a planning obligation based on the above heads of terms would be compliant with regulations that state that such obligations may only constitute a reason for granting planning permission for the development if the obligation is—

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

Equalities Impact

6.60 When determining an application for planning permission 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.

7 CONCLUSION

7.1 The application is required to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance the harmful impacts of the proposed development and the failures to meet all relevant policy requirements need to be weighed against the benefits of the proposed development. By reference to the assessment above a number of problems with the development are identified which are contrary to policies in the development plan. These include the failure to provide a good quality north-south route through the site as required by the site specific policy CR11g, the overdevelopment of the site in the form of large scale apartment blocks sited close to one and other and close to the Thames, harm to the character and significance of the Thames as a Major Landscape Feature, harm to ecological habitats and loss of a locally listed building. There will be other temporary impacts, such as disturbance during the demolition and construction phases for example. However, a number of these matters could be sufficiently mitigated by various measures applied by the applicant and secured by conditions and legal agreement obligations.

7.2 This harm needs to be weighed with the benefits of the proposals. In particular, the development provides residential development in a sustainable location close to the town centre and includes the provision of

just over 20% affordable apartments and a number of other infrastructure improvements as set out above to be secured via a legal agreement. This is a considerable planning benefit when set within the context of a pressing need for housing, and affordable housing, in the Borough. The sustainability credentials of the proposals are another factor which, when applying an overall critical planning balance of all material considerations weigh in favour of the proposal.

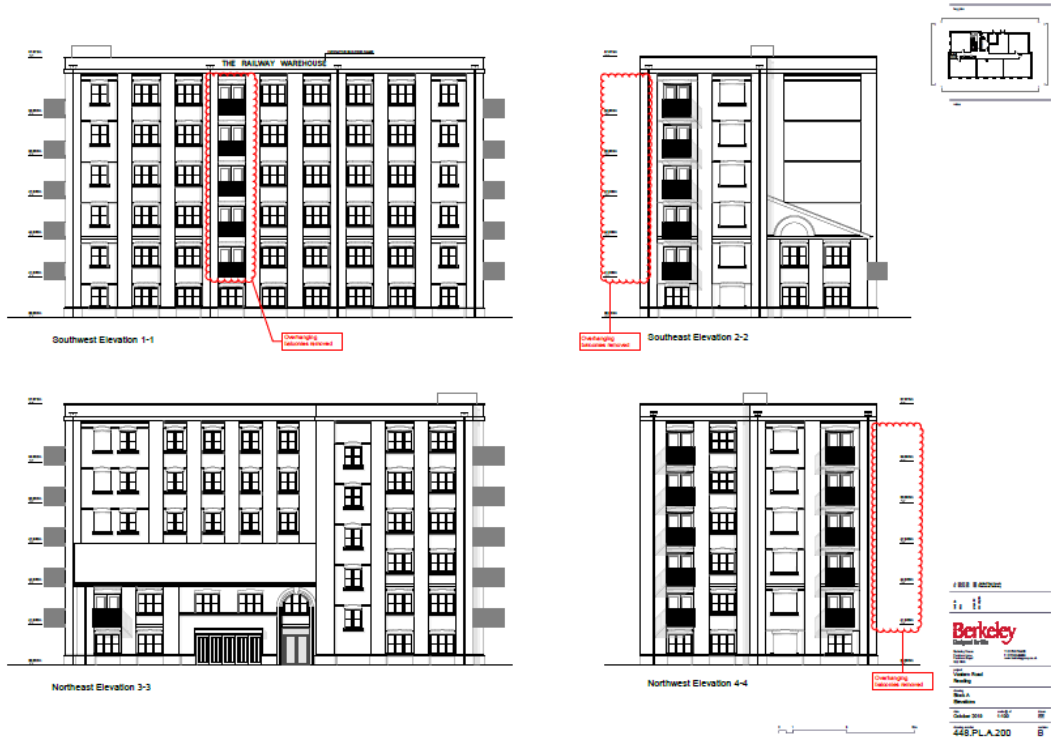
- 7.3 However, officers have spent a long time working with the applicant to try to overcome the main objection, which is the poor north-south route, as expressed by the Policy Team Leader. Officers believe that a different layout with fewer blocks would allow the north-south route to be provided directly and to the quality that the local plan policy allocation aspires to. Officers therefore consider that approving the development as proposed would lose the chance to achieve this key policy objective. The benefits as identified would be sought from any developer looking to develop this site for housing in excess of 100 dwellings so while not unwelcome are not specific to this proposed scheme.
- 7.4 As such, officers have concluded that the conflicts with the development plan are not outweighed by the benefits of the proposal in this instance. Officers have applied a suitable planning balance when reaching this conclusion. Planning Permission is therefore recommended to be refused for the reasons as stated at the start of this report.

Case Officer: Mr Jonathan Markwell

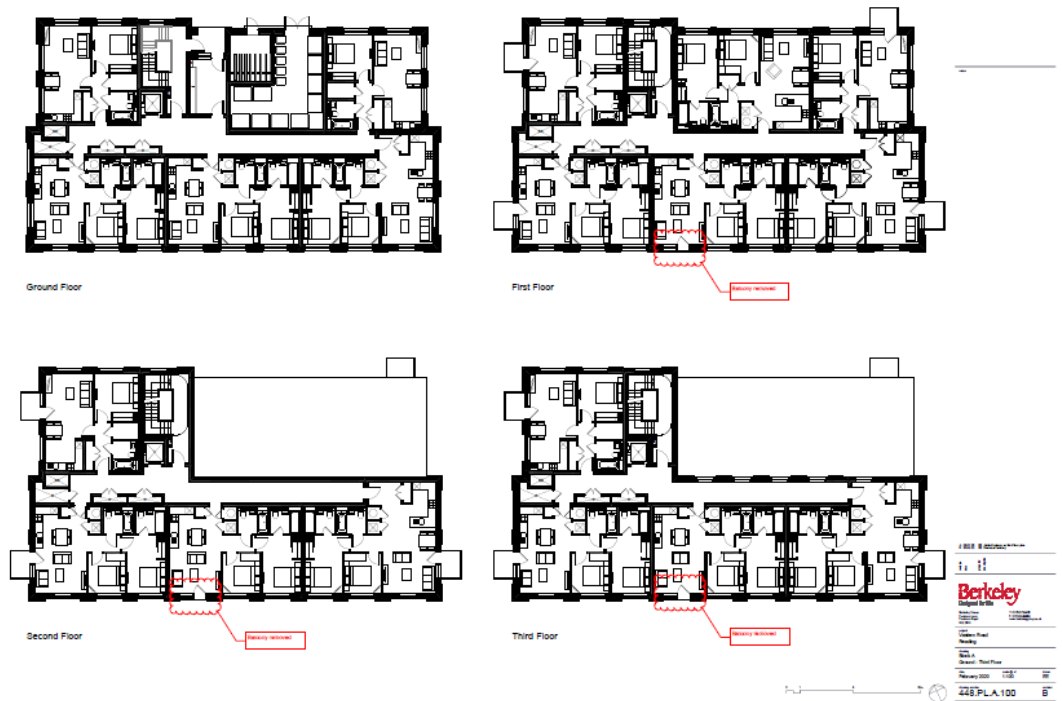
Master Plan



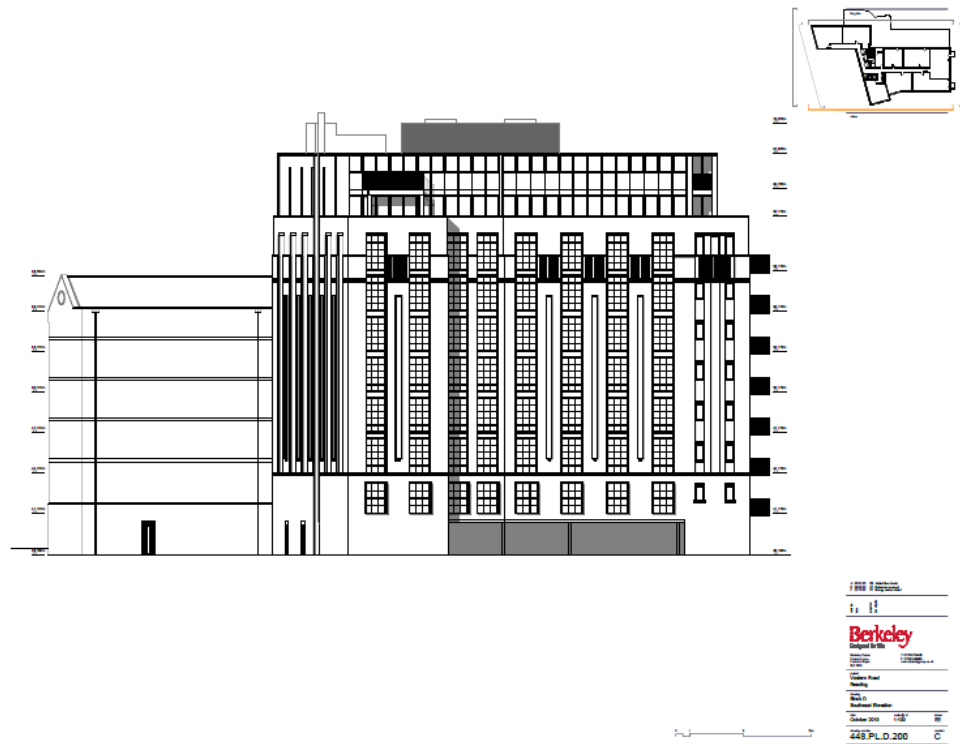
Block A Elevations



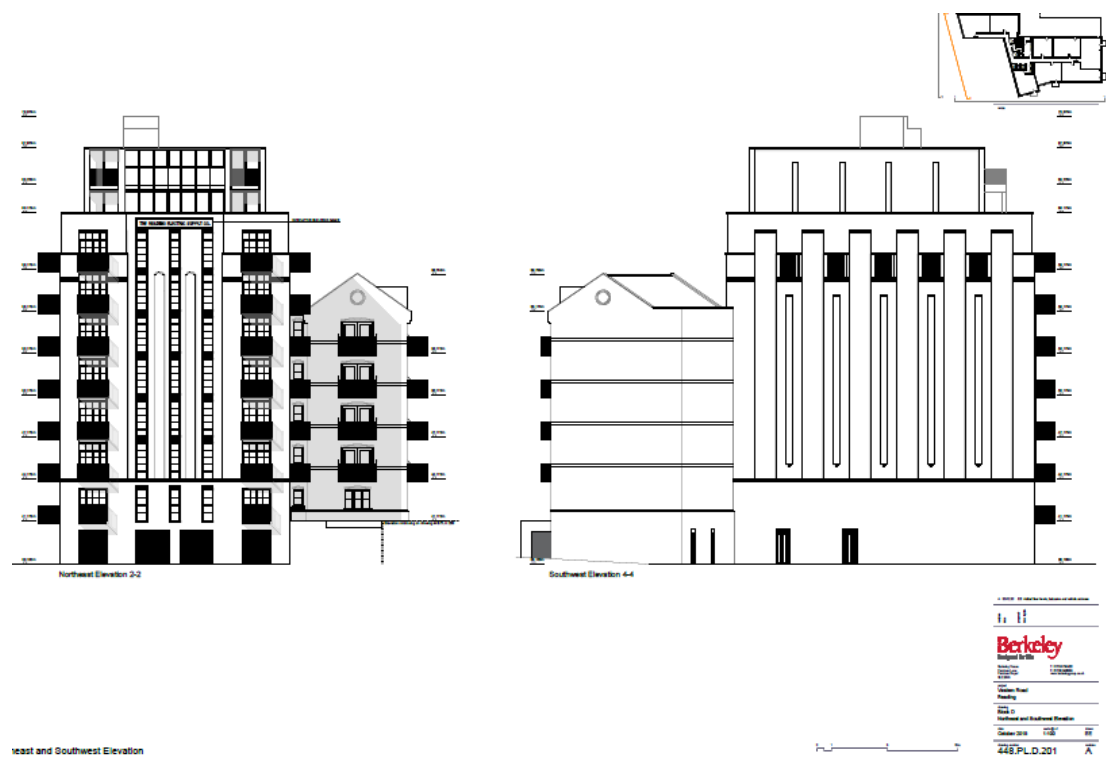
Block A floor plans



Plans for Block D



Southeast Elevation 1-1
View from east



West and Southwest Elevation
View from north and south

Plans for Block E

Elevation facing east and south



Block E

Elevations from west and north



Block E

Elevations for Block F & G



Block FG

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Sheet: 1 - Drawings

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Submitted technical reports:

Report title	Prepared by	Date
Air Quality Assessment	Peter Brett Associates	December 2019
Archaeological Desk-Based Assessment	CgMs Consulting	March 2019
Bat Activity Survey Report	EcoConsult	October 2019
Daylight & Sunlight Report	EB7	December 2019
Daylight & Sunlight Assessment of Cumulative Schemes	EB7	May 2020
Design and Access Statement, including Fire Safety report	Berkeley Homes	January 2020
Design and Access Statement Addendum	Berkeley Homes	April 2020
Design Addendum	Berkeley Homes	November 2020
Ecological Assessment	EcoConsult	December 2019
Energy Statement	Hodkinson	December 2020
Extended Phase 1 Habitat Survey Report	EcoConsult	April 2018
Flood Risk Assessment	Peter Brett Associates/ Stantec	January 2020
Heritage Statement	Built Heritage Consultancy	December 2019
Lighting Assessment	Peter Brett Associates/ Stantec	December 2019
Noise Impact Assessment	24 Acoustics	January 2020
Open Space Statement	Berkeley Homes	December 2019
Pedestrian Level Wind/Microclimate Assessment	RWDI	October 2020
Phase I-II Geo-Environmental Site Assessment	Omnia	November 2019
Planning Statement	Barton Willmore	January 2020
Proposed Drainage Strategy	Peter Brett Associates/ Stantec	January 2020
Consultation Report	Pegasus	December 2019
Strategic Shared Cycle Footway booklet	Berkeley Homes	September 2020
Sustainability Statement, including Ventilation/Extraction details	Peter Brett Associates/ Stantec	January 2020
Superfast Broadband Energy Statement	Peter Brett Associates/ Stantec	November 2019
Townscape and Visual Impact Assessment	Barton Willmore	January 2020
Townscape and Visual Impact Assessment Addendum	Barton Willmore	May 2020
Transport Statement	Peter Brett Associates/ Stantec	October 2019
Travel Plan	Peter Brett Associates/ Stantec	October 2019
Tree Survey and Arboricultural Impact Assessment	Greengage	November 2019
Utilities Appraisal Report	Peter Brett Associates/ Stantec	November 2019
Viability Assessment	Berkeley Homes/Fulkers/Savills	January 2021

Further information submitted in response to consultation responses:

Document title	Prepared by	Date
Air Quality – Responses to Reading Borough Council Comments	Stantec	April 2020
Noise-Related Planning Conditions Note	24 Acoustics	22 nd April 2020
Wind Peer Review Responses	RWDI	24 th April 2020
Daylight and Sunlight review response	EB7	20 th May 2020
RBC Highway Response Technical Note	Stantec	9 th June 2020
Wind Peer Review Responses	RWDI	16 th June 2020

Wind RBC Responses	RWDI	9 th July 2020
Daylight and Sunlight additional review response	EB7	10 th July 2020
Response to Environment Agency	EB7	14 th July 2020
Energy Strategy: Response to Element Energy	Hodkinson	July 2020
Breakdown of Predicted Heating Costs	Hodkinson	4 th September 2020
RBC Highway 2 nd Response Technical Note	Stantec	9 th September 2020
Policy Assessment Note: North/South Shared Pedestrian Cycle Route	Barton Willmore	24 th September 2020
RBC Highway 3 rd Response & Vastern Road Crossing Technical Note	Stantec	24 th September 2020
Tree Pit Soil Volume Requirements	Berkeley Homes	September 2020
Summary of Energy Strategy Technical Note	Hodkinson	19 th October 2020

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

Ward: Abbey

App No.: 201734

Address: Rivermead Leisure Complex, Richfield Avenue

Proposal: New replacement leisure centre including a 25m 8 lane competition pool and diving, with associated parking and landscaping, followed by demolition of existing centre.

Applicant: Greenwich Leisure Limited (GLL)

Deadline: 12th March 2021

Extended Deadline: 9th April 2021

Planning Guarantee 26 week target: 11th June 2021

RECOMMENDATION:

GRANT Planning Permission subject to conditions and informatives.

CONDITIONS TO INCLUDE:

- 1) TL1 - 3 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) C1 - Hours of Construction
- 5) C2 - Construction Method Statement to be submitted and approved including Phasing Plan.
- 6) C3 - CMS as Specified - The measures within the approved Air Quality Assessment (Syntegra, November 2020) for the control of dust during construction shall be adhered to throughout the whole of the construction period unless otherwise agreed in writing by the Local Planning Authority.
- 7) C4 - No Bonfires
- 8) C04 - Submission and approval of a contamination assessment - for areas under the current leisure centre
- 9) C06 - Assessment of previously unidentified contamination
- 10) Land Gas - Remediation scheme to be submitted, approved and implemented prior to occupation.
- 11) Land Gas - Implementation of the remediation scheme in accordance with the approved timetable of works and a validation report to be submitted and approved prior to occupation.
- 12) No drainage systems for the infiltration of surface water to the ground (EA wording)
- 13) Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.
- 14) N8 - Noise levels of plant/ equipment restricted
- 15) N21 - Hours of operation (external lighting)
- 16) Details of lighting

- 17) In accordance with the FRA and that finished floor levels shall be set no lower than 39.22 metres above Ordnance Datum (AOD)
- 18) SU5 - BREEAM Excellent - Design stage
- 19) SU6 - BREEAM Excellent - Built stage
- 20) SU7 - SUDS plan to be approved
- 21) SU8 - SUDS to be implemented
- 22) S1 - Detail of PV to be approved
- 23) DC1 - Vehicle Parking as specified
- 24) An annotated plan showing the proposed layout and access arrangements of No building hereby permitted shall be occupied until full details of the direction signage and markings within the car park area has been submitted to an approved in writing by the Local Planning Authority, and thereafter maintained in good condition.
- 25) DC3 - Vehicle Access as specified prior to occupation
- 26) DC6 - Cycle Parking to be approved
- 27) DC7 - Refuse and Recycling to be approved (to be vermin proof)
- 28) DD6 - Visibility splays to be provided as specified
- 29) DE6- Provision of Electric Vehicle Charging Points
- 30) L2 - Hard and soft landscaping scheme to be submitted and approved
- 31) L3 - Boundary Treatment
- 32) L4- Landscape Management and Maintenance Plan to be submitted and approved
- 33) Bat survey before any demolition
- 34) Measures to provide bat and bird boxes to be implemented prior to occupation
- 35) Vegetation clearance to avoid bird nesting season (March-August)
- 36) Hours of use - 6am to 11pm Mon to Sat, and 6am to 9.30pm on Sundays
- 37) The use of the existing leisure centre to cease prior to the occupation of the replacement leisure centre
- 38) Submission and approval of an Employment, Skills and Training Plan - construction skills

INFORMATIVES TO INCLUDE:

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I11 - CIL Not Chargeable
- 5) IF4 - S106
- 6) IF3 - Highways
- 7) I29 - Access Construction
- 8) IF7 - Complaints about Construction
- 9) IF8 - Encroachment
- 10) Thames Water informatives.
- 11) IF1 - Positive & Proactive.

1. INTRODUCTION & BACKGROUND

- 1.1 The application site is approximately 5.25 hectares and comprises the existing Rivermead Leisure Centre, which opened in 1988. A gym

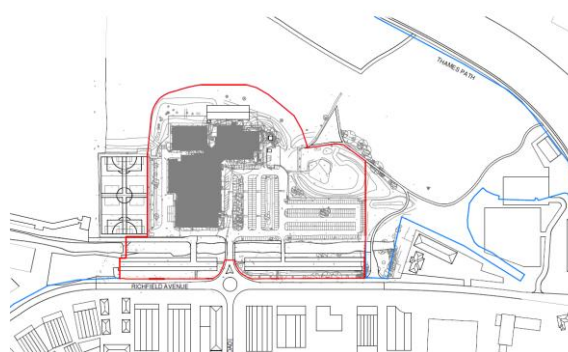
extension was added to the north-west of the centre in 2007/08 and a new demountable training pool and hall were constructed in 2017/18. There is also an artificial floodlit grass pitch (to the west, beyond the red line area), car parking, a play area, and associated landscaping.

- 1.2 The application site is relatively level and is located within the Rivermead Park, on the south side of the River Thames, to the north of Richfield Avenue and west of Caversham Bridge. To the south of the site is a large commercial/ industrial area. To the west is the site of a future 8-form entry secondary school and detailed pre-application discussions have taken place for the masterplanning of this part of the Rivermead site between the Department for Education (DfE), Reading Borough Council and GLL (the applicant for the proposal under consideration).
- 1.3 Further west is the site of the annual Reading Festival. The nearest residential properties are at Caversham Place approximately 280m away and there are also properties on the Warren, approximately 295m away.

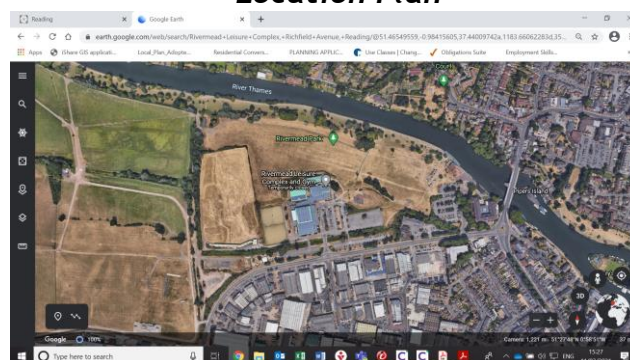


- 1.4 The site is within the Air Quality Management Area (Policy EN15); allocated for leisure under WR3d; in Flood Zone 2 (between 1 in 100 and 1 in 1,000 annual probability of river flooding - Policy EN18); within a Major Landscape Feature (Policy EN13); and partly within, but mostly adjacent to a Local Green Space and Public Open Space (Policy EN7 Wp).
- 1.5 The proposed scheme arose from a strategic review of indoor sports facilities in the Borough, undertaken in 2015. This assessed the age, quality, size, accessibility, community use, opening hours and type of management of each existing facility, focusing on the current and future supply and demand for key sporting facilities and, in particular, considered the amount and configuration of swimming pool water (including diving) and sports hall space. Extensive consultation was undertaken with stakeholders and this resulted in a range of recommendations for sport and recreation facilities including those for Rivermead.
- 1.6 The proposed redevelopment of the Rivermead site forms one part of the borough wide 25-year leisure contract awarded by RBC to GLL following RBC Policy Committee in January 2020.

- 1.7 The submitted Design and Access Statement states that the centre has exceeded its anticipated lifespan and reached the end of its economic life, and therefore, a proposed replacement, rather than refurbished solution, was pursued.
- 1.8 In January 2019 the Council published a detailed specification seeking and inviting interested leisure operators to submit detailed solutions and the specification included the following:
- A new-build solution at Rivermead, incorporating a new 8 lane competition standard pool with provision for diving, learning, introduction to water space and a 5 court sports hall which could accommodate league 1 basketball.
- 1.9 The Council subsequently procured Greenwich Leisure Limited (GLL) as the operator of their leisure facilities, with the joint aims of managing the existing facilities and to develop new facilities. These new facilities were identified through an assessment of local needs and delivery options, which confirmed that whilst there is sufficient pool space in the Borough the quality of provision needs upgrading. The options appraisal included in the assessment recommended the replacement of the most outdated facilities with more modern cost-effective leisure facilities. This included the recommendation for a new competition standard pool with diving provision at Rivermead.
- 1.10 The application is referred to committee as it is a 'major' development. It is not a REG3 application, because GLL are the applicant and would design, build and run the facility on behalf of the Council.



Location Plan



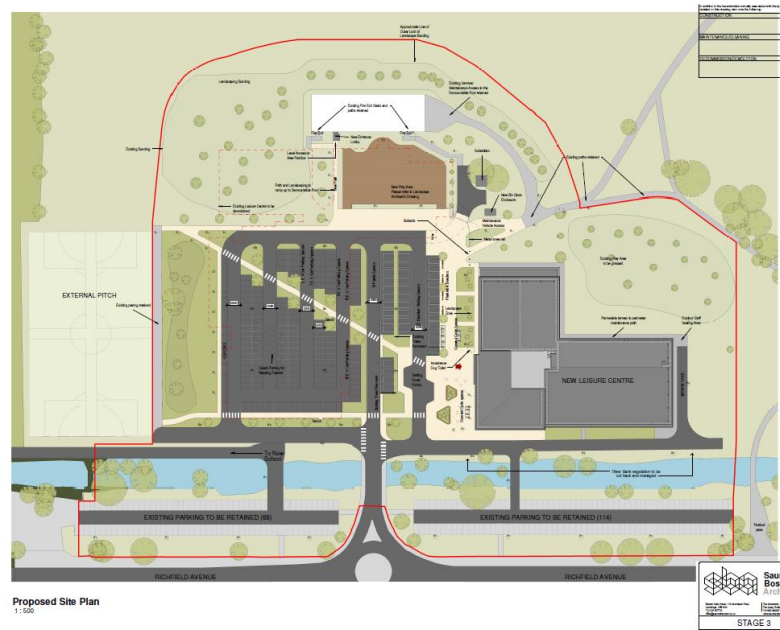
Aerial Photo



Google Earth Image (looking east)

2. PROPOSAL

- 2.1 The proposal is for a new two storey l-shaped building with three main sections: 'Hub' (central), sports hall (wing north-south), and pool (wing east-west), (see proposed site layout below) to accommodate the following functions:
- 25m, 8 lane competition pool with part moveable floor
 - Teaching and diving pool with moveable floor
 - Splash pad with elements of play features
 - 250 spectator seats for the pool hall.
 - Six court sports hall with spectator seating (dry diving)
 - Fitness suite (120 stations)
 - Studio spaces (for a range of exercise classes - spin, etc)
 - Spin studio
 - Café / seating area
 - Soft play area/ double activity zone
 - Party rooms
 - Wet and dry changing areas
 - New entrance pavilion to retained training pool (existing demountable)
 - 188 new car parking spaces
 - 40 Electric Vehicle Charging Points
 - 40 new cycle spaces
 - Associated soft and hard landscaping
 - Existing pedestrian and vehicular access and overflow car park areas along Richfield Avenue will be retained.
- 2.2 The existing leisure centre is proposed to remain fully operational whilst the new centre is constructed on a phased basis. Once completed, the existing leisure centre would be demolished although the existing demountable pool retained with a proposed new small entrance pavilion.



- 2.3 Submitted plans and documentation received 4th December 2020, unless otherwise stated (including amended details) are as follows:
- Location Plan - Drawing no: 1790-SBA-RM-XX-A-5001 Rev A
 - Existing Site Plan - Drawing no: 1790-SBA-RM-XX-DR-A-5002 Rev C
 - Proposed Ground Floor Plan 1790-SBA-RM-00-DR-A-0013 Rev P1 rec 15/3/21
 - Proposed First Floor plan 1790-SBA-RM-00-DR-A-0014 Rev P1 rec 15/3/21
 - Proposed Roof Plan - Drawing no: 1790-SBA-RM-R1-A-0012 Rev E
 - Proposed Site Plan - Drawing no: 1790-SBA-RM-XX-DR-A-5003 Rev P4, received 15th March 2021
 - Proposed North and East Elevations - Drawing no: 1790-SBA-RM-ZZ-A-2002 Rev H
 - Proposed South and West Elevations - Drawing no: 1790-SBA-RM-ZZ-A-2001 Rev P2, received 17th March 2021
 - Demountable Pool Pavilion - Drawing no: 1790-SBA-XX-00-DR-A-6022, received 15th March 2021
 - Proposed Pavilion Elevations - Drawing no: 1790-SBA-XX-ZZ-DR-A-6200, received 15th March 2021
 - Proposed Sections - Drawing no: 1790-SBA-RM-ZZ-A-1001 Rev F
 - Outline Landscaping Plan - Drawing no: EML PEL 114201 Rev G, received 17th December 2020
 - Site Plan - New connections Mechanical and Electrical Site Services Layout - Drawing no: C7403-TLP-RM-00-DR-ME-902 Rev A
 - Air Quality Statement, Document ref: 20-6868, dated 27th November 2020, prepared by Syntegra Consulting
 - Built Heritage, Townscape and Visual Impact Appraisal, Document ref: 2016-RE01 V3, dated December 2020, prepared by Neaves Urbansim
 - Contamination Assessment, prepared by Furness Partnership

- Integrated Planning, Design and Access Statement, Document ref: SBA-RM-XX-RP-A-001, dated 9th November 2020, prepared by Saunders Boston Architects
- Elevation Design Drivers [DAS Addendum,] Document ref: SBA-RM-XX-RP-A-002 dated 12th March 2021, prepared by Saunders Boston Architects, received 12th March 2021
- Energy Strategy Rev D, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd
- External Lighting Impact Statement, Second Issues, dated 25th November 2020, prepared by Thornley & Lumb Partnership
- Site Plan External Lighting Layout - Drawing no: C7403-TLP-RM-00-DR-E-801 Rev A
- Flood Risk Assessment, Rev 03, dated 1st February 2021, prepared by Furness Partnership, received 2nd February 2021
- Flood Risk Assessment Addendum Rev 01, dated February 2021, prepared by Furness Partnership, received 19th February 2021
- Letter from Furness Partnership to the Environment Agency regarding the revised Flood Risk Assessment, dated 8th January 2021, received 2nd February 2021
- Main Investigation Report, Document ref: 17755/MIR_R27 Rev 1.01, dated August 2019, prepared by Soils Ltd
- Noise Impact Assessment, Document ref: 20-6868, dated 20th November 2020, prepared by Syntegra Consulting
- Outline Landscaping Proposal Revision E
- Proposed Drainage Layout - Drawing No: FUR ZZ ZZ DR D 0911
- Preliminary Bat Roost Assessment, Document ref: R2670/a, dated November 2020, prepared by John Wenn Ecological Consultancy
- Preliminary Ecological Appraisal, Document ref: R2302/b, dated August 2019, prepared by John Wenn Ecological Consultancy
- Request for Screening Opinion, Document ref: GLL1001, dated 1st December 2020, prepared by Gillings Planning
- Sustainability Statement for Rivermead Leisure Centre, dated 27th November 2020, prepared by Ecoteric
- Transport Assessment, Document ref: 15058-HYD-XX-XX-RP-TP-5001, Issue P04, dated 30th November 2020, prepared by Hydrock
- Travel Plan, Document ref: 15058-HYD-XX-XX-RP-TP-6001, Issue P02, dated 27th November 2020, prepared by Hydrock
- Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement and Tree Protection Plan, dated 12th March 2021 Rev B, prepared by Hayden's Arboricultural Consultants, received 22nd March 2021
(Planning Officer note: Review of this by Natural Environment officer to be reported in an update)
- TS & AIA [Tree Survey and Arboricultural Impact Assessment] - Drawing no: 8458-D-AIA Rev B, received 22nd March 2021
(Planning Officer note: Review of this by Natural Environment officer to be reported in an update)
- Utility Assessment, Issue 2, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd

- Ventilation and Extraction Statement, dated 19th November 2020, prepared By Thornley & Lumb Partnership Ltd
- CIL Form 1: Additional Information
- Consultation Response Statement, dated 24th February 2021, prepared by Saunders Boston Architects, received 12th March 2021

2.4 Community Infrastructure Levy (CIL): the proposal is CIL liable, but leisure is not a chargeable use, as set out in the Council's CIL Charging Schedule.

3 PLANNING HISTORY

Relevant planning history is as follows:

161069/PREAPP - A single storey extension (900m²) to the existing leisure centre comprising of a demountable swimming pool encompassing a five lane 25msq 10m teaching pool, 10msq 13m leaner pool, pool plant filtration and ancillary changing space - Observations sent 15/12/2016

162323/FUL - Northern extension of the existing Rivermead Leisure Centre to accommodate a new, permanent building for leisure purposes (D2 use), with an associated changing village and associated plant, to house a temporary 'demountable' swimming pool - Approved 21/2/2017

170486/APPCON - Application for approval of details reserved by condition. (162323) - Discharged 1/7/2017

170808/APPCON - Application for approval of details reserved by condition. (162323) - Discharged 23/8/2017

170809/APPCON - Application for approval of details reserved by condition 14 of 162323 - Habitat protection/Mitigation - Discharged 15/6/2017

171331/NMA - Non-Material Amendment to planning permission 162323 (northern extension to Rivermead Leisure Centre) to: substitute glazed walling system and polycarbonate corridor glazing with aluminium frame windows; alterations to rainwater goods specification; adjustments to louvre and high level window positions and base/cill lines and level of corridor glazing - Agreed 2/10/2017

200153/PREAPP - Pre-application advice for new leisure centre including swimming pool and ancillary facilities - Observations sent 22/4/2020

4 CONSULTATIONS

Statutory

Environment Agency (EA)

- 4.1 The EA initially objected: The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. This application is also contrary to Policy EN18 of the Reading Local Plan. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:
- Take the impacts of climate change into account - different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances', without adequate justification.
 - Proposes inadequate floodplain compensation - the applicant has referenced a model that is no longer the best available information and there is limited information provided to demonstrate the impact of the proposed development on the floodplain.
- 4.2 The applicant can overcome our objection by supplying further information on the following:
- footprints of the existing and proposed development
 - clarifying if the proposed development, including any landscaping, will take up more flood plain storage and therefore compensation is required
 - identifying where the proposed development will sit within 1 in 100 plus appropriate climate change extent. We recommend that the flood extents are overlain onto the site plan
 - further information on the earth bunds as shown on the proposed site plan - are these existing earth bunds or proposed? Are these within the 1 in 100 plus 35% extent and will compensation be required?
- 4.3 Floodplain storage - It will need to be shown that any increase in built footprint within the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change can be directly compensated for. This is necessary to prevent the new development reducing flood plain storage and displacing flood waters, thereby increasing flood risk elsewhere.
- 4.4 Level-for-level compensation is the matching of volumes lost to the flood plain, through increases in built footprint, with new flood plain volume by reducing ground levels. Please note for this to be achievable it requires land on the edge of the floodplain and above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change to be available. A comparison of ground levels (topographical survey) with modelled flood plain levels will

show land above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change to be used as compensation. If it is not possible to provide level for level flood plain compensation then other forms of mitigation may be considered if agreed with the Local Planning Authority (LPA). The FRA must demonstrate that level for level compensation has been considered, explain why it was not possible to provide it and detail how any associated risks from the chosen form of mitigation can be minimised.

- 4.5 If voids are proposed as an alternative form of mitigation these will need to be floodable, with the underside of the void above the 1% annual probability (1 in 100) flood level with an appropriate allowance for climate change. The LPA must also be satisfied that they can enforce a condition to maintain the voids as designed and that an adequate maintenance plan is in place to ensure the voids remain open for the life time of the development.
- 4.6 If the LPA are not satisfied that alternative mitigation measures are appropriate then the applicant should revise their development proposals to ensure that there will be no increase in built footprint on this site.
- 4.7 If this cannot be achieved, we are likely to maintain our objection.
- 4.8 ***Planning Officer note:*** Following the submission of an amended FRA and FRA addendum (*latter quantifying the amount of existing bunding surrounding the demountable pool which would be retained*) the EA removed their objection subject to conditions: Development to be carried out in accordance with the submitted FRA; land gas remediation strategy and verification report; No drainage systems for the infiltration of surface water to the ground; and no piling.

Sport England

- 4.9 The following is a summary of their response:
- 4.10 The proposal will result in the loss of squash courts and an indoor bowling rink.
- 4.11 Sport England has been working with Reading Borough Council in the past on producing an evidence base for the replacement/enhancement of the city's leisure stock. It identified the need to replace the current leisure centre. Sport England, therefore, considers this proposal addresses an identified need for this facility type and has the potential to be of benefit to the development of sport. We would wish to see this accorded an appropriate weight in the decision that is reached on this application.

- 4.12 Sport England carried out a number of consultations with specific NGBs whose sports would be impacted by the proposed new leisure centre.
- 4.13 I have reviewed the design and I have a number of concerns including on disability and diversity grounds based on the make up of the population in Reading.
- 4.14 There is a strategic justification for the need for the new leisure centre. I would strongly advise that the applicants engage with the concerned National Governing Bodies (NGBs) to resolve the outstanding issues. I would also advise the applicants to ensure the design of the new leisure centre reflects the needs of the local community.
- 4.15 Sport England does not raise an objection to the granting of planning permission for the proposed new leisure centre.
- 4.16 **Planning Officer Note:** The applicant has confirmed that detailed design items are being addressed through design workshops with Sport England (last held 1st and 12th March 2021), with internal layouts being adjusted accordingly. Also RBC and GLL have engaged further with NGBs as follows:
- England Netball
 - Volleyball England
 - British Gymnastics
 - England Handball
 - Table Tennis England
 - British Wheelchair Basketball
 - Basketball England
 - Swim England
 - Badminton England
- 4.17 The applicant also confirmed *“The following were consulted in detail as both bowls and squash are not being re-provided in the new centre:*
- *English Indoor Bowls Association - RBC have consulted EIBA both separately and through Sport England since October 2020, with a detailed response still awaited. Sport England note that EIBA requested re-provision of bowls within the new sports hall, but that this is impractical due to the length of the bowls rinks being longer than the sports hall*
 - *Rivermead and Whiteknights Bowls clubs - RBC and GLL have also engaged with both these clubs, with discussions ongoing. RBC has assessed that membership numbers of these clubs are declining and are discussing merging the two clubs at the Whiteknights facility in Earley.*
 - *England Squash - RBC have consulted with them since October 2020, and are still waiting for a detailed response. Sport England*

note that there are sufficient squash facilities in the locality to serve squash players who may be displaced from Rivermead.”

Non-statutory

Access Officer

4.18

1. Footpath surfaces must be suitable for all; tarmac and bonded gravel are both good surfaces for wheelchair users, scooter users, etc.
2. Lighting is very important, especially for those with visual impairments and cognitive impairments; bad lighting can cause confusion. People using wheelchairs and scooters, and those with walking difficulties also need to be taken into consideration; you need to be able to see hazards, and areas where there are gaps between the lighted areas can be very disconcerting, especially where there is a change of level, no matter how slight.
3. I am concerned that knee rails could be a trip hazard for blind or visually impaired people.
4. It might be best to have a mix of seating; some with backs, some without, some with arms, some without. None should be too low or too high. There should be a “clutter zone” for street furniture so that people know where they can walk safely, if they cannot see, or if they have dementia, etc. Colour and contrast is very important for people who have trouble with vision or cognition.
5. Tree pits could be a trip hazard and also dangerous for wheelchair users and those with walking difficulties if not carefully maintained and planned.
6. Shared footpaths are not at all popular with many disabled people, especially visually impaired or blind people.
7. Barrier matting must be suitable for wheelchair users and those who have walking difficulties.
8. I am very pleased to see a Changing Places facility included in the plan.
9. I am unsure if “Grasscrete” is suitable for wheelchair users and those with walking difficulties to move on.
10. Coloured tarmac and other differing types of paving would be useful for some people, especially in areas where cars and people will be in the same area.

- 4.19 **Planning Officer note:** The applicant confirmed that a number of matters including footpath surfaces, seating, lighting, barrier matting, colours of tarmac/ surfaces would be detailed at the next design stage and would be provided as part of submissions to discharge conditions. An amendment removed the grasscrete and replaced it with planting. It was confirmed that knee rails would be kept to a minimum.

Ecology

- 4.20 To be reported in an update.

Environmental Health

- 4.21 Noise generating development - The submitted noise assessment has been carried out in accordance with BS4142:2014 and the methodology has been correctly applied. The assessment concludes that the specific noise level of the proposed plant will not exceed - 10dB below the background noise and the rating level does not exceed the background noise so adverse impact on the local noise climate is unlikely. I therefore have no objections to the proposed plant subject to the following condition: N8 - Noise Levels of Plant/ Equipment Restricted.
- 4.22 Kitchen Extraction - odour - No further information is required due to the low risk cooking type that will take place (reheating).
- 4.23 Air Quality - Increased emissions - The air quality assessment concludes that there will be no adverse impact on air quality due to the proposed development as the transport assessment has concluded that there will be no increase in vehicle journeys in comparison to the existing leisure centre. I question that conclusion, as due to the significant improvement in facilities at the proposed new leisure centre, surely this will attract more customers who are likely to arrive by car? Will any electric charge points be provided in the car park?
- 4.24 Contaminated Land - The contaminated land risk assessment concludes that gas protection measures will be required. Therefore, a condition is recommended for further details on the proposed remediation scheme to be submitted for approval.
- 4.25 Some contaminants have been found in the soil but these are not higher than the threshold values for the proposed use. However, has this taken into account the proposed new children's play area?
- 4.26 The locations sampled are under the proposed building footprint. Have the areas of soft landscaping been sampled and taken into account in the risk assessment?
- 4.27 Recommended conditions: Land Gas - remediation scheme submission and implementation; CO6 - Unidentified Contamination.
- 4.28 Light - I am satisfied with the design of the proposed lighting scheme subject to the following condition: N21 - Hours of Operation (External Lighting).
- 4.29 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.

Conditions are recommended for the submission and approval of a construction method statement, hours of construction and demolition, and no burning on site.

- 4.30 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. A condition is recommended.
- 4.31 ***Planning Officer Note:*** The applicant provided a response to the issues raised by the Environmental Health (EH) Officer with regard to confirming:
- That a number of existing facilities would not be replaced, which would reduce the overall user numbers;
 - There would be 40 no. designated electric vehicle sharing points;
 - That with regard to contaminants there were no samples tested directly where the play area will be located, along with some other areas of proposed soft landscaping, because the current leisure centre building envelope covers these areas. In order to address concerns about possible soil contamination in these (currently) inaccessible areas, it is proposed that samples are taken once the existing building is demolished. If results come back with exceedance for “Park” threshold in these areas, it is proposed to remove 600mm thickness of ground locally and replace with new granular material and topsoil, or similar through agreement with the EHO. Elsewhere on the site there have been no exceedances for the “Park” threshold.
- 4.32 The EH Officer confirmed that the response was satisfactory and that a further condition requiring further sampling would be required.

Natural Environment (tree officer)

- 4.33 *A summary of the original comments are as follows:* Trees - The Arboricultural documents confirm that 18 ‘C’ category trees will require removal to facilitate the development (building, car park, access or landscaping) and a further 6 trees require removal on arboricultural grounds - total 24.
- 4.34 I have concern over the felling of a few trees, which appear to be healthy. A plan needs to be submitted, which shows all trees (including those to be removed). Further discussion is required about potentially retaining some of these trees.
- 4.35 I note that several public comments have pointed out that some trees have not been included in the survey. Specific comments were received from Caversham Globe [Their comments in full below]. An

amended tree survey and AIA are required to respond to the queries raised to include the missing trees or explain their omission.

4.36 As indicated in the Arboricultural document, an Arboricultural Method Statement will be required which will need to cover all phases of development.

4.37 Landscaping - Landscaping principles have been provided which are generally acceptable, but it is disappointing that no species palette has been provided. There are some factors that need to be considered in the final design:

- There is no mention in the SUDs section about potential trees and SUDs combined - the two can be mutually inclusive. This should be the default option in order to provide greater wildlife benefits and a complete redevelopment provides the opportunity for creative landscaping to include SUDs rather than just the provision of underground attenuation tanks - the drainage strategy should be reconsidered.
- Tree Planting across the car park (avenue either side of walkway) - the provision of soft beds for these trees is positive. The soil volume provision of these beds will need to be provided to demonstrate that it is sufficient
- Tree species - I note the intention to plant all native trees, which is positive, however the planting palette can include some non-natives as long as they are wildlife friendly. Inclusion of exotic species will be necessary long term to create a greater tree stock diversity and resilience to climate change. Large canopy trees should be included wherever feasible for maximum environmental benefits. Some evergreen tree species should be included, particularly on the northern side, to help provide all year-round screening. The overall landscaping (trees) should aim and demonstrate that it follows the 30:20:10 ratio, i.e. no more than 30% from any one family, 20% from any one genus and 10% from any one species. It should also be demonstrated that there will be a net gain in tree number (a 2:1 has been suggested in the submissions).
- Future submission will need to clarify the works to the retained trees along the culvert/ditch and habitat improvements along this area.

4.38 Visual impact (from the Thames / Major Landscape Feature - The land to the north and west of the site is designated under policy EN7 of the Local Plan as a 'Local Green Space & Public Open Space'. Policy EN11 relates to Waterspaces.

4.39 The redevelopment of the site is a major development in that it will be in place for many decades so is a 'once in a generation' opportunity to vastly improve, not just the facilities, but the

appearance of the building. This is extremely important given the adjacent Major Landscape Feature and likely views across the river from Caversham Court and the St Peters Conservation Area.

- 4.40 I can understand the principle of use of lighter cladding at a higher level as this will blend better into the background/sky. However, it is reasonable to question whether the cladding is the most appropriate material that could be used adjacent to this important natural setting. It is particularly disappointing that nowhere on the building have green walls or roofs been proposed given the setting - the use of these is supported by our SPD Sustainable Design and Construction, our revised Tree Strategy and Revised Biodiversity Action Plan. I don't consider that the proposal has maximised its response to the setting or the biodiversity opportunities.
- 4.41 In conclusion, there are a number of matters that require further consideration in order to fully respond to our tree, landscape and biodiversity aims and policies and to better reflect the setting of the proposal. I support the principle of the development in tree and landscape terms, but work is required to ensure that it fully meets policies and to be a building for Reading to be proud of now and in the future, in view of the town's green aims.
- 4.42 **Planning Officer Note:** Following an amended AIA and responses to issues raised the Natural Environment Officer advised that *"there are some trees shown for removal, which are established trees either planted by the Council or tree wardens, and as tree establishment has been difficult in this area it would be a pity to relocate or remove and replace them if minor adjustment to the design could be made to accommodate their retention."* Although the arboricultural issues had mostly been addressed with the amended AIA the Officer specifically asked if the following could be considered:
- 1) Whether the proposed extension to the bund, which runs east-west north of the demountable pool, could be shortened to enable the retention of an Aspen tree on the Thames Promenade?
 - 2) Retention of a tree close to the existing play area.
 - 3) Amendment to the shape and extent of the bund to enable the retention of some or all of 3x London Plane trees.
 - 4) Acknowledgement of the younger trees established planted by tree wardens.
- 4.43 Further amended details were provided as documented in the Landscape Section below. The Officer maintained their position with regard to SUDS provision and green walls/ roofs.

SUDS Manager

- 4.44 The submitted drainage assessment has proposed a 50% reduction on the discharge rate for the 1 in 100 rainfall event which is deemed acceptable. However, the DEFRA standards states the following:

“S3 For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”

- 4.45 The application includes no assessment of the 1 in 1 year event and therefore this would need to be clarified that during this event, a betterment would be provided at the very least. I would be happy with this to be in the form of a written statement, with full details provided by way of a condition.

- 4.46 **Planning Officer note:** Following confirmation from the applicant that *“...the proposed centre and associated hard landscaping provide a smaller impermeable area than the existing centre. Any storm water flow off the new development are attenuated and the flow is restricted. Therefore, the development will provide betterment to the 1 in 1 year storm event when compared against the existing discharge rates.”* The SUDS Manager confirmed that further detail would be required of the 1 in 1 year event to confirm the discharge rate, but this could be dealt with by condition: SU7 (Sustainable drainage to be approved), and SU8 (Sustainable Drainage to be implemented) the scheme was acceptable subject to conditions.

Thames Water

- 4.47 In summary:
- Waste Comments - With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.
 - Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
 - Thames Water recommends an informative: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

RBC Transport Strategy

- 4.48 The application site is currently occupied by the Rivermead Leisure Complex. The Rivermead Leisure Complex site is accessed via the

northern arm of the Richfield Avenue/Tessa Road roundabout which is provided along the southern boundary of the site. The main car park for the leisure centre is provided to the east of the existing leisure centre building providing 369 parking spaces. There are two further parking areas to the south of leisure centre providing an additional 202 overspill parking spaces.

- 4.49 The proposals are to redevelop the existing Rivermead Leisure Complex site to provide a new leisure complex with a new 25 lane competition swimming pool, café, soft play room, six court sports hall and gym. The existing demountable pool will be retained to the north of application site located adjacent to a new children's play area.
- 4.50 A Transport Assessment has been submitted with the application. Table 4.1 outlines the existing and proposed facilities at Rivermead Leisure Complex. The majority of the facilities will be retained with some of the facilities such as the sports hall being reduced in both size and capacity, and some elements of the existing offering being lost as a result of the proposals.

Table 4.1: Rivermead Leisure Complex Existing and Proposed Facilities

Facility	Existing	Proposed
Demountable swimming pool	✓	✓
Lagoon swimming pool	✓	✗
Sports hall	✓ x10 badminton courts	✓ x6 badminton courts
Event space (standing 1,650/seated 1,800)	✓	✗
Squash courts	✓ x3	✗
Indoor bowls hall	✓	✗
Creche	✓	✗
Multi-purpose artificial pitch	✓	✓
Gym	✓ 120 stations	✓ 125 stations
Cafe	✓	✓
Competition swimming pool	✗	✓
Teaching/diving pool	✗	✓
Parking	596 total provision	390 total provision

- 4.51 Although the competition/diving pool represents a new offering, it is stated that the programme of swimming sessions and events at the centre is to remain the same and split across the retained demountable pool and the new competition pool so the use of each will be less intensive than the current usage. It is important to note that although the same programming is to be retained the timetabling of classes and events may be subject to change.
- 4.52 To accompany the planning application a Transport Assessment has been submitted and I comment on this as follows:

Site Accessibility

- 4.53 The site is located within the existing Rivermead Leisure Centre complex and benefits from the existing network of footways to

Richfield Avenue and the Thames Path. The Thames Path runs along the river north of the site.

- 4.54 Richfield Avenue is lit and served with footways approximately 1.5-2.0m wide on both sides of the carriageway. Pedestrian refuges are provided along the route and a pelican crossing is present 395m east of the site access, near the roundabout with the A4155.
- 4.55 An assessment of the pedestrian facilities has indicated that all signal-controlled pedestrian crossings have an audible signal for those with a visual impairment whilst tactile paving and dropped kerbs are provided at all local junctions and pedestrian crossing points.
- 4.56 Continuous cycle connections are provided from the site to the various surrounding residential areas. The R40 route is a locally signed cycle route connecting Emmer Green and Caversham Heights to the Rivermead Leisure Complex. It runs from the north across Caversham Bridge and along the shared pedestrian/cycle footway on Richfield Avenue. NCN Route 5 is provided adjacent to the River Thames approximately 660m east of the site.
- 4.57 In terms of public transport, there is a single bus stop immediately outside the site. It is served by the 42 and the 60a with a 40 minute frequency in core areas.
- 4.58 Overall the proposed development is in a sustainable location that allows for alternative modes of travel to be utilized to access the site.

Proposed Development Trip Generation

- 4.59 The proposals are to redevelop the existing Rivermead Leisure Complex site to provide a new leisure complex with a new 25 lane competition swimming pool, café, soft play room, six court sports hall and gym, alongside the existing demountable pool which would be retained as part of the proposed scheme. The existing multi-purpose artificial 3G football pitches would also be retained.
- 4.60 Due to the ongoing COVID-19 pandemic, the Rivermead Leisure Complex site is not fully operational. It is therefore agreed that the existing trip generation of the site can be calculated using the 2016 Automatic Traffic Count Survey (ATC) data used as part of the planning application for the demountable swimming pool on the site (App ref: 162323).
- 4.61 As the majority of the existing uses are to be retained as a result of the proposals and the events / classes are to remain as existing with the same clubs / societies utilising the facilities, the baseline traffic generation figures derived from historic operational information of the existing site would be applied to the new proposals.

- 4.62 As stated previously, the proposed leisure centre is to serve generally the same purpose as the existing Rivermead Leisure Complex. Therefore, the proposed 25 competition lane swimming pool is considered to be the sole additional trip generating element of the proposed redevelopment in this assessment.
- 4.63 However, it is stated that the existing classes/events timetable currently accommodated by the demountable pool would be split across the two pools once the works are complete with no notable intensification of swimming events proposed. The diving/teaching swimming pool is also considered to be ancillary to the new 25m swimming pool and therefore it is not considered that this element of the development would generate any additional trips to the site. Therefore, the proposed development is therefore not forecast to generate significantly more trips than the existing leisure centre uses on the site given that the programme of swimming sessions and events is intended to stay largely the same.
- 4.64 The redevelopment proposals are not forecast to generate a material increase vehicle movements to and from the site and, therefore, the site operation of the access junction and local highway network would not be impacted by the development proposals.

Access

- 4.65 Vehicular access to the site from the local highway network will continue to be served via the Richfield Avenue/Tessa Road roundabout to the south the site. All internal access roads are to measure 6m in width allowing two-way vehicle movement throughout the site.
- 4.66 An annotated plan showing the proposed layout and access arrangements of the development proposals are included at Figure 4.1 of the TA. It is indicated that the main car park access routes will operate as a in/out arrangement. However, no directional signage or markings has been illustrated on the proposed site plan to ensure that priority movement is given to vehicles entering the site to prevent vehicles queueing back to Richfield Avenue. This needs to be addressed but I am happy for the details to be covered by condition and submitted prior to occupation.
- 4.67 The layout includes the provision of two dedicated setting down/drop off spaces adjacent to the main entrance of the building. The existing vehicular access route to overflow parking to the west of the main access, adjacent outdoor activity centre will remain in its current position. The access route to the overflow parking to the east of the main access road will be repositioned and slightly staggered to improve priority.
- 4.68 Internally, footways and footpaths are to be provided within the site with zebra crossing facilities provided linking the car park to the new building access and a landscaped public realm area adjacent to the

building frontage. This area of public realm will link to the existing footpaths providing connections to the Thames Path.

- 4.69 22 disabled parking spaces are sited close to the building entrance. Level access will be provided from the disabled parking spaces to the building entrance for visitors using mobility assistance such as wheelchairs, electric scooters and for carers with buggies.
- 4.70 Cyclists would continue to access the site via the northern arm of the Richfield venue/Tessa Road roundabout with connection to the existing cycling routes on Richfield Avenue.
- 4.71 Swept path analysis has been carried out for the vehicular access and is deemed acceptable.

Parking

- 4.72 In accordance with the NPPF, development should provide car parking and cycle parking that is appropriate to the type, mix and use of development; accessibility of locations within the Borough to sustainable transport facilities, particularly public transport; and local car ownership levels.
- 4.73 Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. It goes on to say that ensuring the appropriate level of car parking in new developments involves striking a careful balance. On the one hand, it is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway and public transport network through on-street parking. On the other hand, an over-provision of car parking, particularly at places of work, can lead to less sustainable travel choices.
- 4.74 Local parking standards are set out in the Council's Revised Parking Standards and Design Supplementary Planning Document (SPD). The site is located in Zone 2, Primary Core Area, which directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading.
- 4.75 There are no specific parking standards for leisure complexes such as that provided at Rivermead however maximum parking standards are provided for some of the individual elements within Rivermead Leisure Complex. These are set out in Table 4.2.

Table 4.2: RBC Parking Standards

Facility	Parking Standard (Zone 2)
Playing Fields	12 spaces per hectare of pitch area
Swimming Pools	1 space per 7.5 fixed seats & 1 space per 15 m2 pool area
Health Clubs/Gymnasiums	1 space per 35 m2

4.76 The Reading BC Revised Parking Standards and Design SPD also outlines the suggested level of accessible and family/toddler spaces for developments in all zones as follows:

- Up to 200 spaces provided - 3 disabled spaces or 5% of total capacity, whichever is greater; and
- Up to 200 spaces provided - 2 spaces or 4% of total capacity, whichever is greater.

4.77 In addition to the above, RBC Local Plan Policy TR5 states that 10% of car parking spaces provided should provide an active charging point for Electric Vehicles (EV).

4.78 The proposed leisure centre is to serve generally the same purpose as the existing Rivermead Leisure Centre with a reduction in dry facilities (including the removal of the large event space provision) and an increase in wet facilities (including a splash pad, an 8-lane competition pool and a teaching/diving pool.) It is stated that the programme of swimming sessions and events at the centre is to remain the same and split across the retained demountable pool and the new competition pool so the use of each will be less intensive than the current usage.

4.79 As there are no specific parking standards for sports complexes and the parking standards for individual uses do not cover all of the facilities provided, parking levels for the proposed development have been calculated using historical data including both an ATC and parking beat survey that were conducted at the site in October 2016 as part of the consented planning application for the demountable pool app ref; 162323. Given the ongoing COVID-19 pandemic, this approach is acceptable.

4.80 The daily profiles of total vehicle arrivals and departures to and from the proposed Rivermead Leisure centre redevelopment have been used in order to predict the peak level of parking required at the site during a Monday (busiest day at the centre) and a Saturday. The resulting Monday parking accumulation is presented in Table 5.4.

4.81 The above parking accumulation indicates that there is likely to be a maximum parking demand of 369 parking spaces by the proposed redevelopment at any one time during an average Monday.

4.82 The Saturday parking accumulation is presented in Table 5.5.

- 4.83 The above parking accumulation indicates that there is likely to be a maximum demand of 270 car parking spaces during an average Saturday at the redeveloped Rivermead Leisure Complex site.
- 4.84 A total of 112 standard car parking spaces are to be provided within the new main car park with an additional 22 dedicated disabled bays, 14 family/toddler spaces and 40 Electric Vehicle charging spaces. In addition to the new main car park it is proposed that the existing overflow car parks to the south of the Rivermead Leisure Complex site are retained as part of the proposals. These overflow car parks provide an additional 114 and 88 standard car parking spaces respectively.
- 4.85 Overall a total of 390 parking spaces will be provided on site. All standard car parking spaces are designed to be 2.5m x 5m whilst all disabled and family parking bays are designed to be 2.4m x 4.8m with a 1.2m buffer to the side and to the rear in line with guidance set out in the RBC Revised Parking Standards and Design SPD.
- 4.86 The provision of 390 car parking spaces across the site is therefore considered appropriate to serve the proposed development.

Cycle Parking

- 4.87 The standards for cycle parking are also contained within the Revised Parking Standards and Design SPD. There are no specific standards applicable to the site as a whole with only standards for individual facilities provided, however these do not cover all of the facilities offered at the site.
- 4.88 To identify what level of cycle parking would be required the applicant has undertaken a review of the multi-modal trip rates obtained from TRICS and this indicates that a forecast 3% of patrons travelling to the proposed redeveloped leisure centre would do so by cycle.
- 4.89 Based on 3% of visitors to the site cycling a total of 27 cycle parking spaces could be required during the peak accumulation time at the site.
- 4.90 A total of 40 cycle parking spaces in the form of 20 Sheffield stands are proposed for the redevelopment of the Rivermead Leisure centre located in close proximity to the building entrance. It appears that 10 cycle parking spaces will be provided within a covered enclosure. Full details should be covered by condition (*Planning officer note - all proposed cycle spaces would be covered*)

Servicing

- 4.91 The bin store and substation is to be provided adjacent to a turning head north of the new car parking areas. Service vehicles would enter the site from the Richfield Avenue/Tessa Road roundabout and continue north along the main access road towards the north of the

car parking before turning right up a ramped access road which provides access to the turning head adjacent to the bin store and substation.

- 4.92 A secondary servicing area is also provided directly adjacent to the eastern frontage of the leisure centre building. A turning head is provided to allow a service vehicle to enter and exit the site in a forward gear.
- 4.93 Swept path analysis of the site servicing arrangement has been reviewed and is deemed acceptable.
- 4.94 There are no transport objections to this application subject to the following conditions: Construction Method Statement, vehicle parking as specified, vehicular access as specified, cycle parking to be approved, refuse and recycling, EV charging points, a plan to show direction signing and markings within the car park, and a highways informative.

Public consultation

- 4.95 The consultation undertaken with RBC's Planners, stakeholders, and statutory consultees, prior to the submission of the application, is fully detailed in Section 8. of the submitted Integrated Planning, Design and Access Statement.
- 4.96 Following the submission of the application the scheme was presented to the Sports Forum on 21st January 2021, with the opportunity for questions, and included the following organisations:
 - Reading Roadrunners
 - Burghfield FC
 - Reading Athletics Club
 - Reading Rockets Basketball
 - 5 a-side and walking football
 - Reading Judo Club
 - Reading Underwater Hockey
 - Albatross Diving Club Reading
 - Rivermead Badminton Club
 - Reading Swimming Club
 - Reading FC Community Trust
 - Sport in Mind
 - Woodley Untied FC
 - Meadway and Rivermead Squash Club
 - South Reading Football Club
- 4.97 The following addresses were consulted and site notices were displayed:
 - The Boathouse, 1 Thameside Promenade
 - The Toby Carvery, Richfield Avenue
 - Express By Holiday Inn Reading, Richfield Avenue
 - Premier Inn, Richfield Avenue
 - Crowne Plaza Hotel
 - 14-18 (even) & 20-22, 24, 26, Richfield Avenue

- Kwik Fit, Richfield Avenue
- Unit 3-5 Tessa Road
- Reading Festival
- 8 Tessa Road

4.98 A video of the proposals was available to view online via the RBC and Get Reading websites from 3rd February 2021, which was a joint approach by the applicant and RBC, Leisure.

4.99 3 no. objections and 7 no. observations were received. Full neighbour/organisation consultation comments are available to view on the Council's website. A summary is provided below:

- The buildings will be more visible in the winter when there is no leaf canopy.
- The building will extend further east and will be more visible than the present building.
- Further planting will be required to extend the current screening belt around the demountable further east to the north of the existing play area.
- Proposed removal of a number of mature and semi-mature trees is a concern especially those more recently planted, which struggled to establish and are only now beginning to put on growth. Mature trees should be kept.
- Not all trees are shown on the landscaping plan.
- A green roof would help meet environmental aims.
- It should be of a more appropriate design & cladding material for this highly sensitive riverside park setting. Blue and white cladding would make the building stand out and would not enhance the aesthetic. Suggestions of natural greens, browns, off white would be more appropriate.
- Pool too small should be 50m
- Spoil mounding and landscaping must not increase flood risk.
- Could trees in the car park be placed to avoid 'doughnuts'?
- It is disappointing that a number of properties have been missed from the Built Heritage Townscape & Visual Impact Appraisal report.
- Timber knee rails are not sufficient to stop vehicles accessing the Thames Promenade, they should be metal.
- A number of conditions applied to permission 162323 [demountable pool] should be applied - use of the land should only be for sport and leisure and not for concerns, films etc, hours of construction, 10-year landscape management plan, no increase in flood risk, building should be green.
- The loss of squash and bowls at Rivermead is extremely unwelcome.

Caversham Globe

4.100 **Planning Officer** *note:* Their comments mostly related to landscaping details. In summary they stated:

- Plans seem to indicate that a number of trees will be removed. The plans therefore need to clarify that they will be retained and protected - Specifically: 1 x Aspen, 4 x Oaks, 6 x Lime and 1 x Field maple. The following are mature or semi-mature trees within the site which appear to be proposed for removal unnecessarily - 3 London Planes, 5 willows.

CADRA

4.101 CADRA welcomes this updating of a popular and well-used facility. Our comments concern its impact on views across the river from St Peter's Church, St Peter's Conservation Area and Caversham Court Gardens, and especially its landscaping.

1) The proposed building, while fairly standard for this type of facility, is an improvement on the existing and provides a welcome move of the main structure further from the river. We urge that great care is taken with the selection of external finishes, to avoid either bright colours or reflective surfaces, because of its continued high visibility from the Conservation Area etc. Local Plan Policy EN5 (Protection of Views with Heritage interest) identifies views upstream from Caversham Bridge as worthy of protection. The underpinning Views Study, at para 1.1.11, says that development within or on the fringes of the water meadows should be low rise and *of appropriate non-reflective materials*.

We welcome the statement in the supporting lighting analysis that upward glare will be avoided, and ask that this aim be rigorously pursued.

2) We note that the demountable pool is to remain. This is perhaps the least attractive part of the existing structure and is nearest to the river. The application appears silent on its treatment, and we suggest that low-cost means of reducing its impact (possibly as part of the landscaping) be investigated, unless this is just a temporary structure until the new pool is completed.

3) Our main point, however, concerns landscaping. The tone of the Design and Access Statement is strongly that Richfield Avenue is the 'front' of the development (see sections 4.1, 4.3.1 and 4.3.2, for example) and that the Thames frontage is 'round the back'. We feel the opposite emphasis would be correct: Richfield Avenue is never going to be a beautiful environment, but the Thames path could and should be. Given its proximity to the riverside walk and importance in sensitive cross-river views, landscaping of the northern side should therefore be one of the best-developed aspects of the project. However, the submitted details are scanty and consist of placing excavated spoil on top of existing mounds and planting on top of that, the details of which are largely absent.

We feel this is a serious missed opportunity. This riverside area is potentially of great benefit to Reading as a whole. This application,

and the proposed school just upstream, offer a unique chance to create a joined-up landscape plan for the whole of this riverside meadow area, to which these two proposals plus any subsequent ones can incrementally conform and contribute, along with any other ad hoc resources which might arise. It could also incorporate any essential festival needs, could include enhanced bio-diversity, and could investigate flood amelioration through planting. Such potential was partly recognised in the Council's Thames Parks Vision Statement of 2004.

The result would be a great improvement on the current rather barren appearance of this important asset and we urge that this opportunity should not be missed, rather than relying on separate, ad hoc and limited-impact landscaping for each project as it emerges. The Built Heritage, Townscape and Visual Impact Appraisal may well be correct in concluding that the proposals would have limited impact, in the sense of not making things worse, but it fails to identify the potential for making them considerably better. A bolder, more imaginative and above all comprehensive landscaping strategy for the wider area is the key to doing so.

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". The relevant sections of the NPPF are:

National Policy

- 5.2 National Planning Policy Framework (NPPF)
Section 2 - Achieving Sustainable Development
Section 6 - Building a Strong Competitive Economy
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

Adopted Reading Borough Local Plan - November 2019

- 5.3 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 CC4: Decentralised Energy
 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 EN7: Local Green Space and Public Open Space (EN7wp)
 Policy EN10: Access to Open Space
 Policy EN11: Waterspaces
 Policy EN12: Biodiversity and the Green Network
 Policy EN13: Major Landscape Features and Area of Outstanding Natural Beauty
 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 TR1: Achieving the Transport Strategy
 Policy TR2: Major Transport Projects
 Policy TR3: Access, Traffic and Highway-Related Matters
 Policy TR4: Cycle Routes and Facilities
 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
 Policy RL2: Scale and Location of Retail, Leisure and Culture Development
 Policy RL5: Impact of Main Town Centre Uses
 Policy WR3: Other Sites for Development in West Reading and Tilehurst (WR3d)

5.4 Supplementary Planning Guidance/Documents

- Employment, Skills and Training (Apr 2013)
- Sustainable Design and Construction (Dec 2019)
- Revised Parking Standards and Design (Oct 2011)
- Planning Obligations Under Section 106 (Apr 2015)

5.5 Other Relevant Documents

- Tree Strategy (2020)
- St. Peter's Conservation Area, Conservation Area Appraisal (Nov 2018)
- RBC Corporate Plan (2018)

6. **Environmental Impact Assessment**

6.1 Under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended¹) the proposed

¹

scheme falls under 10. Infrastructure Projects (b) Urban Development Projects, which includes the construction of shopping centres, car parks, sports stadiums, leisure centres and multiplex cinemas and the development would include more than 1 hectare. Therefore, under Regulation 6 the applicant submitted an EIA Screening request for the Local Planning Authority (LPA) to determine whether the scheme would have a likely significant effect on the environment for which a full Environmental Statement (ES) would be required. This was submitted alongside the submission of the full application, which is allowable under the Regulations.

- 6.2 It is the LPA's opinion that the proposed development does not fall specifically within the sensitive areas as defined under Regulation 2(1) of the Regulations. The National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) recognises that local designations, which there are in this case, may also be relevant in determining whether an EIA is required. The site is within a Major Landscape Feature and adjacent to a Local Green Space.
- 6.3 In order to determine whether a Schedule 2 project is likely to have significant effects a LPA must take account of the selection criteria in Schedule 3 of the Regulations. Not all of the criteria will be relevant in each case and the National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) states that *"Each case should be considered on its own merits in a balanced way"*.
- 6.4 The NPPG indicates that for urban development projects an EIA is *"unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination."* And the key issues to consider are *"Physical scale of such developments, potential increase in traffic, emissions and noise"*.
- 6.5 To determine whether a proposed development is likely to have significant effects on the environment a LPA needs to consider it against the selection criteria set out in Schedule 3 of the Regulations (included in Appendix 1 below), which cover characteristics of the development, the location of the development and types and characteristics of the potential impacts.
- 6.6 The LPA has assessed the submitted screening request (Gillings Planning, Ref: GLL1001 dated 1st December 2020).
- 6.7 In terms of characteristics the proposed scheme would be similar to the existing leisure centre and the overall built form would be slightly smaller than existing, and indeed would in itself be less than

1ha. It is therefore considered it would be of an appropriate scale in relation to the site and surrounding area.

- 6.8 The focus of the proposed scheme would reflect a more sustainable modal shift and is likely to have fewer impacts compared to the existing development.
- 6.9 It is not considered that there would be significant environmental effects with respect to landscape and visual impacts, and any effects and mitigation could be adequately addressed through the submission and assessment of standard technical documents as part of the planning submission.
- 6.10 The proposal would use a previously developed site in an established urban area and would not have an impact on the absorption capacity of the natural environment.
- 6.11 It is not considered that the types and characteristics of the potential impacts of the proposed scheme would be significant and not considered likely to extend beyond the immediate environs of the site nor of a scale likely to give rise to significant environmental effects. **The LPA therefore, considers that the proposed development is not EIA Development and an Environmental Statement is not required.**
- 6.12 It is considered that the potential impacts associated with the proposed scheme can be adequately addressed through the application submission documents as part of this application and any effects capable of being mitigated.

7 APPRAISAL

The main matters to be considered are:

- **Principle of Development**
- **Design considerations and the effect on the Major Landscape Feature, Heritage Assets and Open Space**
- **Transport/ Parking**
- **Landscaping, Ecology & Open Space**
- **Sustainability**
- **Environmental Matters - Contamination, Flood Risk, Air Quality & Noise**
- **Infrastructure requirements**
- **Other Matters**
- **Equalities impact**

Principle of Development

- 7.1 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the

presumption in favour of sustainable development, which lies at the heart of the National Planning Policy Framework (NPPF).

7.2 It goes on to state that *“Planning applications that accord with the policies in the development planwill be approved without delay, unless material considerations indicate otherwise.....”*

7.3 The proposed site is a specific allocation under the Reading Borough Local Plan (RBLP) Policy WR3d:

“Additional development to improve the town’s leisure offer, including new swimming provision. Development should:

- Address any contamination on site; and*
- Address flood risk issues arising from a Flood Risk Assessment.*

3.75 ha Additional leisure floorspace”

7.4 Paragraph 86 of the NPPF states that *“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.”* As the proposed scheme would accord with an up-to-date plan with respect to it being an allocated site under WR3d no sequential test will be required in this instance. However, the proposal itself will need to meet other policy requirements as identified below.

7.5 The general principle of re-use for a new leisure centre would therefore be acceptable and Policy WR3d has been subject to sustainability appraisal as part of the local plan process.

7.6 The need for a replacement leisure centre at Rivermead forms part of the conclusions of a borough-wide assessment of leisure provision, and part of a long- term leisure contract.

7.7 The three overarching objectives to achieving sustainable development within the Framework are defined as economic, social and environmental. The economic role requires proposals to contribute to building a strong, responsive and competitive economy. The social role requires planning to support strong, vibrant and healthy communities and a high-quality built environment. The environmental role requires the natural, built and historic environment to be protected and enhanced with mitigation and adaptation to climate change; this will be addressed below.

7.8 The proposals would contribute to economic activity both through the construction period and as part of the ongoing operation of the leisure centre.

7.9 In terms of social, the provision of a new leisure centre responds to leisure needs, which have been assessed as part of a borough-wide approach. Paragraph 91 of the NPPF specifically supports planning

decisions which achieve healthy places and: *“enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”* (91 c)). Para 92 states: *“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments”*; and b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community...”

- 7.10 The provision of leisure would also accord with a number of corporate priorities as set out in the Council’s Corporate Plan 2018 - 2021 (refreshed in June 2019), including: ‘Promoting health, education, culture & wellbeing’. This is further reflected in the RBLP objectives (Para. 2.2.2):

3. Improve the quality of life for those living, working, studying in and visiting the Borough,with good access toservices and facilities (such as, sport and recreation, etc.) to meet identified needs;

8. Offer outstanding cultural opportunities, which are based on leisure and visitor facilities;

- 7.11 Reading Borough Local Plan (RBLP) Policy RL2: Scale and Location of Retail, Leisure and Culture refers specifically to the need for replacement swimming facilities and replacement of the existing leisure centre with a pool on the same site would meet policy and Policy RL6: Protection of Leisure Facilities and Public Houses.

- 7.12 In conclusion, the principle of the use of the site for a replacement leisure centre is acceptable and this importance is reflected in the specific site allocation in the RBLP. The remainder of this report therefore considers the proposed development against other relevant policies, including with respect to contamination and flood risk, as specifically set out within the allocation policy; design, impact on the major landscape feature, as well as sustainability and energy efficiency standards, which are addressed in the sections below.

Design considerations and the effect on the Major Landscape Feature, Heritage Assets and Open Space

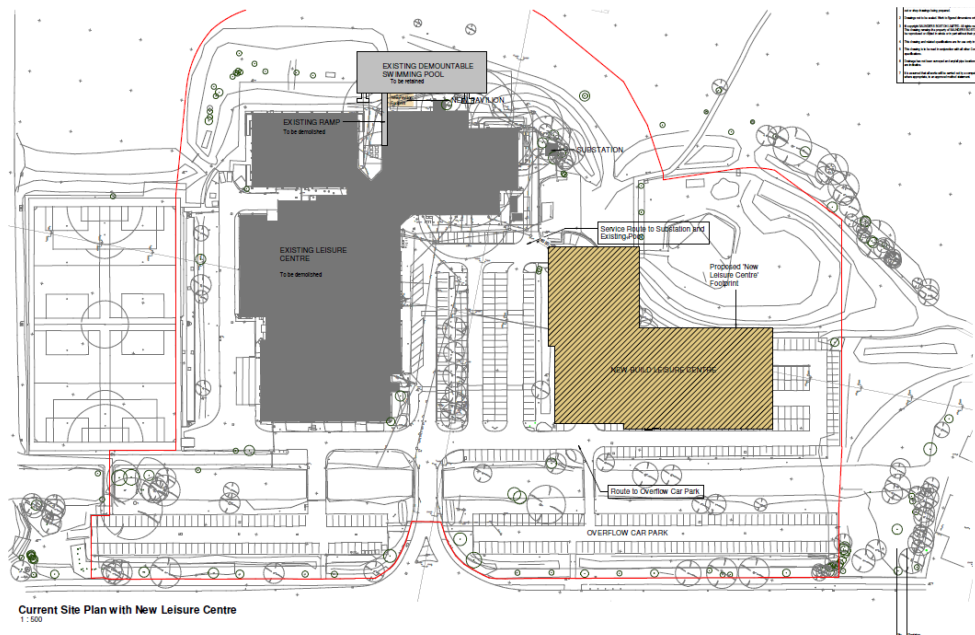
- 7.13 Paragraph 124 of the NPPF states that *“Good Design is a key aspect of sustainable development”* and that schemes are *“visually attractive as result of good architecture and appropriate landscaping; are sympathetic to local character and history,*

*including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change” and “create places that are safe, inclusive and accessible and which promote health and wellbeing..”*The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.

- 7.14 The Government’s National Design Guide identifies a number of characteristics to consider in achieving good design, and one of these relates to the context of a site where well-designed development is that which *“responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones.”*
- 7.15 RBLP Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.”
- 7.16 The proposed site is within the Thames Valley designated Major Landscape Feature (MLF under Policy EN13), and in close proximity to the River Thames (Waterspaces Policy EN11), and includes part of, but is mostly adjacent, to the Local Green Space of the Rivermead and Thameside Promenade (EN7Wp).
- 7.17 Policy EN13 states that *“Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.”* It goes on to state that *“the extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals.”* The supporting text states that the policy *“does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.”*
- 7.18 Under Policy EN11 there is the requirement for water spaces to be protected, enhanced and that *“there will be no adverse impact on the function and setting of any watercourse and its associated corridor”.*
- 7.19 Policy EN7 identifies that proposals will not be permitted that *“erode their [Local Green Space’s] quality through insensitive adjacent development....”.*
- 7.20 The wider environs include Caversham Court Gardens, a Grade II Listed Registered Park and Garden, and the St. Peter’s Conservation Area. Policy EN1 states that *“Historic features, areas of historic*

importance and other elements of the historic environment, including their settings will be protected and where possible enhanced". Specifically with regard to Historic Parks and Gardens it states "*Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.*" The Conservation Area Appraisal also identifies the importance of views to and from it.

- 7.21 The submission includes a Design and Access Statement and A Built Heritage, Townscape and a Visual Impact Appraisal. (BHTVIA) The latter considers the effect of the proposed scheme on the character and appearance of the MLF and on views into and across it from the St. Peter's Conservation Area including from Caversham Bridge, The Thames Promenade and Caversham Court Gardens.
- 7.22 The applicant has referenced a suite of design guidance, as set out in section 4.2 of the DAS, which has informed the design, including a whole range of Sport England design guides and design standards set by National Governing Bodies (NGBs). The overall design approach is therefore, strongly defined by the specific requirements for particular spaces and functions for a leisure centre, which leads to large rectangular spaces. The activities within then further limits the options for creating vistas into and out of the facility.
- 7.23 It has also been necessary to consider the buildability of the scheme and to take account of access requirements for the Reading Festival and other Thames Park events, as well as siting the proposed building to enable the retention of the existing leisure centre during the construction. The proposed scheme has also sought to include measures to contain the overall footprint, such as including the use of bleacher seating for spectator seating.
- 7.24 Measures to ensure the sensitive treatment of the site in the context of the MLF have also been fully considered and incorporated into the overall design approach and are described further below.
- 7.25 The proposed building would be a contemporary flat roofed design located to the east of the site on the existing parking area. It would include three connected key buildings in an 'L' shape: 'hub', sports hall, and swimming pool. The hub forms the central proportion with the other two wings running north-south and east-west from it. The functions of the building would require large volume spaces and the layout proposed is with the aim of breaking up the overall mass.



Proposed leisure centre overlaid on existing site plan

7.26 The surrounding scale of buildings comprises two storey commercial buildings on the opposite side of Richfield Avenue and to the east the three storied Premier Inn and Crowne Plaza, slightly higher than the proposed. Overall the siting and scale and form is considered to respect the location and scale of neighbouring buildings, including the emerging school site to the west, would not be overbearing and would provide a better frontage and improved streetscape to Richfield Avenue.





- 7.27 It would have a maximum height of 12.5m (to the top of the roof top plant enclosure), which is slightly lower than the existing building (the stair towers and sports hall are approximately 13m high). Its overall footprint would be slightly smaller than the existing leisure centre, making it less prominent. The retained demountable pool, which is approx. max height of 7.7m would be to the northern side of the proposed car parking area, and the retained external courts (outside the reline) would be to the west.
- 7.28 A new plaza, including outdoor seating, would link the proposed building and the existing demountable and provide an active public realm to the site and a welcoming entrance and meeting area, which would be in stark contrast to the existing leisure centre with its entrance set a long way back and with no public space to the front



- 7.29 It is also proposed to enhance the existing entrance to the demountable pool, which is currently at over 1m above surrounding ground levels. The proposal includes new landscaping mounding to the front of the demountable and on top of this a modular entrance pavilion to provide a secure entrance for the building.
- 7.30 The smaller sports hall building would be the wing running north-south, and would be sited closest to the MLF, with the main mass of the building positioned further from the Thames and the MLF, as a means to improve its impact on the wider area. In addition, the proposed landscaping scheme would incorporate several screening measures to break up the visual impact of the proposed building. There are existing tree belts along the banks of the River Thames. There would be enhanced tree planting and mounding on the northern side to create further screening of the proposed scheme when viewed from the north. There is a current tree belt of mature trees on the north-eastern side and between this and the building an

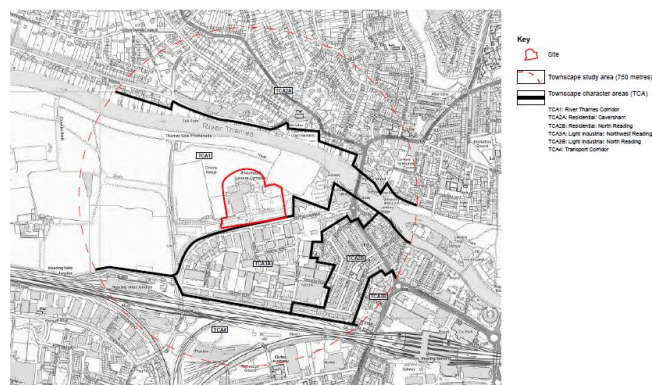
existing mound would be landscaped higher and excavated material and new soft landscaping put on top.

- 7.31 The demolition of the existing leisure centre and the siting of the proposed building to one side would open up the site and views into the MLF from Richfield Avenue, providing an enhancement to the visual links to the surroundings through the site. In contrast to the existing building, which has limited openings within the cladding, apart from high level strip windows, the proposed scheme would maximise openings, including windows front and back creating visual links through into and from the buildings, which would improve the appearance and overall presence on site.
- 7.32 In addition, the proposed building would be sited considerably closer to Richfield Avenue (80m from the access junction compared to 140m at present) which would improve its presence to the street and would allow greater public legibility with the main entrance hub closer to the road. At present, the building is somewhat hidden within the car park.
- 7.33 In terms of providing a welcoming public building the 'hub' would be given prominence through being taller than the wings either side. It would be differentiated from the other two wings, both through the use of materials and colours (dark blue and slate), but also the level of glazing, and signage. It would have a double height activity zone with full height glazing, a projecting roof with dark grey cladding, supported by angled columns with a timber soffit, and brise soleil feature. It has been designed deliberately so that it faces on to the car park entrance with the main pool hall running parallel with Richfield Avenue. The main entrance would have a small lightweight canopy with contrasting yellow/gold cladding to provide a clear entrance point. This would further provide a focal point for the building.
- 7.34 There would be a more active frontage created on the southern side, towards Richfield Avenue achieved with signage, and glazing at ground floor, to allow views out and some visibility of the activities within. Further interest to this elevation would be created through a vertical strip of glazing to the diving area and floor to ceiling glazing would be included to the fitness suite at first floor. This would make clear its function and would create a much more positive and welcoming appearance to the proposed building than the current leisure centre.
- 7.35 There would be a proposed plaza to the western side adjoining the main entrance and 'hub', which would be a pedestrian space, which would include seating, and landscaping.
- 7.36 Access to the main entrance for pedestrians would be enhanced with the extension of the pedestrian pavements, either side of the existing road bridge over the culvert, into the new car park area and

to link with the new footpath through the car park to the main entrance. There would new pedestrian paths to the north and east of the centre to link to the Thames Path and the wider Rivermead Park. These additions to the paths would create an enhanced network of pedestrian and cycling accessibility, and would serve to remove the dominance of the present parking area

- 7.37 Some of the consultation responses raised concern with the colour, design and longevity of materials. A minimal palette of materials are presented with the elevations to the sports hall and swimming pool largely comprising white composite panels with dark grey brick plinth. These materials have been chosen because of their longevity and sustainability: high thermal performance, high levels of air tightness, and their suitability for a corrosive atmosphere. The design incorporates elements of dark blue panels to ground floor elevations with lighter panels above. The blue is incorporated to reflect the nearby watercourse and make clear its function as including a swimming pool. Having lighter cladding to the upper levels, with a random pattern of grey panels is intended to reduce the visual impact and to be more sympathetic to the surroundings than the current leisure centre building. Imagery is provided below to demonstrate this point. The visual impact of the buildings is further addressed below within the context of the MLF, heritage assets and the Conservation Area. It is considered that other colours would make the building more visible.
- 7.38 The design is considered to incorporate good quality landscaping within and to the edges of the site, and within the parking area too, and with good and safe connections through the site to the proposed building and the existing demountable pool building. The landscaping is detailed within the section below. The landscaping scheme presented would create an enhanced appearance to the site.
- 7.39 A Built Heritage, Townscape and Visual Impact Appraisal (BHTVIA) was submitted and is considered to provide a thorough and robust assessment of the potential impact of the proposed development on the significance of heritage assets, townscape character and visual amenity, from visual receptors at the site and its surroundings. This includes with respect to the effect on the character and appearance of the MLF and views into and across the St. Peter's Conservation Area, including from Caversham Bridge, the Thames Promenade and the Grade II listed Park and Gardens of Caversham Court Gardens.
- 7.40 It should be noted that although the study was undertaken in the Autumn, in line with best practice, the consultant appraised the visual effects, relating to when there would be the highest degree of visibility, which would normally be during the winter months when deciduous trees would be bare of leaves. The BHTVIA was based on access to publicly accessible areas, and although potential effects from properties were considered the nearest publicly accessible location was used.

- 7.41 The site itself has no Heritage Assets (HA), but those within 500m of the proposed site are assessed. An assessment of their significance² has been undertaken, and is documented in table 3.1 of the BHTVIA. All except The Church of St. Peter, are identified as having a medium level of sensitivity to development.
- 7.42 In terms of the St. Peter's Conservation Area, relevant defined key characteristics of it, as set out in the Conservation Area Appraisal (CAA), have been used to assess the impact of the proposed scheme. The CAA states that with respect to views out only the churchyard and Caversham Court have significant views out of the area, across and along the River Thames. It states *"Although the Thames-side Promenade is an attractive walk on the opposite side of the River, the buildings in this view are unattractive. The new swimming pool [referring to the demountable pool] adjacent to Rivermead Leisure Centre is visible from Caversham Court Gardens, and it will be important that sufficient tree planting takes place to screen the building as much as possible."* The CAA concludes that elsewhere the views out of the CA are very limited.
- 7.43 The conclusion of the BHTVIA is that the proposal would have no harmful effect on the setting or significance of the HAs in the surrounding area, and the assessment has had regard to the statutory duties in Section 66³ of the Planning (Listed Buildings and Conservations Areas) Act 1990 (as amended) and is in line with Section 16 of the NPPF and the guidance in the NPPG.
- 7.44 With respect to townscape the BHTVIA identifies four main Townscape Character Area receptors, and these are shown below:



² The NPPF defines heritage significance at 'Annex 2: Glossary' as: *"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

³ *"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State 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."*

- 7.45 The townscape value has been assessed as: TCA1: River Thames Corridor - High; TCA2: Residential Caversham - medium- to high; TCA3: Light Industrial - low; and TCA4: Transport Corridor - low. In addition, the assessment includes a review of the value of views towards the site from defined sensitive receptors, such as Caversham Court Gardens, the Church of St. Peter and Caversham Road Bridge, and assesses the scheme's visual impact.
- 7.46 The proposed scheme would be visible in some views, as is the existing leisure centre. It would be seen beyond the tree planting along the river edge, such visibility would remain broadly the same as the existing centre, although the views from some of the visual receptors identified in the BHTVIA would change. Officers agree that the proposed building would not be considered harmful in the context, as the magnitude of change in the views from these visual receptors are assessed as being low.
- 7.47 The elevational detail and materials have been developed in consideration of the views to it from the surrounding properties to the north. Screening would be provided by the retained north-east mound, which would be extended in height and soft landscaped. The windows to the rear of the first floor would provide views into the leisure centre and the choice of cladding is intended to break up the northern elevation with variations in colour and angled sections. In addition, the existing raised bunds to the north and east of the site would be extended to further screen views from Rivermead Park and the Thames Path. There would be approximately 100 new trees provided as part of the overall landscape strategy. In combination, it is considered that the impact of the proposal would be limited, and indeed it is considered it would have an enhanced appearance, compared to the existing leisure centre.
- 7.48 The proposed building would be a comparable height to the existing leisure centre and would continue the character of development in the area. It would be of a higher design quality than the existing centre. It would be seen through the tree planting along the river edge against a backdrop of industrial buildings along Cardiff Road.
- 7.49 Overall the design is considered to be in accordance with Policy CC7, whilst ensuring it meets the requirements for sports provision and would achieve a high level of sustainability. It is considered that a good balance has been achieved between a functional contemporary building and a scheme which respects the wider setting within the MLF and views from the north.
- 7.50 The existing views within the BHTVIA have been supplemented by superimposed CGIs of the proposed scheme, and some images are included below. It is considered that the proposed scheme would not be overly prominent when viewed from the north and would not have a detrimental effect on the MLF, or views across it, and would not

detract from the overall character or appearance of the MLF and would therefore accord with Policies EN1, EN7, EN11 and EN13.



Figure 30: Artist's Impression of the view of the Rivermead Leisure Centre across River Thames



Figure 31: Artist's Impression of approaching the leisure centre from the Thames Path

Transport/Parking

- 7.51 The application was supported by a Transport Assessment and Travel Plan.
- 7.52 The Application Site is in a sustainable location easily accessible by foot, cycle paths and public transport. It is surrounded by a network of local on and off-road cycle routes providing a link to residential areas. The R40 route connects Emmer Green and Caversham Heights to the site and other local cycleways provide connections to other parts of Reading. NCN Route 5 adjacent to the River Thames is approximately 600m to the east of the site and provides a link to the R40.
- 7.53 There are also a number of bus routes within the vicinity which provide access to Reading town centre and surrounding residential areas. The site is also served by Readibus.
- 7.54 The proposal would retain the existing pedestrian and vehicular access from Richfield Avenue. The proposed scheme would include a car park on the site of the existing leisure centre with a total of 122 standard car parking bays, 22 blue badge bays, 14 family spaces, and the retention of the two overflow parking areas of 88 and 112 no. spaces. There would be a coach drop-off point on the western edge of the car park and a Readibus drop off point.
- 7.55 There would be 40. no designated electric vehicle charging points (EVCP).
- 7.56 There would be a total of 40 no. covered cycle storage spaces located directly outside the main entrance hub.
- 7.57 The current pedestrian access from Richfield Avenue terminates at the edge of the existing car park. The proposal would extend the pavements either side of the access road, would link to the pedestrian plaza, the leisure centre, and the surrounding park. This would create a safe route to the parkland for pedestrians and cyclists. Pathways within the site would be well lit and suitable for all abilities including level access, tactile signs and suitable surfaces.
- 7.58 The enclosed bin storage area and existing substation would be provided adjacent to the turning head to the north of the new car parking areas and deliberately sited away from the drainage culvert to minimise rodent ingress. A condition is recommended for the submission and approval of further details.
- 7.59 A secondary servicing area would be provided adjacent to the eastern frontage of the building, also with a turning head.
- 7.60 The DAS includes some information with regard to the proposed phased approach to construction, intended to allow the existing leisure centre to remain in operation throughout the build period. A

condition is recommended for the submission and approval of a Construction Method Statement, to include a phasing plan.

- 7.61 The Highway Authority has confirmed that the scheme would be acceptable in transport terms, subject to attaching a number of conditions (set out in the Recommendation above), and would therefore accord with requirements of policies TR2-TR5.

Landscaping, Ecology & Open Space

- 7.62 Policy CC7 requires developments to be assessed to ensure that they *“Are visually attractive as a result of good high quality built forms and spaces, ... and appropriate materials and landscaping.”*
- 7.63 Policy EN12 states that on all sites development should provide *“a net gain for biodiversity wherever possible.”*
- 7.64 Policy EN14: Trees, Hedges and Woodlands requires new development *“...make provision for tree retention and planting within the application site, particularly on the street frontage, ... 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.”*
- 7.65 The site is within the Rivermead Park and this is within the Major Landscape Feature (MLF) (Policy EN13) and includes a small part of, but is largely adjacent to, the protected Local Green Space under EN7Wp (Rivermead and Thameside Promenade), which states that *“proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.”*
- 7.66 The site is also within an Air Quality Management Area (EN15) where the provision of tree coverage is important.
- 7.67 To the west, north and north-east side of the site there is a large section of short amenity grass forming the parkland setting of Rivermead Park. Most of the site to the south of the existing centre is tarmac car park, broken up with elements of soft landscaping within and at the perimeter of the car park. There is also a tree belt running along the drainage culvert and along Richfield Avenue to the south of the site. There is a further tree belt to the east of the existing centre, screening the play area from the River Thames.
- 7.68 The site is not covered by Tree Preservation Orders and contains 50 individual trees, the majority of which are classified as Category C, with 7 no., as category U trees. The submitted Arboricultural Impact Assessment recommends the felling of 24 trees; most to achieve the proposed layout and 6 which are considered low quality trees.

- 7.69 At the pre-application stage the Natural Environment Officer identified that landscaping could serve to screen areas of the site from outside the site. The Officer also advised that although native tree planting would be preferable there have been some issues with the successful establishment of certain trees to the north of the demountable swimming pool. Therefore, the advice was that an assessment of the ground/ soil would be required to identify any issues and suitable remediation.
- 7.70 The proposal includes for a comprehensive landscaping scheme, which was amended following detailed comments raised by the Natural Environment Officer, Caversham Globe and others regarding a number of the existing and proposed trees, in particular the proposed removal of a number of younger trees, which had been planted by Tree Wardens and had been hard to establish. The landscaping proposals have been amended including reduced/ replanned bunding footprints, paths relocated to avoid removal of trees which are now being retained (and protected during demolition / construction). *(Planning officer note: Any further comments on the amended scheme from the Natural Environment Officer will be reported in an update).*
- 7.71 In summary the amended landscaping scheme includes the following:
- Improvement of the raised bunds on the northern boundary and retention of existing and proposed new trees to further screen views from Rivermead Park and the Thames pathway.
 - The north-eastern mound will be increased in height with excavated spoil and planted with native species trees of local provenance, to extend the existing tree belt to the northeast and 3x London Planes, and a juvenile Aspen, north of the sports hall and east of the substation on the Thames Promenade, will be retained.
 - Replacement tree planting at a ratio of 2:1 replacements to link the existing northern belt of trees around the substation, around the new centre and connect with the existing planting to the south along the drainage culvert (Richfield Avenue side).
 - New tree planting to the western elevation with a tree lined avenue leading to the main entrance and within the hard paving of the proposed path between the new leisure centre and the existing demountable pool.
 - Outdoor seating with planters along the main promenade west of the building.
 - Planting beds within the car park and to the front of the main building.
 - A café and play area to the x of the existing demountable pool to the north of the site would be enclosed by low level shrub to provide clear site lines around the play area.
 - A raised height bund in the location of the existing play area (to be relocated).

- Soft landscaped area between the existing external pitches and the western end of the proposed car park to include grass and seasonal bulbs.
 - The existing areas of landscaping along the southern boundary water course will be pruned and rationalised.
 - Trees outside the boundary of works to be retained and protected during works with hoarding: 4 no. juvenile Oaks on the Thames Prom north of the sports hall and east of the substation; 6 no. Lime trees to the north of the existing demountable; and 1 no. Field Maple north of existing play area (north of the new centre) lies outside of the development area.
- 7.72 The site includes a small part of the area of Local Green Space, and the proposal includes minimal loss of land to the development confined to some strips for the service road to the east of the building and a bin store to the north. The loss would be mitigated through the demolition of the existing centre and the subsequent enhanced landscaping scheme. Policy EN7 seeks to protect the unnecessary loss of areas of open space, which can be accessed by the public. It is not considered that the Local Green Space, which this policy intends on protecting, would be affected by the proposal.
- 7.73 To meet the requirements of Policy EN12 there should be no net loss of biodiversity and there should be a net gain wherever possible. At pre-application stage the Council's Ecology Consultant specifically identified that the redevelopment provided the opportunity to enhance the ditch which runs adjacent to Richfield Avenue, by creating a more varied channel, and the removal of litter, invasive species and dense vegetation.
- 7.74 The submitted Ecological Appraisal identifies that the site is not designated for its wildlife interest and does not support UK Priority Habitat and predominantly comprises areas of hard standing and amenity grassland and no habitats of ecological importance. No evidence of roosting bats was found during inspection, although there would be a re-survey prior to demolition.
- 7.75 The proposal includes enhancements to the site's biodiversity value and protection of existing features including shrubs and trees. The proposed landscape plan identifies that the ditch would be improved through the ongoing maintenance and treatment of Japanese Knotweed, that overgrown sloped embankments would have ongoing annual mowing, and that existing London Planes would be retained.
- 7.76 Key mitigation measures would include vegetation protection and management, sensitive lighting, and sensitive removal of vegetation. Key compensation measures would include bird nesting and bat roosting boxes and wildlife attracting native hedges and tree species.
- 7.77 Comments from the Ecology officer and further comments from the Natural Environment officer will be reported in an update.

Conditions are currently as recommended above, and subject to the receipt of further satisfactory details officers advise that the landscape strategy and biodiversity enhancements are likely to be considered acceptable. Further confirmation will be provided in an update report.

Sustainability

- 7.78 There are several sustainability policies within the local plan which are relevant to new development.
- 7.79 The overarching sustainability Policy, CC2 requires proposals for new development to be designed and have 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.”* In order to achieve this *“all major non-residential developmentsare required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible;....Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 7.80 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 7.81 CC4: Decentralised Energy is relevant to this application as it is over 1000sqm, and requires the consideration of the *“... inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.”*
- 7.82 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 7.83 The submitted Sustainability Statement and Energy Strategy demonstrate that the proposed scheme would, through a building fabric first design approach combined with available Low and Zero Carbon (LZC) technology, meet carbon emission reduction targets to 45% below Part L 2013 baseline, and would be able to exceed the target of BREEAM rating of ‘Excellent’.
- 7.84 The scheme would achieve this through a number of measures as follows:
- A passive design exercise has been undertaken to optimise the building design and siting to reduce demand and to make best use of natural daylight and thermal mass insulation.
 - Natural ventilation for the sports hall and main reception area.
 - Solar shading has been provided for large areas of glazing through the use of external brise soleil and high level canopies.

- Design and use of construction details, which will limit thermal bridging and reduce heat loss through the building envelope.
- Low external element u-values.
- Low air permeability.
- Low energy LED lighting with lighting controls.
- Mechanical ventilation with passive heat recovery .
- Moveable floor pool cover to reduce the unregulated energy use.
- Water conservation measures.
- Air Source Heat Pump ASHP space heating to Gym, Studios, Offices, Café, and associated areas.
- High efficiency Air to Water CO2 Air Source Heat Pump ASHP hot water services.
- Solar Photovoltaic panels generating on site zero carbon electricity.
- Space available for plate heat exchangers in the plant room should a hot water services be provided by a district heating or energy scheme in the future.

7.85 The inclusion of 40 electric vehicle charging bays would also contribute to reducing carbon emissions.

7.86 A number of renewable measures were explored within the Energy Strategy and with respect to decentralised energy schemes the leisure centre is not one of the most suitable areas as identified in the Council's commissioned studies. Therefore, the leisure centre would not be able to connect to a district energy centre. The Strategy also recommends that on site LZC is the best method of reducing carbon emissions from the leisure centre.

7.87 Consideration was given to the use of a green or blue roof⁴ and the applicant has advised that the structural spans that would be required clear of columns for the pool hall and sports hall would mean that this measure would be prohibitively costly due to the weight of such measures. The use of green roof/walls is one possible measure, and the proposed scheme already exceeds the BREEAM rating of 'Excellent' through a combination of other measures, which meets RBC's sustainability targets and relevant policies.

7.88 Subject to conditions requiring the submission and approval of BREEAM certificate and details of PV panels, it is considered that the scheme would accord with Policies CC2, CC3, CC4 and CC5.

Environmental matters

7. 89 ***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 Environmental Health Officer has confirmed that the submitted Air Quality Assessment demonstrates that the impacts of the operational scheme on air quality would not be significant. As

⁴ A blue roof is a [roof](#) designed for the [retention](#) of rainwater above the [waterproofing element](#) of the [roof](#)

there is a risk of dust emission during construction, a condition is included requiring a Construction Method Statement to include dust control measures.

- 7.90 **Noise:** Policy EN17 relates to noise generating equipment and that where such is proposed “.. *the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.*” The proposal includes locating plant away from facing directly onto residential properties. The submitted noise assessment demonstrates that the plant noise would not cause adverse impacts on the nearest sensitive receptors and the traffic associated with the site’s use would not create a change to noise levels. The Environmental Health Officer has reviewed the submitted noise assessment and has no objection to the proposed plant subject to a condition restricting the noise levels.
- 7.91 **Contaminated land:** Policy EN16: Pollution and Water Resources states that “*Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.*”
- 7.92 The site is contaminated land as it is a former landfill site. Of concern is that the site is also over a principal aquifer. The submission included a Contamination Statement which shows that the site is a Characteristic Gas Situation (CS) level 3, and outlines appropriate gas protection measures, potential reduction in the source of groundwater contamination and the testing and re-use of excavated material.
- 7.93 The Environmental Health Officer has confirmed that the submitted remediation scheme is acceptable and conditions are included for the implementation of the land gas remediation scheme and the submission and approval of a verification scheme. As there are parts of the site which have not been tested because they are covered with buildings it has been agreed that a condition be included requiring further sampling of the soil once the buildings are demolished and if required further remediation measures set out. The EA considered the scheme acceptable subject to a number of conditions related to land gas contamination and the requirement for no drainage systems for the infiltration of surface water to the ground and no piling. All these conditions are included in the recommended conditions above.
- 7.94 **Drainage & Flood Risk:** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions or be no worse than existing.

- 7.95 A Sustainable Drainage Strategy and Proposed Drainage Layout have been submitted. The surface water discharge would be to the existing minor watercourse running along the south of the site via an outfall just south of the existing building with a reduced flow rate via a flow control device. A betterment of 50% on the existing site drainage would be achieved through the use of attenuation tanks. These would be sized to attenuate a 1 in 100 year storm event with a 40% allowance for climate change. Following confirmation from the applicant that the development would provide betterment in a 1 in 1 year storm event when compared against the existing discharge rates, the SUDS officer confirmed the scheme was acceptable subject to conditions as included above.
- 7.96 Policy EN18: Flooding and Sustainable Drainage requires development to be directed to areas as the lowest risk of flooding in the first instance, following the Sequential and Exception Test set out in the NPPF. The sequential test⁵ for the site has already been undertaken as part of the background for developing the new local plan and the allocation of the site.
- 7.97 The site is within Flood Zone 2 and 3A and the submitted Flood Risk Assessment identifies the site as have a low risk susceptibility to fluvial flooding and the proposed use is classified as 'less vulnerable'. The proposed location of the building would be within the lowest risk part of the site. The EA initially objected, because the original Flood Risk Assessment did not have the most up-to-date flood level information at the time of submission. A revised FRA was subsequently submitted with the updated information, and the EA removed their objection.

Infrastructure requirements

- 7.98 In accordance with Policy CC9, the following would be sought:
- Employment, Skills and Training - construction
- 7.99 The applicant has agreed to work with Reading UK CIC to develop an Employment Skills Plan and a condition requiring this is recommended.

Other matters raised during consultation

No 50m Pool

- 7.100 Some objectors have raised concern over the proposal not including a 50m pool. This is not material to the planning balance, but for clarity this was thoroughly considered in developing the proposals. RBC Leisure has provided the following information:

⁵ http://www.reading.gov.uk/media/8646/EV028-Sequential-and-Exception-Test-Local-Plan-2018/pdf/EV028_Sequential_and_Exception_Test_Local_Plan_2018.pdf

- 7.101 The Sport England's modelling results indicated that there was no clear strategic need for provision of this scale on a single site. The provision of a 50m pool was not supported by Swim England (formerly Amateur Swimming Association - ASA) as the most appropriate facility type for Reading.
- 7.102 50m pools are rare due to the cost of building, maintaining and operating them and it would not have been possible to provide a 50m pool and diving facilities. The overall aim was to provide a wide range of facilities to meet a broad range of activities and a 25m pool would still meet FINA (International Swimming Federation) requirements and it would be able to be used as a short course competition pool.
- 7.103 Consultation with Sport England and Swim England supported 25m pool options as the most appropriate scale of facility to meet the strategic needs of swimmers and clubs in Reading.

Equalities Impact

- 7.104 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. Matters have been raised through the consultation with regard to a number of access matters, as documented in the Consultation section above. The proposed scheme would be DDA compliant. The scheme was presented to the Reading's Access and Disabilities Working Group on 5th March 2020.
- 7.105 The proposed scheme includes a wide range of accessibility measures (listed in Appendix 2).
- 7.106 Following consultation with the Access Officer during the course of the application, as detailed in the Consultation section above, and in direct response, the applicant mainly provided further clarification within the Consultation Response Statement (dated 24th February 2021 rec 12th March 2021). One change was made, however, to the original grasscrete in front of the southern elevation glazing, so that this would now be a planted, landscaped area.
- 7.107 A further presentation was made to RBC's Access and Disabilities Working Group on 4th March 2021, to explain the accessibility strategy further. The applicant has confirmed that a working group is being set up between members of this working group, GLL, RBC and SBA who would review plans going forward into the next design stage.
- 7.108 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.

CONCLUSION

- 8.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019. The proposal would provide an enhanced replacement leisure centre on an allocated site, making effective use of a previously developed site.
- 8.2 The design has been carefully considered and developed, so that it responds positively to the site in terms of being positioned closer to Richfield Avenue, placing the smaller mass of the sports hall closest to the MLF, enhancing its prominence within the street and providing a welcoming and clear entrance. It incorporates a comprehensive landscaped scheme, with biodiversity enhancements, which have been amended during the course of the application to respond positively to consultation and neighbour comments, and includes enhancement of screening. It is considered to not cause significant harm to the character and appearance of the wider Major Landscape Feature, or detrimentally affect the views from the north and specifically from the St. Peter's Conservation Area and specific heritage assets within it, and would be an enhancement compared to the existing Leisure centre.
- 8.3 The design would be a smaller footprint, of good quality, with better designed facilities than the existing centre, in a flexible space to be able to respond to future leisure provision, such as differing uses within the double height activity area. It has been developed in consultation with a range of national and local sports groups and other stakeholders. It would be a sustainable building which would exceed the BREEAM 'Excellent' rating and would therefore, meet the Council's sustainability policies.
- 8.4 The centre would provide enhanced leisure facilities that would meet national and local objectives and policies regarding access and participation in sport and leisure and promoting health and wellbeing.
- 8.5 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, which accords with relevant national and local policy. The planning application is therefore recommended for approval subject to conditions as detailed above.

Case Officer: Alison Amoah

APPENDIX 1: EIA Schedule 3 Criteria

CHARACTERISTICS OF DEVELOPMENT

1. The characteristics of development must be considered with particular regard to—

- (a) The size and design of the whole development;
- (b) Cumulation with other existing development and/or approved development;
- (c) The use of natural resources, in particular land, soil, water and biodiversity;
- (d) The production of waste;
- (e) Pollution and nuisances;

LOCATION OF DEVELOPMENT

2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—

- (a) The existing and approved land use;
- (b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) The absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) Wetlands, riparian areas, river mouths;
 - (ii) Coastal zones and the marine environment;
 - (iii) Mountain and forest areas;
 - (iv) Nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) Densely populated areas;
 - (viii) Landscapes and sites of historical, cultural or archaeological significance.

TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in Regulation 4(2), taking into account—

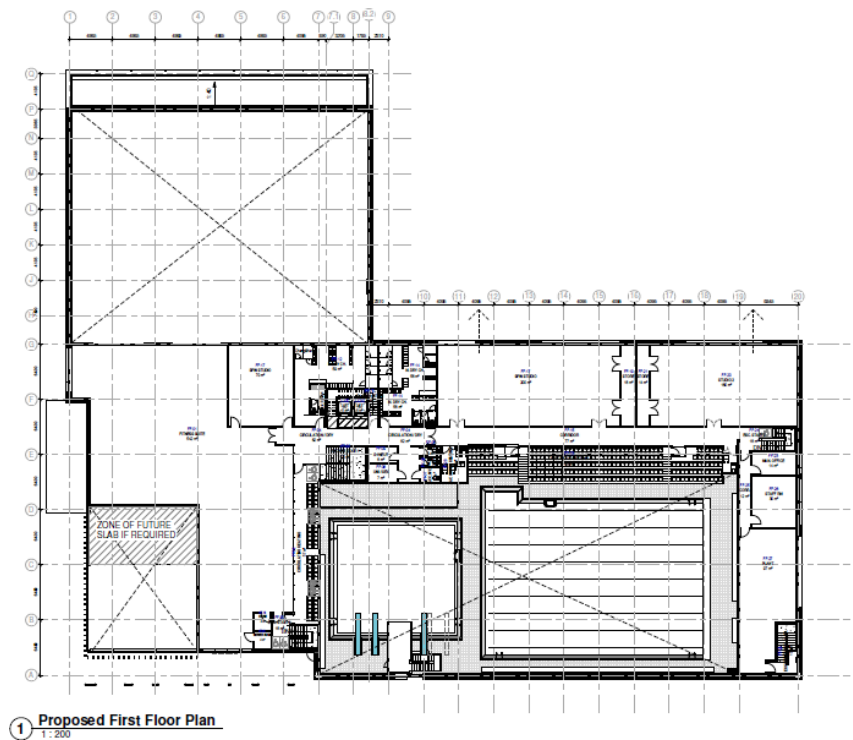
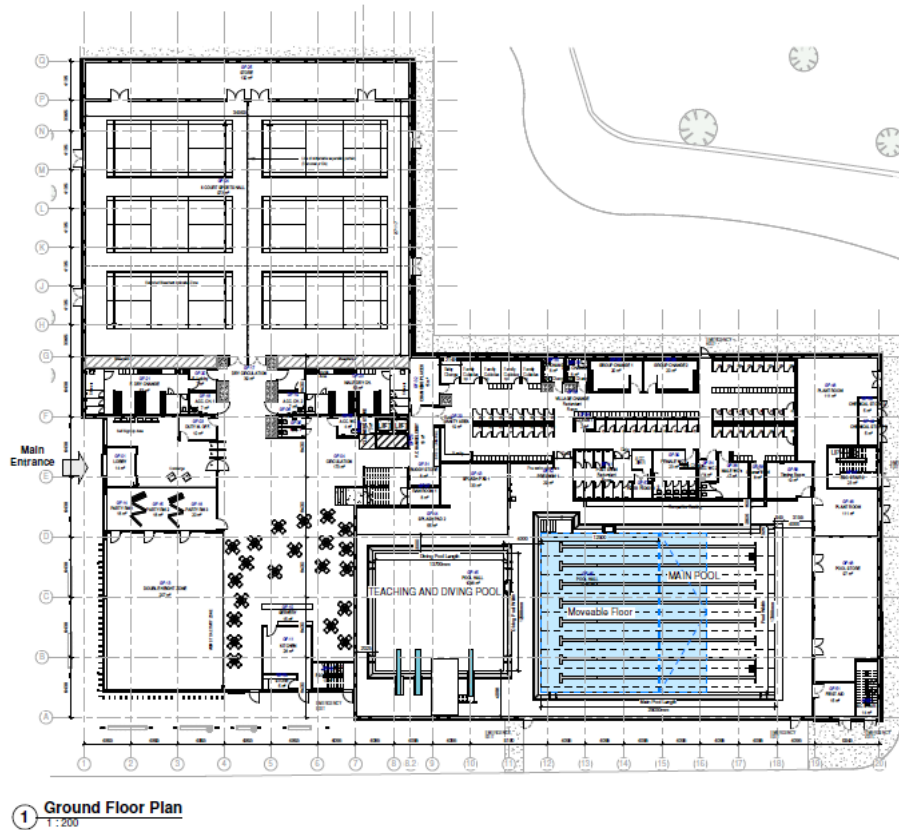
- (a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) The nature of the impact;
- (c) The transboundary nature of the impact;
- (d) The intensity and complexity of the impact;
- (e) The probability of the impact;
- (f) The expected onset, duration, frequency and reversibility of the impact;
- (g) The cumulation of the impact with the impact of other existing and/or approved development;
- (h) The possibility of effectively reducing the impact.

APPENDIX 2: Accessibility Measures

- Well-lit level footpaths, with suitable surfaces, through to the main entrance, with dropped kerbs and blister paving where required. Resting benches will be provided no more than 50m apart along these routes to the entrance;
- 22 no. accessible parking spaces;
- Drop off points and dropped kerbs outside the main entrance;
- Level access into the building through the main reception;
- Level access from fire escape routes around the building;
- Visual contrast of colour of cladding to make the entrance clear;
- Automatic doors within the lobby area;
- Circulation widths suitable for wheelchair users, with sports wheelchairs at ground floor;
- Induction hearing loops and dropped counter sections;
- Accessible toilets;
- Accessible Changing facilities (in accordance with Sport England's Guidance) including a Changing Places room;
- Unisex and gender neutral changing cubicles;
- Lifts;
- Wheelchair storage;
- Shallow accessible steps into the pool with handrails;
- Wet side wheelchair lifts;
- Stairs to be accessible for ambulant disabled with wheelchair refuges;
- Brail signage;
- Detailed review of Swim England's Dementia Friendly design guidance to ensure the centre would be Dementia friendly.
- Coloured paving and tarmac to be decided at the next detailed design stage;
- Pedestrian Plaza would be wide enough to allow adequate circulation between users and detailed design to ensure 'clutter free' zones;
- Knee rails would be kept to a minimum;
- Tree pits with suitable grating and future maintenance;
- Lighting strategy for suitable site wide lighting. To be detailed further at next design stage;
- Manifestation on glass doors and windows would be provided in line with Building Regulations;
- Entrance barrier matting would be suitable for wheelchair users and of an appropriate colour for those with Dementia.

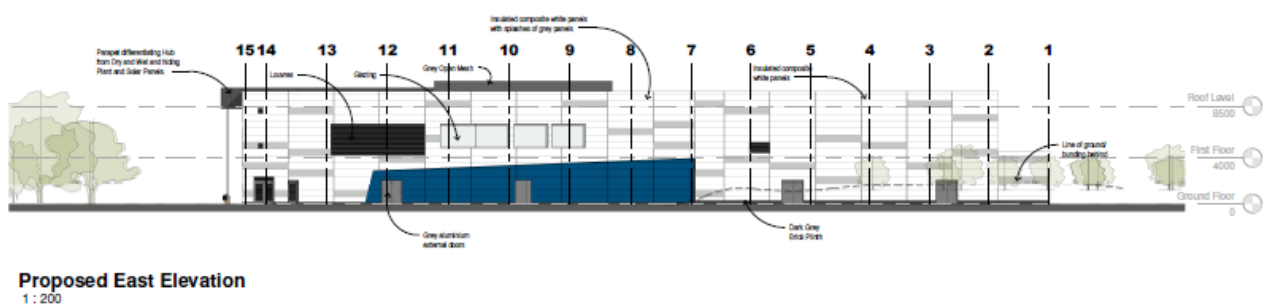
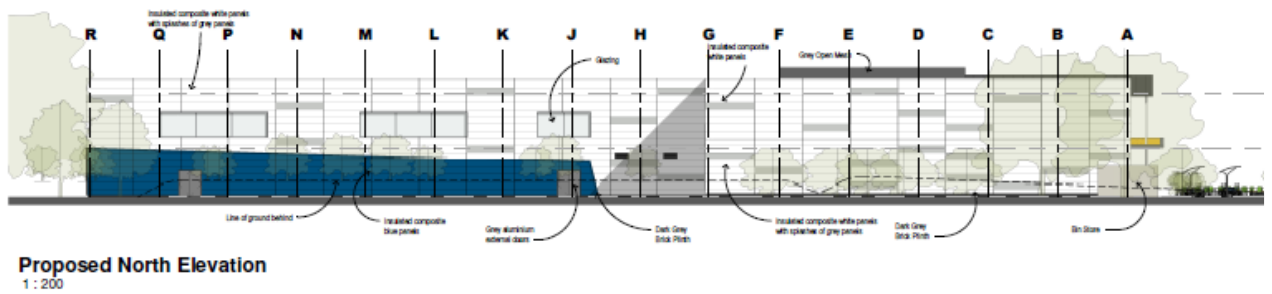
APPENDIX 3: Plans

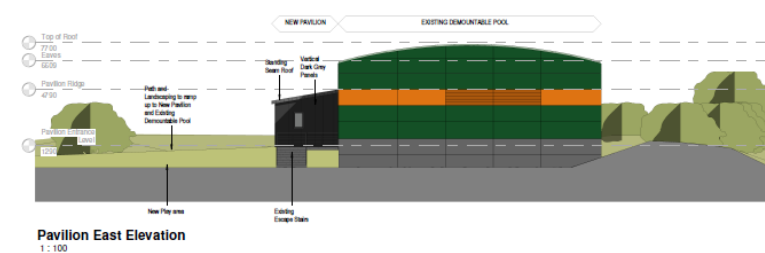
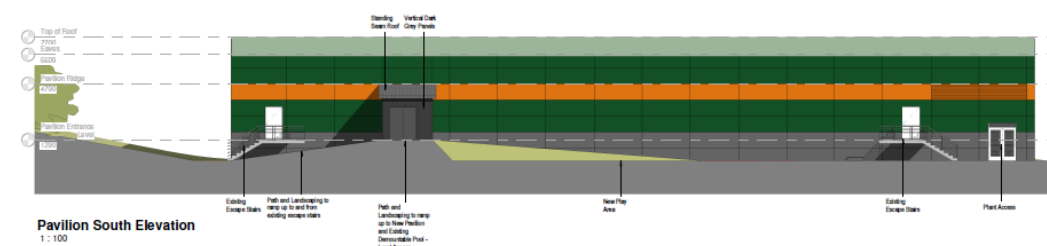
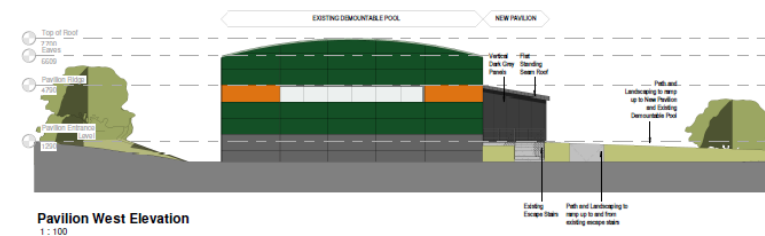
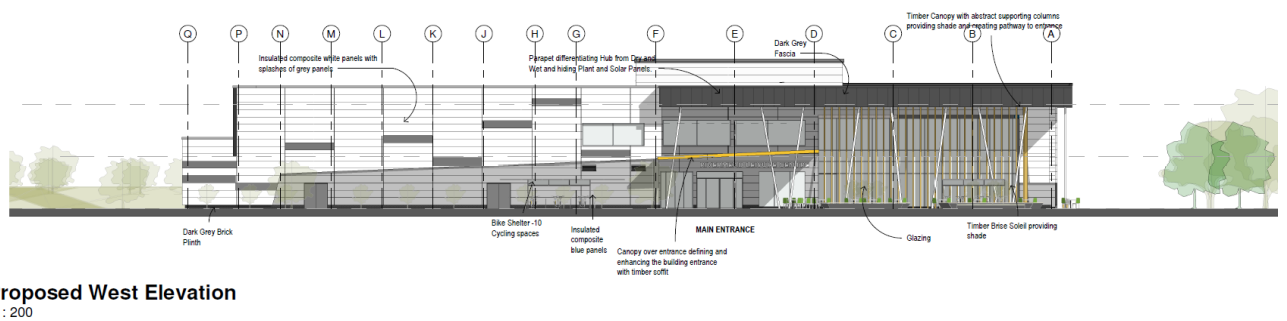
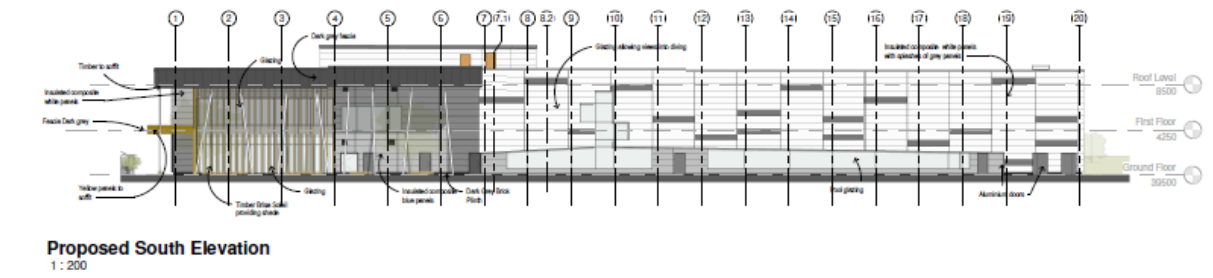
Plans



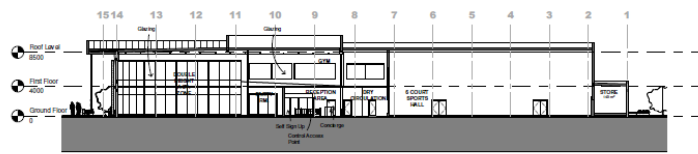


Elevations

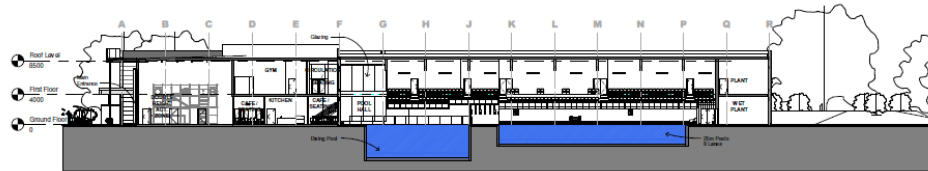




Sections



Proposed Section A
1 : 200



Proposed Section B
1 : 200



Proposed Section C
1 : 200



Tree Plan (review to be provided in the update report)

Proposed Site Plan



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COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD
SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

Ward: Minster

App No.: 200979

Address: 18 Parkside Road, RG30 2DB

Proposal: Demolition of detached house and annex and erection of 3 storey building for 3x3, 3x2, and 6x1 bed flats, with undercroft parking, landscaping and bin stores

Applicant: Colony Developments

Deadline: 27/11/2020

Extended Deadline: 30/4/2021

Planning Guarantee 26 week target: 26/2/21

RECOMMENDATION:

As per attached reports.

1. SITE VISIT

- 1.1 At your meeting on 3rd March, the Committee resolved to defer consideration of this application for a member site visit. This has now been arranged as a physical site visit, to take place on the morning of 25th March.
- 1.2 Please see attached reports from 3rd March Agenda, if there are any further matters to add between now and your meeting, this will be set out in an Update Report.

Case Officer: Alison Amoah

APPENDIX 1 report to 3rd March Planning Applications Committee

APPENDIX 2 update report to 3rd March Planning Applications Committee

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 12

PLANNING APPLICATIONS COMMITTEE: 3rd March 2021

Ward: Minster

App No.: 200979

Address: 18 Parkside Road, RG30 2DB

Proposal: Demolition of detached house and annex and erection of 3 storey building for 3x3, 3x2, and 6x1 bed flats, with undercroft parking, landscaping and bin stores

Applicant: Colony Developments

Deadline: 27/11/2020

Extended Deadline: 30/4/2021

Planning Guarantee 26 week target: 26/2/21

RECOMMENDATION:

GRANT Planning Permission subject to conditions and informatives and subject to the satisfactory completion of S.106 Legal Agreement.

OR Refuse permission should the S.106 Legal Agreement not be completed by 30th April 2021 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

- £150k AH contribution paid on occupation of 10th Unit; or three no. shared ownership units.
- Deferred payment contribution with a 50/50 share in excess of 12% GDV on an open book basis capped at a policy compliant sum of £521,000 to be calculated on the sale of the 11th unit, or policy compliant 30%.

Employment Skills and Training Plan - Construction skills - preparation and delivery of an ESP or a financial contribution of £2,130 (construction).

Zero Carbon Offset - All Dwellings

- Zero Carbon Offset as per SPD 2019 a minimum of 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus a Section 106 contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/tonne over a 30-year period).
- As-built SAP calculation for all dwellings to be submitted for approval within 6 months following first occupation.

- Contribution based on SPD formula below towards carbon-saving projects calculated for all dwellings based on approved SAP calculation to be paid to the Council within 9 months following first occupation:

$$\text{TER CO2 m2/yr less 35\% CO2 m2/yr} = 65\% \text{ of TER}$$

$$65\% \text{ of TER} \times \text{total square metres} = \text{total excess CO2 emissions annually}$$

$$\text{Total excess CO2 emissions annually} \times \text{£1800} = \text{S106 contribution.}$$

CONDITIONS TO INCLUDE:

- 1) TL1 - 3 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) L1 - Hard and soft landscaping scheme to be submitted and approved
- 5) L4 - Landscape Management Plan to be submitted and approved
- 6) L5 - Tree retention
- 7) L7 - Arboricultural Method Statement to be approved.
- 8) L11 - Licence for development works affecting bats
- 9) L10 - Habitat enhancement - Prior to occupation mitigation and enhancement measures, detailed in section 7 and figure 4 of the 'Update Preliminary Roost Assessment, High Level Inspection and Mitigation Report' (Darwin Ecology, Oct 2020), be installed and retained thereafter
- 10) Nesting birds Vegetation clearance outside of nesting season
- 11) CO3 - Contamination assessment to be submitted
- 12) CO4 - Remediation scheme to be submitted
- 13) CO5 - Remediation scheme to be implemented and verified
- 14) CO6 - Unidentified contamination
- 15) CO7 - Land gas
- 16) C2 - Construction Method Statement to be submitted and approved
- 17) C1 - Hours of Construction
- 18) C4 - No Bonfires
- 19) SU1 - SAP assessment (design stage)
- 20) SU2 - SAP assessment (as built)
- 21) SU7 - SUDS plan to be approved
- 22) SU8 - SUDS to be implemented
- 23) DC1 - Vehicle Parking as specified
- 24) DC3 - Vehicle Access as specified prior to occupation
- 25) DC6 - Cycle Parking to be approved
- 26) DC7 - Refuse and Recycling to be approved (to be vermin proof)
- 27) DE6- Provision of Electric Vehicle Charging Points

INFORMATIVES TO INCLUDE:

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I11 - CIL
- 5) IF4 - S106
- 6) IF3 - Highways
- 7) I29 - Access Construction
- 8) IF7 - Complaints about Construction

9) IF8 - Encroachment

10) 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.

11) Thames Water - The proposed development is located within 15 metres of Thames Water's underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk.

12) IF1 - Positive & Proactive.

1. INTRODUCTION & BACKGROUND

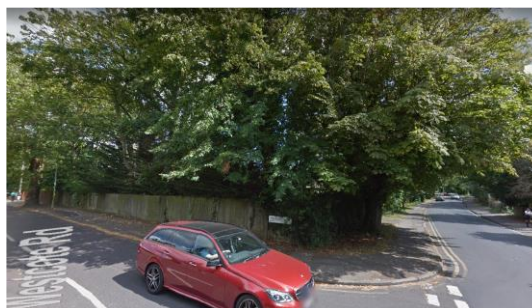
- 1.1 The site is a 0.14ha residential plot on the corner of Parkside Road and Westcote Road, with an existing shared vehicular and pedestrian access from Parkside Road. It comprises a three bedroom 1960s house, with a triple garage and a 3 bedroom annex over, with a small basement. It sits in a large garden and is very verdant bounded by trees and hedges on all sides, and is covered by TPO no:10/19
- 1.2 The site slopes from west to east (front to rear) and there is a change in levels of ca 2.3 m between Westcote Road and the level of the garden, with a retaining wall enclosing a landscaped area with trees and shrubs on this northern side.

- 1.3 This is a well-established residential area, which comprises a range of properties including family homes, care homes, hotels and flats of varying styles and eras.
- 1.4 The application is referred to committee as it is a 'major' development.

Location Plan



View from Parkside Road



View of junction of Westcote Road and Parkside Road

2. PROPOSAL

2.1 The amended proposal is for:

- Demolition of the existing dwelling and annex
- Erection of a three-storey residential building with undercroft, car parking and landscaping/ amenity space.
- A total of 12 no. flats comprising:

Ground Floor

Unit 1 - 3 bed - 74sqm

Unit 2 - 1 bed - 40sqm

Unit 3 - 1 bed - 39sqm

First Floor

Unit 4 - 2 bed - 62sqm
Unit 5 - 1 bed - 45sqm
Unit 6 - 1 bed - 50sqm
Unit 7 - 1 bed - 45sqm
Unit 8 - 3 bed - 78sqm

Second Floor

Unit 9 - 2 bed - 61sqm
Unit 10 - 2 bed - 61sqm
Unit 11 - 1 bed - 48sqm
Unit 12 - 3 bed - 78sqm

- 14 no. car parking spaces and 12 no. cycle spaces.
- Landscaping.

2.2 Submitted plans and documentation received 13th July 2020, unless otherwise stated (including amended details), are as follows:

- Site Location Plan as Existing - Drawing no: 01-01
- Block Plan as Existing - Drawing no: 01-02
- Topo and Trees as Existing - Drawing no: 01-05
- Floor Plans as Existing - Drawing no: 03-00
- Elevations as Existing - Drawing no: 05-00
- Elevations as Existing - Drawing no: 05-01
- Proposed Ground Floor Plan - Drawing no: 03-10 Rev P2, received 18th February 2021
- Proposed First Floor Plan - Drawing no: 03-11 Rev P1, received 1st February 2021
- Proposed Second Floor Plan - Drawing no: 03-12 Rev P1, received 1st February 2021
- Proposed Third Floor Plan - Drawing no: 03-13
- Proposed Elevations - Drawing no: 05-10 Rev P1, received 18th February 2021
- Proposed Elevations - Drawing no: 05-11 Rev P1, received 18th February 2021
- Proposed Elevations - Drawing no: 05-12 Rev P2, received 18th February 2021
- Proposed Sections - Drawing no: 04-10 Rev P1, received 1st February 2021
- Proposed Block Plan - Drawing no: 02-10 Rev P1, received 1st February 2021
- Proposed Site Plan - Drawing no: 02-15, received 1st February 2021
- Overlooking Section - Drawing no: 02-50, received 18th February 2021
- Proposed Landscaping Plan - Drawing no: 02-16
- Proposed Utilities Plan - Drawing no: 02-17 Rev P1 received 18th February 2021
- Proposed SUDS Plan - Drawing no: 02-18
- Proposed Highways Plan - Drawing no: 02-19 Rev P1, received 18th February 2021

- Affordable Housing Statement, dated 7th July 2020, Document Ref: - 8799000, prepared by Colony Architects
- Arboricultural Impact Assessment, dated 2nd July 2020, Document Ref: 1312, prepared by SJ Stephens Associates
- Conceptual SUDS Strategy Report, Rev A, dated November 2020, prepared by Innervision Design, received 17th December 2020
- Design and Access Statement, dated 23rd June 2020, Document ref: 500/DAS/DRAFT-02, prepared by Colony Architects
- Energy Assessment, dated 5th November 2020, Document ref: 015722-015731, prepared by Energy Calculations, received 5th November 2020
- Planning Statement, dated June 2020, prepared by Nexus Planning
- Preliminary Ecological Appraisal and Preliminary Bat Roosts, dated May 2019, prepared by Dawn Ecology, received 13th July 2020
- Update Preliminary Roost Assessment, High level Inspection and Mitigation Report, dated October 2020, prepared by Darwin Ecology, received 3rd December 2020
- Transport Statement, dated 19th June 2020, Document ref: SJ/MD/ITL16121-001A, prepared by I-Transport, received 13th July 2020
- CIL Form 1: Additional Information

- 2.3 *Community Infrastructure Levy (CIL)*: the applicant has duly completed a CIL liability form with the submission. The proposed C3 use is CIL liable and the estimated amount of CIL chargeable from the proposed scheme would be £92,779 based on £156.71 (2021 indexed figure) per sqm of Gross Internal Area (GIA).

3 PLANNING HISTORY

190834/PREAPP - Demolition of existing dwelling house. Replaced with 14 new flats (1, 2 & 3 beds) over 3.5 storeys

4 CONSULTATIONS

Statutory

- 4.1 None.

Non-statutory

Ecology

- 4.2 The application site comprises a detached house with detached summerhouse and shed surrounded by habitat suitable for use by bats (connected gardens with tree lines linking to woodland and parkland in the wider landscape). It is proposed to demolish the buildings and replace them with a block of flats with associated car parking and landscaping.
- 4.3 The ecology report (Darwin Ecology, May 2019) has been undertaken to an appropriate standard and details the results of a preliminary ecological

appraisal and a preliminary bat roost assessment. The report concludes that boundary habitats on the site could be used by nesting birds, reptiles, and hedgehog, and that the house, summerhouse, and one of the trees contain features suitable for use by roosting bats.

- 4.4 In order to confirm whether the buildings and tree host roosting bats and, if so, the type and status of the roost(s), the report recommends that further surveys be undertaken. The results of the further survey would need to be provided prior to the determination of the application, or 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. Further information is given below.
- 4.5 *Planning policy and legislation:* All species of bats receive special protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations), deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).
- 4.6 If a bat roost will be affected by the works, a licence for development works affecting bats (i.e. for derogation from the provisions of the Habitat Regulations) will need to be obtained before works which could impact upon the roost can commence. This involves submitting a licence application to Natural England with a detailed mitigation plan informed by surveys undertaken in accordance with national guidelines.
- 4.7 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) 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.”
- 4.8 In this case, since 1) the presence or otherwise of protected species has not been established, and 2) there appear to be no “exceptional circumstances”, the application would not be in accordance with the above planning policy.
- 4.9 *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 “high” suitability for use by roosting bats

(as is the case for the house) three dusk emergence / pre-dawn re-entry bat surveys need to be carried out. Surveys need to be carried out between May and September, with at least two taking place in the optimum period of May to August (inclusive), and with at least one being a pre-dawn survey.

- 4.10 Where the building has been assessed as having “low” suitability for use by roosting bats (as is the case for the summerhouse and tree) one dusk emergence or pre-dawn re-entry survey needs to be carried out. The survey needs to be carried out in the optimum period of May to August (inclusive).
- 4.11 *Summary* - The buildings and tree have a number of features potentially suitable for use by roosting bats, and further surveys would need to be undertaken to confirm if it hosts a bat roost and if it does how it would be affected by the proposals. The application should not be determined until the surveys have been carried out and the results 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.
- 4.12 As the surveys could now not be completed until 2021 the applicant may wish to withdraw the application.
- 4.13 **Planning Officer note:** Following the submission of a more detailed visual inspection survey the Ecology officer confirmed that *“The survey shows that the building hosts roosting bats and three soprano pipistrelle roosts were identified. These will be destroyed when the building is demolished but it is likely that post development the favourable conservation status of bats can be maintained. As such if you are minded to grant permission you should include the following condition:*

“Condition: Demolition of the house shall not commence until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy of the licence (or an email from Natural England that the site has been registered under a bat mitigation class licence) has been submitted to the council. Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details. Should the applicant conclude that a licence for development works affecting bats is not required for all or part of the works the applicant is to submit a report to the council detailing the reasons for this assessment and this report is to be approved in writing by the council prior to commencement of the works.

Reason: The building hosts a bat roost which may be affected by the proposals. This condition will ensure that bats, a group of protected species and a material consideration in the planning process, are not adversely affected by the development.”

You should also set a condition to ensure that the mitigation and enhancement measures on Figure 4 of the report are installed.”

Environmental Health

- 4.14 *Contaminated Land* - The developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.
- 4.15 The development lies on the site of an historic pit/scar which has the potential to have been filled with contaminated material land and the proposed development is a sensitive land use.
- 4.16 Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.
- 4.17 Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.
- 4.18 Recommended conditions as follows, to ensure that future occupants are not put at undue risk from contamination: CO3 - Submission of a contaminated land assessment; CO4 - Remediation scheme to be submitted; CO5 - Remediation scheme to be implemented and verified; CO6 - Unidentified contamination.
- 4.19 *Land Gas* - The nature of the site means there is the potential for it to have been infilled with gassing materials. The following conditions are recommended: Land Gas - site investigation, submission of a remediation scheme, and implementation of remediation scheme.
- 4.20 *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).
- 4.21 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.
- 4.22 *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 and condition is recommended.

Natural Environment (Tree Officer)

- 4.23 I met with the consultant Arborist for this site back on 20th November 2019 to look at the trees in relation to the proposed development. Trees on site are protected in area TPO 10/19.

- 4.24 As a corner plot, trees along the north and west boundaries are the most visually significant running adjacent to the public highway. The better specimen trees are also growing along this boundary and of note, a large London Plane within the adopted highway. Elsewhere within the site the trees are small and of no notable arboricultural merit.
- 4.25 Due to the topography of the site tree roots are not expected to extend far into the site and will be restricted, particularly to the south by a tall retaining wall, which, if retained will largely prevent any damage to tree roots in this area. The current plan retains the trees along the northern boundary and the better specimens along the eastern boundary which can then be bolstered by additional new planting. The aim of the finished landscape scheme is to maintain screening adjacent to the public highway in an informal unmanaged style, similar to the existing property and other dwellings along this length of Parkside Road.
- 4.26 I am happy that the current application is a fair reflection of the points I raised on site with the applicant and their Arboricultural consultant at our site meeting and that the trees around the boundary of the site can be protected and retained on completion of the development. Notably, the northern elevation is close to the canopies of trees and that of T6 a Sycamore which will require a reduction of around 1.2. Although not ideal, this is a light canopy reduction which will not affect the wider amenity of the tree.
- 4.27 If planning permission is granted we will require a site specific Arboricultural Method Statement which details the steps to be taken in order to protect the retained trees during the course of the building works. Space is very restricted on site therefore the AMS should include information on site supervision and regular monitoring, the details of which should be forwarded on to the Borough Council after each visit.
- 4.28 The landscape scheme is acceptable in principle although we will require more information on planting sizes and densities - post planting maintenance etc. Boundary fencing will need to include small holes for mammals etc to forage within the site.
- 4.29 Please attach conditions L1 - Hard and soft landscaping; L5 - tree retention, and L7 - Arboricultural Method Statement to be submitted and approved, if planning permission is granted.

SUDS

- 4.30 I have looked at the SuDs submission which appears to be just a plan at this stage and as such would not be sufficient information for me to assess. The applicant would be required to provide a written statement confirming that the proposal will not worsen the surface water run off but as far as I can see this has not been provided. As such I would currently object to the proposals.
- 4.31 **Planning Officer note:** Further to the submission of additional information the SUDS Officer confirmed that the SUDS proposal would be acceptable in

principle and that there was no objection subject to the following conditions:
SU7 - Sustainable drainage scheme to be approved and SU8 - Sustainable drainage scheme to be implemented and maintained as specified.

Thames Water

- 4.32 No objection subject to informatives [as included in the recommendation above]

RBC Transport Strategy

- 4.33 *The following are the initial comments from Transport based on the originally submitted scheme of 13 flats:* The site is 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.
- 4.34 In accordance with the adopted Parking Standards and Design SPD the proposed development would be required to provide off road parking of 1 Parking space for each 1 and 2 bedroom flat, therefore equating to a total of 13 parking spaces. In addition to this, visitor parking should also be provided at a ratio of 1 per 10 dwellings, therefore the whole development would require 14 parking spaces. Each parking space should be a minimum of 2.4m wide by 4.8m long and have a forecourt depth of 6m to ensure that spaces can be manoeuvred in and out of easily. Submitted Ground Floor Plan illustrates 14 parking spaces of which parking spaces 4 to 11 are provided as undercroft parking and 8 spaces fronting the site, dimensions of parking spaces conform to the Councils current standards.
- 4.35 As previously advised in the pre-application enquiry, the access will need to be a minimum of 4.8m wide to allow for two way vehicular movements. The applicant should be advised that a licence must be obtained from the Council's Highways section before any works are carried-out on any footway, carriageway, verge, or other land forming part of the public highway to agree the access construction details. Revised plans illustrating 4.8m access is required.
- 4.36 It should be noted that the Local Plan states:

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Development should make the following provision for electric vehicle charging points:

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*

- 4.37 The Design and Access confirms that EV charging points will be provided.
- 4.38 Tracking diagrams will be required illustrating the entry and egress of delivery and service vehicles to the site.
- 4.39 It should be noted bin storage should not be located further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods and should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods. Details of bin storage and collection should be illustrated on plans.
- 4.40 Cycle storage will also be required at a ratio of 0.5 spaces per 1 & 2 bedroom flats, a total of 7 spaces is required, these should be secure, conveniently located and equipped with Sheffield type stands. Details of the type and location of storage will need to be illustrated on submitted plans.
- 4.41 A Construction Management Statement will be required for this site.
- 4.42 **Planning Officer Note:** Amended plans were provided reducing the number of units to 12 with 14 no. car parking spaces and 12 no. cycle spaces. Further Transport comments will be reported in an update report.

Public consultation

- 4.43 The following addresses were consulted: 9c, 9d, 11a, 11b, 11c, 9c, 9d, 15, 16, 17a, 17b, 17c, 19 - Parkside Road; 27, 28, 29 - Westcote Road; Chilmington House, Armadale Court, and site notices were displayed on Westcote Road and Parkside Road.
- 4.44 Following the original submission 16 no. objections and 2 observations were received, summarised as follows:

Design

- Exterior elevations are incongruous and out of character with the rest of Parkside and Westcote Road. Architecture needs to be more sympathetic with the immediate locality, which have pitched and gabled roofs.
- Looks like an office block and would be a visual oddity.
- There are some buildings of a large scale in the locality with reflect their commercial use i.e. the BUPA Parkside Care Home nearby.
- Too severe, stark and utilitarian-looking for the area. In no way will the proposed development create anything but a negative visual impact.
- The prevailing character comprises detached dwellings of a traditional scale and character.
- Number of examples where more recent development has enhanced the character of the road. The proposal makes no effort to do this.
- Too tall and flat roof makes it look more bulky.
- Higher than the existing house and other developments and overbearing and bulky in the streetscene with limited interest.

- A significant uplift in site coverage, about 40%, and out of keeping with surrounding properties for this reason.
- Parkside road does not have a single building of this size and style.

Density and mix

- Density is around 90 dwellings per hectare well in excess of the indicate density ranges for suburban areas.
- No family housing.
- Should have houses and not flats.

Amenity of existing and proposed residents

- The top floor will overlook our house and garden [no. 29 Westcote Road].
- Little consideration to the privacy of immediate 2 storey neighbours or their outlook. The height and scale will dwarf neighbours.
- The proposal has numerous floor to ceiling windows and balconies. This design will destroy the privacy of our property and garden as well as other properties nearby.
- For the number of flats the garden space is very limited.
- Positioning of windows does not preserve privacy.
- The fenestration approach to the east elevation, which faces onto no.29 Westcote Road, is very different with limited openings and the use of high-level windows to limit overlooking opportunities, which suggest this façade is too close to no. 29.
- Walkways, communal areas and private amenity space would be close to the boundary with no. 29 Westcote Road.
- Would be significantly closer to no. 29 [compared to existing] reducing the distance from 20m to 6m.
- Balconies at elevated positions provide a watch tower effect over adjacent properties.
- No. 15 Parkside Road will be in full view of the two upper floors of the development without a solid permanent screening between my property and the development.
- Will cause extra noise and disturbance.

Traffic & Parking

- Insufficient car parking spaces and parking is already a growing issue along both roads.
- A large development on a small plot will contribute to traffic issues and make Parkside Road a worse' rat run'.
- The access is narrow and steep and the spaces will be difficult to use, so residents will be likely to park in the street.
- Currently the safety of this road hinges solely on good visibility but it will cease to be the case with the additional cars parking along the road. Highway safety will be compromised.
- The road is totally congested and this will exacerbate the problem.
- Deficient in disabled spaces.

Landscaping

- Removal of trees which are beautiful and provide privacy.

Biodiversity

- Additional details are required from the applicant as to how they are achieving a biodiversity net gain on this site in accordance with Policy H11 and EN12. The proposals would result in the significant loss of residential gardens, which will negatively impact on the local habitat and ecology.
- The area has bats, owls, stag beetles and hedgehogs which we fear will be affected by the increased housing density and traffic.
- The mature trees are diseased and will not provide the potential concealment identified.

Affordable Housing

- Affordable Housing Statement which states that no affordable housing will be provided by the development for reasons of viability.

Other

- Where will construction lorries and cranes park and how they will negotiate the narrow roads and trees? There will be no space on the site for them and the entrance would be too steep for access.
- The council should take seriously its statutory duties to access to information. This application would not be accessible electronically to everybody who might be affected and wish to comment.
- We have experienced problems with sewers blocking in the past and this development will add significantly to the demand on the sewer.

Following the consultation on amended plans (February 2021) 15 no. objections were received, which reiterated a number of the issues above and made the following additional points:

- The removal of the top storey is welcome and the change in brick colour is an improvement, but the development is still hugely out of character and overbearing.
- Would support the redevelopment of 18 Parkside Road with an appropriate scheme to replace what has become a derelict building and a social nuisance over the last few years. However, the proposal is not.
- The density has increased with more bedrooms.
- Parking issues would be worse with more bedrooms.
- Increased occupancy in a smaller space is liable to lead to increased issues - noise, rubbish, use of balconies as unsightly storage area, parking issues etc.
- The proposed levels on the plans are incorrect by at least 1.5m. As such, there is still potential for the height of the building to be reduced which would minimise the impact on surrounding properties.

- Highway safety will surely be compromised for pupils, in addition to members of the public, due to the excess traffic and parked cars (reducing visibility) generated?
- Designated on-road car parking makes access to driveways difficult, and this will increase, as it is more likely that these spaces will be full to capacity on a more regular basis, with the proposed flat development.
- The site on which no 18 stands has a sharp drop at the back of the house. I am concerned that a cheaply built construction could endanger those who buy these apartments.
- Very poor quality soil led to the requirement for many piles for a single storey extension at no. 29 Westcote Road. No. 18 is on the same worked out gravel pit.

Ward Councillors

Minster councillors welcome the amendments to the planning application. The development has reduced slightly, and the proposal now appears to be less bearing on the local area. The new proposed development is more aesthetically pleasing in comparison to the previous designs with more appropriate materials proposed. We have some concerns about parking.

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”. The relevant sections of the NPPF are:

National Policy

Section 2 - Achieving Sustainable Development

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

- 5.2 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Reading Borough Local Plan (2019)

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 EN12: Biodiversity and the Green Network
 Policy EN14: Trees, Hedges and Woodland
 Policy EN15: Air Quality
 Policy EN16: Pollution and Water Resources
 Policy EN18: Flooding and Drainage
 Policy H1: Provision of Housing
 Policy H2: Density and Mix
 Policy H3: Affordable Housing
 Policy H5: Standards for New Housing
 Policy H10: Private and Communal Outdoor Space
 Policy TR3: Access, Traffic and Highway-Related Matters
 Policy TR4: Cycle Routes and Facilities
 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

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)
- Planning Obligations Under Section 106 (April 2015)

5.4 Other relevant documents:

- DCLG Technical housing standards - nationally described space standard (2015)
- Reading Tree Strategy (2010)

6 APPRAISAL

The main matters to be considered are:

- Principle of Development
- Design and Effect on Character and Appearance of the Area
- Housing Density & Mix
- Transport/ Parking
- Landscaping & Ecology
- Sustainability
- Environmental Matters
- S106 obligations
- Equalities impact

Principle of Development

- 6.1 The provision of housing would contribute towards “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations...” (NPPF, Para. 8) and would also make effective use of urban land in accordance with NPPF (Para. 117). It would contribute to meeting the need for additional housing in accordance with Policy H1 of the Reading Borough Local Plan (RBLP).

- 6.2 The principle of development for residential is therefore acceptable subject to meeting other relevant policies including those related to design, ecology, landscaping, and parking, which are addressed in sections below.

Design and Effect on Character and Appearance of the Area

- 6.3 The NPPF (Para 124) sets out that good design is a key aspect of sustainable development.

6.4 Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.”* Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.

- 6.5 At pre-application stage a number of iterations of a residential flatted scheme were presented and a final version for 12 flats presented to the Design Review Panel on 12th March 2020 (as shown below):



- 6.6 The DRP considered that the principle of redevelopment was acceptable and that a 3 storey 't' shaped block could work if placed to respect the building lines to the south and east. They considered that the simple concept responded to the site context and that the language and form of the building was good. They commended that the design was not over articulated nor used detailing that was too elaborate.
- 6.7 They suggested that a taller element could be used to the northern corner if this enabled a smaller footprint and that parking could be moved under the north part of the site. They advised that north facing bedrooms should be avoided and that the building needed to be further from the southern boundary.
- 6.8 The pre-application proposal included three different brick types, red, buff and grey and the DRP suggested that a narrower palette be used of a similar colour with subtle variations. In terms of detailing The DRP advised that large scale drawings would provide assurance that the quality proposed could be achieved.
- 6.9 The originally submitted scheme under this application was for 13 flats in a part 3 and part 4 storey building (as below).



Parkside Road



Westcote Road

6.10 Following the initial consultation period officers raised a number of issues with the proposal with suggested amendments, summarised as follows:

- Reduce the scale - remove a floor and reduce the footprint.
- Amend the appearance to make it more domestic.
- Consider further against Policy CC8 and safeguarding amenity.
- Improve the mix of units.

6.11 An amended scheme was submitted, which was also reviewed by the Council's Conservation and Urban Design Officer.



Parkside Road



Westcote Road

6.12 In summary the amendments were as follows:

- Reduction in the corner height by 1 storey.
- Alterations to the appearance including:
 - replacing the glass balconies for metal ones;
 - changing the brick tone to be more "earthy";
 - making the recessed tops floors darker tones of brick (slate tone); and
 - emphasising the horizontal floor bands, to offset the verticality of the fenestration, thus making the building appear more residential.
- Width and depth has been reduced moving it further from no. 16 Parkside Road and no. 29 Westcote Road
- Alterations to the parking.
- Change to the mix to increase the number of 3 beds.
- Balconies added/ amended.

6.13 The local context does include a range of building types and styles, which are largely in residential use. There are a number of traditional forms with pitches and gables, but there are also other simpler and more modern forms of building.



Florence Court



YMCA

6.14 The area comprises detached and semi-detached 2 storey housing, bungalows, care homes and blocks of flats. Some of these are large buildings with some surrounding setting/ garden space and are up to 4 storeys. These include 19 Westcote Road, Parkside Care Home, and YMCA, a large modern corner building (marked with red stars on the plan below).



12 flats - 19 Westcote Road



Parkside Care Home



- 6.15 Although different in design to the adjacent buildings the overall layout of the proposed scheme would provide effective redevelopment of the plot, whilst maintaining sufficient distance to neighbouring properties. It would have a plot coverage consistent with other plots within the area, whilst ensuring sufficient landscaping and amenity setting to serve the proposed residents and to retain the verdant nature.
- 6.16 The height of the proposed scheme would be higher than the adjacent houses, but would reflect heights of other buildings within the wider area. Due to the site levels it is considered that it would be less dominant and overbearing in the street scene than other similar scale buildings. The agent has confirmed that the proposal would not involve raising the height of the land above the current ground level as suggested by an objector.
- 6.17 The stagger to the building lines would break up the mass of the building. It would be sited to respect the building alignments on either side and would be a minimum of 7.5m (16 Parkside Rd) and 5.5m (29 Westcote Road) to the south and east boundaries. This would provide adequate spacing between neighbouring properties to reflect the rhythm and spacing of existing buildings along this road.
- 6.18 Although it would be taller than the houses directly either side of it, the second floor is set in and back, which reduces its overall bulk, and minimises overbearing effects, and it is considered that there would be sufficient distance to these properties to not cause significant detriment to surrounding amenity. This is addressed further in the amenity section below.
- 6.19 Its simple form and proposed use of traditional materials with different textures, would assist in enabling the proposed scheme to sit comfortably within its setting. The NPPF recognises that whilst new development needs to reflect the identify of local surroundings and materials, contemporary development should not be prevented or discouraged.



- 6.20 The proposed scheme whilst contemporary respects the scale of development in the wider area, utilises the site more effectively and presents an active frontage to each street.
- 6.21 A comprehensive landscaping scheme is proposed which includes tree planting to the southern and western sides, which will assist in it retaining its verdant nature.
- 6.22 It is therefore, considered that whilst the proposal is for a contemporary design, which is different to the immediately adjacent buildings, there is a range of styles and plot coverages within the area and the overall siting, density, layout, materials and landscaping make for an acceptable scheme overall, subject to conditions regarding securing materials samples and detailed landscaping, which accords with Policy CC7.

Housing Density & Mix

- 6.23 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; and the need to minimise the environmental impacts including detrimental impacts on the amenities of adjoining occupiers.
- 6.24 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. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.”*
- 6.25 The amended proposal includes 3 x 3 bed units, which represents 25% of the total number of units. However, the proposal also includes 3 x 2 bed units, i.e. 50% 2 and 3 bed units. Para 4.49 of the RBLP explains that *“taken as a whole .. homes with two or more bedrooms, capable of accommodating families, represent the majority of the need”*. It is considered that this combined with the overall accessibility of the site, the need to make effective use of the site and the existing range of housing types and mix within the area, make this mix of units acceptable in this case.

- 6.26 The proposed scheme would equate to a density of 86 dwellings per hectare (DPH), which would be in excess of the indicative densities advocated in para 4.5, which for suburban areas is 30-60 DPH. In paragraph 4.4.8 it states that *“it is important to note that these will not be applied as hard-and-fast rules, and the particular characteristics of a site when judged against the criteria in the policy may well mean that a density outside these ranges is appropriate.”*
- 6.27 The character of the surrounding area is an important factor and the proposal would be comparable to the density of existing flatted developments in the area, for example no. 19 Westcote Road, which equates to a density of ca 100 DPH. The site is also considered to be a sustainable location being sited within close proximity of frequent premier bus routes on Bath Road and Tilehurst Road that run to and from the town centre and Reading West Railway Station to the east. In itself, the proposed density is not considered to be a reason to object to this application.
- 6.28 Therefore, in terms of mix and density the proposed scheme is considered to comply with the requirements of Policy H2.

Residential Amenity

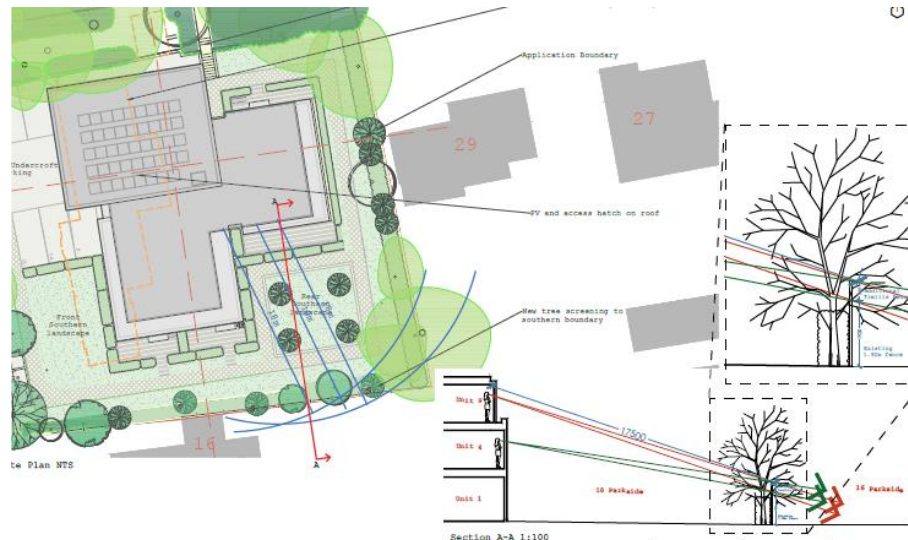
- 6.29 Policy CC8 requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety.
- 6.30 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 relating to amenity considerations are *“...a. All new build housing outside the Central Area.....will comply with the nationally-described space standard.
e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) ..”*. Units 1 & 3 at ground floor would be accessible and adaptable in line with M4(2)
- 6.31 Policy H10 deals specifically with private and communal space and for flats requires communal space, balconies and/ or roof gardens, and para. 4.2.40 states that *“Policy H10 seeks to secure private and communal outdoor amenity areas on all residential developments, the extent of which will be guided by the site’s proximity to quality public open space.”*
- 6.32 The proposed dwellings and rooms within them are stacked appropriately and are of a size which would meet the National Space Standards (Policy H5).
- 6.33 Most of the dwellings are double or triple aspect with no dwellings solely north facing. The trees on the south, east and west boundaries are far enough from the building to not shade it significantly, and the trees are predominantly

deciduous, which would allow more daylight through in the winter months when the sun is lower.

- 6.34 Windows of nearby residential buildings would not be adversely affected by the proposed scheme.
- 6.35 The proposal includes balconies for all first and second floor units, and the ground floor units their own private space. In addition, there would be communal space available to the southern and eastern sides of the building. The site is also located within walking distance of the large public open space of Prospect Park.
- 6.36 The proposed scheme includes windows looking towards adjacent sites. With respect to the windows on the southern side (to no. 16 Parkside Road) within the wing of the building closest to the boundary, the majority of these would be facing the side of the no. 16 where there are no windows. There would be some limited oblique views into the rear amenity space. However, windows within the southern elevation of the other wing (parallel to Westcote Road), would be at ca 15.3m (ground/first floors) & 16.2m (second floor) from the boundary with no. 16 and it is considered that this distance, combined with tree and landscaped boundaries, would be sufficient to not cause significant detriment to the amenity of no. 16.



View from south (outline of 16 Parkside Road in black)



Section to show angle of vision/ distance

- 6.37 With respect to no. 29 Westcote Road, similarly the closest east facing windows, would largely look directly towards the side elevation of no. 29, where there are no windows. It is considered that the remainder of the windows on the eastern side of the proposed scheme, which would be at a distance of ca 14.7m (ground & first) and 16.4m (second), combined with the retained and proposed landscaping, would also be sufficient to ensure that there would be no significant detriment to amenity and privacy. There are existing similar relationships, for example the relationship between Parkside Care Home and no. 16 Parkside Road.



View from the east (outline of 29 Westcote Road in black)

- 6.38 The scheme is therefore considered to accord with the relevant policies CC8, H5, and H10.

Transport

- 6.39 The application site is in a sustainable location close to a number of bus routes.
- 6.40 The proposal would retain a joint vehicular and pedestrian access to Parkside Road and introduce a new pedestrian access from Westcote Road.

- 6.41 A total of 14 no. car parking spaces are proposed. This would comply with parking standards with respect to the provision for the units themselves. In terms of visitors the Council's parking standards require one space per 10 flats, and as there is some unrestricted parking on Westcote Road and some limited time bays on Parkside Road, it is considered that this visitor parking could be accommodated on street, without significant detriment to highway safety.
- 6.42 A total of 12no. covered cycle storage spaces (Sheffield type) are proposed with ground floor Units 1-3 having 2 spaces each and the remaining units to share the 6no. spaces within the communal storage at the northern side of the proposed building. This would comply with standards and a condition is recommended to would be provided which would comply with policy.
- 6.43 Bin storage is located in a bin store to the Parkside Road frontage, which would comply with required standards.
- 6.44 The scheme is considered to be acceptable in transport terms, subject to attaching a number of conditions (set out in the Recommendation above), and would therefore accord with requirements of policies TR2-TR5.

Landscaping and Ecology

- 6.45 Policy CC7 requires developments to be assessed to ensure that they *"Are visually attractive as a result of good high quality built forms and spaces, ... and appropriate materials and landscaping."*
- 6.46 Policy EN12 states that on all sites development should provide no net loss of biodiversity and a *"net gain for biodiversity wherever possible."*
- 6.47 Policy EN14: Trees, Hedges and Woodlands requires new development *"...make provision for tree retention and planting within the application site, particularly on the street frontage, ... 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."*
- 6.48 The site is covered by a TPO and the proposal includes for the retention of all the trees along the northern boundary and the better specimens along the eastern boundary, save for some reduction of a sycamore on the northern boundary. The proposal also includes new planting and landscaping on the eastern and southern boundaries, landscaped communal garden and areas of private amenity space assigned to the ground floor units. The overall aim of the proposed landscaping scheme is to maintain screening adjacent to the public highway.
- 6.49 The Natural Environment Officer confirmed that the proposal would be acceptable subject to securing more detail on planting sizes and densities, maintenance, boundary fencing with mammal gaps etc.

- 6.50 The submitted ecological appraisal concluded that the site is of low-moderate ecological value, but with the potential to support a small number of protected species, including bats for foraging, hedgehogs for foraging and nesting, nesting birds, reptiles and common amphibians. The habitats of most value to wildlife such as bats and birds are the buildings and trees.
- 6.51 A bat survey was submitted, which identified that there was the potential for bat roosts. A further high level inspection was undertaken by the applicant's ecologist and an updated assessment and mitigation report were submitted. The Ecology Officer confirmed that, subject to conditions requiring obtaining a licence for development works affecting bats and mitigation and enhancement measures set out in the 'Update Preliminary Roost Assessment, High level Inspection and Mitigation Report' being implemented, the proposed scheme would be acceptable and accord with Policy EN12.
- 6.52 Therefore, it is considered to accord with Policies CC7 and EN12 and EN14.

Sustainability

- 6.53 There are several policies within the local plan which are relevant to new development to meet the aim of eliminating carbon dioxide emissions in Reading by 2030.
- 6.54 Adopted Local Plan Policy CC2 requires new development to reduce the consumption of resources and materials. Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change. Policy CC5 requires minimisation of waste during construction and the life of the development.
- 6.55 Policy H5 sets out the expectations for the performance of new build homes in terms of emission, unless it can be clearly demonstrated that this would render a development unviable. With respect to major residential schemes the policy states: "*...b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations. c. All major new-build residential development should be designed to achieve zero carbon homes.*
- 6.56 Policy H5 and the Council's Sustainable Design and Construction SPD (2019) identify that, as a minimum, new dwellings should achieve 35% improvement in regulated emissions over the Target Emissions Rate (TER) in the 2013 Building Regulations, plus a contribution of £1,800 per tonne towards carbon off-setting.
- 6.57 The submitted Energy Assessment identifies that the proposal would achieve at least 35% improvement of CO2 emissions, through the use of air source heat pumps and photovoltaic panels.
- 6.58 To ensure that policy would be fully met, the recommendation includes for a financial contribution, secured through the S106 legal agreement, for carbon offsetting.

- 6.59 Overall, subject to the conditions and obligations, the scheme would accord with measures in Policy CC2, CC3 and H5.

Environmental matters

- 6.60 ***Contamination:*** The Environmental Health Officer has confirmed, as raised by an objector, that the proposed development lies on the site of an historic pit/scar, which has the potential to have been filled with contaminated material land and the proposed development is a sensitive land use. The Officer has recommended conditions to ensure that a detailed survey and any relevant remedial measures are submitted and approved to comply with Policy EN16.
- 6.61 ***Drainage & Flood Risk:*** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions or be no worse than existing. The SUDS officer has confirmed that the proposed SUDS information would be acceptable. Standard SUDS conditions are included in the recommendation for the submission and approval of a final SUDS strategy.

Legal Agreement Unilateral Undertaking

- 6.62 In accordance with Policies CC2, CC9, H3 and H5, the following obligations would be sought:
- Affordable Housing:
 - £150k AH contribution, paid on sale of 10th Unit or 3 no, shared ownership units;
 - Deferred payment contribution with a 50/50 share in excess of 12% GDV on an open book basis capped at a policy compliant sum of £521,000 to be calculated on the sale of the 11th unit, or policy compliant 30%.
 - Employment, Skills and Training - construction
 - Carbon Off-Setting financial contribution based on a formula
- 6.63 Policy H3 requires “*• on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing;For sites of 10 or more dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate. In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.*”
- 6.64 The applicant submitted a viability assessment, which has been reviewed and negotiated by the Council’s Valuer and the above obligations have been agreed as acceptable. Shared ownership units would reflect the mix of the scheme, i.e. 1x1, 1x2 and 1x 3bed.

- 6.65 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.
- 6.66 As set out in the Sustainability section above, to meet policy H5, a contribution will be required towards carbon off-setting.
- 6.67 The applicant has confirmed their commitment to these obligations, which would be part of a S106 legal agreement.

Equalities Impact

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

CONCLUSION

- 7.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019. The principle of redeveloping for additional housing is considered to be in accordance with relevant policy and a contribution would be secured towards meeting the needs for affordable housing in the Borough. It would make an effective use of a suburban site in a sustainable location.
- 7.2 Although the design would be contemporary it is considered that there are a range of styles of buildings within the area and it would respect building lines, heights, materials and overall plot coverage of equivalent sites developed for flats. The building would be sufficiently set away from neighbouring boundaries and combined with retained and proposed landscaping it is considered that the scheme would not create significant detriment to residential amenity.
- 7.3 Officers have worked positively and proactively with the applicant on this scheme, and amendments secured, which are considered to satisfactorily address policy issues and overall officers consider this to be a supportable scheme, which accords with relevant national and local policy. The planning application is therefore recommended for approval subject to conditions and the completion of a S106 legal agreement as detailed above.

Case Officer: Alison Amoah

APPENDIX 1: Plans

Floor Plans

Ground Floor



First Floor



Second Floor



Elevations



Westcote Road Streetscene 1:200



Side (South) Elevation 1:200





Sections



Site Plan



UPDATE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 12

PLANNING APPLICATIONS COMMITTEE: 3rd March 2021

Ward: Minster

App No.: 200979

Address: 18 Parkside Road, RG30 2DB

Proposal: Demolition of detached house and annex and erection of 3 storey building for 3x3, 3x2, and 6x1 bed flats, with undercroft parking, landscaping and bin stores

Applicant: Colony Developments

Deadline: 27/11/2020

Extended Deadline: 30/4/2021

Planning Guarantee 26 week target: 26/2/21

RECOMMENDATION:

As on main report, but with the following amendments:

The Section 106 Legal Agreement to Secure the Following:

Affordable Housing

- £150k AH contribution paid on occupation of 10th Unit, ~~or three no. shared ownership units together with a Deferred Payment contribution with a 50/50 share in excess of 12% GDV on an open book basis capped at a total policy compliant sum of £521,000 to be calculated on the occupation of the 11th unit.~~

OR

- Three on-site shared ownership units or equivalent in terms of habitable rooms ~~together with a Deferred Payment contribution with a 50/50 share in excess of 12% GDV on an open book basis capped at a total policy compliant sum of £521,000 to be calculated on the sale of the 11th unit, or policy compliant 30% equivalent to 30% calculated on the occupation of the 11th unit.~~

Additional Condition:

28. Obscure glazing to first floor full height windows on the southern side.

1. AMENDED INFORMATION

Transport

- 1.4 Following consultation on the amended plans and further discussion between the Officer and the agent an amended ground floor plan was submitted (received 03-10 Rev P2, received 18th February 2021), which increases the overall parking provision to 14 no. on site car parking spaces. The Transport officer provided further comments on these amendments and confirmed:

“In accordance with the adopted Parking Standards and Design SPD the proposed development would be required to provide off road parking of 1 Parking space for each 1 and 2 bedroom flat and 1.5 for a 3 bedroom flat, therefore equating to a total of 14 (rounded) parking spaces. In addition to this, visitor parking should also be provided at a ratio of 1 per 10 dwellings, therefore the whole development would require 15 (rounded) parking spaces. After reviewing car ownership data the proposed provision of 14 parking spaces as illustrated in the amended plan 3-10 P2 is acceptable.”

- 1.5 Transport has reiterated that cycle storage would need to be covered secure storage. A condition requiring such details is already included in the recommendation in the main report.
- 1.6 A further revised drawing has been submitted by the applicant (3-10 P3), which shows proposed and future electric vehicle charging points as required by Policy TR5.
- 1.7 Further details for bin storage are required and a condition as on the main report is maintained.
- 1.8 The amended scheme is considered to be acceptable in transport terms, subject to attaching conditions, and would therefore accord with requirements of policies TR2-TR5.

Site Levels

- 1.9 Following further resident submissions and disagreement over the site levels as presented, the applicant’s agent has revisited the topographical survey data and has prepared the following statement and amended drawings (see Appendix 1) as follows:

“Concerns have been raised during the consultation process that there is a significant increase in building height and ground levels. The initial explanation offered to the planning officer was that there would be no significant adjustments, but as a result of ongoing residents’ concerns, the officer has sought further clarification. It is correct that the general site levels to the rear gardens would remain similar to the existing. Whilst the driveway and undercroft parking would be raised slightly to lessen the overall gradient for the parking area and to allow disabled access. The raised levels would mainly be to the Parkside Road aspect and less so to the rear amenity, where the levels would be generally equal or less than the neighbouring properties.

Further topographic data has been provided to clarify the exact level changes and comparisons with context and all elevation sections have been updated to reflect this, alongside elevation gridlines to aid the understanding of height variations. Any indicative levels of the neighbouring properties have been refined, in particular the garden to No. 29 which now reflects a better illustration of the relationship to the site and proposal.

With respect to the floor levels and building heights the existing house has a ground floor level of 57.32. The proposed building would have a car park/external level of 57.75 and ground floor level of 57.90, raising the levels by only 430mm and 580mm respectively. It is estimated that the building ground floor level would be very similar to that of No.29 if not slightly lower.

The tallest part of the proposal is 66.35, with the two wings, addressing No. 29 Westcote Road and no. 16 Parkside Road, lowered to 65.95. When compared to No.29 at 65.43, and No.16 at 64.52 the increase in height would be 550mm and 1455mm respectively, which is reasonable given the taller element of the proposal would be ca 14m from the boundary to no. 29 Westcote Road and the slight increase on the corner plot could be accommodated.”

- 1.10 Officers are satisfied that sufficient information has been presented to demonstrate what the effect of the proposed development would be with respect to its overall height and in its context, and does not change the assessment as set out in the main report.

Residential Amenity

- 1.11 Additional points have been raised, specifically by the residents of number 16. Parkside Road, which include reference to an inaccuracy within the report with respect to windows present on the northern side of their property (see comments and photos in Appendix 2; photos from no. 29 Westcote Road are included in Appendix 3). The officer confirms that this was an error, and as the application was received during Covid restrictions, had utilised information such as streetview, and other mapping systems, which allow a range of views. The side windows were not clearly picked up. In light of the confirmation that there are side facing windows at no. 16 Parkside, the officer has re-reviewed the effect of the proposed scheme with respect to overlooking/ loss of privacy in terms of those side facing windows.
- 1.12 The residents have advised that there are four no. windows: 2 at first floor serving a bedroom, and two at ground floor serving a study (see photo below).



- 1.10 It is considered that the main issue would be with respect to the effect of the proposed windows at first and second floor levels within the wing nearest

no. 16. The latest proposed southern side of the building (05-12 Rev P2, rec 18/2/21) includes 4 no. high level windows and two full height windows at first floor and two slim windows at second floor (see below).



- 1.11 As the rooms these windows serve also have windows on the east and west elevations (front and back - from Parkside Road) the applicant has confirmed that the first floor full height windows would be obscured glazed, and a further condition is included in the recommendation above. In terms of the second floor windows these are very slim windows at ca 9m from the nearest point of no. 16, and it is considered that the level of direct overlooking/ loss of privacy would be minimal, and combined with landscaping along this boundary it is considered that this would not cause significant detrimental harm to the amenity of no. 16 in accordance with Policy CC8.

Section 106 obligations - Affordable Housing

- 1.12 Since the completion of the main report there has been further negotiation between the applicant and the Council's Valuer with respect to the Affordable Housing Contribution. It has been agreed that in the case of delivery of the option of three on-site shared ownership units, that this could be based on an equivalent number of habitable rooms, i.e. 9 habitable rooms. This could mean the delivery of fewer, but larger units as shared ownership, which is considered acceptable by RBC's Housing Team, who have confirmed that they would prefer larger units.
- 1.13 This is still considered to accord with the relevant Policies CC9 and H3 and the recommendation for approval is maintained, subject to some minor changes to the Heads of Terms in the recommendation as above.

Ecology

- 1.14 For further clarification, further bat surveys would be undertaken between mid-May and August 2021 and the results of these would inform the licensing process and the type of license that would be required (condition 8 of the main report).

- 1.15 The applicant has provided an updated report (*Update Preliminary Roost Assessment, High Level Inspection and Mitigation, rec 2/3/21*) Report, which makes it clear that the proposed mitigation measures, which include bat roosting features, bird boxes, bee bricks, hedgehog gaps, and wildlife beneficial landscaping scheme would provide biodiversity net gains to meet Policy EN12. The amended mitigation plan is included in Appendix 4. The measures within the amended document would be specifically referenced within recommended condition 9 as set out in the main report.

Sustainability

- 1.16 The applicant has submitted an updated Energy Assessment, which relates to the 12 unit scheme. This confirms that the proposed scheme would continue to achieve an overall reduction in Co2 of 36.97% with the proposed use of heat pumps and photovoltaic panels in accordance with Policy H5.

Written Statements

- 1.17 Written statements have been submitted by those members of the public who are registered under 'public speaking' and are included in Appendix 5. below.

Conclusion

- 1.18 Having reviewed the additional information the officer recommendation is not altered, save for the amendments to the S106 heads of terms, and an additional condition regarding windows, as above.

Officer: Alison Amoah

APPENDIX 1: SITE LEVELS/HEIGHTS PLANS



APPENDIX 2: FURTHER COMMENTS AND PHOTOS FROM NO. 16 PARKSIDE ROAD - provided by Mark Ashton & Lisa French

We have been shocked so see the committee report today ahead of the committee meeting on Wednesday in regards to the re development of 18 Parkside Road. Despite multiple objections from ourselves and many of the local residents the main objections all seem to have been ignored or given an unsatisfactory response and in some cases blatant lies.

We purchased our property just over 8 years ago when at the time we were up against 2 local developers and the family selling the house chose to sell to us as we wanted to renovate the property as our forever home. We love the fact that the houses on the road are all different shapes and sizes and full of character in this historic Reading Road. 16 Parkside Road is a lovely plot size and the garden is very private We are nearing the end of our renovation after 8 long years but it now feels like the joy it once brought is about to be destroyed.

Please see below in particular the points on the committee report we feel we need to comment on [*Planning officer note: extracts from the committee report in red*]

6.14 The area comprises detached and semi-detached 2 storey housing, bungalows, care homes and blocks of flats. Some of these are large buildings with some surrounding setting/ garden space and are up to 4 storeys. These include 19 Westcote Road, Parkside Care Home, and YMCA, a large modern corner building (marked with red stars on the plan below).

The application keeps making reference to Parkside Care Home and that this proposed development is in someway comparable. The site on which that building sits is 4 times the size and in keeping in design with the houses in the area. Please see below photo of Parkside Care Home next door in line with our home. The building is set back with the 2nd floor in the pitched roof, the windows on the 1st floor are considerably smaller than the ones proposed at 18 Parkside Road and the windows on the 2nd floor are tiny, covered with shutters and hold some sort of generator room. There simply is not the feeling of being over looked by this building as the developers have been considerate and careful with their design. The one big thing to point out that this is a very quiet care home - not a residential block housing over 30 occupants. The developers have built a fitting amenity as opposed to maximizing profit on the site at 18 Parkside Road foresaking local character and residents privacy and well being.



6.15 Although different in design to the adjacent buildings the overall layout of the proposed scheme would provide effective redevelopment of the plot, whilst maintaining sufficient distance to neighbouring properties. It would have a plot coverage consistent with other plots within the area, whilst ensuring sufficient landscaping and amenity setting to serve the proposed residents and to retain the verdant nature.

Please see below photos of all the houses on Parkside Road next to and adjacent to 18 Parkside Road - these are all residential and all of the same character and charm of Parkside Road. How in anyone's mind can these proposed plans think that this "office block" style of building will be a visual benefit to the area?





6.16 The height of the proposed scheme would be higher than the adjacent houses but would reflect heights of other buildings within the wider area. Due to the site levels, it is considered that it would be less dominant and overbearing in the street scene than other similar scale buildings. The agent has confirmed that the proposal would not involve raising the height of the land above the current ground level as suggested by an objector.

As you can see from the below photos this proposed development will undoubtedly tower over our back garden ensuring we will lose all privacy which was one of the reasons we purchased our home.



6.27 The character of the surrounding area is an important factor and the proposal would be comparable to the density of existing flatted developments in the area, for example no. 19 Westcote Road, which equates to a density of ca 100 DPH. The site is also considered to be a sustainable location being sited within close proximity of frequent premier bus routes on Bath Road and Tilehurst Road that run to and from the town centre and Reading West Railway Station to the east. In itself, the proposed density is not considered to be a reason to object to this application.

This proposed development also keeps comparing itself to the flats at 19 Westcote Road. As you can see from the photos, I took this morning this building is most defiantly in keeping with other buildings near by, the 2nd floor within the gable roof line and sympathetically designed along with consideration to neighbours by having no windows on the side. We would welcome a development along these lines.



6.36 The proposed scheme includes windows looking towards adjacent sites. With respect to the windows on the southern side (to no. 16 Parkside Road) within the wing of the building closest to the boundary, the majority of these would be facing the side of the no. 16 where there are no windows. There would be some limited oblique views into the rear amenity space. However, windows within the southern elevation of the other wing (parallel to Westcote Road), would be at ca 15.3m (ground/first floors) & 16.2m (second floor) from the boundary with no. 16 and it is considered that this distance, combined with tree and landscaped

boundaries, would be sufficient to not cause significant detriment to the amenity of no. 16.

Please see below a photo of this side of our house (excuse render - we are mid renovation) where there are in fact 4 windows - one being our home office where Lisa works all day and the other being our bedroom - to say there are no windows on this side of our house is a lie.



6.37 With respect to no. 29 Westcote Road, similarly the closest east facing windows, would largely look directly towards the side elevation of no. 29, where there are no windows. It is considered that the remainder of the windows on the eastern side of the proposed scheme, which would be at a distance of ca 14.7m (ground & first) and 16.4m (second), combined with the retained and proposed landscaping, would also be sufficient to ensure that there would be no significant detriment to amenity and privacy. **There are existing similar relationships, for example the relationship between Parkside Care Home and no. 16 Parkside Road.**

This is the side aspect of our house from Parkside Care Home - how is this similar when they have been respectful and have only one window facing our house - which is infact just a stair well window.



6.24 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. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.”*

6.25 The amended proposal includes 3 x 3 bed units, which represents 25% of the total number of units. However, the proposal also includes 3 x 2 bed units, i.e. 50% 2 and 3 bed units. Para 4.49 of the RBLP explains that *“taken as a whole .. homes with two or more bedrooms, capable of accommodating families, represent the majority of the need”*. It is considered that this combined with the overall accessibility of the site, the need to make effective use of the site and the existing range of housing types and mix within the area, make this mix of units acceptable in this case.

Sorry, but this requirement is not being met, no amount of arguing can change that. If the developer was serious about offering quality family accommodation, then the 50% target would be met. If developers can offer the explanation above and get planning approval, then what is the point in having the regulations in the first place? If this guidance is not adhered to then there is no incentive for developers to offer decent family sized dwellings.

One more point on this and just a general observation. Reading is bursting at the seams with flats, everywhere you drive there are new developments popping up, some of which are massive in size such as the Thames Quarter complex and the ongoing construction of Kennet Island. Is there truly still that much demand for flats in Reading? I find it hard to believe when you can see multiple for sale and to let

signs outside many existing developments throughout Reading. A quick search on the internet on Rightmove shows 1935 flats available to rent in Reading and 1215 flats available for sale as of 1st March 2021. Add other sites into this and that is a pretty big number.

Reading is desperate for quality family housing. A development that concentrated on high quality homes would be far more suitable for the plot and location than yet more flats.

6.41 A total of 14 no. car parking spaces are proposed. This would comply with parking standards with respect to the provision for the units themselves. In terms of visitors the Council's parking standards require one space per 10 flats, and as there is some unrestricted parking on Westcote Road and some limited time bays on Parkside Road, it is considered that this visitor parking could be accommodated on street, without significant detriment to highway safety.

This is, an incredible assumption that it will be okay for visitors to park on Westcote Road. As local residents, Mark walks to work everyday via Westcote Road and there is always large number of cars parked along here on both sides of the road, including up on pavements. With Covid restrictions currently in place the parking issue isn't as bad but I can guarantee that once Covid restrictions are lifted we will see people who don't live in the area dumping their cars and walking to Reading West Station or in some case all the way to Reading town centre. Believe me, this happens an awful lot as I see it with my own eyes.

Many households have more than one car so even with 14 car parking spaces planned this will not be enough for the number of occupants in the building. Add in visitors and it will result in a significant number of cars parked along Westcote Road.

The parking bays on Parkside Road are already full at night as time restrictions do not apply so that rules that out as an option for visitors to park in. In summary, the parking issue has not been addressed, in my opinion can't ever be as the development is simply too big and dense for the plot size. If this is approved, Westcote Road will become an absolute nightmare for the residents living along there. The road will also be extremely difficult and dangerous for motorists to navigate along.

In closing we want to add that we are not against the development of the site, in fact welcome it. But please try to ensure we preserve the beautiful charm of this old Reading road and be respectful to all the neighbouring properties and their privacy.

**APPENDIX 3: PHOTOS FROM 29 WESTCOTE ROAD AND 16 PARKSIDE ROAD -
provided by Mr. Dodson**

Site Photos – 29 Westcote Road & 16/18 Parkside Road RG30 2DL



Road entrance into 18 Parkside Road – note steep angle – too steep to be able to park across the slope hence new ground level has to be raised for proposed development.



Looking at the south end wall of 18 Parkside Road from across entrance to 16 Parkside Road. Note fence line which is constant along the boundary to where it joins 29 Westcote Road fence line.



View from road entrance of 29 Westcote Road looking across to boundary with 18 Parkside Road. Both buildings in worked out gravel pit.

Note summer house in 18 Parkside Road garden behind silver car cover.



View from 29 Westcote Road showing retaining wall of level car parking area and corner of roof of summer house in garden of 18 Parkside Road





This picture has the laser level line transferred and projected from top of the fence along the boundary between 18 Parkside Road and 16 Parkside Road shown projected onto the back of the summer house.



Height
between
lines ~0.5m

This picture has the laser level line from the front door threshold of 29 Westcote Road projected onto the rear of the summer house showing that it is ~0.5m below the 18/16 Parkside Road fence line.

The Colony drawing number '500 05-11 1:200 Westcote Road elevation' shows the ground level of the new development to be ~0.5m above the threshold of the front door of 29 Westcote Road.

Thus the proposed new site level is approximately at the same level as the top of the boundary fence between 18 and 16 Parkside Road.




This is also approximately in line with the top of the retaining wall seen in the picture below that runs right across the north of the 18 Parkside Road site.



Retaining wall
running across
north/Westcote
Road side of site

APPENDIX 4: UPDATED BIODIVERSITY MITIGATION PLAN



-  6 x Green & Blue Bat Block integrated bat boxes
-  2 x Schwegler 1FD bat boxes
-  2 x Green & Blue Swift Block swift boxes

-  2 x interconnected Green & Blue Bat Block integrated bat boxes to create a maternity roost feature suitable for pipistrelle bats.
-  2 x bee bricks

DARWIN
ECOLOGY
integrating nature conservation
info@darwin-ecology.co.uk
www.darwin-ecology.co.uk

Project: 18 Parkside Road, RG30 2DB

Figure 4: Mitigation, compensation and enhancement plan

Date: March 2021

APPENDIX 5: WRITTEN STATEMENTS

A) Chris Dodson OBE - 29 Westcote Road

A need for an appropriate development at 18 Parkside Rd is recognised. However, this is not an appropriate development because:

- It would make a negative contribution to the character of the immediate area with inappropriate scale, overall bulk and density of occupation.
- The design density of the proposed development is overwhelmingly out of keeping with the immediately surrounding properties and nothing less than an eyesore. The fact that other developments nearby have such a density - 'two wrongs do not make a right'.
- The proximity to neighbouring properties categorically does not minimise exposure to such an overbearing and architecturally inappropriate structure.
- When new drawings were submitted to the planning portal on 18th February 2021, it was the first time they showed site lines for no 16 Parkside, it became clear that they proposed the whole site be lifted ~2m above the existing ground level - this will exacerbate the intrusive sight lines into surrounding properties and gardens (the new ground level is at the height of the top of fences of surrounding properties and gardens) and effectively 'adds a floor' in terms of appearance from adjoining properties and the street scene. The drawing 'Overlooking Section 500 02-50' with Section A-A does not show the 2m lift of the site and so the overlooking sightlines shown are not real, they are a great deal worse. An engineer has used a laser level to determine the existing building ground level (>1.5m below our front door threshold at 29 Westcote Road) and compared that with the new proposed sections which show the ground floor of the new development throughout to be some 0.5m above our front door threshold level. We therefore suggest the committee is being totally misled under 6.16 of the Committee Report in front of you.
- We feel strongly that the drawings were trying to hide from us the fact that the intent was to lift the building and the land that surrounds it over 2metres, above standard fence height. This would result in people effectively walking at the top of our fence height looking down on our property and gardens. At the same time it lifts the building and effectively reinstated the floor they said that they had removed in response to our objections.
- The residents of surrounding properties consider this proposal to be a blight on our immediate area which leads us to question why this application has any support within Reading Borough Council. This is a clear attempt to build as many units as possible to maximise profits with no regard to design quality and our immediate neighbourhood's character, unique assets and current density.

We ask you to reject this application and seek an appropriate more family friendly development on this site **built from the existing ground level.**

B) Mark Ashton & Lisa French - 16 Parkside Road

We are extremely disappointed that we are still objecting to the proposed redevelopment of 18 Parkside Road for the same reasons that we have submitted now on several occasions. Minimal concerns raised by ourselves and local residents have been addressed, to the point of actually being ignored. We want to clarify again that we are not against the redevelopment of 18 Parkside Road, but not in its current form.

Below is why we are objecting to the proposed development including breaking several key planning committee policies.

- It is clearly too large and dense for the plot size. Little consideration has been given to the size and quality of the dwellings. This is presumably to maximise developer profit. Squeezing 12 flats (possible 33 occupants) onto a plot that has for many years been a single family house is excessive to say the least.
- The southern boundary will now sit much higher so in effect the bottom of the new building will be in line with the top of our fence line. This isn't demonstrated on the plans at all which we feel is underhand and quite deliberate.
- The privacy of our property and surrounding buildings will be destroyed by the sheer size and overbearing nature of the development. This issue is amplified by the size of the windows and the glass balconies that are planned to overlook all adjacent properties. The architectural features proposed do not lend themselves to the rhythm of surrounding buildings as outlined in planning committee policies. A few trees and some trellis are not going to solve the issues with privacy on any of the boundaries.
- The design is ugly and not in any way in keeping with other surrounding buildings. The building offers nothing positive to the landscape and character of this prominent Reading area. How is this design even being considered in this location when the houses in this area feature pitched and gable roofs and brick and render finishes? This development is more in keeping with an office block suited to the town centre. Other recent developments in the area such as Westcote Road, specifically 5 & 19 have been designed sensitively and importantly with no over looking windows on both sides of the building to protect the privacy of nearby neighbours. The complete opposite is true of 18 Parkside Road.
- This size development will in turn create issues with traffic and parking. Parkside Road already has limited parking and is used as a rat run. It is already recognised that parking is a problem on Westcote Road, with cars parked on pavements both sides already. This will just add to the problem, especially when you factor in visitor traffic. Speed restrictions along both roads in recent weeks already slows there are traffic issues. The development offers only 13 parking spaces when a minimum of 14 are required. The fact this allows just one space for all visitors to 12 flats is a major concern.
- Under current policy a building with over 10 dwellings must have 50% of properties with 3 beds. This is not the case with this development, currently only 25% of units will be 3 beds. There is clearly little emphasis here for the provision of family-sized housing which again is another key part of planning policy.

C) Sue Spooner - 9B Parkside Road

The amended plans do not in any way make the design of the proposed development appropriate for Parkside or Westcote Roads. The flat-roofed boxy style of the design is completely out of keeping with nearby properties which all have pitched roofs and gables. Other recent developments of houses, flats and care homes on both roads have been exemplary in following the local design style, and have therefore blended in to and enhanced the appearance of the street. This rectangular, office-block style of development might be appropriate for a city centre, but is completely out of place in the middle of traditional Victorian-style housing. Having such an ugly, large development on a prominent corner plot will greatly detract from the appearance of both streets and will completely dominate neighbouring houses.

I am also very concerned about the impact that such a dense development will have on traffic and parking on Parkside and Westcote roads. Clearly there will not be sufficient parking provided within the precincts of the property itself for such a large number of flats, which will mean that residents of the flats and their visitors will have to park on Parkside or Westcote roads. These roads are too narrow to have cars parked on both sides, so this is likely to greatly inconvenience existing residents as well as make driving down the streets very difficult. It is also likely to result in cars parking on the pavement which will be dangerous for pedestrians.

I appreciate that redevelopment of this plot is reasonable, but I really hope that the Council will reject these plans to conserve the beauty and character of the area.

D) Dr. J A ("George") Nowacki and Mrs Helen Nowacka - 4 Parkside Road

The proposed design is completely out of keeping in a long-established road with many houses around 100 years old and the newer properties (Bewley Homes development) carefully designed to blend in with the older houses.

1. Reading Local Plan Policy CC7: Design and the Public Realm.

High design quality that maintains and enhances the character and appearance of the area of Reading in which it is located, (with respect to: density and mix, scale, height and massing and architectural details and materials.

NOT MET

2. H11, Development of Private Residential Gardens:

Relationship with surrounding area, integration with surrounding area, the arrangement of doors, windows and other principal architectural features and their rhythm between buildings.)

NOT MET

Just look at the elevations showing adjacent buildings, Drawing no. 500-05-10 and new buildings opposite. No attempt at blending or integrating.

3. Revised Parking Standards and Design (SPD Oct 2011)

The Standard for flats in Zone 2 stipulates 1.5 car spaces for 3-bedroom flats and 1 car space for 1 and 2 bedroom flats plus 1 visitor's space. This comes to $3 \times 1.5 = 4.5$ plus $9 \times 1 =$ plus 1. A total of **14.5** spaces. There should also be parking provision for **9** bicycles. The developers offer 12 car parking spaces only.

NOT MET

Parking in Parkside Road is restricted and cars are already parked on both sides of the road (and pavements) in Westcote Road. These roads are used as a rat-run in non-lockdown times.

4. Local Plan for Housing

50% of new-build developments of 10 or more dwellings outside Central Reading to be family units (i.e. 3 or more bedrooms) The proposal offers 25%

NOT MET

The proposal is trying to cram too many dwellings into a plot occupied by one family house with no regard to blending with adjoining properties. It is surprising that the Planning Officer recommends Approval when the proposal does not meet the criteria set by the Planning Committee. It would save a lot of Committee time if the Planning Officer guided developers to present proposals that met Planning Committee Policies and Guidelines. If the Planning Committee does not enforce its policies, there is no incentive for developers to comply.

**BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021**

Ward: Abbey

App No.: 201735

Address: Palmer Park

Proposal: Leisure centre extension to include a 25m 6 lane pool, fitness suite, cafe, activity room, parking spaces and landscaping, and the refurbishment of the existing grandstand to include demolition of the existing entrance lobby, internal works and roof works.

Applicant: Greenwich Leisure Limited (GLL)

Deadline: 12th March 2021

Extended Deadline: 9th April 2021

Planning Guarantee 26 week target: 11th June 2021

RECOMMENDATION:

Delegate the Head of Planning and Regulatory Services (HPDRS) to **GRANT** Planning Permission subject to the satisfactory completion by 9 April 2021 to a S106 agreement (unilateral undertaking) to secure:

A contribution of £6,000 towards the improvement of crossing facilities on London Road in the vicinity of Palmer Park, payment prior to the implementation of the development.

If the S106 agreement is not completed by 9 April 2021, delegate to officers to REFUSE planning permission, unless an extension by the HPDRS is agreed.

CONDITIONS TO INCLUDE:

- 1) TL1 - 3 yrs
- 2) AP1 - Approved Plans
- 3) M2 - Materials to be submitted and approved
- 4) C1 - Hours of Construction
- 5) C2 - Construction and Environmental Management Statement to be submitted and approved including Phasing Plan.
- 6) C4 - No Bonfires
- 7) N8 - Noise levels of plant/ equipment restricted
- 8) N21 - Hours of operation (external lighting)
- 9) Hours of use - 07:00-22:30 (M-Thursday); 07:00-21:30 (Friday) and 09:00-18:00 (weekends)
- 10) Submission, approval and implementation of a Piling Method Statement
- 11) Contamination Land remediation to be undertaken in accordance with report
- 12) CO6 - Unidentified contamination
- 13) SU5- 'Excellent' BREEAM - Design stage
- 14) SU6 - 'Excellent' BREEAM - Built stage
- 15) SU7 - SUDS plan to be approved

- 16)SU8 - SUDS to be implemented
- 17)S1 - Detail of PV to be approved
- 18)DC1 - Vehicle Parking as specified
- 19)DC6 - Cycle Parking to be approved
- 20)DC7 - Refuse and Recycling to be approved (to be vermin proof)
- 21)DD8 - Car Parking Management Plan
- 22)DE6- Provision of Electric Vehicle Charging Points
- 23)Delivery of enhanced crossing prior to occupation
- 24)L2 - Hard and soft landscaping scheme to be submitted and approved
- 25)L4- Landscape Management and Maintenance Plan to be submitted and approved
- 26)L7 - Arboricultural Method Statement and tree protection plan to be submitted and approved
- 27)Measures to provide bat and bird boxes to be submitted and approved
- 28)Details of lighting including to protect wildlife
- 29)Bollard Lighting Levels
- 30)No floodlighting
- 31)Vegetation clearance to avoid bird nesting season (March-August)
- 32)Bat survey before any demolition
- 33)No development until a programme of archaeological work has been submitted and approved.
- 34)Submission and approval of an Employment, Skills and Training Plan - construction phase

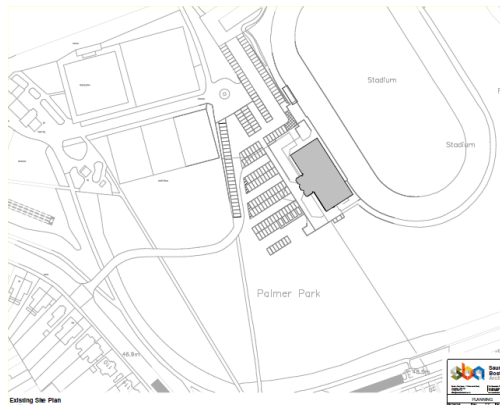
INFORMATIVES TO INCLUDE:

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) IF2 - Pre-Commencement Conditions
- 4) I11 - CIL Not Chargeable
- 5) IF4 - S106
- 6) IF3 - Highways
- 7) I29 - Access Construction
- 8) IF7 - Complaints about Construction
- 9) Thames Water informatives
- 10)IF1 - Positive and Proactive

1. INTRODUCTION & BACKGROUND

- 1.1 The application site is relatively level and is approximately 1.29 hectares in area and is part of Palmer Park. It comprises the Palmer Park Stadium with athletics track and velodrome, the Grade II listed monument: Statue of George Palmer, parking spaces and access road from Wokingham Road.
- 1.2 The current stadium, which opened in 1988, provides a range of activities within the existing grandstand building including fitness studio, gym, and changing rooms for the floodlit pitches, athletics stadium and velodrome.

- 1.3 The remainder of the park comprises open space, play areas, sports courts, football pitches, a library, a café, nursery, St. Bartholomew's Church and the Pakistan Community Centre, and a single storey building housing grounds maintenance storage and the Reading/Thames Valley Sub-Aqua Club, and other parking areas. To the north, west and south are residential areas and the Park is surrounded by roads on three sides with the railway line to the east. Palmer Park is the second largest public open space in the Borough after Prospect Park and serves the east of the Borough and also residential districts within Wokingham Borough.



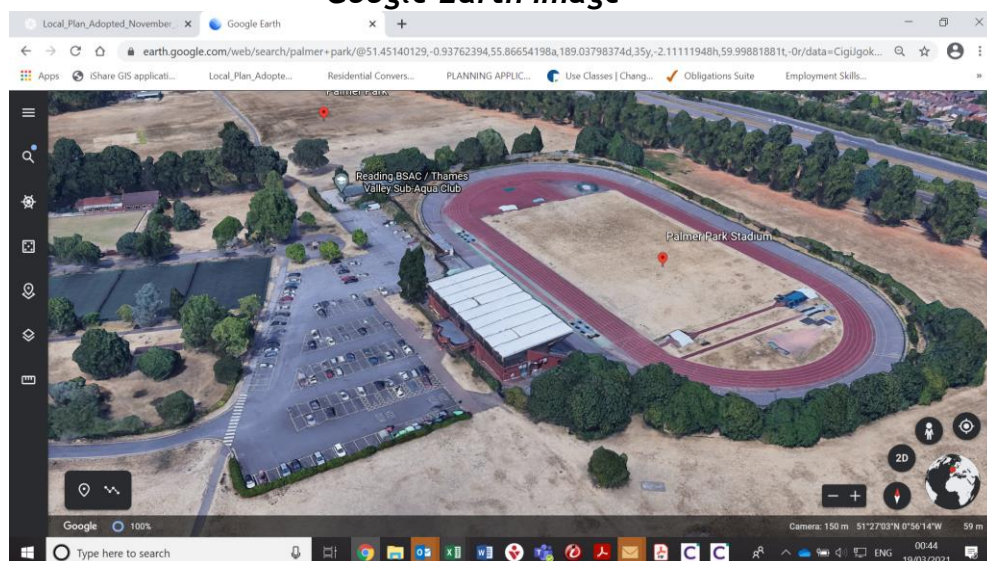
- 1.4 The site is partially within the Air Quality Management Area (Policy EN15); allocated for leisure under Policy ER1j; and is within a Local Green Space and Public Open Space (Policy EN7Ed). There is also a Palmer Park Development Framework (SPD), adopted April 2020, which covers the allocated site and the wider park area.
- 1.5 The proposed scheme arose from a strategic review of indoor sports facilities in the Borough, undertaken in 2015. This assessed the age, quality, size, accessibility, community use, opening hours and type of management of each existing facility, focusing on the current and future supply and demand for key sporting facilities and in particular considered the amount and configuration of swimming pool water and sports hall space. Extensive consultation was undertaken with stakeholders and this resulted in a range of recommendations for sport and recreation facilities including those for Palmer Park.
- 1.6 A new community pool at Palmer Park, to replace the Arthur Hill pool at Cemetery Junction/ Kings Road, forms one part of the borough-wide 25-year leisure contract awarded by RBC to GLL at the Council's Policy Committee in January 2020.
- 1.7 As the proposed scheme would involve the loss of open space under local authority control, the Council has separately advertised this as a disposal of open space in accordance with S.123 of the Local Government Act 1972, advertised on 4th and 11th February 2021, and as confirmed by the Council's Head of Legal and Democratic Services , no objections were received.

- 1.8 The application is referred to committee as it is a 'major' development. It is not a REG3 application, because GLL are the applicant and would design, build and run the facility on behalf of the Council.

Location Plan



Google Earth Image

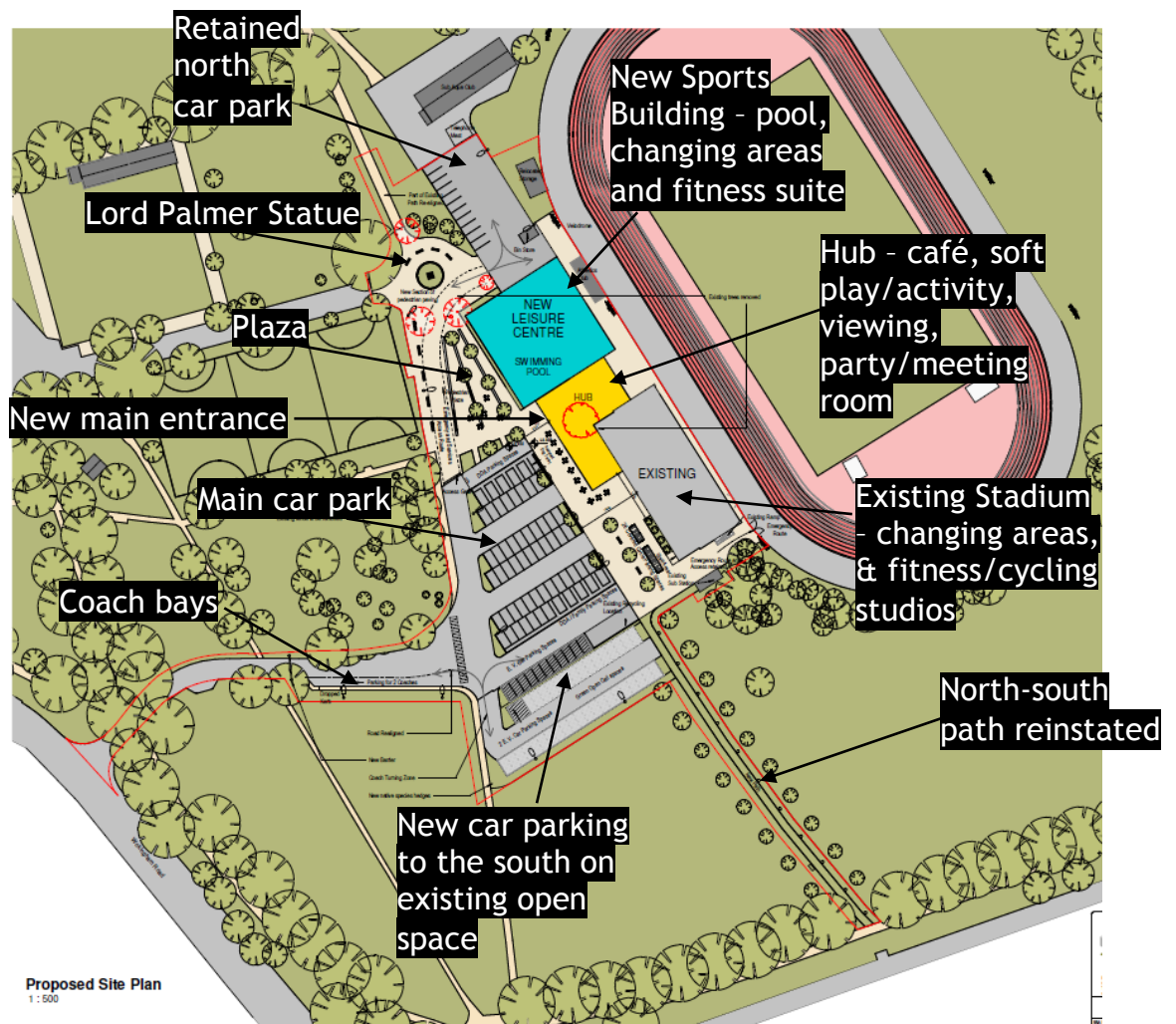


2. PROPOSAL

- 2.1 The proposal is for a two-storey extension on the north and west of the existing Palmer Park Stadium and would comprise the following:
- Sports hall - comprising a 25m, 6-lane community pool and fitness suite (110 stations)
 - Hub - comprising: Ground floor - Café / seating area, soft play/ activity zone, viewing area (Double height); First floor - Party/meeting room
 - Wet and dry changing areas

- A total of 131 car parking spaces; 11 Electric Vehicle Charging Points; 26 new cycle spaces and parking for 2 coaches
- Associated soft and hard landscaping and new Plaza area
- Demolition of the existing entrance lobby, main entrance relocated to the new extension, internal decoration of the existing changing rooms, creation of new accessible changing rooms, and alteration of first floor spaces to create new studio spaces.
- Existing roof will be replaced

2.2 Construction of the extension would involve the closure of the existing stadium to provide the alterations and refurbishments. However, the DAS states that during construction safe access would need to be maintained to the athletics field, cycle track, substation, telecommunications mast, and the grounds maintenance/sub aqua club to the north.





2.3 Submitted plans and documentation received 4th December 2020, unless otherwise stated (including amended details) are as follows:

- Location Plan - Drawing no: 1789-SBA-PP-XX-A-5001 Rev A
- Existing Site Plan - Drawing no: 1789-SBA-PP-XX-A-9001 Rev A
- Existing Ground Floor Plan- Drawing no: 1789-SBA-PP-00-A-9010 Rev A
- Existing First Floor Plan - Drawing no: 1789-SMA-PP-01-A-9011 Rev A
- Proposed Ground Floor Plan 1789-SBA-PP-00-A-0010 Rev I, received 7th December 2020
- Proposed First Floor plan 1789-SBA-PP-01-A-0011 Rev I
- Proposed Roof Plan - Drawing no: 1789-SBA-PP-02-A-0012 Rev P2, received 18th March 2021
- Proposed Site Plan - Drawing no: 1789-SBA-XX-XX-DR-A-5003 Rev P6, received 15th March 2021
- Proposed North-East and South-East Elevations - Drawing no: 1789-SBA-PP-ZZ-A-2001, received 15th March 2021
- Proposed South-West and North-West Elevations - Drawing no: 1789-SBA-PP-ZZ-A-2004, received 15th March 2021
- Proposed Sections - Drawing no: 1789-SBA-PP-ZZ-A-1001 Rev E
- Landscaping Plan Sheet 1 of 3 - Drawing no: EML PEL 1143 01 Rev PL1, received 18th March 2021
- Landscaping Plan Sheet 2 of 3 - Drawing no: EML PEL 1143 02 Rev PL1, received 18th March 2021
- Tree Pit Details Sheet 3 of 3 - Drawing no: EML PEL 1143 03 Rev PL1, received 18th March 2021
- Outline Landscaping Proposal - Drawing no: EML PEL 1143 01 Rev H, received 5th January 2021
- AIA [Arboricultural Impact Assessment Plan] - Drawing no: 8457-D-AIA

- Site Plan - Diversions Mechanical and Electrical Site Services Layout - Drawing no: C7402-TLP-PP-00-DR-ME-901 Rev C
- Site Plan - New Connections Mechanical and Electrical Site Services Layout - Drawing no: C7402-TLP-PP-00-DR-ME-902 Rev A
- Air Quality Statement, Document ref: 20-6869, dated 27th November 2020, prepared by Syntegra Consulting
- Biodiversity DEFRA Metric, prepared by John Wenman Ecological Consultancy, received 9th March 2021
- Addendum for DEFRA Biodiversity Metric 2.0, dated 18th March 2021, prepared by John Wenman Ecological Consultancy, received 19th March 2021
- BREEAM Ecology, received 9th March 2021
- Built Heritage, Townscape and Visual Impact Appraisal, Document ref: 2015-RE01 V3, dated December 2020, prepared by Neaves Urbansim
- Contamination Assessment, prepared by Furness Partnership
- Integrated Planning, Design and Access Statement, Document ref: SBA-PP-XX-RP-A-001 P05, dated 16th November 2020, prepared by Saunders Boston Architects, received 11th December 2020
- Energy Strategy Rev D, Fourth Issue, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd
- External Lighting Impact Statement, Issues 01, dated 25th November 2020, prepared by Thornley & Lumb Partnership
- Site Plan External Lighting Layout - Drawing no: C7402-TLP-00-00-DR-E-801 Rev A
- Flood Risk Assessment, Rev 02, dated 27th November 2020, prepared by Furness Partnership
- Main Investigation Report, Document ref: 17760/MIR_R27, dated August 2019, prepared by Soils Ltd
- Noise Impact Assessment, Document ref: 20-6869, dated 20th November 2020, prepared by Syntegra Consulting
- Parking Note, Document ref: 15059-HYD-XX-XX-RP-TP-001, prepared by Hydrock, received 23rd February 2021
- Proposed Drainage Strategy - Drawing No: 6264-SK-3 Rev A
- Open Spaces Planning Note, dated December 2020, prepared by Avalon Planning and Heritage, received 17th December 2020
- Preliminary Ecological Appraisal, Document ref: R2298/b, dated August 2019, prepared by John Wenman Ecological Consultancy
- Request for Screening Opinion, Document ref: GLL1001, dated 1st December 2020, prepared by Gillings Planning
- Sustainability Statement, dated 27th November 2020, prepared by Ecoteric
- Transport Assessment, Document ref: 15059-HYD-XX-XX-RP-TP-5001, Issue P04, dated 30th November 2020, prepared by Hydrock
- Travel Plan, Document ref: 15059-HYD-XX-XX-RP-TP-6001, Issue P02, dated 27th November 2020, prepared by Hydrock
- Tree Survey, Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement and Tree Protection Plan, dated 20th November, prepared by Hayden's Arboricultural Consultants

- TS & AIA [Tree Survey and Arboricultural Impact Assessment] - Drawing no: 8458-D-AIA
- Utility Assessment, Issue 2, dated 25th November 2020, prepared by Thornley & Lumb Partnership Ltd
- Ventilation and Extraction Statement, dated 25th November 2020, 2nd issue, prepared By Thornley & Lumb Partnership Ltd
- CIL Form 1: Additional Information
- Consultation Response Statement, Document ref: 1789.03a Rev A, dated 18th March 2021, prepared by Saunders Boston Architects, received 18th March 2021

- 2.4 Community Infrastructure Levy (CIL): the proposal is CIL liable, but leisure is not a chargeable use, as set out in the Council's CIL Charging Schedule.

3 PLANNING HISTORY

Relevant planning history is as follows:

85/TP/871 - Redevelopment of existing stadium to provide new grandstand, grounds maintenance buildings and extension to existing bowls pavilion at Palmer Park, Wokingham Road, Reading - Approved 10/1/1986

95/00887/REG3 (950607) - Erection of detached storage building. Installation of enclosed lobby to entrance to stadium. REGULATION 3 - Approved 22/1/1996

09/01248/REG3 (091758) - Insertion of window openings to south-west elevation - Approved 15/9/2009

09/002214/FUL (090257) - New clubhouse for Reading Athletic Club - Approved 9/2/2010

10/00488/NMC (100464) - Non-material change to planning application 09/02214/FUL for alterations to windows - Agreed 7/5/2010

11/00707/FUL (110179) - Erection of vent stack and temporary site access (drop kerbs), forming part of larger underground sewer improvement/replacement works which are permitted development - Approved 5/7/2011

200154/PREAPP - Pre-application advice for extension to existing grandstand building of 25m, 6 lane community swimming pool, café and kitchen/servery, double height activity zone, 100+station fitness gym. Refurbishment of existing grandstand to include remedial works to the roof, general internal redecorations, creation of party room/ studies. Associated 160 car parking spaces (20 retained normal spaces, 9 retained, but remarked Blue Badge/ designated

Family space, 66 retained, but remarked normal spaces, 65 new car parking spaces on open cell pavements. (Amended).

4 CONSULTATIONS

Statutory:

Sport England

4.1 It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

4.2 Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 97) and against its own playing fields policy, which states:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- *all or any part of a playing field, or*
- *land which has been used as a playing field and remains undeveloped, or*
- *land allocated for use as a playing field*

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.”

4.3 Sport England's Playing Fields Policy and Guidance document can be viewed via the below link: www.sportengland.org/playingfieldspolicy

4.4 The Proposal and Impact on Playing Field - The proposal is for the leisure centre extension to include a 25m 6 lane pool, fitness suite, cafe, activity room, parking spaces and landscaping, and the refurbishment of the existing grandstand to include demolition of the existing entrance lobby, internal works and roof works. There is no loss of playing fields.

4.5 Strategic Need and Assessment - The new provision of a new pool is needed due to the lack of water space with the borough. Sport England has been working with Reading BC for a number of years on their leisure provision and I am satisfied that the development is strategically needed.

4.6 I have had several pre-application discussions with the applicants in recent years, the last being just prior to the submission of the planning application. The applicants have carried out discussions

with a number of national governing bodies, such as Swim England and England Athletics (EA). I have also spoken to EA as well as the County FA about this scheme who were very supportive of the proposals.

- 4.7 For completeness I did invite Swim England and England Athletics to comment on the proposal, but perhaps due to a combination of the festive period and Covid, I have had nothing back from them. Notwithstanding these I am content that the scheme is strategically sound.
- 4.8 As Sport England is putting funds into this project, I am not commenting on the layout as this will be picked by my technical team as part of the grant award conditions.
- 4.9 Having assessed the application, Sport England is satisfied that the proposed development meets Exception 3 of our playing fields policy, in that:

'The proposed development affects only land incapable of forming part of a playing pitch and does not:

- *reduce the size of any playing pitch*
- *result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);*
- *reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;*
- *result in the loss of other sporting provision or ancillary facilities on the site; or*
- *prejudice the use of any remaining areas of playing field on the site.'*

Also there is a clear strategic need for the development.

- 4.10 This being the case, Sport England wishes to support this application.

Does the EA need consulting?

Non-statutory

RBC Transport Strategy

- 4.11 Following the submission of a further Transport Technical Note amended Transport comments were received as follows: The proposals comprise the partial redevelopment of the existing Palmer Park Sports Centre and Stadium site in order to provide a new swimming pool, extended leisure centre building and associated parking.
- 4.12 The majority of the facilities provided at the existing Palmer Park Sports Centre and Stadium will be retained as a result of the

proposals with additional facilities such as a 25m lane swimming pool proposed. Table 4.1 (from the Transport Assessment (TA)) outlines the existing and proposed facilities at the site.

Table 4.1: Palmer Park Sports Centre and Stadium Existing and Proposed Facilities

Facility	Existing	Proposed
Athletics track	✓	✓
Velodrome	✓	✓
x3 3G five-a-side pitches (outdoor)	✓	✓
4 x 11-a-side grass football pitches (outdoor)	✓	✓
Gym	✓ 60 stations	✓ 100 stations
Multi-purpose room	✓	✓
Cafe	✓	✓
Hub	✗	✓
Swimming pool (25m)	✗	✓
Parking	198 spaces in main car park	131

- 4.13 Although the ‘hub’, which includes a café and soft play/ activity zone, represents a new offering its use is considered ancillary to the existing facilities so it is not considered that this would attract any notable additional trips to the sports complex.
- 4.14 A number of clubs and societies currently use the existing facilities for training, matches and races and it has been confirmed that the same programme of events would be retained as a result of the proposals. It is important to note that although the same programming is to be retained, the timetabling of classes and events are subject to change.
- 4.15 To accompany the planning application, a Transport Assessment has been submitted and I comment on this as follows:

Site Accessibility

Walking

- 4.16 The site is located within an existing public park and is bound on three sides by residential areas with an existing network of footways and footpaths that permeate the area within the immediate vicinity of the site.
- 4.17 The adjacent footpath and footway connection facilities are of a high standard, supported by additional facilities such as street lighting and pedestrian crossings which benefit from dropped kerbs and tactile paving.
- 4.18 Footways/footpaths varying between 2-3m in width are provided on both sides of Wokingham Road within the vicinity of the site. A ‘tiger’ crossing (a combined pedestrian zebra/bike crossing) is provided on Wokingham Road approximately 110m to the north west of the junction of the access road (Palmers Way) and Wokingham Road. The footway/footpaths are well-surfaced and lit and continue south east towards the southern residential areas of Earley and northwest towards central Reading.

- 4.19 There are a number of footpaths that cross Palmer Park connecting the site with the footways provided on Palmer Park Avenue, Wokingham Road and St Bartholomews Road.
- 4.20 Crossing facilities and footways are provided on the A4 London Road to the north of the site which provide a pedestrian connection to Newtown to the north of the A4 London Road and westwards towards central Reading.

Cycling

- 4.21 The proposed development site is surrounded by a network of local on and off-road cycle routes which provide a link to local residential areas.
- 4.22 Palmer Park forms part of the East Reading and Woodley local cycle route. Within Palmer Park, cycle paths accommodate an off-road section of the route which continues east under the A3290 into the residential area of Woodley. The East Reading and Woodley cycle route is also provided along Wokingham Road as a demarcated on-road cycle lane. The route continues north west into central Reading and southeast where it connects to other local cycle routes.
- 4.23 Continuous cycle connections are provided from the site to the various surrounding residential areas.
- 4.24 In addition to local cycle routes in the surrounding area the site is also well connected to the National Cycle Network (NCN) with NCN Route 4 provided within close proximity to the site. NCN Route 4 is provided adjacent to the River Kennet approximately 850m north of the site and is directly linked to the site by the East Reading and Woodley local cycle route. NCN Route 4 is a long-distance cycle route linking London to Fishguard in west Wales via Reading, Bath and Bristol. Locally NCN Route 4 provides a traffic free route west into central Reading and east to the residential areas to the east of the A3290.

Bus Accessibility

- 4.25 The closest bus stops to the site are the College Road bus stops located on Wokingham Road directly adjacent to the secondary site access which lies on a pedestrian and cycle desire line from the site. A dedicated bus layby, timetable and flag are provided at both stops, with the addition of a seat/shelter provided at the westbound stop.
- 4.26 The bus stops are served by several bus services which includes route 17 that provides a 10 minute frequency to and from Reading Town Centre.
- 4.27 Overall the proposed development is in a sustainable location that allows for alternative modes of travel to be utilized to access the site.

Proposed Development Trip Generation

Overview

- 4.28 The development proposals encompass the redevelopment of the existing sports centre to provide a new swimming pool and hub building to be provided alongside the existing leisure centre building and sports stadium (athletics track and velodrome) which would be retained as part of the proposed scheme. The hub would contain a new café with outdoor seating and will be ancillary to the sports facility offering. The existing 3G football pitches and grass football pitches would also be retained.
- 4.29 As the majority of the existing uses are to be retained as a result of the proposals and the events / classes timetables are to remain as existing with the same clubs / societies utilising the facilities, the baseline traffic generation figures derived from historic operational information of the existing site would be applied to the new proposals to form the proposed traffic generation position, with the new 25m lane swimming pool added on top.
- 4.30 Although the number of fitness stations within the gym is proposed to increase from circa. 60 stations to circa. 100 it is not considered that this would lead to a material increase in vehicle movements to the site. The gym exists and will largely have its customer base established. The redevelopment of the gym represents an improvement in the existing facilities rather than a new offering therefore, and for the purposes of trip generation calculation it is considered that the level of gym patronage would remain as existing.
- 4.31 The proposed 25m 6 lane swimming pool does however represent a new trip generator at the site and although a proportion of trips are likely to be shared with the existing uses on the site (users of the gym may also go for a swim, for example), for the purposes of calculating a trip generation it has been assumed that the swimming pool would attract entirely new person and vehicular trips to the leisure facility.
- 4.32 The proposed swimming pool is therefore considered to be the sole additional trip-generating element of the proposed redevelopment in this assessment. In reality, there may be a small variance in the number of gym users but likewise no allowance is made for linked trips (the same person using both the gym and the pool) which would offset this.
- 4.33 This section identifies the likely impact of the development proposals on the local highway network, considering the change in trips between the existing uses, and the proposed redevelopment scheme.
- 4.34 Analysis of historical, pre-COVID operational data and discussions with the Stadium operations manager has highlighted that the busiest day at the existing Palmer Park Sports Centre and Stadium in terms

of patronage is a Wednesday. Therefore, in order to conduct a robust assessment of the likely impact of the proposals the typical peak AM and PM network hours of 08:00-09:00 and 17:00-18:00 have been assessed based upon the Wednesday operational timetable provided by site management. The Saturday operational peak of 11:00-12:00 has also been assessed.

Existing Trip Generation

- 4.35 The existing Palmer Park Sports Centre and Stadium which currently occupies the site generates a number of staff, visitor, delivery and servicing vehicle trips associated with the daily operation of the site.
- 4.36 Due to the ongoing COVID-19 pandemic the Palmer Park site is not fully operational and therefore conducting traffic surveys during this time would not capture the trip generating potential of the site compared to fully functioning pre-COVID levels of operation. There is also no existing historical traffic data for the Palmer Park Sports Complex.
- 4.37 The existing trip generation of the site has therefore been assessed through a review of existing operational information provided by management staff at the Palmer Park Sports Complex. This operational information includes the following:
- hourly arrivals to the existing building over a seven-day period (transaction data recorded by membership card swipes, allowing a customer to walk through the turnstiles);
 - average daily gym patronage;
 - timetables and average patronage of gym classes;
 - information of 3G pitch bookings including times and average patronage;
 - club booking information for use of both the athletics track and cycle track including times and patronage;
 - timetable and usage information for the grass football pitches; and
 - an average timetable of yearly events.
- 4.38 The hourly usage information, recording the number of customers through the turnstiles, has been used as the primary source of information to establish a daily arrivals profile of users at the site as this records all club and gym members accessing the leisure building over an average week.
- 4.39 This data does however exclude those using the 3G pitches, grass football pitches and velodrome. Therefore, the remaining timetable and patronage data has been reviewed and these additional users of the site added in order to account for those not recorded by the turnstiles.
- 4.40 The historical turnstile information provides hourly numbers of users entering the existing leisure building but does not record what time users leave. Therefore, the accompanying timetable information

relating to classes/clubs has been provided and has been reviewed to establish the length of time that each user remains at the site, with assumptions of an hour-long stay applied to general gym customers. It has been assumed that users arrive to the site in the hour period before the start of their respective class or club activity and depart the site in the hour period after the finishing time in order to establish an existing daily arrivals and departures profile.

- 4.41 It must be stressed that this is a complex assessment to ascertain a person trip rate but the Highway Authority are happy that this is a robust assessment and as such is an acceptable methodology.
- 4.42 The existing person trips generated by the Palmer Park Sports Centre and Stadium are summarised in Table 5.1 below (taken from the TA).

Table 5.1: Summary of Existing Person Trips

Scenario	Period(s)	Person Trip Generation		
		Arrivals	Departures	Two-way
Wednesday	AM Peak (08:00-09:00)	19	18	37
	PM Peak (17:00-18:00)	89	34	123
	Daily	774	774	1548
Saturday	Sat Peak (11:00-12:00)	63	110	173
	Daily	380	380	760

- 4.43 To assess what level of vehicle trips would be generated by the site, the applicant has utilized the TRICS National Database in order to obtain multi-modal trip rates from sites with a similar mix of leisure facilities to those provided at Palmer Park. This methodology has been reviewed and is deemed acceptable.
- 4.44 Analysis of the multi-modal trip rates obtained from the TRICS review indicates that a total of 48% of users currently drive to the site. This proportion has been applied to the total people trips outlined in Table 5.1 above to give a daily vehicle arrivals and departures profile to and from the site.
- 4.45 This is with the exception of patrons arriving to the site to use the velodrome as the applicant has been informed by the management at Palmer Park that the majority of velodrome users cycle to the site. Therefore, a lower 20% vehicle driver figure has been applied to velodrome users to reflect the nature of these trips whilst still capturing the small proportion that may drive. The Highway Authority are happy with this approach.
- 4.46 A summary of the existing Wednesday and Saturday vehicle trips to and from the site is provided at Table 5.3 below (taken from the TA).

Table 5.3: Summary of Existing Vehicle Trips

Scenario	Period(s)	Vehicular Trip Generation		
		Arrivals	Departures	Two-way
Wednesday	AM Peak (08:00-09:00)	9	9	18
	PM Peak (17:00-18:00)	43	16	59
	Daily	372	372	744
Saturday	Sat Peak (11:00-12:00)	30	53	83
	Daily	164	165	329

Proposed Trip Generation

- 4.47 A ‘first principles’ approach has been taken to forecasting the likely vehicle trips generated by the proposed swimming pool based on operational information from the swimming pool at South Reading Leisure Centre. This information has been provided by Reading Sport + Leisure who also run the Palmer Park Sports Centre and Stadium.
- 4.48 It should be noted that a review of TRICS National Database v.7.7.3 2020 was undertaken by the applicant, however upon review of the sites available on the TRICS National Database this highlighted that there are no comparable sites contained on the database, with no surveys of swimming pool-only sites. The sites contained within the database were not considered to have the same traffic generating characteristics as the proposed swimming pool due to the difference in size and services provided.
- 4.49 The proposed traffic generation for the new 25m lane swimming pool has therefore been forecast from a review of existing operational data and timetables from the swimming pool at the South Reading Leisure Centre. The Highway Authority are happy that the pool at South Reading Leisure Centre serves a similar demographic to that of the Palmer Park Sports Centre and is of a similar size to the proposed swimming pool. It is therefore considered that this dataset provides a robust like-for-like comparison on which to forecast trip generation for the proposed pool at Palmer Park.
- 4.50 In order to calculate the proposed number of vehicular trips generated by the development proposals, operational information has been supplied which includes monthly swimming pool patronage information from South Reading Leisure Centre during 2019.
- 4.51 In order to obtain an average weekday and weekend trip generation profile from a years’ worth of monthly data the patronage data was first averaged to provide a patronage figure for an average month. The months of December and August were removed from this calculation as these months were assessed to have considerably lower patronage than the other months of 2019, the data remaining would therefore provide a robust assessment. This average monthly figure was then divided by four (the average number of weeks in a month) to give an average seven-day usage figure.
- 4.52 A weekday/weekend proportional split was then established via a review of weekday and weekend surveys of leisure centre sites contained within the TRICS National Database v.7.7.3 2020. The

analysis of the leisure centre weekday and weekend multi-modal trip rates established that 52% of trips occur on across the week and 48% occur on the weekend - averaging out at c.10% on any weekday and 24% either Saturday or Sunday. These proportions were then applied to the average weekly patronage information to provide an average weekday and Saturday daily person trips figure for the proposed swimming pool.

- 4.53 The daily trip generation profile from the review of the TRICS data has been used to establish an average daily profile of trips across both an average weekday and a Saturday. These daily trip arrivals and departure profiles were then applied to the average daily person trips derived from the monthly patronage data supplied by Reading Sport + Leisure in order to establish a forecast daily profile of person trips to and from the proposed swimming pool.
- 4.54 Finally, the 48% car driver figure established from the earlier TRICS review of similar sites and outlined above has been applied to the average daily person trips to provide a weekday and Saturday daily vehicle trips figure. The vehicular trip rate profile from the review of the TRICS outputs has then been applied to provide a forecast daily vehicular trip generation profile for the proposed swimming pool.
- 4.55 Tables detailing the forecast daily person arrivals/departure profile of patrons to and from the proposed swimming pool element of the site based on operational information from South Reading Leisure Centre are included below at Table 5.4.

Table 5.4: Forecast Swimming Pool Person Trip Generation

Scenario	Period(s)	Forecast Swimming Pool Person Trip Generation		
		Arrivals	Departures	Two-way
Weekday	AM Peak (08:00-09:00)	6	4	10
	PM Peak (17:00-18:00)	20	15	35
	Daily	170	171	341
Saturday	Sat Peak (11:00-12:00)	54	54	108
	Daily	399	400	799

- 4.56 A detailed table providing the forecast daily vehicular arrival/departure trips of patrons to and from the proposed swimming pool based on the application of a 48% car driver figure to the person trips is included at Table 5.5.

Table 5.5: Swimming Pool Vehicular Trip Generation

Scenario	Peak Period(s)	Forecast Swimming Pool Vehicle Trip Generation		
		Arrivals	Departures	Two-way
Weekday	AM Peak (08:00-09:00)	3	2	5
	PM Peak (17:00-18:00)	10	6	16
	Daily	81	80	161
Saturday	Sat Peak (11:00-12:00)	26	30	56
	Daily	192	193	385

- 4.57 It should be stressed that the proposed trip generation is spread throughout the day and although there is a peak in terms of the swimming pool use this is not a drastic contrast to the other times during the day. This is likely to be as a result of the varying swimming classes that would be available and would therefore attract a different demographic of user. The Net Vehicular Trip Generation s identified in Table 5.6 below.

Table 5.6: Net Vehicular Trip Generation

Scenario	Time	Existing Palmer Park Sports Centre and Stadium			Proposed Redevelopment of Palmer Park Sports Stadium			Net change in Trip Generation		
		Arrivals	Departures	Two-way	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Wednesday	8-9	9	9	18	12	11	23	+3	+2	+5
	17-18	43	16	59	53	22	75	+10	+6	+16
	Daily	372	372	744	453	452	905	+81	+80	+161
Saturday	11-12	30	53	83	56	83	139	+26	+30	+56
	Daily	164	165	329	356	358	714	+192	+193	+385

- 4.58 It should be stressed that the figures outlined in Table 5.6 above do not take into account of any shared or linked trips between the various facilities on the site so therefore represent a worst-case traffic generation scenario. In reality a number of the trips to the swimming pool would not be new trips and would be linked to the existing uses at the site such as the gym, cycling or athletics track offerings. Therefore, the increase in trips outlined is likely to be lower in reality.
- 4.59 Regardless of this the tables above identify that the net differences in the level of peak hour trips on a Wednesday would be an increase of just 16 two-way vehicle trips during the PM peak hour and during the Saturday peak (11:00-12:00) there are forecast to be an additional 56 two-way vehicle movements to and from the site.
- 4.60 Neither of these would be regarding as a significant and material increase in trips and as such the principle of the proposal is deemed acceptable.
- 4.61 Regardless of the above the proposed scheme will result in a significant increase in trips by alternative modes, i.e. walking, running and cycling - 180 on a weekday and 414 on a weekend day respectively and therefore, to mitigate this increase, a contribution of £6,000 is sought towards the improvement of the London Road / Liverpool Road pedestrian crossing facility.

Access

Pedestrian and Cyclist Access

- 4.62 Pedestrian access to the site will remain largely as existing with the various footpaths currently provided through Palmer Park and the pedestrian connections to the footways on the local highway network surrounding the site retained.

- 4.63 An area of public realm (Plaza) is proposed to the west of the new swimming pool and surrounding the existing George Palmer statue in order to re-establish a pedestrian focused centre to Palmer Park. The public realm will be shared space design with pedestrians and cyclists to have priority. This area of public realm will link to the existing footpath that continues north across Palmer Park to the A4 London Road with a new footpath provided to the south of the proposed car park providing a continuous pedestrian route to the footpaths adjacent to Palmer Park Avenue.
- 4.64 Once on the site, there will be safe, well-lit and waymarked routes suitable for all abilities between footpaths, car and cycle parking and the building entrance. Level access will be provided for staff and visitors using mobility assistance such as wheelchairs, electric scooters and for carers with buggies. The site will be dementia-friendly in terms of wayfinding and natural points of entry, and tactile signs and surfaces will be provided for users with visual impairment.
- 4.65 Cyclists would continue to access the site as existing, either via Palmer Way or via the local cycle routes that are provided throughout Palmer Park. Cycle parking is also to be provided adjacent to the main car park.

Vehicular Access

- 4.66 Vehicular access to the site will be retained via the existing access drive, Palmers Way which joins with Wokingham Road via a 'T'-junction approximately 160m west of the existing building entrance.
- 4.67 Vehicular visibility for drivers emerging from Palmers Way onto Wokingham Road is provided with splays exceeding 2.4m x 43m to the nearside carriageway to the southeast and northwest of the access, which is in line with design guidance from the Manual for Streets (MfS) for a 30mph design speed.
- 4.68 The secondary, gated vehicular access provided as a pedestrian crossover arrangement with Wokingham Road some 140m northwest of Palmers Way will be retained as part of the development proposals. The entrance will continue to be solely used by emergency/maintenance vehicles and the bollards preventing unauthorised vehicle entry into the site will remain in place.
- 4.69 Two car parking areas are proposed as part of the development, a main car park adjacent to the existing leisure centre building and an overflow car park provided to the north of the new swimming pool building. Both car parks are to be accessed from Palmer Way.
- 4.70 The two car parks will be linked via an area of public realm which has been designed in a shared surface arrangement with priority given to pedestrians and cyclists. Vehicles would therefore utilise this shared surface to access the overflow car park provided to the

north of the proposed swimming pool building. It is intended that this overflow car park is only utilised during peak periods and events, therefore minimising the use of the public realm by vehicles.

- 4.71 Swept path analysis has been carried out for the vehicular access and is considered acceptable.

Parking

Car Parking Standards

- 4.72 Local parking standards are set out in the Revised Parking Standards and Design Supplementary Planning Document (SPD). The Revised Parking Standards and Design SPD splits Reading into a number of different zones with the proposed development site located at the border between Zones 2 and 3. The parking standards for both of these zones were therefore considered.
- 4.73 There are no specific parking standards for leisure complexes such as that provided at Palmer Park, however maximum parking standards are provided for some of the individual elements within Palmer Park. These are set out in Table 4.2 from the TA below.

Table 4.2: RBC: Revised Parking Standards and Design Parking Standards

Facility	Parking Standard	
	Zone 2	Zone 3
Playing Fields	12 spaces per hectare of pitch area	12 spaces per hectare of pitch area
Swimming Pools	1 space per 7.5 fixed seats & 1 space per 15 m ² pool area	1 space per 5 fixed seats & 1 space per 10 m ² pool area
Health Clubs/Gymnasiums	1 space per 35 m ²	1 space per 30 m ²
Stadia	Considered on individual merit	Considered on individual merit

- 4.74 The Revised Parking Standards and Design SPD also outlines the suggested level of accessible and family/toddler spaces for developments in all zones as follows:
- Up to 200 spaces provided - 3 disabled spaces or 5% of total capacity, whichever is greater; and
 - Up to 200 spaces provided - 2 spaces or 4% of total capacity, whichever is greater.
- 4.75 In addition to the above, the Reading Borough Local Plan Policy states that 10% of car parking spaces provided should provide an active charging point for Electric Vehicles (EV).
- 4.76 As there are no specific parking standards for sports complexes such as that provided at Palmer Park and the parking standards for individual uses do not cover all of the facilities provided, parking levels for the proposed development have been calculated using operational and patronage data and associated parking accumulation calculations which is deemed an acceptable methodology.
- 4.77 The daily profiles of total vehicle arrivals and departures to and from the proposed Palmer Park Sports Centre and Stadium redevelopment

have been used in order to predict the peak level of parking required at the site during a Wednesday (busiest day in terms of patronage) and a Saturday. The resulting Wednesday parking accumulation is presented in Table 5.7 below, taken from the TA.

Table 5.7: Wednesday - Car Parking Accumulation of Redeveloped Sports Centre

Time	Arrivals (Cars)	Departures (Cars)	Parking Accumulation (Cars)
00:00	0	0	0
01:00	0	0	0
02:00	0	0	0
03:00	0	0	0
04:00	0	0	0
05:00	0	0	0
06:00	3	0	3
07:00	11	2	12
08:00	12	11	13
09:00	49	12	50
10:00	24	47	27
11:00	12	22	17
12:00	13	13	17
13:00	11	13	15
14:00	15	11	19
15:00	15	15	19
16:00	22	16	25
17:00	53	22	56
18:00	149	52	153
19:00	45	111	87
20:00	17	82	22
21:00	2	19	5
22:00	0	4	1
23:00	0	0	1

- 4.78 The above parking accumulation indicates that there is likely to be a maximum parking demand of 153 parking spaces by the proposed redevelopment at any one time. This level of parking demand is considered an anomaly relative to the remainder of the week, and is only encountered for an hour on a Wednesday evening due to the use of the athletics track by Reading Road Runners running club.
- 4.79 In reality this level of parking demand is likely to be lower as levels of car sharing between members of the running club are likely to be higher than accounted for in the parking accumulation exercise.
- 4.80 As can be seen from Table 5.7 the parking demand over the remainder of the day is forecast to be significantly lower than the peak demand of 153 with a demand of only 87 car parking spaces required.
- 4.81 The Saturday parking accumulation is presented in Table 5.8 below, taken from the TA. It is evident that this weekend parking demand is significantly lower than the maximum weekday demand.

Table 5.8: Saturday - Car Parking Accumulation of Redeveloped Sports Centre

Time	Arrivals (Cars)	Departures (Cars)	Parking Accumulation (Cars)
00:00	0	0	2
01:00	0	0	2
02:00	0	0	2
03:00	0	0	2
04:00	0	0	2
05:00	0	0	2
06:00	0	0	2
07:00	0	0	2
08:00	56	14	44
09:00	28	18	54
10:00	61	35	80
11:00	56	83	53
12:00	40	55	38
13:00	27	39	26
14:00	33	26	33
15:00	32	46	19
16:00	17	22	14
17:00	6	14	6
18:00	0	6	0
19:00	0	0	0
20:00	0	0	0
21:00	0	0	0
22:00	0	0	0
23:00	0	0	0

- 4.82 A total of 108 car parking spaces are to be provided within the main car park to include seven disabled bays, four family/toddler bays and 13 Electric Vehicle (EV) charging bays.
- 4.83 A further 23 car parking spaces are to be provided in the overflow car park giving a site-wide provision of 131 car parking spaces. This would be 22 spaces fewer than are identified in the car park accumulation assessment however ensuring the appropriate level of car parking in new developments involves striking a careful balance. On the one hand, it is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway and public transport network through on-street parking. On the other hand, an over-provision of car parking, particularly at places of work, can lead to less sustainable travel choices.
- 4.84 Given that the under provision of parking is for a very small portion of the week, would not occur during the full year (athletics only occurs during summer months) and the assessment makes no reference of any car sharing or linked trips between different uses on the site to reduce parking demand.
- 4.85 It should also be stressed that the applicant, GLL, are also to be the end operator of the Palmer Park Sports Centre and Stadium as well as the car park when the site is operational post development. It is the intention of GLL to employ a set of measures in order to manage the level of parking demand across the site to ensure that the 131 car parking spaces provided suitably accommodate the demands of organised sports users and casual users of Palmer Park.
- 4.86 It is proposed that the on-going management of the car parking at the site is set out in more detail within a Car Parking Management Plan (CPMP) which could be secured through a suitably worded condition attached to the planning consent. I have no objection to this proposal.
- 4.87 The applicant has also stated that the current timetable of activities at the Palmer Park Sports Centre and Stadium would likely result in peak parking demand exceeding parking supply if it were to be

adopted post-development. This is due to a number of large sports clubs and regular gym goers utilising the facilities at the centre over the same period as at present a number of activities have shared start and finish times.

- 4.88 GLL will be working closely with the local sports clubs and organisations that operate in and out of Palmer Park stadium and the park area to ensure the safe and efficient use of the site. They are very used to amending activity programmes in consultation with users to minimise peaks in demand and have nationwide experience operating similar leisure facilities around the county.
- 4.89 By understanding the programming and key times of operation for local organisations, GLL will work with them to provide an appropriate amount of parking allocations that work in tandem with the leisure centre's own operation and programming. A coordinated approach will ensure that club participants get access when needed for the appropriate amount of people.
- 4.90 This planned approach will also work in tandem with the programming of the individual centre activities that GLL will be offering in the new Palmer Park facility. The use of technology and digital booking systems means that GLL can stagger all the various activity start times for many casual activities such as gym sessions as well as other activities such as fitness classes, swimming sessions, athletics track bookings, etc.
- 4.91 This approach will help control and manage customer arrival and departure times, which minimise potential pressure on parking that may have arisen from a congested activity programme at key pinch points. Implementing several intelligent management solutions and working collaboratively with local clubs and organisations will ensure that a multitude of car parking solutions can be in place simultaneously, maximising available spaces at all times and ensuring there are adequate surplus spaces to accommodate casual users of the park in addition to organised sports users.
- 4.92 The current parking provision will be remodelled so that there would be two car parks, with the main car park adjacent to the existing leisure building intended to accommodate the average day-to-day parking demand of the development. A smaller overflow car park is to be provided to the north of the new swimming pool building to accommodate additional parking demand during peak periods and one-off events.
- 4.93 It has however been noted that anecdotal evidence by objectors has identified that the uses on site currently fully utilise the on-site parking. Clarity has therefore been sought on the current use of the car park, which has identified that a proportion of vehicles utilizing the site are not associated with the leisure or park facilities. Survey information has been provided that specifies between 61 and 92

vehicles currently parking on the site. Although some of the times surveyed would have been during the course of the day which could be attributed to people walking within the park the early morning parking numbers of 85 - 89 vehicles is likely to be from long stay overnight parking as opposed to visitors to the park.

- 4.94 Without knowing the exact numbers that would be parking on the existing site that are not utilizing the facilities it is evident from the above that this would still result in a significant amount of vehicles parked on site that distort the level of parking needed on site.
- 4.95 This level of overspill parking on the site is generated given that currently there are no charge or restrictions for using the existing car park.
- 4.96 As part of the development proposals the car park will be managed with length of stay restrictions and a charging tariff introduced. The car parking restrictions would be enforced through the use of ANPR (Automatic Number Plate Recognition) camera equipment.
- 4.97 The exact parking restrictions and charging regime to be employed have not yet been agreed however the applicant would be confirmed within the Car Park Management Plan to be secured by condition.
- 4.98 Furthermore, the car parking length of stay restrictions and a charging tariff will prevent users from occupying spaces for excessive periods of time and therefore increase the turnaround and availability of parking spaces over the course of the day.
- 4.99 Given all of the above including the measures to be put in place by the applicant, the Highway Authority are happy that the parking provision proposed is acceptable.

Cycle Parking

- 4.100 The standards for cycle parking are also contained within the Revised Parking Standards and Design SPD. There are no specific standards applicable to the site as a whole with only standards for individual facilities provided, however these do not cover all of the facilities offered at the site.
- 4.101 Therefore, as with the car parking levels for the proposed development the level of cycle parking has been calculated based on historical operational and patronage data with the application of a modal split derived from TRICS.
- 4.102 A total of 26 cycle parking spaces in the form of 13 Sheffield stands are proposed for the redevelopment of the Palmer Park Sports Centre and Stadium. The Sheffield stands are to be provided adjacent to the western frontage of the existing leisure building at the site.

- 4.103 To identify what level of cycle parking would be required the applicant has undertaken a review of the multi-modal trip rates obtained from TRICS and this indicates that a forecast 4% of patrons travelling to the proposed redeveloped sports centre would do so by cycle.
- 4.104 The peak number of people movements into and out of the site is forecast to occur between 18:00 and 19:00 on a Wednesday with a total of 289 person trips arriving to the site during this period.
- 4.105 Based on 4% of visitors to the site cycling a total of 12 cycle parking spaces would be required during the peak arrivals time at the site.
- 4.106 The proposed provision of 26 cycle parking bays is sufficient to meet the forecast demand for cycle parking spaces whilst providing additional capacity for any increase in demand.
- 4.107 The Highway Authority are therefore happy that the level of cycle parking is acceptable.
- 4.108 The proposed cycle parking layout is deemed acceptable in principle but the submitted drawings do not identify the cycle parking to be covered even though this is annotated on the drawing. Revised drawings will be required illustrating the cycle parking to be covered but I am happy for this to be dealt with by way of a condition.

Servicing

- 4.109 The bin store for the proposed development is to be located within the northern overflow car park whilst a recycling store is to be provided within the main car park to the south.
- 4.110 Service vehicles would access the site from the Palmer Way vehicular access and continue north through the main car park and across the area of shared surface to the bin store in the overflow car park before exiting the site via the same vehicular access.
- 4.111 The recycling store would also be serviced via Palmer Way with refuse vehicles entering and leaving the main car park in a forward gear. Swept path analysis of the site servicing arrangement has been reviewed and is deemed acceptable.
- 4.112 In the circumstances there are no transport objections to the proposal subject to the following conditions: C2 - Construction Method Statement; DC1 - Vehicle parking as specified; DC6 - Cycle parking to be approved; DC17 - Car Parking Management Plan; and CD24 - EV charging points.

S106

- 4.113 A contribution of £6,000 is requested towards improvements to the London Road / Liverpool Road pedestrian crossing to help promote alternative modes of travel to and from the site.

Access Officer

4.114

1. Footpath surfaces must be suitable for all; tarmac and bonded gravel are both good surfaces for wheelchair users, scooter users, etc.
2. Lighting is very important, especially for those with visual impairments and cognitive impairments; bad lighting can cause confusion. People using wheelchairs and scooters, and those with walking difficulties also need to be taken into consideration; you need to be able to see hazards, and areas where there are gaps between the lighted areas can be very disconcerting, especially where there is a change of level, no matter how slight. Colour temperature is also very important; yellow light alters the colour of surrounding objects, and this could be very confusing, especially in a car park.
3. I am concerned that knee rails could be a trip hazard for blind or visually impaired people. No knee rails have been proposed at this stage.
4. It might be best to have a mix of seating; some with backs, some without, some with arms, some without. None should be too low or too high. There should be a “clutter zone” for street furniture so that people know where they can walk safely, if they cannot see, or if they have dementia, etc. Colour and contrast is very important for people who have trouble with vision or cognition.
5. Tree pits could be a trip hazard and dangerous for wheelchair users and those with walking difficulties if not carefully maintained and planned. Gravel from such pits can “migrate” and cause problems, and small castors can get stuck if there is a change of level, however slight.
6. Shared footpaths are not at all popular with many disabled people, especially visually impaired or blind people, and especially when cars are nearby. Cycles can also cause problems, as they are virtually silent.
7. Barrier matting must be suitable for wheelchair users and those who have walking difficulties. It can be very difficult to move on some matting.
8. I am very pleased to see a Changing Places facility included in the plan.
9. Some sports wheelchairs have widely splayed wheels - has this been considered where doors, lifts etc. are concerned?
10. I am unsure if “Grasscrete” is suitable for wheelchair users and those with walking difficulties to move on.
11. Coloured tarmac and other differing types of paving would be useful for some people, especially in areas where cars and people will be in the same area. However, different colours of paving must not cause visual confusion - for example, the dark lines in the last photograph on Figure 34 on page 33 of the Integrated Planning, Design and Access Statement might be interpreted as steps by some people. Coloured tarmac and other differing types

- of paving would be useful for some people, especially in areas where cars and people will be in the same area.
12. The spaces for Blue Badge holders should be closer to the entrance.
 13. I would hope that the number of spaces for Blue Badge holders has not been reduced; disabled people are more likely to use cars - whether as passengers or drivers - often because they cannot use public transport for some reason, or they are unable to get to places by other methods because it would be too far to go, for example, in their scooter or electric wheelchair. Not only that, but the criteria for getting a Blue Badge have changed and more people are eligible than ever before, which means that demand will be higher. Disabled people may use Readibus; I would hope that they would be accommodated.
 14. Are Blue Badge holders expected to share spaces with families with small children? Is there some demarcation between the two types of space?
 15. There appear to be only 2 or 3 spaces in the overflow car park that could be suitable for Blue Badge holders.
 16. There is only 1 EV space that would be suitable for disabled drivers/passengers.
 17. If there is to be a small play area, it would be appreciated if at least some of the equipment were to be inclusive for all.
 18. Manifestation will be important on glass doors and low windows.
 19. I cannot see any fire refuges on the plan, although they are mentioned in the documentation.
 20. At what gradient will the new ramp from the upper tier or seating to the new circulation core be?
 21. I have concerns that the shadows caused by the columns of the brise soleil will be visually confusing to those with visual impairments or cognitive disorders.

4.115 **Planning Officer note:** The applicant confirmed that a number of matters including footpath surfaces, seating, lighting, barrier matting, colours of tarmac/ surfaces, fire refuge areas would be detailed at the next design stage and provided as part of submissions to discharge conditions.

4.116 In response to other matters the applicant has confirmed:

- Tree grilles would be fitted over tree pits and maintained by the applicant.
- The gradient of the ramp would be compliant with current Building Regulations (Part K2 and Part M).
- An amended site plan was submitted which relocated 5 blue badge spaces closest to the main reception, creating a row of dedicated spaces and increasing the number by 1 (other spaces would be reduced by 1, so overall parking numbers would remain the same).
- New accessible changing room at ground floor would use the existing access to external facilities (1.65m wide corridor and door sets). Accessible changing facilities and a Changing Paces

Room would also be created in the extension at ground floor and both would be accessed from the main reception area to the new circulation hub then on to the athletics field and cycle track beyond. This route would be a sports chair zone with appropriately sized doors/ turnstiles and circulation route based on a design width of 1.2m minimum.

- The brise soleil will throw shadows onto the face of the building and is required for solar shading to the spaces behind and to support the roof. The area between the brise soleil and the face of the building would not form part of the main access route into the building.

Berkshire Archaeology

4.117 There are potential archaeological implications associated with this proposed scheme. The Berkshire Archaeology Historic Environment Record shows the site is located within a broad area of gravel geology known to have potential for prehistoric remains. Whilst past development will have had some negative impact on the potential for survival of archaeological remains there is a record of a type of archaeological feature known as Mase-holes being present. The references to these features date to the 18th and early 20th century and the function and date of these features is currently unknown. Mase-holes are typically 15-20ft deep and therefore it is unlikely that all evidence for these would have been removed.

4.118 Therefore the application site falls within an area of archaeological significance and archaeological remains may be damaged by ground disturbance for the proposed development. It is therefore recommended that a condition is applied should permission be granted in order to mitigate the impacts of development. This is in accordance with Paragraph 199 of the NPPF which states that local planning authorities should *'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'*.

4.119 **Planning Officer note:** Archaeological investigations are currently underway at the site.

Ecology

4.120 To be reported in the update report.

Environmental Health

4.121 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. A noise assessment has been submitted with the application and this demonstrates that there would no additional effect over background noise. A condition is recommended: N8 - Mechanical Plant (Noise level restriction).

- 4.122 Air Quality - Construction Phase: The air quality assessment shows that there may be air quality impacts during the construction phase from demolition, earthworks, construction and trackout¹ activities, but that these can be controlled through the application of mitigation in line with industry best practice as listed in table 24 of the assessment. A Construction Environmental Management Plan should be developed to incorporate these measures and mitigate against the impact of dust from the development.
- 4.123 Air Quality - Operational Phase: An air quality assessment submitted with the application indicates that the proposed development will have a negligible impact on air quality on the roads approaching the development once operational. Air quality at the site is below objective levels, therefore no mitigation has been deemed necessary.
- 4.124 Light - The lighting assessment submitted with the application indicates that the general outdoor lighting scheme will not cause a problem in relation to the amenity of nearby residents. No floodlighting has been included in the assessment, if it is the intention to add this in to the scheme, this would also need to be assessed separately to ensure there is no adverse impact on nearby residents.
- 4.125 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. Conditions are recommended for the submission and approval of a construction method statement, hours of construction and demolition, and no burning on site.

Natural Environment (tree officer)

- 4.126 Trees - The Arboricultural document confirms that the proposal requires a total of 14 trees to be felled and that there is an intention to replace 2:1 [i.e. a total of 28 replacement trees]. A plan is required which plots all trees (retained and removed).
- 4.127 I note that the one B category tree of high visual value (T077 a mature Alder) could not be retained within the current proposal. It is not clear whether the Catalpa around the statue could be retained but I assume that these do not fit with the intended upgrade to the statue surroundings anyway. I note the intention to relocate the one memorial tree (T079 a Birch) however considering the poor condition

¹ refers to the movement of dust and dirt from a construction/demolition site onto the public road network

noted, it would seem better (subject to appropriate agreement) to plant a new Birch.

- 4.128 I note the one impingement into an RPA of a retained tree (T067 a London Plane) in order to convert existing hard surfacing to soft - this can be dealt with via an Arboricultural Method Statement along with tree protection, incorporating the phases of development.
- 4.129 Other landscape impacts - I note the intention to create multiple gaps in the hedge around the landscape area to the west of the car park to allow access points. Creation of these gaps will have a detrimental impact on the function of this hedge and, I would suggest, on it's appearance. Given the pedestrian routes shown, could it not be limited to two as indicated in blue below, which would include moving the top right access to the end of the hedge (where it meets the railings - this location can be seen in the photo):



- 4.130 Landscaping - The tree planting, and other landscaping, should be aimed at meeting policy requirements and aims of our revised Tree Strategy and BAP. I am concerned about the intended use of fastigate trees. I can appreciate the use of these where close to the building, however not for the avenue across the park. It is clear in our Tree Strategy and our SPD on Sustainable Design and Construction (and considering this is within the AQMA where pollution filtration by trees is more important) that large canopy trees should be used where feasible for the considerably higher environmental benefits that these provide, compared to fastigate trees. In addition, large canopy trees provide greater shading hence make improve the new path for users in the summer (and in rainy conditions) - species selection will have to be done with care to minimise nuisance. This therefore should be considered in the final landscape design and the current Outline Landscaping Proposal Plan not be approved whilst these are shown.
- 4.131 With regard to the three fastigate trees immediate adjacent to the pool and the reference in the DAS to these being utilised for shading (arguably limited with a narrow tree), is there any reason why these trees could not be planted in the centre of the new hard landscape area, away from the pool and thereby allowing large canopy trees to be planted with better environment and shading provision? This area

seems dominated by hard landscaping hence would benefit from further softening.

- 4.132 Final landscape details should consider species, which should have wildlife value, and tree planting should ideally follow the '10-20-30' guideline for urban trees, i.e. ratio of no more than 10% of any one species, no more than 20% of any one genus, or no more than 30% of any one family (to reduce the risk of tree loss due to pests).
- 4.133 It is disappointing for no green roof to be proposed given the flat-roofed nature of the proposal. Whilst I note that half of the pool roof is utilised for SV panels, this does not discount the inclusion of green roofs elsewhere - these should be considered and are encouraged in Policy, Strategy and to increase our response to the Council's climate emergency declaration.
- 4.134 It is disappointing to see drainage proposed in the form of an underground cellular storage tank as opposed to creative landscaping that forms part of the drainage strategy. I assume existing drainage has limited the drainage strategy in this case.
- 4.135 I note bollard lighting is proposed along the new path/avenue which is positive as lighting columns would conflict with tree canopies. All service locations, including electricity routes for lighting should be considered alongside tree locations - final details can be secured via condition.
- 4.136 In conclusion, I have no fundamental objections to the proposals, however I consider that the landscape strategy would benefit from further consideration as detailed above. If no further/revised submissions are intended, please let me know and I will suggest conditions.
- 4.137 **Planning Officer Note:** Further details have been submitted by the applicant and the Natural Environment Officer's comments in response, and with officer assessment, will be reported in an update.

Parks and Leisure

- 4.138 Having been consulted extensively about this scheme, RBC Parks and Leisure have no objection to the proposed development.

SUDS Manager

- 4.139 I have reviewed the drainage strategy for the development and no details have been provided on the existing or proposed discharge rate from the site and no confirmation has been provided that a betterment will be secured for 1 in 1 year and 1 in 100 year events.

This would require a statement at the very least that a betterment would be secured on site, without this I would have an objection to the proposal.

4.140 **Planning Officer Note:** Following confirmation from the applicant that “.. *betterment would be secured on site for the existing versus the proposed storm water discharge rate for the 1 in1 and 1in 100 storm events. The new leisure centre is to be constructed on an existing impermeable area of the site. These new areas will have new drainage installed and these areas will be attenuated so reducing storm water run-off from site.*” the SUDS officer confirmed that a detailed assessment would be required to the 1 in 1 year event and recommended that conditions SU7 (Sustainable drainage to be approved) and SU8 (Sustainable drainage to be implemented) should be included.

Thames Water

4.141 In summary:

- With regard to foul water sewerage network infrastructure capacity - no objection
- Recommend petrol / oil interceptors be fitted in all car parking/washing/repair facilities.
- Swimming Pools - following conditions to be adhered to regarding emptying of swimming pools into a public sewer to prevent the risk of flooding or surcharging: - 1. The pool to be emptied overnight and in dry periods. 2. The discharge rate is controlled such that it does not exceed a flow rate of 5 litres/ second into the public sewer network.
- The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a condition for the submission and approval of a piling method statement.
- “With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.
- Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>
- Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn’t materially affect the sewer network and as such we have no objection.
- Water network infrastructure capacity - no objection
- Recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains.

- The proposed development is located within 15m of our underground water assets and as such we would like an informative.

Public consultation

4.142 There was consultation undertaken with RBC's Planners, stakeholders, and statutory consultees, prior to the submission of the application, and is fully detailed in Section 8. of the submitted Integrated Planning, Design and Access Statement and the Consultation Response Statement. In summary the changes following pre-application discussion include:

- Siting of the extension further from the George Palmer monument, by wrapping the new extension around part of the main stadium building.
- Compressed massing / footprint of the building, with the elevations rising to a high point behind the monument. This also allows the building roofline to fall to the existing stadium building, linking the new building to the existing.
- Increased glazing to create a more active frontage;
- Replacement of existing stadium roof and materials at upper level;
- Elevation materials and volumes have been simplified, and with a choice of materials for a positive contribution to BREEAM 'Excellent' rating, to tie into the red brick of the existing stadium and to meet Palmer Park Development Framework principles;
- A strategy for screening and reducing the visual impact of the new car parking to the south of the existing. Proposed low level planting to screen the area has been included;
- A detailed landscaping strategy; and
- Biodiversity enhancements including the use of native plant species of local provenance, and the introduction of bird and bat boxes.

4.143 Following the submission of the application the scheme was presented to the Sports Forum on 21st January 2021, with the opportunity for questions, and included the following organisations:

Reading Roadrunners
 Burghfield FC
 Reading Athletics Club
 Reading Rockets Basketball
 5 a-side and walking football
 Reading Judo Club
 Reading Underwater Hockey
 Albatross Diving Club Reading
 Rivermead Badminton Club
 Reading Swimming Club
 Reading FC Community Trust
 Sport in Mind
 Woodley Untied FC
 Meadway and Rivermead Squash Club

South Reading Football Club

- 4.144 Other sports clubs/ organisations who have been consulted during development stages/ pre-consultation) are:
Reading Aikido Club.
Walking Football
Eldon Celtic football club
Octopush underwater hockey club
- 4.145 No neighbours were directly consulted by letter, but site notices were put up at all entrances to the Park and at the Leisure Centre itself. This accords with Statutory processes.
- 4.146 British Cycling Federation and Sport England were formally consulted as part of the application, the latter who consults sport national governing bodies (NGBs).
- 4.147 A video of the proposals has been available to view online via the RBC and Get Reading websites from 3rd February 2021, which was a joint approach by the applicant and RBC, Leisure.
- 4.148 25 responses were received comprising 9 observations, 1 support and 15 objections and a response from Ward councillors. Full neighbour/organisation consultation comments are available to view on the Council's website. A summary is provided below:
- Loss of a TPO lime tree for the proposed north-south path; could the path be realigned to avoid it?
 - No provision for trees/ shrubs to conceal the overflow car park.
 - Control of parking areas is required so that unauthorised access and parking is not possible. Parking should be for users of the pool and facilities.
 - If a path is planned from the entrance near the bridge at Culver Lane in the direction of the Stadium it should not take a direct route because the table top area is often used for informal games.
 - Design is an ugly box and needs to take account of the Victorian Park and surrounding Victorian properties.
 - The proposal should include a 50m pool.
 - Lack of parking spaces.
 - Proposals disappointing for a cyclist: no direct access to the track without going through the building; no increase in cycle storage; improved availability of the track not addressed; no details of need to improve the track; no details of improved cycling provision in the park.
 - This scheme does not deliver measurable net gains for biodiversity. This is contrary to both the National Planning Policy Framework (NPPF) and Reading Borough Council's adopted Local Plan. *(The objector undertook their own DEFRA Biodiversity Metric calculation and stated : "The DEFRA metric calculates that the site baseline delivers 0.82 biodiversity units. The*

proposals deliver 0.44 biodiversity units, resulting in a net loss of 0.38 biodiversity units (or -47%). As such the scheme should either be redesigned so that net gains for biodiversity can be delivered within the development footprint, or a biodiversity offset found. Enhancement of grassland within the wider Palmer Park could be used to achieve a net gain for biodiversity”).)

- The landscaping should be improved with more trees and hedgerows to improve the environment and allow wildlife to flourish.
- Suggest further facilities to have a walk/run path with markers for different length runs using exiting paths, so that walkers/runners could measure their progress.

4.149 British Cycling asked a number of questions to which responses were provided:

- *How will the planned works impact on the existing velodrome, both during the works and once completed?*
Applicant response: Our aim is to continue with the velodrome to be open as usual and the current planned works should not interfere with its usage. Naturally there may be minor disruptions when undertaking this scale of works, however we will try to keep this to a minimum.
- *How will the contractor's proposals ensure the velodrome surface and surrounds is not negatively impacted by the works and will any resulting cracks / damage to the velodrome be fully repaired as part of the work?* - Contractor response: Before start on site a dilapidation report/photographic record will be prepared of the surrounding area. During the construction site we will avoid any heavy craneage near the velodrome. The steel structure will be erected from the site of the existing car park, as far away possible from the velodrome. We do not have any piling or ground improvement works which are normally the most risky works for effecting the surrounding areas. Any damage / cracks to the track caused by our construction works will be full repaired.

4.150 **Councillor White and Councillor McGonigle (Park Ward)**

“We note with great sadness and disappointment that Labour Councillors’ promises to open a new pool in Reading before closing the existing Arthur Hill pool were broken in 2016. Residents in East Reading miss this much-loved community resource that was run-down and then closed, and have been ill-served by the Council over the last four years with no swimming provision. It will be more years again before any new pool is constructed and opened.

We broadly welcome the application for a new community pool in Palmer Park. The Council has publicly promoted this idea for the last two decades with no result, but the principle for this development is set out in the Council’s Local Plan (Policy ER1j) for a pool located in the stadium area.

Any development work on the Sports Stadium must rectify the long-standing issues with the existing roof. This oddly-designed 'corrugated' roof leaks in the mildest of wet weather and has been left by the Council to be remedied if future development work on a new pool ever takes place. If the application is to be approved, a condition should be placed on the application requiring replacement (or permanent remedy) for the Centre roof prior to use of the new pool.

We note that the application, sadly, is not confined to the stadium area, and that contrary to the Local Plan, it has not been 'Demonstrated that car parking to be lost can be replaced on or off-site, or is no longer required;' but instead is being moved onto park land designated as Local Green Space. Policy EN7 states that 'Proposals that would result in the loss of any of these areas of open space ... will not be permitted'.

The DAS notes that 'land has been lost to the development of the new extension, being the new car park introduced to the south of the existing.' And the Open Space Statement states that 'The loss of open space relates to a small part of the overall park area ... adjacent to the existing car park provision for the site' which it measures at 992 square metres. The access road to the stadium (Palmers Way) will also be widened to create parking for coaches, and a new 100-metre concrete pathway introduced towards Palmer Park Avenue. Can you please confirm if these additional losses to the green space of the park are included in the published figure of 992 square meters? We would welcome confirmation in your committee report.

With the loss of park we are disappointed not to see a green roof introduced, and that we trust that the overall impact of the development will result in a significant increase in biodiversity, if not it should be refused.

If the Council is minded to approve its own application, we believe that it should be clearly stated that no more Local Green Space will be developed for parking in the future. We request an informative be added to the effect of *"The extensions into the Local Green Space of Palmer Park are considered to be the limit of what the area and site can accommodate without harming the appearance and character of the park, eroding it's quality through insensitive development, and jeopardising its use or enjoyment by the public. Any proposed extensions to the parking provision in the future would not be found acceptable."*

- 4.151 Councillor Josh Williams has also asked a number of questions during the course of the application. The responses are incorporated within the assessment below.

- 1) What is the need for the pathway north-south? It would split a flat area of park used for informal sport in two and it would not connect to public transport or a pavement, and there is no gate to easily navigate with a bike.
- 2) Trip generations - the trips assessment notes that if the proposed development were to go ahead with its increased services to residents such as soft play, swimming and a larger gym offer, that there would be an increase in vehicle journeys to the site but there would be a reduction in the parking offer.
- 3) What are the biodiversity enhancements proposed and what is the % net gain?
- 4) The proposed development includes a kiosk and café - I think the Palmer Park Dev Framework detailed that this café should not be competition for the existing café in the park's Pavilion building. How will that removal of competition work - will it be conditioned, and is it enforceable?
- 5) What is the proposed parking area that is located behind the statue (to the North of the proposed pool) for, and how is it accessed?
- 6) What will happen to the existing sports centre roof? This leaks every time there is heavy rain. Does this application seek to remedy that?
- 7) Leisure provision in this location - With a pool at Bulmershe (outside of the Borough) within ca 1mile, does this make a difference to the planning consideration of having a pool at this location?

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". The relevant sections of the NPPF are:
- 5.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving the listed building or its setting or any features of special interest which it possesses.

National Policy

- 5.3 National Planning Policy Framework (NPPF)
 Section 2 - Achieving Sustainable Development
 Section 6 - Building a Strong Competitive Economy
 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

Adopted Reading Borough Local Plan - November 2019

- 5.4 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 CC4: Decentralised Energy
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 an Historic Context
Policy EN7: Local Green Space and Public Open Space (EN7wp)
Policy EN10: Access to Open Space
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 TR1: Achieving the Transport Strategy
Policy TR2: Major Transport Projects
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR4: Cycle Routes and Facilities
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
Policy RL2: Scale and Location of Retail, Leisure and Culture Development
Policy RL5: Impact of Main Town Centre Uses
Policy ER1j: Palmer Park Stadium Area

- 5.5 Supplementary Planning Guidance/Documents

- Employment, Skills and Training (Apr 2013)
- Sustainable Design and Construction (Dec 2019)
- Revised Parking Standards and Design (Oct 2011)
- Planning Obligations Under Section 106 (Apr 2015)
- Palmer Park Development Framework (Apr 2020)

- 5.6 Other Relevant Documents

- Tree Strategy (Mar 2020)
- Biodiversity Action Plan (Mar 2021)
- RBC Corporate Plan (2018)
- Leisure Strategy....
- Local Transport Plan??

- Manual for Streets??

6. Environmental Impact Assessment

- 6.1 Under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended²) the proposed scheme falls under 10. Infrastructure Projects (b) Urban Development Projects, which includes the construction of shopping centres, car parks, sports stadiums, leisure centres and multiplex cinemas and the development would include more than 1 hectare. Therefore, under Regulation 6 the applicant submitted an EIA Screening request for the Local Planning Authority (LPA) to determine whether the scheme would have a likely significant effect on the environment for which a full Environmental Statement (ES) would be required. This was submitted alongside the submission of the full application, which is allowable under the Regulations.
- 6.2 It is the LPA's opinion that the proposed development does not fall specifically within the sensitive areas as defined under Regulation 2(1) of the Regulations. The National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) recognises that local designations, which there are in this case, may also be relevant in determining whether an EIA is required. The site is within a Local Green Space and Open Space.
- 6.3 In order to determine whether a Schedule 2 project is likely to have significant effects a LPA must take account of the selection criteria in Schedule 3 of the Regulations. Not all of the criteria will be relevant in each case and the National Planning Policy Guidance (NPPG, Environmental Impact Assessment, May 2020) states that *"Each case should be considered on its own merits in a balanced way"*.
- 6.4 The NPPG indicates that for urban development projects an EIA is *"unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination."* And the key issues to consider are *"Physical scale of such developments, potential increase in traffic, emissions and noise"*.
- 6.5 To determine whether a proposed development is likely to have significant effects on the environment a LPA needs to consider it against the selection criteria set out in Schedule 3 of the Regulations (included in Appendix 1 below), which cover characteristics of the

2

The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 – SI 2018/695; Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 - SI 2020/505

development, the location of the development and types and characteristics of the potential impacts.

- 6.6 The LPA has assessed the submitted screening request (Gillings Planning, Ref: GLL1001 dated 1st December 2020).
- 6.7 In terms of characteristics, the proposed scheme would be similar to the existing leisure centre and would be of an appropriate scale in relation to the site and the surrounding area. Indeed, the refurbished grandstand and extension would occupy only 0.25 hectares.
- 6.8 The proposed scheme would be just over 100m to the nearest dwellings, and any effects during demolition, construction and operation could be appropriately managed through standard conditions.
- 6.9 In terms of landscape and visual impacts the extension would be within an area of existing built form and set amongst a parkland setting. The proposal would largely be on existing developed areas save for a small area of open space. It is considered, however, that the potential impacts associated with the proposed scheme can be adequately addressed through the application submission documents as part of this application and any effects capable of being mitigated.
- 6.10 It is not considered that the types and characteristics of the potential impacts of the proposed scheme would be significant and not considered likely to extend beyond the immediate environs of the site nor of a scale likely to give rise to significant environmental effects. **The LPA therefore considers that the proposed development is not EIA Development and an Environmental Statement is not required.**

7 APPRAISAL

The main matters to be considered are:

- **Principle of Development**
- **Design considerations and the effect on the Heritage Asset**
- **Transport/ Parking**
- **Landscaping**
- **Sustainability**
- **Environmental Matters - Contaminated land, Flood Risk, Air Quality & Noise**
- **Infrastructure Requirements**
- **Other Matters Raised Through Consultation**
- **Equalities impact**

Principle of Development

- 7.1 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development, which lies at the heart of the National Planning Policy Framework (NPPF).
- 7.2 It goes on to state that *“Planning applications that accord with the policies in the development planwill be approved without delay, unless material considerations indicate otherwise.....”*
- 7.3 The proposed site is a specific allocation under the Reading Borough Local Plan (RBLP) Policy ER1j - Palmer Park Stadium Area:

“Additional leisure development for a new swimming pool. Development should:

- Demonstrate that car parking to be lost can be replaced on or off-site, or is no longer required;*
- Ensure that there is no adverse impacts on the use of the park and its sport and leisure facilities;*
- Ensure that there is no adverse impact on the listed monument and its setting;*
- Take account of potential archaeological significance; and*
- Retain public rights of way across the site.*

Site size: 3.08 ha Approximately 1,000 sq m pool”

- 7.4 Further detail is set out in the adopted Palmer Park Development Framework (PPDF, 2020), the main purpose of which is *“to set out a framework and design principles for the development of a new swimming pool within Palmer Park to ensure a co-ordinated, high quality, comprehensive development creating a well integrated new leisure facility in East Reading. This framework provides urban design, landscape and architectural guidelines by means of supplementary planning guidance, which will be used to inform future planning applications.”*
- 7.5 The boundary of the allocation includes the stadium complex, car park and access road and a small area of land designated as Local Green Space and Open Space under Policy EN7, which states that proposals *“that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.”* In accordance with para. 97b of the NPPF any loss would need to be *“replaced by equivalent or better provision in terms of quantity and quality in a suitable location.”*
- 7.6 The submitted Open Spaces Statement (OSS) assessed the loss against policy. It sets out that the area of open space in question (*yellow coloured area in extract below*) is part of an area of informal open space and reiterates that the allocation for leisure under ER1j has

been made for an identified leisure need and that the development proposed is therefore fully justified and of public benefit.



7.7 The PPDF includes details of how the proposed allocation is envisaged to be delivered, and specifically comments on the loss of open space relating to the provision of car parking. It states that the loss could be offset by greenspace gained as part of the proposal including the Plaza space.

7.8 The OSS includes a calculation that the overall loss of open space would equate to just over 0.6% of the overall green space provision within the Park. In response to ward councillor comments this has been further defined as follows (*within the applicant's Consultation Response Statement 15/3/21*):

"During consultation, the site plan was re-planned to accommodate items such as relocated Blue Badge parking and an increased number of electric vehicle charging points. This allowed slightly larger areas of soft landscaping within the main car park area itself. Open Space areas are therefore as follows:

• The new additional car park area	=	992 m ²
• The new coach bay along Palmers Way	=	178 m ²
• TOTAL parking areas	=	1170 m ²
• LESS new landscape areas in car park	=	(292) m ²
• Overall TOTAL of loss of Open Space	=	878 m ²

The new footpath from the existing stadium to Palmer Park Avenue is a reinstatement of an historic footpath (as outlined in the PPDF) and is an area of 241 m²."

7.9 It is not considered that the loss would have a negative impact on the amount and quality of overall open space provision and the ability for it to be used and enjoyed by the public. When considered against Policy EN7 Officers agree that the proposed development would not result in the loss of Palmer Park as an important area of open space for the local community; erode the quality of the overall open space; or jeopardise its use or enjoyment by the public.

- 7.10 The overall layout and compressed built form of the proposal enabled a smaller area of parking on open space than is set out in the PPDF. The loss of a small area of amenity grassland, necessary to support the overall proposed scheme, is at the southern edge of the existing car park. It would be mitigated through the new public space of the Plaza extending to 2,448sqm, which would be equivalent and better provision, and the loss would be outweighed by the public benefits of the proposed scheme overall. Therefore, in this regard, the scheme is considered to meet the policy requirements of EN7 and the NPPF.
- 7.11 Paragraph 86 of the NPPF states that *“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.”* As the proposed scheme would accord with an up-to-date plan with respect to it being an allocated site under ER1j no sequential test will be required in this instance.
- 7.12 The general principle of re-use for a new leisure centre would therefore be acceptable and Policy ER1j has been subject to sustainability appraisal as part of the local plan process.
- 7.13 The need for a new pool and other facilities at Palmer Park forms part of the conclusions of a borough-wide assessment of leisure provision (set out in the Indoor Sport and Leisure Facilities Strategy 2015), and part of a long- term leisure contract.
- 7.14 The three overarching objectives to achieving sustainable development within the Framework are defined as economic, social and environmental. The economic role requires proposals to contribute to building a strong, responsive and competitive economy. The social role requires planning to support strong, vibrant and healthy communities and a high-quality built environment. The environmental role requires the natural, built and historic environment to be protected and enhanced with mitigation and adaptation to climate change; this will be addressed below.
- 7.15 The proposals would contribute to economic activity both through the construction period and as part of the ongoing operation of the leisure centre.
- 7.16 In terms of social, the provision of a new leisure centre responds to leisure needs, which have been assessed as part of a borough-wide approach. Paragraph 91 of the NPPF specifically supports planning decisions which achieve healthy places and: *“enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”* (91 c)). Para 92 states: *“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions*

should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments”; and b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community...”

- 7.17 The provision of enhanced leisure provision would also accord with a number of corporate priorities as set out in the Council’s Corporate Plan 2018 - 2021 (refreshed in June 2019), including: ‘Promoting health, education, culture & wellbeing’. This is further reflected in the RBLP objectives (Para. 2.2.2):

3. Improve the quality of life for those living, working, studying in and visiting the Borough,with good access toservices and facilities (such as, sport and recreation, etc.) to meet identified needs;

8. Offer outstanding cultural opportunities, which are based onleisure and visitor facilities;

- 7.18 Reading Borough Local Plan (RBLP) Policy RL2: Scale and Location of Retail, Leisure and Culture refers specifically to the need for replacement swimming facilities and a new pool adjacent to the existing Palmer Park Leisure Centre would meet policy and Policy RL6: Protection of Leisure Facilities and Public Houses.

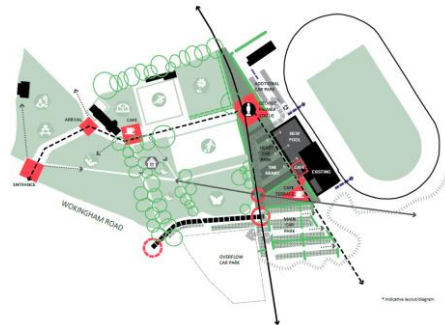
- 7.19 In conclusion, the principle of the use of the site for an extension to the existing stadium, which comprises a pool, fitness suite and enhanced and refurbished facilities, is acceptable and this importance is reflected in the specific site allocation in the RBLP. The remainder of this report therefore considers the proposed development against other relevant policies, including with respect to transport/parking, heritage, archaeology, and public rights of way as well as landscaping, biodiversity and sustainability, which are addressed in the sections below.

Design considerations and the effect on the Heritage Asset

- 7.20 Paragraph 124 of the NPPF states that “*Good Design is a key aspect of sustainable development*” and that schemes are “*visually attractive as result of good architecture and appropriate landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change*” and “*create places that are safe, inclusive and accessible and which promote health and wellbeing..*”. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions.

- 7.21 RBLP Policy CC7: Design and the Public Realm, requires all development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.” Design includes layout, landscape, density and mix, scale: height and massing, and architectural details and materials.”*
- 7.22 The proposed site is within the Local Green Space and Public Open Space of Palmer Park (EN7Ed) and includes the Grade II listed George Palmer monument. It identifies that proposals will not be permitted that *“erode their [Local Green Space’s] quality through insensitive adjacent development....”*.
- 7.23 Policy EN1 states that *“Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced”*.
- 7.24 The submission includes a Design and Access Statement and A Built Heritage, Townscape and a Visual Impact Appraisal, the latter considering the effects of the proposed development on the heritage assets, townscape features, character and visual receptors at the Stadium and its surroundings. The RBLP Policy requires any proposal to *“take account of potential archaeological significance”*.
- 7.25 The adopted RBLP allocation specifically requires that any proposal should:
- *Demonstrate that car parking to be lost can be replaced or is no longer required;*
 - *Ensure that there is [sic.] no adverse impacts on the use of the park and its sport and leisure facilities;*
 - *Ensure that there is no adverse impact on the listed monument and its setting;*
 - *Take account of archaeological significance; and*
 - *Retain public rights of way across the site.*
- 7.26 In addition to the RBLP policy is the Palmer Park Development Framework (PPDF). The main purpose of this is to set out *“a framework and design principles for the development of a new swimming pool”* and *“to set out further ideas and principles for other spaces within the Park.”*
- 7.27 The ‘key design drivers’ set out within the PPDF, and of specific relevance are (see plan extract below from PPDF):
- Reinststate the ‘heart’ of the park around the monument and space in front of the stadium and use the new swimming pool as a desirable destination.
 - Re-establish George Palmer monument as a focal point of converging routes and axes.

- Re-discover historic links specifically the north-south and east-west links
- Consolidate car parking into a single more effective whole close to building entrances and the vehicular access point.
- Make pedestrian movement the priority with careful landscape and urban design.



7.28 Although the PPDF identifies a preferred design option, it acknowledges that other arrangement for a new pool could be possible, whilst delivering the key objectives of the Framework. The PPDF includes ‘key concept’ principles for the allocated site, as well as key ‘design principles’. It is within this overall context that the proposed scheme has been assessed:

Key concept principles:

1. Attach new pool building to existing stadium building. Entrance remains in same location with the addition of a café to anchor an active use to this space.
2. Develop a new public realm in front of the building that attracts people to the centre of the Park. Shared surface allows restricted access to car park and servicing areas. Must provide a setting and entrance for the new pool building (southern space) which encourages people to dwell and enliven the ‘heart’
3. Give an appropriate setting to the George Palmer statue.
4. Pedestrian movement throughout the ‘heart’ space is priority.
5. Main Car Park - Public car park close to pool entrance. Green design with structure planting and grasscrete and softened around the edges with meadow grassland to merge into the park landscape. This area would need further ground site investigation to understand potential subsidence risk and options for mitigation as a result of possible chalk mine voids.
6. ‘Heart’ space car park: Public car parking provided within the heart space to reduce impact on the Park. High quality permeable paving which could also be used as a plaza for events. A defined car free space needs to be provided at the pool entrance.
7. Additional Car Park: Public car park and access for maintenance, servicing and to recycling facilities. The access to the temporary events space and maintenance building is retained but limited to non-public movements via raised bollards.

8. Re-instated historic path link [east-west and north-south] for better circulation through the park and to pass the entrance of the leisure centre for easy access.
9. Must be legible and easy to navigate as a driver and a pedestrian.
10. Incorporate a coach parking drop off/ pick up space with a turning head for coaches and recycling.

The Applicant's key design principles for the preferred building option:

- Integrate the existing building into the new complex, refurbish the building and make it part of a unified architecture.
- Develop an architecture that creates simple and proportioned lines and puts emphasis on the quality of material and detailing.
- Building needs a feature corner to the north with additional height to give interest to the building to the built form and massing.
- Leisure centre should respect its location within the park setting. The architecture should form a calm backdrop in terms of both massing and materiality.
- Provide glazing and an active ground level around the corner (north) to limit the amount of blank façade. Provide plant room and service access to the rear of the building (stadium side).
- Activate prominent edges with glazing and to the 'heart' space and key pedestrian links which allow views in and out of the building including the pool; maximise the inter-visibility between the inside and outside activities.
- Provide an active ground floor /corner towards the car park and main pedestrian routes
- Provide a clear main entrance situation with a space in front of the building for meeting and gathering.
- Provide an active ground level corner towards the heart space, consider a café in this location.
- Mitigate potential impact of glare/ low sunlight during evening use.
- Provide a terrace or outdoor seating area for the café to animate the space and encourage dwell time.
- Consider an extension to front of existing building and active frontage.

7.29 As well as relevant policy and the PPDF the applicant has referenced a suite of design guidance, as set out in section 4.2 of the DAS, which has informed the design, including a range of Sport England design guides and design standards set by the National Governing Bodies (NGBs) for sports.

7.30 The existing building comprises a rectangular form with a roof form of nine curved elements. It is two storey and the front elevation is comprised of brick and large expanses of glass above. To the rear is the grandstand seating which faces the athletics track and the

velodrome. To the front the building setting is dominated by a large area of parking, and which extends close to and around the statue.

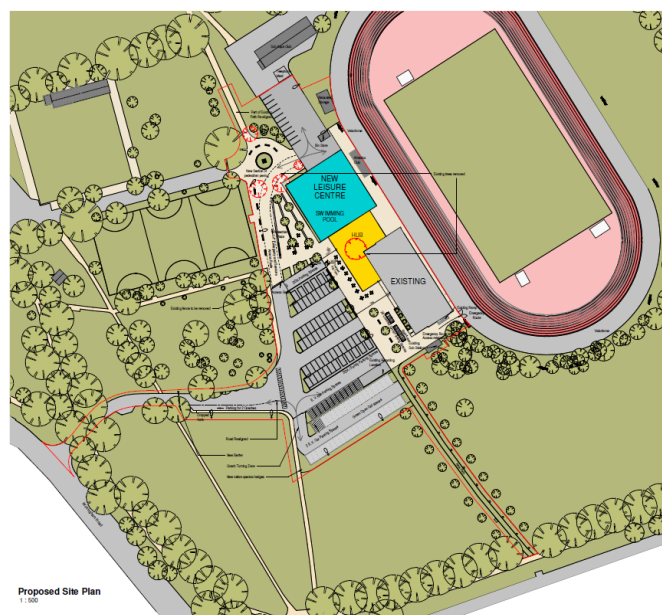


Layout/Siting

- 7.31 The proposed scheme includes for two main additional portions; new entrance/social 'hub' and the main sports hall consisting of the swimming pool hall with the fitness suite over, on part of the existing

car park, to the north-west of the existing stadium building. It would form an extension to and would wrap around the existing building to the north and west, which is it is considered would create a cohesive link to the existing retained building. This compressed form has enabled the new building to be further from the George Palmer statue than would have otherwise been the case. This was amended following the pre-application submission.

- 7.32 The siting of the building would not only link effectively to the existing Stadium, but would utilise existing hard landscaped areas and would minimise further loss of open space. The entrance would be located further north as part of the 'hub', centrally to the overall buildings, which would mean it would be accessed directly from the proposed Plaza, and parking would be in front of the retained building, rather than the new, without requiring a significant extension into the existing open space area to the south.
- 7.33 The main parking area would be sited to ensure a balance between being located close to the main vehicle access point from Wokingham Road to the west, the newly positioned building entrance, and ensuring that the Plaza area would be sited to connect properly and effectively to the main entrance. Further to consultation with the Access Officer the Blue badge parking spaces have been relocated closest to the main reception. The family spaces would also be as close to the entrance as possible.
- 7.34 The area of parking to the north is retained as a bin store/ service zone, and for overflow parking for sports events. This would be accessed via a controlled barrier, and would ensure priority was maintained for pedestrians within the Plaza area.



- 7.35 The proposed Plaza would be sited to contribute to enhancing and achieved the desired 'heart' as set out in the PPDF, and would

extend across to incorporate an enhanced area and setting around the statue, not severed by parking, as it is currently.

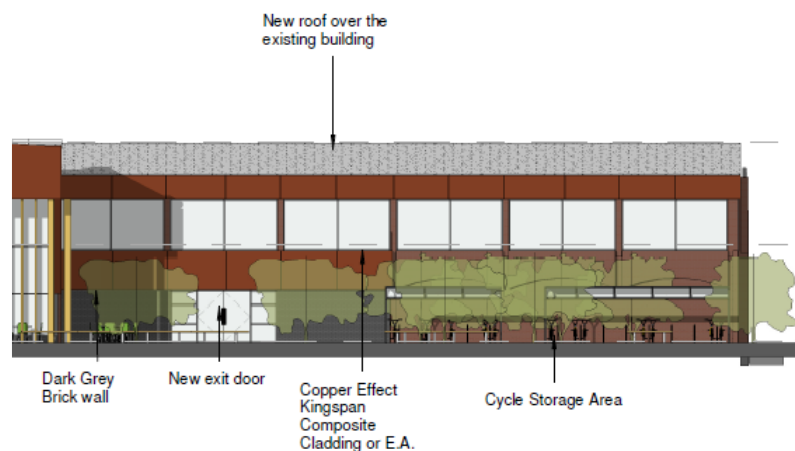
- 7.36 The proposed alignment of the buildings would be to create a visual link north-south, along a reinstated historic north-south path from Palmer Park Avenue, immediately in front of the building, through to the statue beyond.
- 7.37 The building line of the two main portions of the extension would stagger forward of the existing stadium building line, which would create visual interest, but would be sited so as not to block views of the statue on approach from the south.

Height /Mass

- 7.38 The overall size of the buildings, largely defined by sports guidance requirements, would be consistent with the scale of the existing building, and it is not considered that it would be dominant in form when viewed from within and outside the Park. This is supported by the assessment and conclusions presented within the submitted Built Heritage, Townscape and Visual Impact Appraisal (BHTVIA). This provided a thorough and robust assessment of the potential impact of the proposed development on the significance of heritage assets, including the setting of the listed George Palmer statue, townscape character and visual amenity, from visual receptors at the site and its surroundings.
- 7.39 As the proposed building is of similar height to the existing it is not considered it would significantly increase the visibility of the site from surrounding visual receptors. The improvements proposed which include enhanced landscaping, a public Plaza, and a tree-lined north-south path would improve its townscape character.
- 7.40 The proposed scheme would be visible in some views, as is the existing leisure centre, and the views from some of the visual receptors would change. However, Officers agree that the proposed building would not be considered harmful in the context, and as the BHTVIA states, *“there would be a limited change in the quality of the visual openness associated with the site.”*
- 7.41 The staggered building line, and linked forms, i.e. existing building, ‘hub’ and sports hall, along with large areas of glazing, and timber brise-soleil feature all contribute to breaking up the overall mass of the new building and enable the internal functions to be expressed.
- 7.42 In terms of height, the sports hall, which contains the pool, is slightly higher than the remainder of the buildings; the new ‘hub’ and the existing Stadium building. This is because of the Sports England design guidance for heights over swimming pools. The difference in height, however, is considered to be subtle and would not be dominant in itself or on the existing building. The difference in height between the entrance hub and the sports hall building allows

the main parapet roof to rise up from the existing stadium building to create a feature corner facing the George Palmer statue, to create interest to the massing, as envisaged within the PPDF.

- 7.43 The replacement of the existing Stadium roof, which is currently in a very poor condition, forms part of the overall proposal. This would be an insulated panel system in flat roof profile (*see plan extract below*), replacing the existing arched roof form which is presented to the car park elevation with copper-coloured cladding panels as proposed on the new extension. The roof over the existing grandstand external seating would be replaced with uninsulated opaque cladding sheets, with elements of transparent cladding. The “arched” fascia would be retained to the athletics track elevation.



Appearance/ materials

- 7.44 The design would involve a reinvention of the 1980s building through the placement of the cladding system ‘on top’ of the existing building. Window animation at ground level would be continuous, while the first floor glazing would appear as ‘slot holes’ punched with deep reveals into the cladding system, which has an opaque brushed metallic finish to resemble copper. Overall, the effect will be to provide a contemporary updating of the building and a striking design statement, replacing the tired and dated 1980s design.
- 7.45 It would include glazing to the ground and first floors of northern, and western sides, and also to the first floor on the eastern side, of the sports building, and full height glazing to the double height activity area next to entrance hub, which wraps around to the south, where it projects forward of the existing building. The existing building would retain large expanses of glass at ground and first floors and overall the proposed scheme would therefore, provide active frontages all on all sides. In particular it would include prominent glazed edges to the proposed Plaza (‘heart’) space, with a clear and welcoming entrance, and provide an active northern side, which would be prominent from the north-south pedestrian path towards the building.

- 7.46 The glazing would provide an effective means of allowing views in and out of the building from the pedestrian route and Plaza, creating a greater connection and visibility between the activities within and outside the building at both ground and first floors. To ensure visual security, there would be low level defensive planting to the front of the glazing.
- 7.47 Although good natural lighting provision is essential for an attractive swimming environment there is the need to avoid glare on the water surface. Natural lighting is therefore controlled through limiting the amount of glazing at ground floor and direct sunlight controlled through solar shading. In terms of the 'hub' there would be an external timber brise soleil, which would support the roof above and provide a design measure intended to echo and emphasise the tree-lined pedestrian path created along the face of the facility.
- 7.48 The new building would have simple lines and would use copper effect panels to reflect the colour of the brick work of the existing building, whilst using a material which is sustainable, which it is considered would achieve the 'unified' architecture the PPDF sets out.
- 7.49 The simple mass and materials palette of glazing and matt finish copper coloured composite panelling, would create a building which is understated and would enable the natural environment to be dominant, thereby achieving the calm backdrop to the Park setting identified in the PPDF.
- 7.50 The elevational materials would also include dark grey brick cladding at ground floor levels including for the infill wall in place of the demolished entrance foyer to tie in with the plinth of the new extension.
- 7.51 The visual impact of rooftop plant, which would include air handling plant and air-source heat pumps, would be minimised through grey mesh screening (*please note the imagery does not include the amended roof to the existing building*). Roofs would also include a series of photo-voltaic panels.

Public Realm/ Landscaping

- 7.52 The Plaza and the confluence of pedestrian pathways, including the reinstated north-south link, would provide a destination within the Park, reinvigorating the space in front of the Stadium and providing a focus within the Park and the 'heart' the PPDF envisages. The alignment of the extension, and the new footpath and tree planting, would create a tree-lined avenue from the statue to Palmer Park Avenue, and in response to objections raised, the layout has been re-aligned slightly to avoid the mature Lime tree within the Park on the Palmer Park Avenue side.

- 7.53 The Plaza itself would be a welcoming space which would include seating areas, including café seating, and sufficient space for unhindered pedestrian movement to and from the stadium and the wider park, and offering a space to dwell, for play and to relax.

Effect on the setting of the listed statue

- 7.54 The conclusion of the BHTVIA is that the proposal would have no harmful effect on the setting or significance of the listed statue, or other HAs in the surrounding area. It is also considered that there would be some enhancement to the setting of the statue from the proposed new landscaping. The assessment has had regard to the statutory duties in Section 66³ of the Planning (Listed Buildings and Conservations Areas) Act 1990 (as amended) and is in accordance with Section 16 of the NPPF and the guidance in the NPPG.
- 7.55 At present the car parking area comes close to the edge of the area immediately surrounding the statue (*as seen below*), and the proposed scheme would pull the parking away.



- 7.56 It is considered that the simple lines of the building, the distance of approximately 12m to the statue, and the overall enhancement of the space around it, would ensure that the setting would not be detrimentally affected. The combination of the proposed continuation of the Plaza surface treatment around the statue, and

³ "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State 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."

the reinstatement of the north-south path to Palmer Park Avenue, which leads to the monument and passes in front of the new building, would ensure that the setting of the statue would be enhanced in accordance with Policy EN1.

- 7.57 This would meet the desire to reinstate the ‘heart’ of the Park around the statue and the space in front of the stadium, as set out in the PPDF and would ensure that the statue became a focal point again for converging pedestrian routes and axes. This space would also include improved landscaping, detailed further below, which would further activate and enhance this space.



Figure 15: Proposed aerial 3D View of Palmer Park Leisure Centre

(n.b.: this image does not show amendments to curved roof from car park elevation)





- 7.58 Overall officers support the design, which is considered to be of high quality, whilst ensuring it would meet the requirements for sports provision, comply with the principles within the PPDF and the requirements of Policy ER1j, and achieve a high level of sustainability. It is considered that the proposed scheme would not be overly prominent within the Park and would not detract from the overall character or appearance of the wider area, nor detrimentally affect the setting of the listed statue, and would therefore accord with Policies CC7 and EN1.

Transport/Parking

- 7.59 Palmer Park is one of two large Victorian parks in Reading and it sits between two arterial roads (London Road and Wokingham Road) to the east of the town centre and within a largely residential area and consequently, opportunities for sustainable travel using established foot and cycle networks are good.
- 7.60 The existing parking comprises 185 spaces (including 5 disabled spaces) to the front/south-west of the stadium, a small overflow area to north between the stadium and the sub-aqua club building, and a small area of parkland to south of the access road, the latter allowed only during sports meetings and busy periods.
- 7.61 The proposed scheme would refocus parking to an area in front of the proposed entrance hub and existing building and extend further south into a small area of open space. The small parking area to the north would be retained. A total of 131 spaces would comprise the following:

Within the relined main car park

- 48 standard bays
 - 7 blue badge bays
 - 4 family spaces
- All Blue Badge and family parking bays would be linked directly to the new pedestrian avenue being created in front of the existing building, leading to the main reception hub. This would be approximately 50 m lined with bench seating to offer resting places.*
- 11 designated electric vehicle charging points (EVCP)

New car park to the south of the main car park

- 38 standard bays - with proposed use of 'grasscrete' to green this parking area.

Overflow car park to the north

- 23 spaces

- 7.62 Following objections regarding the proposed parking level, a further Transport Technical Note was submitted and reviewed by the RBC Transport Strategy Officer.
- 7.63 This Technical Note considers the use of the car park by other organised sports users such as bowls, and by casual users, and sets out that the applicant (GLL) will use a range of measures to manage the level of parking demand across the site to ensure that the 131 car parking spaces would be suitable to accommodate the relevant demands. The level of parking identified for the proposed scheme is intended to strike a balance between ensuring that there is sufficient parking to meet operational needs, whilst seeking to minimise the impact of parking areas on open space.
- 7.64 Some objectors advise that the uses on site currently fully utilise the on-site parking, but it has been clarified by RBC Leisure that a proportion of the vehicles are not associated with the leisure or park facilities.
- 7.65 It is proposed that the future management of the car park be set out in a Car Parking Management Plan, recommended as a condition. Suggested measures include: length of stay restrictions, and the introduction of a charging tariff. The car parking restrictions would be enforced through the use of ANPR (Automatic Number Plate Recognition) camera equipment. RBC Transport Strategy has confirmed that such measures would prevent users from occupying spaces for excessive periods of time and therefore increase the turnaround and availability of parking spaces over the course of the day. Subject to such control, the level of parking provision is considered acceptable and complies with Policy TR5.
- 7.66 Two coach drop off/pick up bays would be on the southern side of a widened access road.
- 7.67 There would also be 26 covered cycle storage spaces located outside the existing stadium building, on the footprint of the demolished entrance foyer.
- 7.68 A new footpath / avenue would be created leading from Palmer Park Avenue to the south, to the George Palmer's statue. Other footpaths would be retained, and the footpath from the north towards the statute would be realigned to improve the statue's setting.

- 7.69 The enclosed bin storage facility would be to north-west of the new building accessed via the shared zone of the Plaza with the turning circle within the existing parking area.
- 7.70 The servicing access for the new building would also be via the shared zone with traffic access managed to avoid busy periods.
- 7.71 The DAS explains phased approach to construction, and a condition is recommended for the submission and approval of a Construction Method Statement, to include a phasing plan, to ensure that the Park can continue to function safely through the development process, which is particularly important given public access will be maintained throughout.
- 7.72 Overall, officers consider that the scheme would be acceptable in transport terms, subject to attaching a number of conditions (set out in the Recommendation above), and would accord with requirements of policies TR2-TR5.

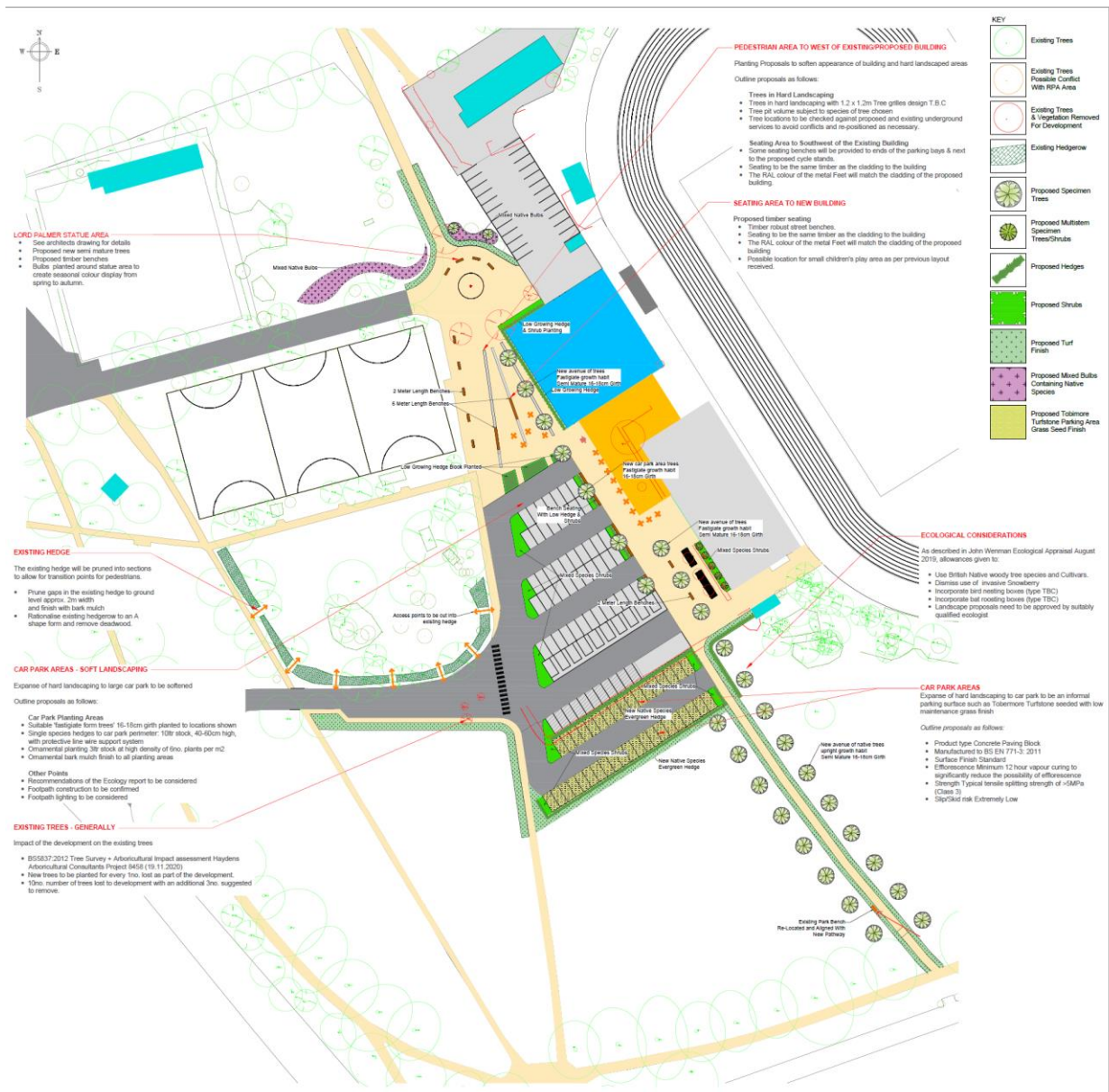
Landscaping

- 7.73 Policy CC7 requires developments to be assessed to ensure that they *“Are visually attractive as a result of good high quality built forms and spaces, ... and appropriate materials and landscaping.”*
- 7.74 Policy EN12 states that on all sites development should provide *“a net gain for biodiversity wherever possible.”*
- 7.75 Policy EN14: Trees, Hedges and Woodlands requires new development *“...make[s] provision for tree retention and planting within the application site, particularly on the street frontage, ... 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.”*
- 7.76 The site is within Palmer Park Local Green Space and Open Space under Policy EN7 which states that, *“proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.”*
- 7.77 The areas of the Park nearest the arterial routes are within an Air Quality Management Area (EN15) where the provision of tree coverage is important.
- 7.78 To the south, south-east and south-west of the site is a large area of short amenity grass. Most of the application site is tarmac car park with areas of soft landscaping in front of the north-west of the building. There are tree belts to the perimeter of the Park and a tree belt and vegetation north, east and south of the stadium. Within the

site itself there are several trees north-west of the building and around the statue.

7.79 The site is not covered by Tree Preservation Orders as trees on RBC land are not protected, but are instead managed by the Council's Parks and Leisure Service. The proposal requires the removal of 14 trees with the mitigation of this tree loss offset by enhanced replacement tree planting at a ratio of 2:1 (in accordance with the aims of the Council's adopted Tree Strategy (2021)) and with the protection of root protection zones for retained trees near the works during construction.

7.80 The proposal includes a comprehensively designed landscaping scheme and further detailed planting plans were submitted following comments from the Natural Environment Officer, and comments on these will be reported in an update report.



- 7.81 The aim of the landscaping scheme is to consolidate the existing current ‘parkland’ tree species in the Park and soften the proposed appearance of the leisure centre within the overall environment. A key focus has been on creating new sightlines, improved views, and gathering points around the statue and main entrance to the facility and this responds positively to the aims within the PPDF.
- 7.82 In summary the landscaping scheme includes the following:
- A tree lined new north-south path which extends the trees along the path in front of the building to the George Palmer statue, with trees within the Plaza and to the ends of groups of parking bays;
 - Mixed bulb planting beds around edge of the hard landscaping surrounding the George Palmer statue, specimen trees and seating;
 - Hedges to the north and western sides of the new building;
 - Hedge to the northern edge of the main car parking area and at the ends of groups of parking bays;
 - Hedging to the southern side of the main parking area;
 - New section of the car parking to the south open cell type pavers.
 - Hard landscaping would comprise the Plaza area with a mix of seating/gathering places and surfaces.
 - Improved access for events and grounds maintenance vehicles.
- 7.83 Subject to the receipt of satisfactory details of planting and ongoing management, officers advise that the landscaping strategy above is likely to be considered acceptable and further confirmation will be provided in the update report.

Sustainability

- 7.84 There are several sustainability policies within the local plan which are relevant to new development.
- 7.85 The overarching sustainability Policy, CC2 requires proposals for new development to be designed and have 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.”* In order to achieve this *“all major non-residential developmentsare required to meet the most up-to-date BREEAM ‘Excellent’ standards, where possible;....Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 7.86 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 7.87 Policy CC4: Decentralised Energy is relevant to this application as it is over 1000sqm, and requires the consideration of the *“... inclusion*

of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.”

- 7.88 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 7.89 The submitted Sustainability Statement and Energy Strategy demonstrate that the proposed scheme would, through a ‘building fabric first’ design approach combined with available Low and Zero Carbon (LZC) technology, meet carbon emission reduction targets to 46% below the Building Regulations’ Part L 2013 baseline, and would be able to exceed the policy target of BREEAM rating ‘Excellent’.
- 7.90 The scheme would achieve this through a number of measures as follows:
- A passive design exercise has been undertaken to optimise the building design and siting to reduce demand and to make best use of natural daylight and solar gains and thermal mass insulation.
 - Natural ventilation for the main reception hub.
 - Solar shading has been provided for large areas of glazing through the use of an external brise-soleil.
 - Design and use of construction details, which will limit ‘thermal bridging’ and reduce heat loss through the building envelope.
 - Fabric upgrades to the existing structure to improve performance including triple glazing and LED lighting
 - Low external element u-values (for both the windows and the building fabric).
 - Low air permeability/air tightness.
 - Mechanical ventilation with passive heat recovery.
 - Water conservation measures.
 - Air Source Heat Pump (ASHP) space heating to Gym, Studios, Offices, Café, and associated areas.
 - High efficiency Air to Water CO2 Air Source Heat Pump (ASHP) hot water services.
 - Solar Photovoltaic panels generating on-site zero carbon electricity.
- 7.91 The inclusion of 11 electric vehicle charging bays would also contribute to reducing carbon emissions.
- 7.92 A number of decentralised energy scheme options were considered by the applicant but the leisure centre is not one of the most suitable areas as identified in the Council’s commissioned studies. Therefore, the leisure centre would not be able to connect to a district energy centre. The Strategy also recommends that on site LZC (ie. minimising carbon emissions and energy use through design of the building itself) is the best method of reducing carbon emissions from the leisure centre.

- 7.93 Consideration was given to the use of a green roof but the applicant has advised that the long structural spans that would be required clear of columns for the pool/ sports hall would mean that this measure would be prohibitively costly due to the weight of such measures.
- 7.94 Subject to conditions requiring the submission and approval of a BREEAM certificate and details of the PV panels, it is considered that the scheme would accord with Policies CC2, CC3, CC4 and CC5.

Environmental matters

- 7.95 ***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 Environmental Health Officer has confirmed that as the air quality at the site is above objective levels for concern, no mitigation has been deemed necessary for the operational scheme. As there is a risk of dust emissions during construction, a condition is included requiring a Construction and Environmental Management Statement to include dust control measures.
- 7.96 ***Noise:*** Policy EN17 relates to noise generating equipment and that where such is proposed “*.. the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.*” The submitted noise assessment demonstrates that the plant noise would not cause adverse impacts on the nearest sensitive receptors, which are the residential properties on St Bartholomew’s Road, Wokingham Road and Palmer Park Road, located at a minimum distance of approximately 184m away. The traffic associated with the site’s use would result in a negligible change to noise levels. The Environmental Health Officer has reviewed the submitted noise assessment and has no objection to the proposed plant subject to a condition restricting the noise levels.
- 7.97 ***Contaminated land:*** Policy EN16: Pollution and Water Resources states that “*Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.*”
- 7.98 The submission included a Contamination Statement which shows that the site is a Characteristic Gas Situation (CS) level 1 for which no protection measures are required.
- 7.99 ***Drainage & Flood Risk:*** Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions or be no worse than existing.

- 7.100 A Sustainable Drainage Strategy and Proposed Drainage Layout have been submitted. The Strategy would be to discharge surface water to a cellular soakaway tank in the new car park area. Attenuation tanks will be sized to attenuate the 1 in 100 year storm event with a 40% allowance for climate change.
- 7.101 Following confirmation from the applicant that the development would provide betterment in a 1 in 1 year storm event when compared against the existing discharge rates, the Council SUDS Manager has confirmed that the scheme is acceptable subject to conditions as included above.
- 7.102 Policy EN18: Flooding and Sustainable Drainage requires leisure development to be directed to areas as the lowest risk of flooding in the first instance. The site is within the lowest Flood Risk area 1.

Infrastructure requirements

- 7.103 In accordance with Policy CC9, the following would be sought:
- Employment, Skills and Training - construction
 - £6k contribution to make improvements to the London Road / Liverpool Road pedestrian crossing to help promote alternative modes of travel to and from Palmer Park Sports Stadium.
- 7.104 The applicant has agreed to work with Reading UK CIC to develop an Employment Skills Plan and a condition requiring this is currently recommended rather than a S106 obligation.
- 7.105 The proposed scheme would result in a significant increase in trips by alternative modes, therefore, to mitigate this increase a contribution of £6,000 is sought towards the improvement of the London Road / Liverpool Road pedestrian crossing facility via a S106 obligation. A condition would also seek to deliver the improvements to the pedestrian crossing in time for when the new pool would open, currently planned as Autumn 2022.

Other matters raised during consultation

Biodiversity Net Gain

- 7.106 The application site itself is within the Park, but the area within the red line is relatively poor in biodiversity terms, given the amount of hard surfacing and buildings. To meet the requirements of Policy EN12 there should be no net loss of biodiversity and there should be a net gain wherever possible. Ecology comments are awaited at the time of writing this report. However, at pre-application stage, having assessed the same ecological appraisal report submitted as part of this full application, the Council's Ecology Consultant had no objection on ecology grounds. It was considered that the report had been undertaken to an appropriate standard and it concluded that

the proposal would be unlikely to affect protected or priority species (such as bats, badgers and reptiles) or priority habitats.

- 7.107 The Ecologist advised that any proposal should maximise its value for wildlife through a 'wildlife friendly' landscaping scheme. The proposed scheme, set out above includes for native mixed bulb planting, trees, and hedges, which would provide additional soft landscaping compared to the existing position.
- 7.108 The Ecologist also stated that in accordance with paragraph 180 of the NPPF, it would be important to ensure that any new lighting was designed to minimise the impacts of the proposals on wildlife, including bats, birds and invertebrates. A lighting strategy has been submitted, and a condition is recommended for further lighting details to be submitted and approved.
- 7.109 Objectors have raised concern the proposal would result in a net loss of biodiversity and no net gain. The applicant has submitted further information in the form of a DEFRA Biodiversity Metric, which is a tool used for measuring biodiversity losses and gains resulting from development projects. This concludes that there would be a biodiversity net gain. The original submission also included a BREEAM metric, which for linear habitats, such as tree lines and hedges, are assessed separately, and this showed a net gain of 127%. The Ecologist's response to this will be confirmed in the update report.
- 7.110 Officers recommend conditions to secure the submission and approval of mitigation and compensation measures such as sensitive lighting, and sensitive removal of vegetation, bird nesting and bat roosting boxes in order to accord with Policy EN12.

No 50m pool as part of these proposals

- 7.111 Some objectors have raised concern over the proposal not including a 50m pool. This is not material to the planning balance, but for clarity this was thoroughly considered in developing the proposals. RBC Leisure has provided the following information:
- 7.112 Sport England's demand modelling results indicated that there was no clear strategic need for provision of this scale on a single site. The provision of a 50m pool was not supported by Swim England (formerly the Amateur Swimming Association - ASA) as the most appropriate facility type for Reading.
- 7.113 50m pools are rare due to the cost of building, maintaining and operating them and it would not have been possible to provide a 50m pool and diving facilities. The overall aim was to provide a wide range of facilities to meet a broad range of activities and a 25m pool would still meet FINA (International Swimming Federation) requirements and it would be able to be used as a short course competition pool.

Consultation with Sport England and Swim England supported 25m pool options as the most appropriate scale of facility to meet the strategic needs of swimmers and clubs in Reading.

No path across the 'table top' area

- 7.114 An objector requested that no path be installed across the 'table top' area and it is confirmed that the proposed scheme does not include for a path from the entrance near the bridge at Culver Lane in the direction of the Stadium.

Proposals disappointing for a cyclist

- 7.115 The remit of the proposed scheme is for the provision of a new pool and additional sports hall space. The velodrome and the wider park are not part of the application area but the enhancements brought in this scheme will benefit all users.

Archaeology

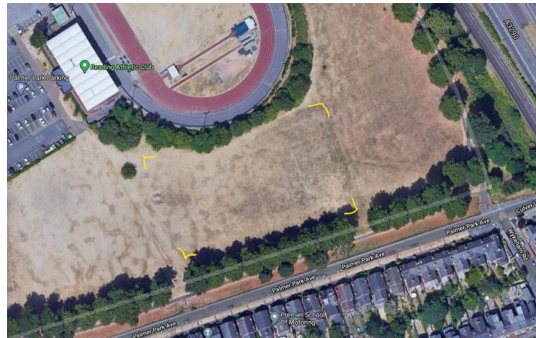
- 7.116 The RBLP allocation for the site includes the requirement for any proposal to "*take account of potential archaeological significance*". Prior to the submission of the application the applicant consulted Berkshire Archaeology who advised that there is little information recorded on the Historic Environment Register upon which to indicate the archaeological potential, but there is record of some mase holes⁴. In their formal consultation on this application they recommended the inclusion of a condition requiring the submission and approval of a programme of archaeological work. Works have been commissioned, and commenced week commencing 15th March, to undertake an archaeological survey through exploratory trenches. Should further detail be available by the time of committee this will be reported in an update, but at present the recommended condition will be retained.

Need for the new north-south path

- 7.117 The Palmer Park Development Framework identifies the importance of the historical routes through the park and creating a new 'heart'. The path is in response to these priorities, although in reality the route is not heavily used (although a desire line can be seen running across the park) the main access routes likely being from the corners of the park not part way along Palmer Park Avenue. However, this entrance is a historic one and one we would not choose to close off and assume has always opened up onto the road rather than footway. At the end of path just before the park boundary you can turn left or right and follow the path just inside the park until you reach a corner.
- 7.118 The new path and more importantly the trees, will be smaller than the lime trees, to be subservient to the existing avenues and path. There is a terraced piece of land to the east of proposed path, which is designed for sport (roughly within the yellow corners), and the land

⁴ Man made pits

to west has been partly used for overflow parking, fairs, car boots over the last few decades and is not very flat. With an anticipated increase in sports centre use, the more that the use of the north south path can be encouraged, rather than cutting diagonally across the sports area, the better this surface will be protected especially in the winter months.



Competition between cafes

- 7.119 The applicant has included a café within the proposal because it was included in the PPDF, and stated that it “*should complement the existing café within the pavilion to ensure both facilities will be successful.*”
- 7.120 Although the café would predominantly serve the leisure centre it includes outside seating for it to serve passing users in the park (this seems to also be important in the development framework). The offer would differ to the current park café, which seems to offer more substantial meals, whereas the proposed café would focus on panini’s/sandwiches and hot/cold drinks. The matter of competition is not a planning matter.

Does the existing pool at Bulmershe impact on the need for pool provision at Palmer Park?

- 7.121 The overall need for pool space was assessed under RBC’s commissioned leisure review and that the closure of Central Pool and Arthur Hill were agreed to be provided at Rivermead and Palmer Park respectively. At the time of that assessment the extension of the pool at Bulmershe was not known about. The extra water space being provided at Bulmershe pool is less than that which was being provided at Arthur Hill. The Council did not wish to see a reduction in the level of provision in the east of Borough. There has been a strong commitment to provide a replacement 6 lane pool by the Council for a number of years. The total amount of water space available is one consideration, overall leisure service provision locally is another.

Equalities Impact

- 7.122 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. Matters have been raised through the consultation with regard to a number of access matters, as documented in the Consultation section above. The proposed scheme would be DDA compliant, with links through to the

existing stadium at first floor, allowing full access to the existing building, achieved through an accessible compliant ramp allowing for level changes. The scheme was presented to the Reading's Access and Disabilities Working Group on 5th March 2020.

7.123 The proposed scheme includes a wide range of accessibility measures (listed in Appendix 2).

7.124 Following consultation with the Access Officer during the course of the application, as detailed in the Consultation section above, and in direct response, the applicant mainly provided further clarification within the Consultation Response Statement. The following was revised:

- 5 Blue Badge spaces relocated closest to the main reception, creating a row of dedicated spaces. Keeping Blue Badge parking within the main tarmac car park, means that the new overflow car parking can be surfaced in a material more suitable for a parkland setting, through the use of Grasscrete or similar.
- Increase of Blue Badge spaces by 1 (normal spaces will be reduced by 1 to compensate)

7.125 A further presentation was made to RBC's Access and Disabilities Working Group on 4th March 2021, to explain the accessibility strategy further. The applicant has confirmed that a working group is being set up between members of this working group, GLL, RBC and SBA who would review plans going forward into the next design stage.

7.126 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.

CONCLUSION

8.1 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019. The proposal would provide new leisure provision, including a pool, as an extension to an existing site and in accordance with the allocation in the Reading Borough Local Plan and identified Corporate priorities. The proposed parking area extends further south than the existing resulting in the small loss of some existing open space. This loss has been offset by the new Plaza enhancements, and as the Plaza would have pedestrian priority, would need to relate well to both the new buildings, but also the enhanced arear around the statue. This has meant that the parking area has had to shift further south. However, this has been kept to a minimum, whilst ensuring sufficient parking provision to meet the needs of the development. This small loss of open space is considered to be acceptable when weighed against the overall public benefits of the scheme.

- 8.2 It would provide enhanced leisure facilities that would meet national and local objectives and policies regarding access and participation in sport and leisure and promoting health and wellbeing.
- 8.3 The design includes a new contemporary building form, which wraps around the existing stadium, and provides a careful use of materials so as to be complementary to the existing structures as well as modernising elements. As such it is considered that the relationship and massing next to the stadium corresponds effectively with it and would provide a simple form and mass which would sit comfortably within the surrounding Park.
- 8.4 The provision of a Plaza to the front of the building, with new hard and soft landscaping would enhance the visual appearance of the area, and reinforce the theme of reintroducing a 'heart' in the Park and a clear destination of routes and vistas, as set out in the Palmer Park Development Brief.
- 8.5 It is considered to not cause significant harm to the character and appearance of the Park, detrimentally affect views into it, nor affect the setting of the listed George Palmer statue.
- 8.6 The proposal would provide for flexible and well designed internal spaces and would integrate effectively within a refurbished and reconfigured existing leisure centre.
- 8.7 It would be a sustainable building, designed to exceed the BREEAM 'Excellent' rating and would therefore, meet the Council's sustainability policies.
- 8.8 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, which accords with relevant national and local policy. The planning application is therefore recommended for approval subject to conditions as detailed above.

Case Officer: Alison Amoah

APPENDIX 1: EIA Schedule 3 Criteria

CHARACTERISTICS OF DEVELOPMENT

1. The characteristics of development must be considered with particular regard to—

- (a) The size and design of the whole development;
- (b) Cumulation with other existing development and/or approved development;
- (c) The use of natural resources, in particular land, soil, water and biodiversity;
- (d) The production of waste;
- (e) Pollution and nuisances;

LOCATION OF DEVELOPMENT

2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—

- (a) The existing and approved land use;
- (b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) The absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) Wetlands, riparian areas, river mouths;
 - (ii) Coastal zones and the marine environment;
 - (iii) Mountain and forest areas;
 - (iv) Nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) Densely populated areas;
 - (viii) Landscapes and sites of historical, cultural or archaeological significance.

TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in Regulation 4(2), taking into account—

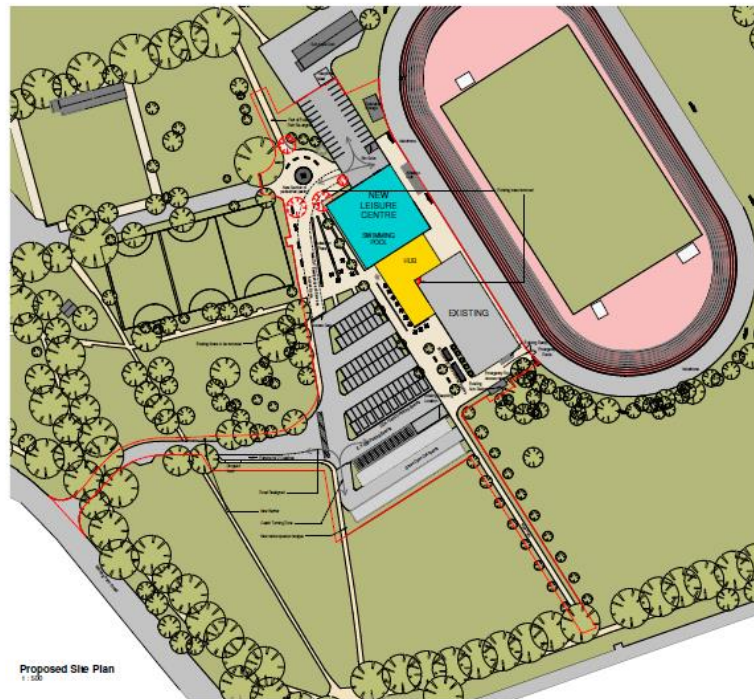
- (a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) The nature of the impact;
- (c) The transboundary nature of the impact;
- (d) The intensity and complexity of the impact;
- (e) The probability of the impact;
- (f) The expected onset, duration, frequency and reversibility of the impact;
- (g) The cumulation of the impact with the impact of other existing and/or approved development;
- (h) The possibility of effectively reducing the impact.

APPENDIX 2: Accessibility Measures

- Well-lit level footpaths through to the main entrance - with suitable surfaces, through to the main entrance, with dropped kerbs and blister paving where required. Resting benches will be provided no more than 50m apart along these routes to the entrance;
- 7 no. accessible parking spaces;
- Drop off points and dropped kerbs outside the main entrance;
- Level access into and within the building;
- Automatic doors within the lobby area;
- Circulation widths suitable for wheelchair users, with sports wheelchairs at ground floor;
- Induction hearing loops and dropped counter sections;
- Accessible toilets;
- Accessible changing facilities (all detailed to Sport England Accessible Facilities Design Guidance note);
- Changing Places room;
- Lift;
- Shallow accessible steps into the pool with handrails;
- Wet side wheelchair lifts;
- Stairs to be accessible for ambulant disabled with wheelchair refuges;
- Brail signage;
- Detailed review of Swim England's Dementia Friendly design guidance to ensure the centre would be Dementia friendly.
- Coloured paving and tarmac to be decided at the next detailed design stage;
- Pedestrian Plaza would be wide enough to allow adequate circulation between users and detailed design to ensure 'clutter free' zones;
- Tree pits with suitable grating and future maintenance;
- Lighting strategy for suitable site wide lighting. To be detailed further at next design stage;
- Manifestation on glass doors and windows would be provided in line with Building Regulations;
- Entrance barrier matting would be suitable for wheelchair users and of an appropriate colour for those with Dementia.
- Tactile surfaces

APPENDIX 3: Plans

Site Plan

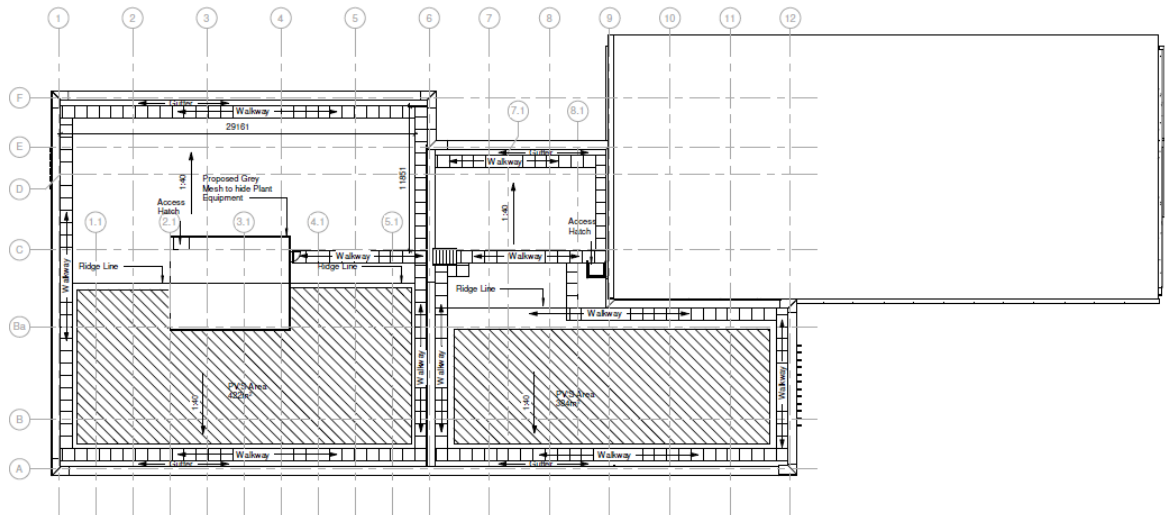
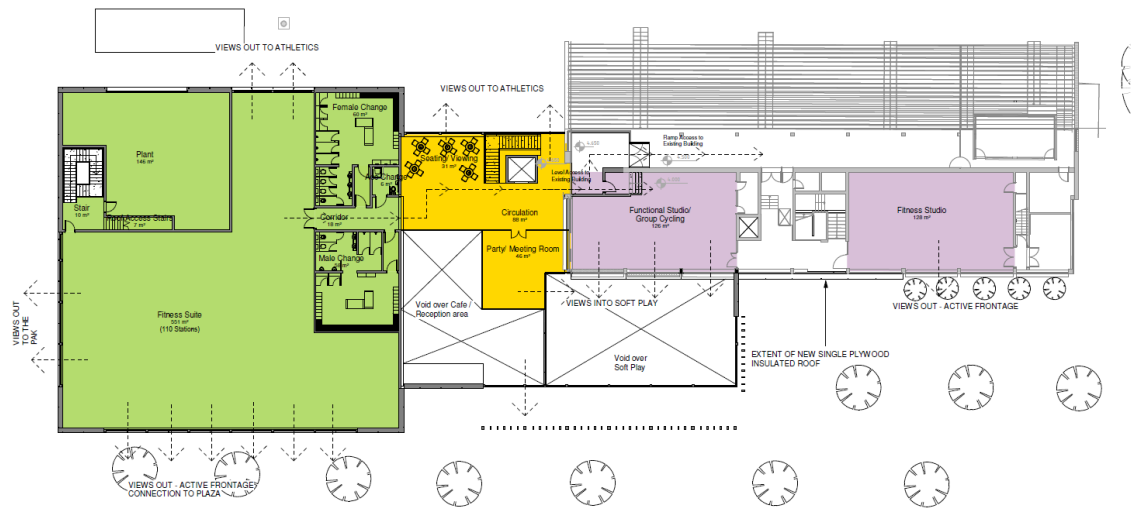


Plans

Ground Floor



First Floor



Proposed Roof Plan
1 : 200

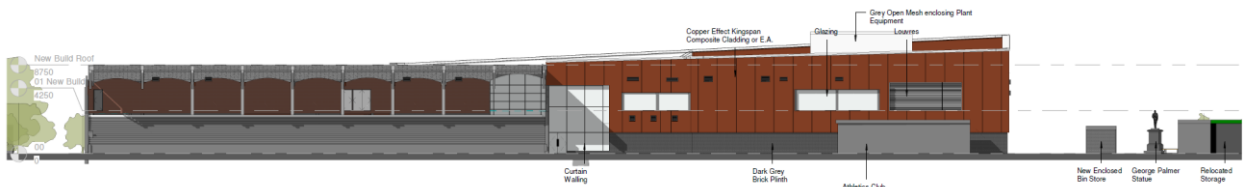
Elevations

Front

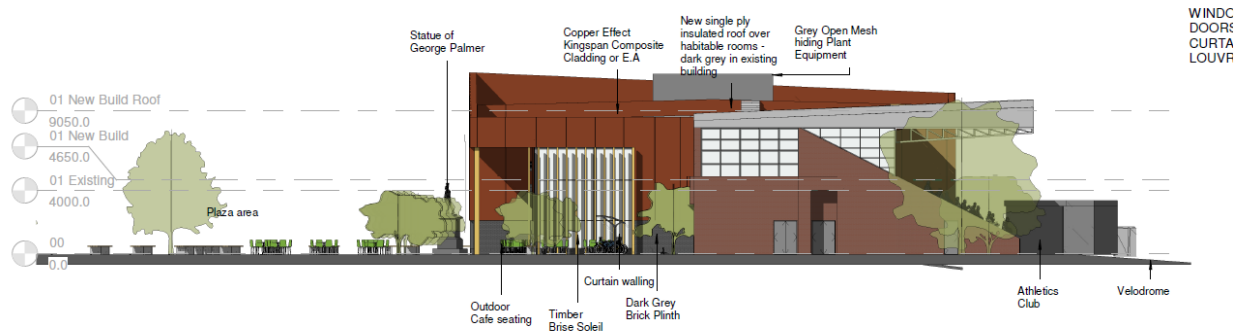


Proposed South-West Elevation
1 : 200

Rear



Proposed North-East Elevation
1 : 200

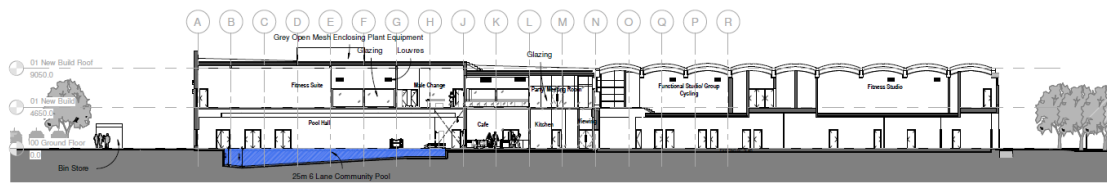


Proposed South-East Elevation
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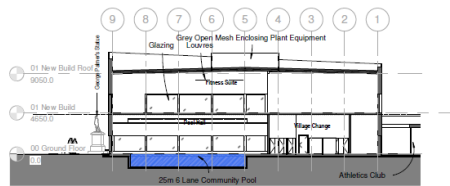


Proposed North-West Elevation
1 : 200

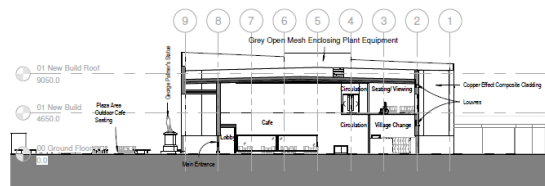
Sections (need amended to show new roof form)



Proposed Section A
1 : 200



Proposed Section B
1 : 200



Proposed Section C
1 : 200

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COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

PLANNING APPLICATIONS COMMITTEE: 31 MARCH 2021

Ward: Out of Borough

App No.: 210237 (SODC ref. P/20/S3501/FUL)

Address: North Lake, Caversham Lakes, Henley Road

Proposal: Change of use of an established lake for recreation and sports purposes

Applicant: Cosmonaut Leisure Ltd.

Date received: valid by SODC on 21 September 2020

Application target date: SODC target date: 4 May 2021

RECOMMENDATION:

That South Oxfordshire District Council (SODC) be informed that Reading Borough Council raises an **OBJECTION** to the proposal on the following transport grounds:

1. Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies TRANS4 and TRANS5 of the South Oxfordshire Local Plan 2035;
2. The proposed development does not comply with the Local Planning Authority's standards in respect of pedestrian facilities and, as a result, is in conflict with South Oxfordshire Local Plan 2035 Policies TRANS2 and TRANS5; and
3. That SODC is sent a copy of this report for their information and use.

1. INTRODUCTION

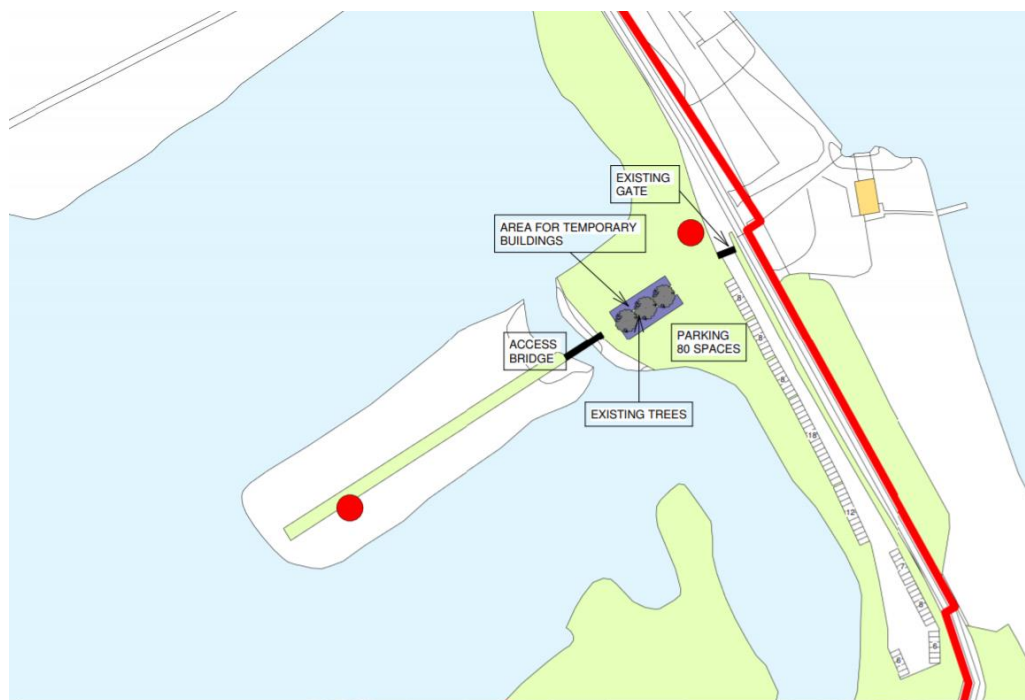
- 1.1 The Council has been notified of an application within the adjacent authority area (within South Oxfordshire District) which directly adjoins the Borough boundary in the eastern extremity of Caversham (Emmer Green ward). The site currently has an undeveloped appearance and was formerly a gravel extraction pit, which ceased operation approximately ten years ago. The application site is 39.44 hectares in total which includes a large lake with a field to the north and an island in the south-west. A private access road leads to this site and other recreational facilities in the area centred around water-based facilities, including the Redgrave Pinsent Rowing Lake, a water ski lake, the Thames and Kennet Marina and an Environment Agency building (a district navigation office).



Location plan

2. PROPOSAL

- 2.1 The application is for the retrospective change of use of a redundant gravel extraction pit and lake to water sports and recreational use. The North Lake is being used for non-motorised sports such as kayaking, open-water swimming and paddle-boarding. Typical hours are stated as being 0600-2000. No buildings are proposed, although the planning statement mentions the need for storage containers for equipment stores, reception, changing rooms, coffee shop. The planning statement suggests that the car park would not be formally marked out but would remain an informal gravel parking area, in keeping with the open countryside character of the area.



Extract of Block Plan

3. RELEVANT PLANNING HISTORY

- 3.1 There is no relevant planning history on this site dealt with by Reading Borough Council.

4. CONSULTATIONS

- 4.1 SODC has carried out its own consultations. RBC's consultation responses are outlined below.

RBC Transport Development Control:

- 4.2 The proposed application consists of the change of use of an established lake to include recreation and sports purposes at North Lake, Caversham Lakes, Henley Road, Caversham, Reading. The site is located to the north of Reading with the existing vehicle access to the site taken from an existing private access road which leads off the A4155 Henley Road. The private access is a single two-way carriageway with the access onto the A4155 Henley Road being located directly adjacent to the signalised junction of the A4155 Henley Road / C103 Caversham Park Road. A Transport Statement has been submitted to accompany the application and I comment on this as follows:

Trip Rates

- 4.3 The Transport Statement has confirmed that the applicants have operated or still operate similar operations at Marlow Lake, Bray Lake, Liquid Leisure [Windsor] and Heron Lake [Staines] and that these other sites are accessed via a single road, away from built up areas, and are therefore are not as accessible as the application site and more reliant upon access by private car. For these other established sites, data has been collected on visitor numbers and in principle I have no objection to the use of this type of data.

- 4.4 The applicant has stated that given their understanding of the operation and the variety of users a ratio of 1.6 people per car has been utilised to estimate the number of cars visiting the site. However, there is no evidence provided alongside this application to corroborate that this ratio is realistic or accurate and therefore further evidence would be required before this ratio can be agreed.
- 4.5 The survey information also shows that the number of cars visiting Heron Lake for swimming has not exceeded 142 in one day. However, the proposed change of use is for a number of non-motorized water sports including kayaking, general swimming and paddle-boarding therefore the survey data is not acceptable as this is not comparable with the Heron Lake facility given that this only provides open water swimming.
- 4.6 I would add that further transport Information has been provided since the submission of the application and this has identified that the use of the application site in 2020 generally generated 300 visitors a day with a maximum of 500 visitors a day during August bank holiday, this is significantly is also greater than the survey data included within the Transport Statement. This is of concern to the Highway Authority given the potential increase in vehicle movements and the close proximity of the access to the adjacent signalised junction and the limited trip rate information accompanying this application.
- 4.7 I would also stress that the applicant has spread the trips evenly throughout the day but the latest accompanying data states that *'most visitors stayed on site for approximately 2 hours, but some up to 4 hrs'*. It is therefore evident that the trips would not be spread evenly and there would be peaks and troughs in relation to vehicle trips. To establish the vehicle trip profile of the site actual survey data of a similar site would be required so that the impact on the Highway network can be thoroughly assessed.
- 4.8 Given that the vast majority of the data submitted to establish the trip rate analysis is not based on factual data or is not comparable to the proposed development, the Highway Authority have significant concerns regarding the assessment of the proposal and as such it could not be supported.

Site Access

- 4.9 The proposal seeks to utilise the existing site access which as stated above is directly adjacent to the signalised junction of the A4155 Henley Road / C103 Caversham Park Road. I am unable to assess the impact on the junction given the limited information on the trip generation of the proposal.
- 4.10 The applicant has also stated that the accident data collected from CrashMap identifies that only two accidents have occurred in the last five years however the actual data has not been submitted to allow the Highway Authority to review the cause of the accidents. Although there may only be two accidents, the proposed use may result in there being more opportunity for these types of accidents to occur and therefore must be reviewed. It is noted that one of the accidents involved three vehicles and therefore implies that this involved vehicles entering or exiting the private road onto the A4155 Henley Road, and it is therefore essential that the Highway Authority reviews the cause of these accidents.

Sustainable Access

- 4.11 Pedestrian access to the site would also be from the vehicle access road which does not benefit from any pedestrian footways or street lighting. The closest bus stops to the site are located on Henley Road, approximately 550m from the application site and therefore does provide for an alternative mode of transport. Whilst the bus stops are well served by public transport, the pedestrian route between the bus stops and the site is considered unsuitable as there no footways or street lighting provided.
- 4.12 Given the above the Highway Authority would object to the proposal on the grounds of insufficient information on traffic generation and unsuitable pedestrian facilities [the reasons supplied by the Highway Authority are set out in the Recommendation box above].

Natural Environment Team

- 4.13 The following is a summary of the comments received from the Planning Natural Environment Team (the tree officer). Physically, the proposal seems to involve temporary buildings as shown on the Proposed Site plan and some parking spaces, however, the location of these buildings would seem to necessitate the removal of some trees? Therefore, it is not clear what harm there would be to trees, whether this has taken place already, or if the trees and container buildings can co-exist in the locations shown. It is also unclear as to whether vegetation will be retained alongside the parking spaces - retention of vegetation along the access road to provide a buffer between this and the parking would be beneficial. Provision of replacement planting is likely to be required.

RBC Ecology Consultant

- 4.14 RBC's ecologist is aware that concerns have been forwarded to SODC from SODC's ecologist. RBC's ecologist concurs with these concerns and has nothing further to add.

RBC Leisure

- 4.15 No objections

CADRA

- 4.16 A response has been received from the Caversham and District Residents Association (CADRA), who advise that if the retrospective application is approved, an outdoor beach and water facility stand to be extremely well used, given how far Reading is from the sea. This seems likely to put substantial pressure on the junction which is already a concern locally.

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) - among them the 'presumption in favour of sustainable development'.

- 5.2 The following local and national planning policy and guidance is relevant to this application:

National Planning Guidance

National Planning Policy Framework

Local Plan

South Oxfordshire Local Plan 2035 (adopted December 2020)

Policies:

TRANS2 Promoting Sustainable Transport and Accessibility

TRANS4 Transport Assessments, Transport Statements and Travel Plans

TRANS5 Consideration of Development Proposals

6. APPRAISAL

- 6.1 The main issues of potential significance to RBC are in terms of traffic generation/highway safety and impact on the local visual environment.

(i) Traffic generation/highway safety

- 6.2 As set out above, given that the vast majority of the data submitted to establish the trip rate analysis from the applicant is not based on factual data or is not comparable to the proposed development, RBC as the immediately adjacent Highway Authority have significant concerns regarding the assessment of the proposal and as such it cannot be supported at this time. Officers advise that the our officers are in direct contact with SODC and Oxfordshire County Council (their Highway Authority), but at the time of writing, RBC Development Control is not satisfied and an objection should be supplied.
- 6.3 Whilst the site is reasonably well situated in relation to the nearest bus-stop, there are no pavements and none are proposed, so this is unlikely to make bus and walking to the site safe or attractive.
- 6.4 As a consequence of the above, it is recommended that RBC should raise an objection on the basis of the relevant traffic generation and sustainable transport policies of South Oxfordshire's newly-adopted local plan.

(ii) Impact on the local visual environment

- 6.5 The initial information submitted with the application is unclear on a number of aspects (including transport, ecology, impact on trees and flooding) and it is understood that officers at SODC are seeking various further submissions from the applicant at this time to answer these matters.
- 6.6 Apart from the highway aspects above, direct impacts on Reading Borough are likely to be very minor. It is not clear that there would be any detrimental impact on the landscape character of the area as observed from Reading Borough given the

number of other trees in the vicinity. Officers assume that the container buildings would be permanent, but from their size, siting and landscaping in this low-level area, clear views from the Borough are considered to be unlikely. SODC will take into account on-site tree/landscaping issues and impact on the open countryside in an assessment against their own policies.

Other matters

- 6.7 The site includes an island that is designated as an ancient woodland. Due to the nature of the proposed use - water sports - there will be no requirement for users to access the island and as a result no damage likely to be caused to the ancient woodland.
- 6.8 There is understood to be no motorsport noise associated with the use, except for a motorboat used for staff/rescue use on the lake and again, this is something SODC would seek to control, were they to issue a planning permission.

7. CONCLUSION

- 7.1 There is some uncertainty regarding the permanent or temporary nature of the buildings/use of the site. However, for reasons of traffic generation and pedestrian safety which may affect Reading Borough, the recommendation of officers is to advise SODC of the objection as set out above.

Case Officer: Richard Eatough

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COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

PLANNING APPLICATIONS COMMITTEE: 31 MARCH 2021

Ward: Out of Borough

App No.: [None] (West Berkshire Council ref 19/00113/OUTMAJ)

Address: Land East Of Pincents Lane Tilehurst Reading Berkshire

Proposal: A hybrid application comprising the following elements: Outline application for up to 265 dwellings on the western part of the site and a mixed use building comprising 450sqm (GIA) of floorspace in use class D1 to provide a community healthcare hub and residential above (included in the 265 dwellings); Engineering operations on the area covered by the outline application to create suitable gradients for internal site roads and development platforms for the residential development; and FUL application for change of use of the eastern part (7ha) of the site for use as public parkland, to be protected from development in perpetuity. All matters except for access to the site are to be reserved. Matters for which detailed approval are sought are: The detailed design of the vehicular access to the site from Pincents Lane and associated turning area, the location emergency vehicular access to the site and the locations of pedestrian and cycling accesses to the site.

Applicant: U and I (Pincents Lane) Ltd.

Date received: validated 15 January 2019 (by West Berkshire Council)

Major Application: West Berkshire agreed extension of time date: 30 April 2021

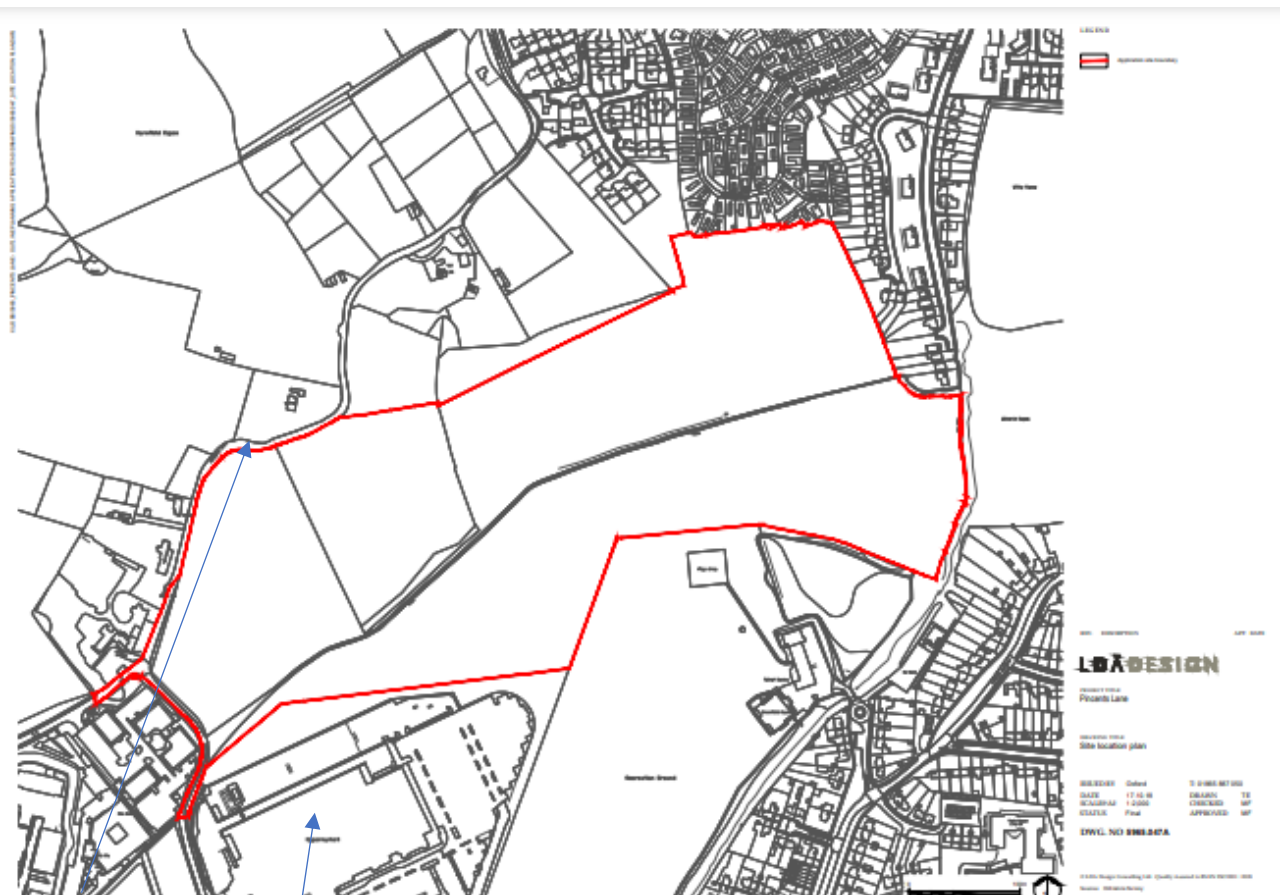
RECOMMENDATION:

That West Berkshire Council be informed that Reading Borough Council raises NO OBJECTION to the application.

That West Berkshire Council is sent a copy of this report for their information and use.

1. INTRODUCTION

- 1.1 The Council is aware that West Berkshire Council is considering a planning application for a major residential-led development of the land at Pincents Hill, Calcot. Although the Council has not been formally consulted on this application, officers consider it important for the views of RBC as the nearby local planning authority, to provide its views on this application.
- 1.2 At its nearest point (Park Lane, Tilehurst) the nearest part of the application site is approximately 0.61 km from the Borough/District Boundary. The application site is 17.48 hectares in total. The site is currently undeveloped and largely used for informal public access (footpaths cross the site).



Pincents Hill Sainsbury's (Savacentre)

Site Location Plan

2. PROPOSAL

- 2.1 The proposal is for a residential-led development of 265 dwellings, with a community facility, with a large proportion of the site for public open space.
- 2.2 Vehicular access would be taken from Pincents Lane, near to the Turnhams Green Business Park and would involve moving the current 'no entry' bollards slightly north. There would continue to be no through-access north on Pincents Lane towards Tilehurst.

3. RELEVANT PLANNING HISTORY

No relevant planning history on this site dealt with by Reading Borough Council.

4. CONSULTATIONS

- 4.1 WBC has carried out its own consultations. RBC's consultation responses are outlined below.

RBC Transport Development Control:

- 4.2 The Transport Development Control Manager has reviewed the information on the West Berkshire website and comments as follows:
- 4.3 This proposal is a hybrid application comprising the following elements: Outline application for up to 265 dwellings on the western part of the site and a mixed use building comprising 450sqm (GIA) of floorspace in use class D1 to provide a community healthcare hub and residential above (included in the 265 dwellings).
- 4.4 The applicant has submitted a Transport Assessment to accompany the planning application which has assessed the junctions within West Berkshire District. It is noted that the scheme would generate 174 trips (53 arrive/121 depart) in the AM peak and 171 trips (102 arrive/69 depart) in the PM Peak. A further 68 trips (34 arrive/34 depart) would be generated during the Saturday peak. The distribution of traffic has been assessed using the census travel to work data and is deemed an acceptable methodology and this estimates that the traffic flow towards Reading would be as follows: 56 trips in the AM Peak, 32 trips in the PM Peak and 16 during the Saturday Peak.
- 4.5 The levels of trips identified above would not be detrimental to the traffic flow within Reading which would further be diluted with trips using both the A4 Bath Road or Langley Hill. As such the Highway Authority has no objection to the proposal.

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) - among them the 'presumption in favour of sustainable development'.
- 5.2 The following local and national planning policy and guidance is relevant to this application:

National Planning Guidance

National Planning Policy Framework (2019)

West Berkshire Local Development Framework

- 5.3 The statutory Development Plan for West Berkshire comprises:
- West Berkshire District Local Plan 1991 -2006 (Saved Policies 2007)
 - West Berkshire Core Strategy (2006-2026) (2012)
 - West Berkshire Housing Site Allocations Development Plan Document (2017)
- 5.4 The application site is not allocated in the Housing Site Allocations DPD.

6. APPRAISAL

- 6.1 The main issues of potential significance to Reading Borough are in terms of transport, impact on local infrastructure and visual effects.

(i) Transport Implications

- 6.2 As set out above, RBC Transport Development Control (the Highway Authority) has considered the proposal and consider that there are unlikely to be significant effects on the highway network within Reading Borough. Therefore, no objection on these grounds is necessary.

(ii) Local Infrastructure

- 6.3 The location of the development near to the Borough boundary means that it is possible that there may be some use of health and/or education facilities in Reading Borough as a result of this development, although the closest primary schools are in West Berkshire. However, West Berkshire currently operates the Community Infrastructure Levy. General contributions towards primary and secondary education and towards healthcare are listed on their Regulation 123 list, i.e. the schemes towards which CIL contributes. These will therefore be covered by CIL rather than Section 10/6, and there are no specific contributions to be sought from this scheme towards infrastructure provision in Reading. However, it is worth commenting to West Berkshire Council that there are substantial cross-boundary demands on local infrastructure, and emphasising the importance of joint working on identifying infrastructure pressures in the local area and directing new provision accordingly. The on-site community use is described as a 'community healthcare hub'.

- 6.4 In terms of open space, the development includes 10.27 hectares of open space to serve the development, to comply with West Berkshire's policy requirements. The site is situated to the immediate north of Calcot Recreation Ground and Linear Park some 0.8km to the south. Both of these are substantial open spaces within Calcot and some distance from the nearest large public open space in Reading Borough (Prospect Park). It is not therefore considered that there will be any significant impact on Reading's open spaces.

(iii) Visual Effects

- 6.5 The application is accompanied by an Environmental Statement which includes a views study. The A4 Bath Road in this area of Calcot may allow some glimpsed views of the proposal and an increase in urbanisation of the western fringe of Greater Reading, but there are no direct impacts in terms of views on Reading Borough.

7. CONCLUSION

- 7.1 As there are not expected to be any significant impacts on RBC in terms of transport, infrastructure or visual effects, it is recommended that RBC raise no objections to this application proposal.

Case Officer: Richard Eatough

Indicative Layout



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