

To: Councillor Gavin (Chair)
Councillors Davies, Ennis, Goss, Hornsby-
Smith, Leng, Lovelock, McCann, Moore,
Rowland, Tarar, Williams and Yeo

Direct ☎ : 0118 9372112

21 April 2026

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

NOTICE OF MEETING - PLANNING APPLICATIONS COMMITTEE 29 APRIL 2026

A meeting of the Planning Applications Committee will be held on Wednesday, 29 April 2026 at 6.30 pm in the *** **Victoria Hall, Reading Town Hall, Blagrove Street, Reading RG1 1QH** ***. The Agenda for the meeting is set out below.

*** **PLEASE NOTE:** This meeting will be held at a different venue from usual. ***

AGENDA	ACTION	WARDS AFFECTED	PAGE NO
1. MINUTES	-		7 - 10
2. DECLARATIONS OF INTEREST	-		
3. QUESTIONS	-		
4. POTENTIAL SITE VISITS FOR COMMITTEE ITEMS	Decision		11 - 14
5. PLANNING APPEALS	Information		15 - 20
6. ANNUAL DEVELOPMENT MANAGEMENT PERFORMANCE - 2025-26	Information		21 - 26
7. RESPONSES TO NATIONAL PLANNING CONSULTATIONS	Decision		27 - 68
8. PL/26/0275 - PROPOSED POLLARDING OF FOUR WILLOW TREES AT ROSE KILN LANE / LAUD CLOSE	Decision	COLEY	69 - 74

PLANNING APPLICATIONS TO BE CONSIDERED

9. PL/24/0846 (FUL) - NAPIER Decision THAMES 75 - 180
COURT, NAPIER ROAD

Proposal: Demolition of existing buildings and erection of new buildings of 11 storeys to provide 570 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works (amended description)

Recommendation: Application Refused

WEBCASTING NOTICE

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Members of the public seated in the public gallery will not ordinarily be filmed. However, please be aware that by moving in front of the camera, or in the unlikely event of a technical malfunction or other unforeseen circumstances, your image may be captured. **Therefore, by entering the meeting room, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes.**

Members of the public who participate in the meeting will be able to speak on-camera or off-camera, according to their preference.

Please speak to a member of staff if you have any queries or concerns.

GUIDE TO PLANNING APPLICATIONS Agenda Annex

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

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

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

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

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

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

Glossary of usual terms

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

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

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

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

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

Brownfield Land - previously developed land.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Scheduled Ancient Monument - Specified nationally important archaeological sites.

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

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

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

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

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

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

Guide to changes to the Use Classes Order in England.

Changes of use within the same class are not development.

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

Present: Councillor Gavin (Chair);
Councillors Davies (Vice-Chair), Ennis, Hornsby-Smith, Lovelock, McCann, Moore, Rowland, Tarar, Williams and Yeo

Apologies: Councillors Goss and Leng

RESOLVED ITEMS

58. MINUTES

The Minutes of the meeting held on 4 February 2026 were agreed as a correct record and signed by the Chair.

Minute 56 of the previous meeting, relating to planning application PL/25/0691 for Land West of Kidmore End Road, set out the decision that the Committee would have made if it had been able to determine the application, which the Council would present to the Planning Inspectorate in respect of the forthcoming appeal.

The Committee noted that it had been agreed at the previous meeting to amend the recommended decision set out in the report, to increase the Section 106 financial contribution for upgrading of the operating system and/or improvements to pedestrian and cycle facilities at the junction of Peppard Road / Henley Road / Westfield Road / Prospect Street from £50,000 to £150,000, in order to help mitigate the impact of the development on traffic.

It was further noted that, during the debate on the application, members of the Committee had also expressed an intention to remove the fettering of this financial contribution to the specific junction, but that the resolution had not been amended accordingly when put to the vote. It was therefore proposed and agreed at the meeting that an additional resolution be agreed as set out below, to be included in the representations submitted by the Council to the planning appeal.

Resolved –

That, if the Committee had been able to determine application PL/25/0691, it would have resolved to grant permission subject to a financial contribution of £150,000 towards identified highway/active travel (pedestrian and cycling) improvement works within the local area, which would be impacted by trips to and from the development.

59. POTENTIAL SITE VISITS FOR COMMITTEE ITEMS

The Committee considered a report setting out a schedule of applications to be considered at future meetings of the Committee to enable Councillors to decide which sites, if any, they wished to visit prior to determining the relevant applications. The report also listed previously agreed site visits which were yet to take place.

PLANNING APPLICATIONS COMMITTEE MEETING MINUTES - 4 MARCH 2026

A verbal update was given at the meeting to explain that it was planned to arrange the previously agreed site visit for application 240846/FUL - Napier Court, Napier Road, for the next scheduled site visits date of 26 March 2026 as the application would soon be ready for consideration by the Committee.

Resolved -

That no new site visits be arranged.

60. PLANNING APPEALS

The Committee received a report on notifications received from the Planning Inspectorate on planning appeals registered with them or decisions made and providing summary reports on appeal decisions of interest to the Committee.

Appendix 1 to the report set out details of four new appeals lodged since the last Committee. Appendix 2 to the report set out details of two appeals decided since the last Committee.

Resolved –

- (1) That the new appeals, as set out in Appendix 1, be noted;
- (2) That the outcome of the recently determined appeals, as set out in Appendix 2, be noted.

61. PL/26/0080 - PROPOSED FELLING OF ONE COUNCIL OAK TREE ADJACENT TO ELIZABETH HOUSE, GOSBROOK ROAD AND PL/26/0063 - TWO COUNCIL ASH TREES AT THE FORMER HEIGHTS PRIMARY SCHOOL, 82 GOSBROOK ROAD

The Committee considered a report on the proposed felling of one council Oak tree adjacent to Elizabeth House, Gosbrook Road and two council Ash trees at the former Heights Primary School, 82 Gosbrook Road. The trees were shown as T1 and G1 respectively on TPO plan 7/08 attached to the report at Appendix 1. Photographs were attached at Appendix 2 and replacement planting details at Appendix 3.

The report explained that the works proposed were necessary in order to appropriately manage the risk the trees presented and there were no feasible alternatives to felling. Replacement planting would be carried out, as was normal following felling of council trees, but also secured via condition. No objection or comments had been received as a result of the public notice and it was therefore recommended that the works be approved.

At the meeting it was moved and agreed that an additional condition be added to require consultation with residents on the location for the replacement oak tree.

Resolved –

PLANNING APPLICATIONS COMMITTEE MEETING MINUTES - 4 MARCH 2026

That the proposed tree works be approved, with the additional condition agreed at the meeting to require consultation on the location for the replacement oak tree.

62. PL/19/0549 (FUL) - SHILLINGFORD HOUSE, 78 OXFORD ROAD

Demolition of existing three storey building containing 4 x ground floor retail units and 4 x flats to first and second floors and erection of a six storey building containing 3 x ground floor retail units and 13 x flats (6 x 1 bed, 6 x 2 bed and 1 x 3 bed) with associated enclosed communal areas, bin store, services room and cycle storage facility (amended description).

The Committee considered a report on the above application. An update report was tabled at the meeting which set out additional information provided by the applicant regarding waste storage, confirming how occupiers of the flats using the external terrace area would be secure and details on the appearance of the proposed building. Two amendments to conditions were proposed.

Comments and objections were received and considered.

Resolved –

- (1) That the Assistant Director of Planning, Transport and Public Protection Services be authorised to grant planning permission for application PL/19/0549 (FUL), subject to the completion of a Section 106 legal agreement by 8 May 2026 (unless a later date be agreed by the Assistant Director of Planning, Transport and Public Protection Services) to secure the Heads of Terms set out in the original report;
- (2) That the Assistant Director of Planning, Transport and Public Protection Services be authorised to make such minor changes to the conditions, Heads of Terms and details of the legal agreement as may reasonably be required to issue the permission;
- (3) That, in the event of the requirements set out not being met, the Assistant Director of Planning, Transport and Public Protection Services be authorised to refuse permission;
- (4) That planning permission be subject to the conditions and informatives as recommended in the original report, with the amended conditions as recommended in the update report.

63. PLANNING ENFORCEMENT - PERFORMANCE REPORT

The Committee received an update report on the Planning Enforcement service. The report outlined the current status of enforcement investigations and actions regarding unauthorised development sites within Reading and the outcomes of recent Town and Country Planning Act 1990 s179 proceedings against non-compliance with an enforcement notice. The following confidential appendices were attached to the report:

PLANNING APPLICATIONS COMMITTEE MEETING MINUTES - 4 MARCH 2026

- Appendix 1 - s188 Enforcement Notices Register since June 2023 with additional confidential status information
- Appendix 1b – Enforcement Notices withdrawn from the Register
- Appendix 2 - s215 Notices Register
- Appendix 3 - s38 Listed Building Enforcement Notices
- Appendix 4 - Images of cases before and after enforcement action
- Appendix 5 - Images of existing appeal cases

The Appendices contained exempt information under Paragraph 6 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and were considered in closed session (see Minute 65 below).

At the meeting it was suggested that officers investigate providing updates to Ward Councillors on planning enforcement cases.

Resolved –

That the report be noted and the Committee record their appreciation of the work done by the Planning Enforcement service and progress made in 2025/26.

64. EXCLUSION OF THE PRESS AND PUBLIC

That pursuant to Section 100A of the Local Government Act 1972 (as amended), members of the press and public be excluded during consideration of item 65 below as it was likely that there would be a disclosure of exempt information as defined in Paragraph 6 specified in Part 1 of Schedule 12A to that Act.

65. PLANNING ENFORCEMENT - CONFIDENTIAL ANNEX

The Committee reviewed the confidential appendices submitted with the Planning Enforcement Performance report (see Minute 63 above).

Resolved –

That the appendices to the report be noted.

(The meeting started at 6.30 pm and closed at 8.00 pm)

**Planning Applications
Committee
29 April 2026**



Reading
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Title	POTENTIAL SITE VISITS FOR COMMITTEE ITEMS
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee
Report author	Mark Worringham, Planning Policy Manager and Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council priority	Not applicable, but still requires a decision
Recommendations	<p>The Committee is asked to:</p> <ol style="list-style-type: none"> 1. note this report and any officer recommendations for site visits. 2. confirm if there are other sites Councillors wish to visit before reaching a decision on an application. 3. confirm if the site(s) agreed to be visited will be arranged and accompanied by officers or can be unaccompanied but with a briefing note provided by the case officer.

1. Executive Summary

- 1.1. To identify those sites where, due to the sensitive or important nature of the proposals, Councillors are advised that a Site Visit would be appropriate before the matter is presented at Committee and to confirm how the visit will be arranged. A list of potential sites is appended with a note added to say if recommended for a site visit or not.

2. The Proposal

- 2.1. A site visit helps if a proposed development and context is difficult to visualise from the plans and supporting material or to better understand concerns or questions raised by a proposal.
- 2.2. Appendix 1 of this report provides a list of, mainly major, applications recently received that may be presented to Committee for a decision and which Officers consider Councillors would benefit from visiting to inform decision making. If agreed, you will be advised whether the visit should be accompanied or not and then later advised of a date when Officers are ready to bring a report to Committee. Appendix 2 lists those sites that have previously been agreed by Committee should be visited before making a decision.
- 2.3. Accompanied site visits are appropriate when access to private land is necessary to appreciate matters raised. These visits will be arranged and attended by officers on the designated date and time. Applicants and objectors may observe the process and answer questions when asked but lobbying is discouraged. A site visit is an information gathering opportunity to inform decision making.
- 2.4. Unaccompanied site visits are appropriate when the site can be easily seen from public areas and allow Councillors to visit when convenient to them. In these instances, the

case officer will provide a briefing note on the application and the main issues to assist when visiting the site.

- 2.5. Often it is during consideration of a report on a planning application that it becomes apparent that Councillors would benefit from visiting a site to assist in reaching the correct decision. In these instances, Officers or Councillors may request a deferral to allow a visit to be carried out.
- 2.6. It is also possible for officers to suggest, or Councillors to request, a visit to a completed development to assess its quality.

3. Contribution to Strategic Aims

- 3.1. The Council Plan has established five priorities for the years 2025/28. These priorities are:
 - Promote more equal communities in Reading
 - Secure Reading's economic and cultural success
 - Deliver a sustainable and healthy environment and reduce our carbon footprint
 - Safeguard and support the health and wellbeing of Reading's adults and children
 - Ensure Reading Borough Council is fit for the future
- 3.2. In delivering these priorities, we will be guided by the following set of principles:
 - Putting residents first
 - Building on strong foundations
 - Recognising, respecting, and nurturing all our diverse communities
 - Involving, collaborating, and empowering residents
 - Being proudly ambitious for Reading
- 3.3. Full details of the Council Plan and the projects which will deliver these priorities are published on the Council's website - [Council plan - Reading Borough Council](#). These priorities and the Council Plan demonstrate how the Council meets its legal obligation to be efficient, effective and economical.
- 3.2. The processing of planning applications contributes to delivering a sustainable and healthy environment and helping the economic, cultural and vibrant success for Reading Borough.
- 3.3. The processing of planning applications contributes to creating a healthy environment with thriving communities and helping the economy within the Borough, identified as the themes of the Council's Corporate Plan.

4. Environmental and Climate Implications

- 4.1. The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).
- 4.2. 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.

5. Community Engagement

- 5.1. Statutory neighbour consultation takes place on planning applications.

6. Equality Implications

- 6.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 6.2. It is considered that an Equality Impact Assessment (EIA) is not relevant to the decision on whether sites need to be visited by Planning Application Committee. The decision will not have a differential impact on people with the protected characteristics of; age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender) or sexual orientation.
- 7. Legal Implications**
- 7.1. None arising from this report.
- 8. Financial Implications**
- 8.1. The cost of site visits is met through the normal planning service budget and Councillor costs.
- 9. Timetable for Implementation**
- 9.1. Site visits are normally scheduled for the Thursday prior to committee. Planning Administration team sends out notification emails when a site visit is arranged.
- 10. Background Papers**
- 10.1. There are none.

Appendices

Appendix 1 - Potential Site Visits. List of applications received that may be presented to Committee for a decision in due course

-PL/26/0138: Hemdean House School, Hemdean Road

Appendix 2 - Previously Agreed Site Visits with date of PAC when requested:

- 240846/FUL Napier Court, Napier Road. Accompanied agreed by PAC 24.07.24.

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Planning Applications Committee

29 April 2026



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Title	PLANNING APPEALS
Purpose of the report	To note the report for information
Report status	Public report
Report author	Mark Worringham, Planning Policy Manager and Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Corporate priority	Inclusive Economy
Recommendations	The Committee is asked: 1. To note the report.

1. Executive Summary

1.1. To advise Committee on notifications received from the Planning Inspectorate on planning appeals registered with them or decision made and to provide summary reports on appeal decisions of interest the Planning Applications Committee.

2. Information provided

2.1. Please see Appendix 1 of this report for new appeals lodged since the last committee.

2.2. Please see Appendix 2 of this report for appeals decided since the last committee with summary reports provided.

3. Contribution to Strategic Aims

3.1. The Council Plan has established five priorities for the years 2025/28. These priorities are:

- Promote more equal communities in Reading
- Secure Reading’s economic and cultural success
- Deliver a sustainable and healthy environment and reduce our carbon footprint
- Safeguard and support the health and wellbeing of Reading’s adults and children
- Ensure Reading Borough Council is fit for the future

3.2. In delivering these priorities, we will be guided by the following set of principles:

- Putting residents first
- Building on strong foundations
- Recognising, respecting, and nurturing all our diverse communities
- Involving, collaborating, and empowering residents
- Being proudly ambitious for Reading

- 3.3. Defending planning appeals made against planning decisions contributes to creating a sustainable and healthy environment with supported communities and helping the economy within the Borough as identified as the priorities within the Council Plan.

4. Environmental and Climate Implications

- 4.1. The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).
- 4.2. 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.

5. Community Engagement

- 5.1. 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 (lists of applications viewable on our website).

6. Equality Implications

- 6.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 6.2. It is considered that an Equality Impact Assessment (EIA) is not relevant to the decision on whether sites need to be visited by Planning Application Committee. The decision will not have a differential impact on people with the protected characteristics of; age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender) or sexual orientation.

7. Legal Implications

- 7.1. 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.

8. Financial Implications

- 8.1. 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. More guidance about costs awards is in MCHLG's [Planning Practice Guidance](#).

9. Timetable for Implementation

- 9.1. Not applicable.

10. Background Papers

- 10.1. There are none.

APPENDIX 1

Appeals Lodged:

WARD: Katesgrove
APPEAL NO: 6006433
CASE NO: PL/25/1836
ADDRESS: 2A, 2B & 2C West Hill, Reading, RG1 2PN
PROPOSAL: Retrospective development for the erection of 3no. dwellings to be used as 3no. C4 - small HMO's with associated parking & landscaping, including cycle and bin storage

WARD: Abbey
APPEAL NO: 6006025
CASE NO: PL/25/1802
ADDRESS: Russell House, 117 – 119 Oxford Road, Reading, RG1 7UH
PROPOSAL: Retrospective installation of aluminium fascia signage

WARD: Southcote
APPEAL NO: 6007612
CASE NO: PL/25/11124
ADDRESS: 2A, 2B & 2C West Hill, Reading, RG1 2PN
PROPOSAL: The erection of 2no two-bedroom semi-detached dwellings comprising two storeys, together with on-site car parking, secure cycle parking, refuse storage and landscaping. Vehicular and pedestrian access via Wingrove Road, following the demolition of all structures on the Site.

APPENDIX 2

Appeals Decided:

WARD: Caversham
APPEAL NO: APP/TPO/E0345/10604
CASE NO: PL/25/0209
ADDRESS: 2b Kidmore Road, Caversham, Reading RG4 7LU
PROPOSAL: Fell two Yew trees
CASE OFFICER: Sarah Hanson
METHOD: Written Representation
Decision: Allowed

The Inspector recognised the amenity value of the two trees and their contribution to the street scene, agreeing that *'the effect of the removal on the character and appearance of the area would therefore be unacceptable'*. However, the reason for removal related to the trees contributing to a health condition experienced by one resident of the property and on balance the Inspector considered that removing the trees to assist in alleviating this, although the benefit could not be quantified, should be given greater weight. The appeal was therefore allowed, and the trees have been felled. Officers accept the Inspector's balanced decision, albeit the loss of both tree is disappointing given the appellant accepted only one impacted the resident's health. Officers have written to PINS to query the loss of both trees, given this point, and are awaiting a response.

WARD: Abbey
APPEAL NO: 6001748
CASE NO: PL/25/1210
ADDRESS: 3 West Street, Reading, RG1 1TT

PROPOSAL: Installation of black metal security shutters (retrospective).
CASE OFFICER: Gary Miles
METHOD: Written Representations
Decision: Dismissed

The FUL application was submitted for retrospective permission for externally mounted roller shutters to a shopfront at 3 West Street in the centre of Reading town centre. Officers advised the applicant that the external mounted shutters were harmful and they should be removed and should consider an alternative design such as laminated safety glazing. The applicant wished to submit a retrospective application for the externally mounted roller shutters which officers advised would be recommended for refusal so recommended the application be withdrawn. The applicant failed to withdraw the application, so the application was refused for its unsympathetic form and materials, incongruent appearance, and inappropriate siting, and failure to respect the character and appearance of the host building. It would result in a discordant and detracting feature, disrupting the architectural and historic significance of the Victorian shopfront and high-street.

The inspector agreed with the officers' reasons for refusal, finding the shutters harmful for a range of reasons. The inspector therefore refused the appeal on harm to character and appearance of the host property and wider streetscene.

WARD: Southcote
APPEAL NO: APP/E0345/D/25/3374554
CASE NO: PL/25/0851
ADDRESS: 78 Burghfield Road, Reading, RG30 3LP
PROPOSAL: Prior Approval Part 1 Class A.1(ea): Larger home extension
CASE OFFICER: Sian Hickey
METHOD: Written Representations
Decision: Dismissed

A pleasing appeal decision that upheld the Council's interpretation of permitted development rights, and upheld the decision to refuse.

WARD: Church
APPEAL NO: APP/E0345/D/25/3374757
CASE NO: PL/25/1217
ADDRESS: 33 Birdhill Avenue, Reading, RG2 7JT
PROPOSAL: Rear extension measuring 5.0m in depth, with a maximum height of 3.16m, and 3.0m in height to eaves level. Notification of the construction of an extension under class A Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
CASE OFFICER: Gary Miles
METHOD: Written Representations
Decision: Dismissed

Another permitted development appeal. Permitted Development rights allow householders to improve and extend their homes without the need to apply for planning permission. The inspector concluded the proposed extension does not constitute permitted development under Schedule 2, Part 1, Class A of the GDPO and dismissed the appeal.

WARD: Caversham Heights
APPEAL NO: APP/E0345/W/25/337514
CASE NO: PL/23/0663

ADDRESS: Flat 1 92 Albert Road, Caversham RG4 7PL
PROPOSAL: The proposed development is erection of hoarding as a means of Enclosure to secure an unoccupied building
CASE OFFICER: Anthony Scholes
METHOD: Written Representations
Decision: Allowed

This is a disappointing decision. However, the appeal allowed the hoarding to remain only on a temporary basis of 18 months (until August 2027), with the Inspector accepting that the proposal does result in harm to the character and appearance of the area contrary to the policies of the Local Plan. However, the Inspector concluded that there would be significant benefit in terms of public safety through preventing the public from entering the site and harming themselves, and the security of the site/building.

WARD: Southcote
APPEAL NO: 6001950
CASE NO: PL/25/0350
ADDRESS: 58 Bath Road Reading RG30 2AY
PROPOSAL: Erection of five detached 4 bed-dwellings and associated works, following the demolition of detached dwellings
CASE OFFICER: Anthony Scholes
METHOD: Written Representations
Decision: Dismissed

This is a pleasing decision, the Inspector followed their own guidance on not accepting additional information at appeal that had not already been supplied at application stage. The Inspector upheld reasons for refusal relating to privacy and overlooking, as well as overshadowing of neighbouring development, the failure to demonstrate no net loss of biodiversity and unsuitable information to enable determination of a mandatory net gain, and a failure to enter into a legal agreement for off-site affordable housing.

An application for costs was also dismissed but there was limited justification provided by the Appellant for a costs award. However, a late costs application was also made by officers, but it was not awarded either. This was made because the Appellant provided new information during the 'final comments'. This new information was not accepted by the Inspector, and officers advised that they were content that they would not seek such costs if the information was not considered.

WARD: Abbey
APPEAL NO: 6001870
CASE NO: PL/25/0929
ADDRESS: Pinnacle, 20 Tudor Road, Reading, RG1 1NH
PROPOSAL: Change of use of from Class E (offices) to C3 (dwelling houses) to comprise 58 flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (amended by plans received on 11 August 2025).
CASE OFFICER: Anthony Scholes
METHOD: Written Representations
Decision: Dismissed

This is an excellent decision which upheld the Council's reason for refusal relating to flood risk for future occupants in prior approval conversions.

WARD: Katesgrove
APPEAL NO: APP/E0345/W/25/3376563
CASE NO: PL/24/1079
ADDRESS: Trinity Hall, South Street, Reading, RG1 4QU
PROPOSAL: Change of use of existing building and extensions to provide 18
apartments.
CASE OFFICER: Ethne Humphreys
METHOD: Hearing
Decision: Allowed

Planning Applications Committee

29 April 2026



Reading
Borough Council
Working better with you

Title	Annual Development Management Performance
Purpose of the report	To note the report for information
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Mark Worringham, Planning Policy Manager / Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council priority	Secure Reading's economic & cultural success
Recommendations	To note the report.

1. Executive summary

- 1.1. To advise Committee on the work and performance of the Planning Development Management team over the last year – 1 April 2025 to 31 March 2026, including comparison to previous years.

2. Policy context

Planning

- 2.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications 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). The NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). The Levelling-Up and Regeneration Act 2023 places national development management policies on an equal footing with the development plan (with conflicts to be resolved in favour of the national development management policies) but these provisions are yet to come into force.

- 2.2. The current approach for measuring the performance of Local Planning Authorities (LPAs) when dealing with applications was introduced by the Growth and Infrastructure Act 2013. It is based on an LPA's performance on the speed of determining applications and the quality of their decisions. The **Ministry of Housing, Communities, and Local Government** (MHCLG) collects data from LPAs to enable performance tables to be published on a quarterly basis. LPAs are at risk of being designated as "underperforming" if targets are not met over the preceding 24 months. If an LPA is designated as underperforming applicants can submit their applications directly to the Planning Inspectorate (who act on behalf of the Secretary of State) to make the decision.

Building Control

- 2.3 Local authorities have a duty under the Building Act 1984 to enforce the Building Regulations 2010 in their area. To do this they are obliged to undertake a range of functions aimed at securing the health, safety, welfare, and convenience of people in and about buildings.

2.4 There has also been a series of regulatory changes brought forward by the Building Safety Act 2022, with one being the requirement for all building control surveyors to be registered, to practice. The Building Safety Regulator has responsibility for the oversight of all building control professionals in terms of their competence, ensuring building control teams have appropriate levels of competence to perform their roles. In addition to this, there are operational standards, which all building control bodies are expected to work within and report on. These operational standards include several broad themes including:

- Systems and controls
- Risk management
- People
- Building Control functions
- Enforcement and intervention activity

2.5 A range of key performance indicators (KPI's) has been established to monitor performance against these themes to ensure building control bodies are operating efficiently and effectively and delivering their intended purpose. It should be noted the Building Safety Regulator will have the power to intervene in cases where Building Control Bodies (including local authorities) are failing to meet requisite standards.

3. Planning Development Management Team Performance

3.1 As set out in paragraph 2.2, performance is measured on the speed of determining applications and performance at appeal. The criteria for designation as “underperforming” are:

a. Major development: less than **60 per cent** of an authority's decisions on major applications made within the statutory determination period or such extended period as agreed in writing with the applicant;

b. Non-major development: less than **70 per cent** of an authority's decisions on non-major applications made within the statutory determination period or such extended period as agreed in writing with the applicant;

c. For applications for both major and non-major development, above which a local planning authority is eligible for designation, is **10 per cent** of an authority's total number of decisions on major and non-major applications respectively made during the assessment period (previous 24 months) being overturned at appeal.

Speed – criteria a & b

3.2 Once a planning application is valid the local planning authority should issue a decision on the proposal within the statutory time limits set. The statutory time limits are normally 13 weeks for applications for major development (when an application is subject to an Environmental Impact Assessment a 16 week limit applies) and 8 weeks for all other types of development.

3.3 Local planning authorities can agree with the applicant to extend the time needed. In most cases a written agreement is sufficient when it becomes apparent that more time is needed to address details. For more significant developments, where it is clear from the start that more than 13 weeks is needed, a formal Planning Performance Agreement can be used to set a timetable. When an applicant has agreed to extend time the “Planning Guarantee”, which requires the planning application fee to be refunded to applicants if no decision has been made within 26 weeks, does not apply (Regulation 9A of the 2012 Fees Regulations).

3.4 Table 1 below shows the performance on decisions issued last year and how many were decided within the statutory timeframe or an agreed extended timeframe for the different types of planning applications handled. Data for preceding years is provided for comparison.

Table 1: Application Performance in 2025/26 compared with previous years.

Description	MHCLG Target	22/23	23/24	24/25	25/26
Number and Percentage of major applications decided within statutory 13 weeks or an extended period agreed with the applicant.	60%	13/15 86%	20/20 100%	17/20 85%	7/11 64%
Number and Percentage of minor applications decided within statutory 8 weeks or an extended period agreed with the applicant.	70%	145/196 74%	145/159 91%	132/153 86%	151/180 84%
Number and Percentage of other applications (including householder applications) decided within statutory 8 weeks or an extended period agreed with the applicant.	70%	404/539 75%	377/417 90%	349/395 88%	388/452 86%
Total decisions issued	N/A	750	596	568	643
Number and Percentage of householder applications decided within statutory 8 weeks or an extended period agreed with the applicant.	70%	287/386 74%	269/295 91%	285/314 91%	239/284 84%

3.5 Performance on speed of making decisions last year was generally slower than both of the most recent years across all types of application, although it was faster than 2022/23 for everything but major applications. The performance on major applications in 2025/26 is particularly low in comparison to previous years, and is only slightly above the MHCLG target, and major application performance is therefore something that will need to be carefully monitored in future years.

3.6 Table 1a shows the performance by quarter, and, other than for major applications (where there were very small numbers in each quarter) the performance has been relatively consistent across the year.

Table 1a: Application Performance by quarters in 2025/2026

Description	MHCLG Target	Q1 Apr-Jun	Q2 Jul-Sept	Q3 Oct-Dec	Q4 Jan-Mar
Major	60%	1/3 33%	1/1 100%	2/4 50%	3/3 100%
Minor	70%	42/50 84%	25/32 78%	47/53 89%	37/45 82%
Other	70%	43/45 93%	25/31 81%	56/64 88%	25/28 89%
Householder	70%	62/77 81%	57/64 89%	61/71 86%	59/72 82%

Types of applications received

3.7 In addition to planning applications for new development the Council also receives requests for pre-application advice, plus a variety of other applications. Table 1b shows the fluctuations in the various types of applications received over the last 4 years. The notable changes include a year on year reduction in householder applications, an increase in 25/26 in both pre-application enquiries and listed building consent applications, and there has also been a resurgence in interest in prior approvals that would result in new dwellings, potentially in response to increasing viability pressures in new-build development.

Table 1b: Number of types of applications received

	22/23	23/24	24/25	25/26
Full Planning	265	240	233	269
Householder Applications	428	358	340	313
Advertisement consent	67	49	51	67
Pre-application advice	113	129	106	184
Certificates of lawfulness	167	157	182	147
Listed Building consent	59	55	39	76
Variations / s73	27	27	33	63
Householder Prior Approvals	32	28	42	49
New residential prior approvals	28	10	14	37
Non-Material Amendment	71	57	74	72
Approval of conditions	197	164	252	213
Works to TPO/CA trees	200	213	209	214
Other types of application ¹	62	61	29	81
All types of applications	1,716	1,548	1,604	1,785

TPO – Works to trees with Tree Preservation Orders
CA – Works to trees in Conservation Areas

Quality – criteria c

Planning Appeals

- 3.8 Table 2 shows how many of the appeals lodged found favour with the Planning Inspector and were allowed but that in most of the appeal cases the Council's defence of the reasons for refusing planning permission were successful. Performance when dealing with appeals in 25/26 was not as strong as in 24/25 but remains superior to 22/23 and 23/24, with 27% of appeals allowed. There were 43 appeals lodged, significantly higher than in the most recent three years, which has been inflated by 12 appeals against refusal of permission for BT street hubs.

Table 2: Section 78 Appeals against the refusal of planning permission

	22/23	23/24	24/25	25/26
Appeals lodged	24	29	21	43
Number of all appeal decisions	28	28	27	30
All appeals allowed in year	9 (31%)	11 (39%)	3 (11%)	8 (27%)

- 3.9 Local planning authorities' performance on appeals is measured by checking the proportion of all decisions made on applications that are subsequently overturned at appeal. Quality is given to be the number of non-major appeals allowed as a percentage of all non-major decisions issued and likewise for major appeals allowed as a percentage of all major decisions issued. The threshold for designation on applications for both major and non-major development, above which a local planning authority is eligible for designation, is 10% of an authority's total number of decisions on relevant applications made during the assessment period being overturned at appeal.
- 3.10 Tables 2a and 2b show a summary of the latest published government performance tables (P152 and P154) for the previous 24 months ending March 2025 (the qualifying period) for Reading and other local authorities in Berkshire. For non-majors our decision making was overwhelmingly upheld with 0.9% of all decisions overturned at appeal. For majors the figure is higher, at 2.4%, but this is still well below the 10% threshold.

¹ Adjacent authority consultations, outline, reserved matters, screening opinions, other forms of prior approval, miscellaneous

Table 2a – Government statistics (24 months to end of March 2025 – non-major appeals)

	Total non-major decisions	Total non-major appeal decisions	Non-major decisions overturned at appeal	<i>Quality of decisions (% overturned at appeal)</i>
Reading	992	40	9	0.9
Wokingham	2,264	50	12	0.5
Bracknell Forest	1,044	44	12	1.1
West Berkshire	1,960	63	21	1.1
Slough	1,248	53	15	1.2
Windsor and Maidenhead	2,595	141	40	1.5

Table 2b – Government statistics (24 months to end of March 2025 – major appeals)

	Total major decisions	Total major appeal decisions	Major decisions overturned at appeal	<i>Quality of decisions (% overturned at appeal)</i>
Reading	41	4	1	2.4
Bracknell Forest	51	0	0	0.0
West Berkshire	106	5	3	2.8
Slough	37	4	2	5.4
Windsor and Maidenhead	62	10	4	6.5
Wokingham	91	12	6	6.6

- 3.11 This is why it is important when officers or Planning Applications Committee decide to refuse to grant planning permission that the grounds for refusal are carefully considered and tested to ensure that they derive from material planning considerations and are substantiated by reference to Local Plan policies. Appeal statements produced by officers are also checked to ensure that a robust defence of the Council's decision is presented. However, despite all our efforts, sometimes a Planning Inspector can give different weight to concerns raised and the benefits of an application to justify reaching a position that supports allowing a planning application.

4. Planning fee income

- 4.1 The following table 3 shows fee income to the planning service from Major, Minors and Other applications last year. Table 3a provides a comparison of the same income over the previous 3 years. Fee income in 2025/26 has been higher than any year since before the Covid pandemic. The increase in applications in 2025/26 has meant that the benefits of the November 2023 increase in planning fees has been reflected in the total fee income. The fee income was boosted by the receipt of one very large major application fee on the last day of the financial year.

TABLE 3: Income from applications for Major, Minor, Others submitted by quarter

Quarter 25/26	Majors £	Minors £	Others/HH £	Total Fee £
Q1 April - June	25,474.00	121,256.42	46,992.80	193,723.22
Q2 July - September	192,685.45	99,061.50	46,865.52	338,612.47
Q3 October - December	16,113.05	111,626.40	55,123.20	182,862.65
Q4 January - March	186,249.00	121,705.40	62,115.00	370,069.40
Totals	420,521.50	453,649.72	211,096.52	1,085,267.74

Table 3a – Total application fee income for 25/26 and previous 3 years

	22/23	23/24	24/25	25/26
Total Fee Income	£733,703	£596,412	£967,488	£1,085,267.74

5. Contribution to strategic aims

5.1 The Council Plan (2025-2028) identifies five priorities for the Council over the next three years. These are:

- Promote more equal communities in Reading
- Secure Reading's economic and cultural success
- Deliver a sustainable and healthy environment and reduce Reading's carbon footprint
- Safeguard and support the health and wellbeing of Reading's adults and children
- Ensure Reading Borough Council is fit for the future.

5.2 The processing of planning applications (also for work to trees and listed buildings) and associated enforcement work and building control activities contribute to securing Reading's economic and cultural success, delivers sustainable development and healthy environments, including reducing the carbon footprint through application of our policies and national regulations on energy efficient buildings.

6. Community engagement

6.1 Statutory consultation takes place on most planning applications and appeals. The Council's website also allows the public to view information submitted and comments on planning applications and on the decision once it is reached. There is also information on our planning policies. Facilitating engagement can influence the quality of public involvement and thereby the quality of the eventual decision.

7. Equality impact assessment

7.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to:

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

7.2 In terms of the key equalities protected characteristics, it is considered that the development management performance set out in this report has no adverse impacts.

8. Environmental and climate implications

8.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). The Planning and Building Control functions are essential in helping to address the Climate Emergency through ensuring that development is undertaken to the highest possible environmental standards in line with national regulations and local policies.

8.2 There are no direct environmental or climate implications of this report.

9. Legal implications

9.1 The collection and monitoring of performance indicators and publication of financial performance is a statutory requirement. In addition, a number of the functions of the service are mandatory requirements including the determination of planning applications and the preparation of the development plan.

10. Financial Implications

10.1 There are no direct financial implications arising from this report although we continue to monitor fee income and look for ways to improve our efficiency and boost fee income.

Planning Applications Committee

29 April 2026



Reading
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Title	Responses to National Planning Consultations
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Mark Worringham, Planning Policy Manager / Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council priority	Secure Reading's economic & cultural success
Recommendations	<ol style="list-style-type: none"> 1. To note the response that has been submitted to the National Planning Policy Framework consultation. 2. To note that a response will be submitted on the consultation on planning committee reform. 3. To agree that a response be submitted to the consultation on consulting the Secretary of State based on the points in paragraph 5.5 of this report. 4. To agree that a response be submitted to the consultation on fees for planning applications based on the points in paragraph 6.5 of this report.

1. Executive summary

1.1 This report highlights a number of national planning consultations which are currently open or have already closed. It deals with the following consultations:

- A revised National Planning Policy Framework and related matters
- Planning committee reform
- Consulting the Secretary of State on planning decisions
- Fees for planning applications.

2. Background

2.1 Addressing the Planning system is among the key priorities of national government. This has meant that there have been a substantial number of changes made and proposed to how Planning functions over recent years.

2.2 On 16 December 2025, a revised National Planning Policy Framework (NPPF) was published for consultation alongside some other questions around planning reform, in particular the approach to data centres and on site energy generation, greater consistency in inputs to viability assessment and setting a 'medium' category of development with a proposed range of 10-49 dwellings on sites with an area up to 2.5 hectares. The consultation ran to 10 March 2026. It is available to view on the MHCLG website¹.

¹ [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK](https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system)

2.3 In addition, between 23-26 March a number of additional consultations were published relating to the planning system, as follows:

- Consulting the Secretary of State on planning decisions (closes 4 May)²
- Fees for planning applications (closes 18 May)³
- Planning committee reform: draft regulations and guidance (closes 23 April)⁴

2.4 Each of these is dealt with in turn below.

3. National Planning Policy Framework

3.1 The NPPF is the comprehensive statement of national planning policy, and was last updated in December 2024. A new version was published for consultation that was substantially different from the existing version. The main objectives for this new version were as follows:

- Ensure national planning policy is accessible and understandable for everyone who uses it;
- Establish a comprehensive suite of national policies on general planning matters to avoid these matters being repeated or deviated from in locally-produced plans; and
- Make the policy more 'rules-based' and certain, and so more capable of supporting timely and consistent planning.

3.2 The proposed national development management policies were initially intended to be statutory policies with the same status as the development plan in determining applications. However, this has not been taken forward, and the relevant legal provisions not yet brought into force, so as it stands these policies will continue to have the same status as the existing NPPF.

3.3 The consultation was based around more than 200 questions. This presented a significant capacity issue in responding, particularly since it took place at a time when the Council was involved in hearings into the Local Plan Partial Update. These capacity and timing issues therefore did not allow officers to bring a draft response to the consultation to Committee for agreement. A response by officers was therefore submitted by the deadline of 10 March. This response is included as Appendix 1. Only those questions considered to be of relevance to Reading have been answered.

4. Planning committee reform

4.1 In May 2025 a technical consultation was published on proposals to reform planning committees. This consultation included the following proposals:

- Identifying Tier A applications (which must always be delegated to officers) and Tier B applications (which must be delegated unless the Chief Planner and Chair of Committee agree that it should go to Committee based on a gateway test.
- A maximum of 11 committee members
- Mandatory training of committee members, administered at a national level

4.2 The government has now published its response to the 2025 consultation, and is now consulting on draft Regulations (which would be referred to as The Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026) and accompanying guidance. The key elements of the draft Regulation to note are as follows:

- That Schedule 1 of the draft Regulations specifies types of application that would always be delegated to officers (previously referred to as Tier A) which are as follows:
 - Minor commercial or residential applications
 - Householder applications
 - Applications for permission in principle
 - Non-material amendments
 - Modification or discharge of planning obligations in connection with a Schedule 1 development

² [Consulting the Secretary of State on planning decisions - GOV.UK](#)

³ [Fees for planning applications - GOV.UK](#)

⁴ [Planning committee reform: draft regulations and guidance - GOV.UK](#)

- Certificates of appropriate alternative development (for the purposes of assessing compensation for compulsory purchase)
- Certificates of lawfulness
- Biodiversity gain plans
- Reserved matters applications other than for phased development
- Applications for discharge of planning conditions
- Applications for prior approval
- That Schedule 2 of the draft Regulations lists types of applications that may be considered by either an officer or by the planning committee as follows:
 - An application for planning permission that is not a householder, minor residential or minor commercial application
 - Listed building consents or variation or discharge of conditions on LBCs
 - Applications for planning permission associated with a LBC
 - Variation or removal of conditions
 - Retrospective planning applications
 - Modification or discharge of planning obligations in connection with a Schedule 1 development
 - Reserved matters applications for phased development
 - Applications for express consent to display advertisements
 - Works to protected trees
- The decision on whether Schedule 2 applications are referred to committee is made by a nominated member and nominated officer depending on whether the proposal raises:
 - one or more issues of economic, social or environmental significance to the local area, or
 - one or more significant planning matters having regard to the development plan and any other material considerations.
- Planning functions not listed in either Schedule would be down to the authority's constitution to determine whether it would be referred to committee.
- That applications by and on behalf of 'linked persons' (i.e. the authority, an officer or member of the authority or an entity wholly or partly owned or controlled by the authority) may be referred to committee.
- That planning committees be limited to 13 members (an increase from the previous consultation).

4.3 Of these elements, those with the greatest significance for PAC would be that, firstly, there would no longer be an ability for an application within Schedule 1 to be called into Committee (unless it was by a linked person), and, secondly, that certain application such as reserved matters (unless it was part of a phased application, which are rare in Reading) would no longer come to Committee. This would restrict democratic oversight of development. In addition to this it is also not clear why some types of application appear in one schedule rather than the other. For instance, as the Regulations are currently drafted, it would not be possible for a minor application to come to committee yet it would remain possible for a variation of the conditions on a resulting minor permission to be referred to committee.

4.4 In terms of the limit of 13 members, the Council already complies with this requirement and this should not present any particular concerns.

4.5 The Regulations are accompanied by guidance. This guidance states that the nominated officer should be the Chief Planning Officer and the nominated member should be the Chair of Committee. It also states that the "overwhelming presumption" is that Schedule 2 planning functions will also be delegated to officers. It also states that, where the nominated officer and member do not agree on whether a Schedule 2 application should be referred to committee it should be delegated to officers. Furthermore, it states that applications which comply with a detailed site allocation are unlikely to fulfil the tests for referral to committee.

4.6 The deadline for submission of responses is 23 April, before the Committee meeting. Officers have not yet formalised a response at the time of writing. The headlines of a response will be agreed with the Chair, Vice Chair and Lead Councillor for Planning prior to its submission by the deadline and the full response will be reported to this meeting as an update.

5. Consulting the Secretary of State

- 5.1 There are already requirements in place for LPAs to consult the Secretary of State to where they are minded to approve certain types of application, which include inappropriate development in the Green Belt and development in an area at risk of flooding where the Environment Agency has objected. This consultation proposes introducing additional requirements for LPAs to consult the Secretary of State, as follows:
- Where a LPA is minded to refuse an application for commercial development with a floorspace of 15,000 sq m or more.
 - Where a LPA is minded to refuse an application relating to nuclear facilities
 - Where a LPA is minded to grant permission for an application for one or more dwellings within the Detailed Emergency Planning Zones (DEPZs) of AWE Aldermaston and Burghfield where the Office for Nuclear Regulation (ONR) and/or an Emergency Planning team has objected.
- 5.2 In terms of the commercial development proposal, 15,000 sq m is a significant amount of floorspace and has been set as the threshold for what is considered 'strategic'. However, such proposals will continue to come forward in Reading, as a significant town centre office building is likely to exceed this threshold for instance.
- 5.3 There are unlikely to be any applications relating to nuclear facilities in Reading.
- 5.4 The approach to the DEPZs of the two AWE sites affects only four authorities, of which Reading is one. The DEPZ for AWE Burghfield extends into Reading and covers the land west of the A33 and south of the Kennet & Avon Canal, including Green Park. It is likely that any residential development in this area would attract an objection from the ONR and both Reading and West Berkshire's emergency planners, as it would be likely to be incapable of being accommodated within the Off-Site Emergency Plan. Effectively this is likely to mean that there is no realistic route to further residential development in this area, but this was already likely to be extremely difficult with ONR and emergency planning responses likely to carry significant weight. The updates to the Local Plan do not envisage further residential development in this area.
- 5.5 The deadline for a response is 4 May. Officers have not yet had a chance to formally draft a response, but it is proposed that a response be drafted which:
- Considers that the 15,000 sq m threshold for commercial development is too low as a development of this scale remains of principally local rather than strategic significance, and that a threshold of 50,000 sq m better reflects genuine strategic significance;
 - Raises no objection to the proposals around nuclear development;
 - Cautiously accepts the rationale regarding development in the DEPZs for AWE but makes clear that this strategic constraint needs to be factored into setting housing targets for affected local planning authorities, as it can rule out significant proportions of the relevant authorities for residential development.
- 5.6 It should be noted that there is also a proposal for requiring consultation with the Secretary of State for an application for 150 or more homes which an LPA is minded to refuse. This is not part of the current consultation, and there is no ongoing consultation on this matter.

6. Fees for planning applications

- 6.1 A consultation has been published on a National Default Fee Schedule. This relates to the ability within the Planning and Infrastructure Act 2025 for local planning authorities to set their own fees. Where local fees are not set, there will be national default fees, and this is the subject of the consultation.
- 6.2 Based on survey work it was determined that no planning fee fully covers the costs of determination, with the shortfall ranging from 18% to 60%, with applications to vary or remove conditions and outline applications particularly underpriced. The proposed Schedule therefore proposes a level set at 90% of the assessed costs of determining an application.
- 6.3 The consultation includes the proposed Schedule in full which compares the proposed default fee to the current fee. This is in Annex A of the [consultation](#) and has not been reproduced here in full due to its length. It shows that fees would increase across the board. The most significant increase

for common types of application is for variation of condition for major applications, which would see a 52% increase. Certain types of application, such as listed building consents and works to protected trees would remain free.

6.4 The consultation also includes guidance around the basis for local fee setting. Much of this guidance is relatively straightforward, but it does prevent LPAs from using planning fees to fund other parts of the planning service (e.g. policy and enforcement) and also prevents LPAs from setting fees for those free applications referred to above.

6.5 The deadline for a response is 18 May. Officers have not yet had a chance to formally draft a response, and in any case we do not have a clear evidential basis to dispute the specific fees set, but it is proposed that a response be drafted which:

- Welcomes the proposed increase in planning fees, particularly for removal/variation of conditions and outline applications;
- Raises concerns that the fees for prior approval that result in residential development remain well short of the costs of determining such applications;
- Broadly welcomes the guidance around local fee setting, but raises concerns that statutory planning functions such as plan-making cannot be considered in local fee setting (as initially proposed) as there are few other sources of funding for this function other than central budgets.

6.6 The response in full will be brought to this meeting as an update report.

7. Contribution to strategic aims

7.1 The Council Plan (2025-2028) identifies five priorities for the Council over the next three years. These are:

- Promote more equal communities in Reading
- Secure Reading's economic and cultural success
- Deliver a sustainable and healthy environment and reduce Reading's carbon footprint
- Safeguard and support the health and wellbeing of Reading's adults and children
- Ensure Reading Borough Council is fit for the future.

7.2 The planning service contributes to securing Reading's economic and cultural success, delivers sustainable development and healthy environments, including reducing the carbon footprint through application of our policies and national regulations on energy efficient buildings.

8. Community engagement

8.1 The issues identified in relation to planning committees do not directly affect community engagement, but do have potential to reduce democratic accountability through restrictions on which applications can be determined by committee.

9. Equality impact assessment

9.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to:

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

9.2 The consultations referred to in this report include questions relating to the Public Sector Equality duty, but there are no proposed responses that identify particular issues.

10. Environmental and climate implications

10.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). The Planning and Building Control functions are essential in helping to address the Climate

Emergency through ensuring that development is undertaken to the highest possible environmental standards in line with national regulations and local policies.

- 10.2 The draft NPPF included a number of policies relating to the environment and climate. The submitted responses in Appendix 1 highlight important issues where relevant.

11. Legal implications

- 11.1 The NPPF represents national policy and is a material consideration in determining planning applications, but the development plan remains the primary consideration under the Town and Country Planning Act 1990 and Planning and Compulsory Purchase Act 2004.
- 11.2 The proposals relating to planning committees form draft Regulations.
- 11.3 The consultations on planning fees and consultation with the Secretary of State will ultimately require legislation to be drafted to bring into force.

12. Financial Implications

- 12.1 Responses to national consultations are funded from existing budgets.
- 12.2 The restrictions on the role of committees would potentially result in some savings through reduced frequency, length and reporting requirements. These have not been quantified.
- 12.3 The proposed increase in national default planning fees would be expected to result in an increase in planning application fee income to better reflect the cost of determining applications. Depending on the type of application, the increases vary from 5 to 25% for the most common types of application. Although full calculations have not been carried out, and the increases may deter some applications, it is reasonable to anticipate an approximately 10% increase in income, which would be in the range of £50-100K per annum.

13. Appendices

Appendix 1: Response to National Planning Policy Framework

Appendix 1: Response to National Planning Policy Framework

The following responses and opinions are those of officers of the Borough Council.

- 1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?**

LPA response: These should be based on a National Spatial Strategy to direct the right development to the right places so that limited land resources are used most effectively in the public/national interest. Any associated NDMP should be based on the existing NPPF. Imposed national policies should focus on national/regional matters, leaving local scale matters to local authorities.

- 2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA response: A more clearly arranged set of policies may assist with clarity, but appears largely cosmetic and still lacks the spatial approach referred to above.

- 3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Disagree with Annexe 1 (2)“2. *Development plan policies which are in any way inconsistent with the national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.*”

Undermines development plan policies adopted under the 2024 Framework in good faith and in accordance with the plan-led system set out in statute. Will simply result in greater uncertainty for developers and an increase in Planning-by-appeal.

Annexe 1(5) – Agree with spatial strategies, but that these are also needed at national and regional level to be useful. Identifying genuine growth points.

Annexe C – seems overly specific in some cases whilst missing key matters in others. E.g. too detailed on telecoms whilst failing to mention practical matters related to trees (tree survey/method statement) etc. Best left to local authorities to set out local requirements.

- 4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree**

LPA Response: Agree that national policy should require all authorities to consider the matter and set out main principles. Key issue remains the need for regional/national spatial strategy to identify the required/best locations. Possible use of Crown Land and central government-owned sites. Agree that it should be part of the main document rather than a separate document.

- 5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree a) Please provide your reasons, particularly if you disagree

LPA Response: Agree that clarity of wording is essential. However please see above in terms of potential conflict between Development Plan and NPPF. Should avoid short-circuiting the preparation of the Development Plan (which must accord with the NPPF at the time of preparation) but which then becomes the primary decision-making document once adopted.

Paragraph 1 calls the NPPF a “material consideration of critical importance” which is not only unclear but it doesn’t seem to be consistent with simplifying the terminology down to ‘substantial weight’. Suggest this should just say “It is of critical importance in both contexts” to avoid confusion, as paragraph 3 deals with material considerations anyway.

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. 20 a) Please provide your reasons, particularly if you disagree

LPA Response: Agree with SDS for each LPA to the extent to which they will apply. PM1(1) refers to a sub-regional scale. The SDS will only be useful to their full extent if set within an over-arching regional-scale strategies informed by a national-scale spatial strategy.

One of the roles is setting out broad locations for nature conservation, but we would note that the boundaries of Local Nature Recovery Strategies and anticipated SDS geographies do not currently line up, and there would need to be some rationalisation or clarification of the roles of these different documents.

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Partly disagree. As spatial development strategies are intended to be primarily a framework for investment and growth it is not agreed that they should automatically be amended every 5 years (which would be the case as proposed, as there will always be at least some change in housing requirements over a 5 year period) because this will not maximise the certainty that an SDS can provide for investment. Instead, they should be amended in response to significant changes in housing need as set out in point a), with this ideally expressed as a percentage variation.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area’s local housing need? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. If there has not been a significant change in local housing need, it would be appropriate for plan-making (including five year supply) to continue to be on the basis of housing need within the SDS. There would need to be guidance on what ‘significant’ means in this instance, because otherwise it will end up being the subject of considerable debate at appeal.

9) Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Whilst the broad scope of matters to include in local plans is accepted, the adoption of local plans within 30 months remains highly ambitious, and sufficient changes to the process to enable this to happen in most cases have not been made. Adoption is also not entirely within the control of the local planning authority as it is dependent on the time taken for an Inspector's report.

We are also concerned that adoption of an SDS should immediately result in the need to commence a new plan, even if a new plan has recently been adopted. This is likely to result in authorities delaying plan production until after an SDS has been adopted to avoid abortive work, and will also result in plan-making timetables in a single SDS area being co-ordinated, which will have benefits such as the ability to assemble joint evidence but will also have risks in terms of Inspector resource.

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

LPA Response: Yes

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Partly agree.

It is agreed that local policies should not seek to duplicate national decision-making policies. However, it is not clear whether the restriction on modifying the content of those policies would prevent a local planning authority from identifying requirements that are in addition to the content of national policies. If so, this would require clarification. We consider that local planning authorities should be able to respond to local circumstances through additional policy content in addition to national policies.

It is not clear what the required data standards in point f relate to. This will need to be the subject of further policy or legislation.

12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Partly agree. Our concerns with 30 month timescales are set out in relation to question 9, but we would emphasise that it would be difficult to set out realistic milestones as required by point 1. a. when the overall required timescale itself is unlikely to be realistic in the majority of cases.

We do not agree that every element of the plan should be subject to consultation and examination even if it is not proposed to be amended in any way. As long as a local planning authority has demonstrated that a policy is up-to-date, there should be no need to expend further effort and resource on reassessing it every five years.

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The content of PM8 is largely appropriate and will support a proportionate approach to evidence production. In point 3, in addition to information and data, evidence would also need to be based on up-to-date methodologies, particularly if there are changes to how the needs for different types of development are to be assessed. An example would be changes to how travellers are defined in national policy, as has recently occurred.

14) Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. PM9 reflects current good practice in identifying land for development in local plans.

15) Do you agree with the policies on maintaining and demonstrating crossboundary cooperation set out in policy PM10 and policy PM11? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The broad content of these policies is supported. However, the requirement to co-operate with infrastructure providers and ensure that local plans align with infrastructure and investment plans of infrastructure providers and authorities only applies to cross-boundary matters. However, plans should align with infrastructure or investment plans as a general principle and this should not only be the case for cross-boundary matters.

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly disagree. This may change the emphasis but the usual negotiations would remain as the requirements would be set out in policy rather than regulation and viability considerations would remain a feature. Significant uncertainty would remain.

Given that developer contributions need to be linked to the specific impacts of a development and what is necessary to make it acceptable in planning terms, it is not always appropriate to be more specific in the plan, unless there is to be a return to the more tariff-based approach that predated CIL in many authorities.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Agree that Local Plan should set out circumstances and that this should be supported by national policy.

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree.

We strongly disagree with any proposal to limit local planning authorities' ability to seek local standards relating to the energy efficiency of buildings. This principle would be acceptable if the Future Homes Standard were sufficient to tackle the climate emergency and achieve net zero, but this is not the case. The FHS will represent a 75 - 80% reduction in carbon emissions compared with 2013 standards, but will not eliminate operational emissions as it relies on the complete electrification of the grid (expected by 2035 at the earliest). We are pleased to see that the FHS will effectively phase out fossil-fuel heating, but it will not deliver truly zero carbon homes. This will "lock-in" future energy use and result in the need for costly retrofit. Moreover, the FHS sets a minimum, nationally-defined level of performance that does not account for local net zero targets or fuel poverty. Where an authority can demonstrate that achieving a higher

standard without compromising viability and where it supports local net zero aims, this should be an appropriate measure for local plans to tackle.

We welcome the additional flexibility to be able to set standards above the optional water efficiency standard in areas of serious water stress

Under point c, matters relating to internal layout should not be covered other than for space standards, but accessible or wheelchair homes under M4(2) and M4(3) of the Building Regulations relate in part to internal layout and are considered appropriate matters for a local plan to cover in point b.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on

LPA Response: Partly agree. We generally support the tests of soundness as identified, which represent an appropriate evolution of those already in place. The 'appropriate' test is a replacement for 'justified' but does not contain the text on being based on proportionate evidence, which was a useful reference that prevented the need to assemble extensive and unnecessary evidence, and we therefore consider that it should be retained.

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

LPA Response:

Policy PM4 appears to restrict the use of supplementary plans beyond the restrictions that are already in Schedule 7 of the Levelling-Up and Regeneration Act and resulted in Section 15CC of the Planning and Compulsory Purchase Act 2004, in that it restricts site-specific content to unanticipated changes between plan-making cycles and does not include the potential to use supplementary plans for infrastructure and/or affordable housing requirements. We do not agree that these additional restrictions are necessary and appropriate, not least because they may require local plans to contain a significant level of detail which will be difficult to achieve within the 30-month timeframe for production. With the new processes for supplementary plans that include public examination, it is not clear why these additional restrictions are necessary.

Policy PM16 only requires supplementary plans to 'have regard to' national policy rather than to 'be consistent' with it. With supplementary plans becoming part of the development plan, it is not clear why there should be a different standard applied.

21) Do you agree with the principles set out in policy DM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly Disagree – this is more planning procedure rather than planning policy. Agree with a proportionate response and that only the minimum information should be required to make a decision. This actually increases the importance of pre-app for smaller proposals to ensure that the key information is agreed on and not missed prior to submission. Ultimately in the developers' best interests. Also reduces burden on Planning Inspectorate.

22) Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree – although DM3(F) goes without saying and is therefore of limited usefulness. The question will be who determines whether or not an application "*should clearly be approved*".

23)Do you have any views on whether such a policy could be better implemented through regulations? DM3: Determining Development Proposals

LPA Response: Guidance is probably more helpful and allows a proportionate and flexible approach at local level.

24)Do you agree with the principles set out in DM3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: 1.a - The LPA welcomes a positive and proactive approach. However this relies on the quality of the application submission and a cooperative approach by the applicant. Sometimes a timely decision means refusing the application to avoid abortive work and unnecessary delay to other, more appropriate, proposals. Greater officer involvement in finding solutions is directly linked to increased funding, training and experience.

1.b-f – agree.

25)Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree on the basis that the sentiment of reducing reliance on viability assessment at application stage is welcomed, however points 2 (a-d) simply introduce a new (although not that different from the current situation) set of criteria which developers can claim apply to their proposal. These remain broad and subject to interpretation and would inevitably result in Planning-by-appeal. Also, the current draft wording suggests that developers only need to satisfy one of the four “situations” to justify a viability assessment, which would be too low a threshold.

26)Do you have any further comments on the likely impact of policy DM5: Development viability?

LPA Response: The key issue for this authority is Affordable Housing. Currently viability appraisals are the norm in the majority of applications and not exceptional. Currently the levels of AH achieved fall well below the 30% LP policy requirement which is often undermined on appeal. It is unclear how the revised policy would prevent this situation continuing. A clearer national basic level of Affordable Housing, regardless of viability would provide certainty.

27)Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

LPA Response: No. The current system works well and is proportionate.

29)Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: DM6.4 - disagree that national model planning obligations are required. Unnecessarily prescriptive and lacks flexibility and proportionality taking into account local circumstances, including the specifics of each case and the needs of all parties.

Unclear why tests for conditions are in the NPPF but tests for obligations are not.

30)Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: This is already a well-established principle. No further comment.

31)Do you agree with the new intentional unauthorised development policy in policy DM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Agree.

32)Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? a) If so, are there any particular additions or mitigations which we should consider?

LPA Response: No comment.

33)Do you agree with the new Article 4 direction policy in policy DM10? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: The current one year period for confirming an Article 4 should be reduced – perhaps to 6 months to avoid undesirable outcomes once the intention to serve an Article 4 is publicised.

34)Do you agree with the proposed approach to setting a spatial strategy in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. The requirement to identify settlements is not always relevant for an urban authority which constitutes a single settlement, as is the case for Reading, and there is a need for the addition of “where relevant” in point 1. a. of the policy.

35)Do you agree with the proposed definition of settlements in the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree.

36)Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Strongly disagree.

The approach essentially bypasses local policy when considering development proposals within settlements, by only tying adverse effects to national development management policies. This is not in accordance with how the legislation operates in terms of the status of the development plan, and is not appropriate in that it does not allow any consideration of local circumstances. Policy S4 (1) should refer to and give equal weight to the development plan.

In addition the phrase “substantially outweighed” creates unnecessary uncertainty and is open to interpretation and dispute. It will delay matters by pushing cases onto appeal. A plain reading of each policy on its own merits to be weighed in the overall balance by the decision maker is preferable and less confusing. Each policy should be worded appropriately according to the

relative importance of the matters addressed by that policy. Rather than the meaning of policy being distorted by an abstract concept such as the “tilt” suggested.

37)Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree – in particular L2d(3) - development in curtilage. This is appears overly prescriptive and unnecessary and would have undesirable unexpected outcomes.

38)Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree – in particular L2d(3) - development in curtilage. This is appears overly prescriptive and unnecessary and would have undesirable unexpected outcomes.

39)Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: Neither agree not disagree.

40)Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

LPA Response: Disagree. Railway stations can offer a key strategic sustainable location for housing and mixed use development – as evidenced by many of the stations within Reading Borough. However it is apparent that not all stations will be suitable and this should be a matter to be planned and considered properly through Strategic Development Strategies (and regional and national spatial strategies) to realise all benefits including rail freight, industry, logistics as well as well-planned housing and associated infrastructure.

41)Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? 36 Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree. a) If not, please provide your reasons

LPA Response: Neither agree not disagree

42)Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Partly agree – These matters should definitely be addressed in Local Plans, supported by the NPPF. Clarity of wording will be key as often these requirements are additional costs on developers and this is a disincentive to comply. Many of these matters should also be supported through a national/regional level strategy – water, power, flood risk, sustainable transport etc.

43)Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration

LPA Response: Partly agree – Should remove the phrase “where relevant to the proposal” as this introduces unnecessary debate and uncertainty.

Agree that Planning is particularly well placed as a discipline to take a holistic view to the many, complex and interrelated requirements involved in mitigating climate change.

44)Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

LPA Response: (See 43 above)

45)Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: No comment.

46)How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

LPA Response: No comment.

47)Do you have any other comments on actions that could be taken through national planning policy to address climate change?

LPA Response: Certain aspects would be best achieved through the Building Regulations – especially the performance and specification of buildings.

48)Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. The broad requirements for SDSs is agreed. In our view, national policy should contain greater flexibility for alternative methods of identifying housing need where it can be demonstrated to be a more robust assessment of local need than the standard method.

49)Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what elements should this guidance cover?

LPA Response: Neither agree nor disagree. These matters are generally covered in Planning Practice Guidance and are well understood, but if additional guidance were available it would only be helpful.

50)Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. It is useful to incorporate PPTS within the NPPF, as there does not appear to be a good reason for it to be kept separate.

51)Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what are the key principles this guidance should establish?

LPA Response: Strongly agree. Further guidance on assessing need is required for circumstances such as Reading where there are no existing sites, small numbers of residents in bricks and mortar accommodation and it is difficult to secure any information directly from residents about needs.

52)Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their 42 local plan 5-year housing land supply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Strongly agree.

53)Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The Annex states only that the Secretary of State will “seek to” publish HDT results. These results have important implications for decision making, and regular publication will be required to ensure that national policies can be applied in practice. Change “seek to” to “will” and confirm frequency.

54)Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree.

55)Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Not every authority will have opportunities for large scale residential and mixed use development due to the nature of their area, and the policy should therefore use wording such as ‘where appropriate’ to make it clear that this may not always be applicable.

56)Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Neither agree nor disagree.

57)Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: This would be best achieved through Building Regulations. To avoid unnecessary debate and uncertainty at individual application stage. Protection of existing bungalows and other adaptable buildings could be a planning policy.

58)Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

LPA Response: See above.

59)Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Site allocations will need to be flexible, particularly for specialist housing for older people, as it is our experience that plans for specific sites change and the market may move from provision of general housing to specialist accommodation and vice versa.

60)Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

LPA Response: Partly agree. It is agreed that plans should set out their tenure expectations for affordable housing in particular, but this will need to be applied to any sites where there is expected to be on-site provision, not just those of 150 homes or more.

61)Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: Strongly disagree. The sites that are allocated within a constrained authority such as ours are those that are available, whatever size category they fall within. There is not usually a choice of sites that would allow us to select sites on the basis of the size category. In addition, in our experience the size of site is not directly related to the type of developer and whether or not they are an SME, and a site of more than 1 hectare in Reading is a large site of several hundred dwellings that would likely be developed by a larger developer.

62)Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

LPA Response: It is not entirely clear that policy HO7 is necessary, given the presumption in favour of sustainable development in policies S3, S4 and S5 which we consider should be amended to refer to local development plan policy. Local needs should be reflected in the development plan, and the suggested change to S4 and S5 would therefore ensure that these needs are taken into account.

63)Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered 46 as part of affordable housing requirements, will successfully enable the provision of military homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Clearer wording is required here. "Development proposals for military affordable housing" rather than "Development proposals that include military affordable housing".

housing". This avoids ambiguity and undesirable outcomes where military housing forming a small part of a larger development is used to circumvent development plan requirements.

64)Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree – although this could harm the quality of accommodation for occupiers of the market housing and fail to meet identified housing need within the market housing component.

65)Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

LPA Response: Agree – If this is a set level and not subject to viability or other uncertainties.

66)Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards? a) If so, what changes would be beneficial?

67)Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer

LPA Response: Strongly disagree. The LPA is best placed to decide what is appropriate in each case. Allowing the applicant to dictate this would undoubtedly lead to instances where the Council would end up not being able to mobilise properly (e.g. collecting multiple pots to go towards a scheme) and then having to pay the contribution back.

We already accept commuted sums for a range of matters, affordable housing, leisure, transport improvements, etc. as appropriate.

71)Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Agree

a) Please provide your reasons, particularly if you disagree.

LPA Response: It allows flexibility for the Council, as required.

72. Do you agree the with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree: A well-meaning policy if what it is trying to achieve is that such developments are either sited near to or provided with suitable community and communal facilities, including a clear aim of resisting inappropriately sited/ designed development.

73. Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: No additional comment.

74. Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

75. Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, including what other changes may be needed to increase their uptake?

76. Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

77. Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

78. Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

79. Please provide your reasons, particularly if you disagree.

80. Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Disagree.

a. Please provide your reasons, particularly if you disagree.

LPA Response: Disagree - Shorter timescale for commencement likely to frustrate investment and funding. Also fails to acknowledge that once lawfully commenced there is no time limit on completion of development. Any shift away from this long-established principle would require new legislation rather than a tweak to NPPF.

81. Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: There are already mechanisms in place to allow for flexibility including appropriate wording of conditions/S106 agreements, use of S.73.

82. Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? *Yes, no*

a) Please provide your reasons.

LPA Response No – likely to require legislation and a strategic national spatial plan rather than generic policy.

83. Do you agree with the proposed changes to the Housing Delivery Test rule book? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Neither agree nor disagree.

a. Please provide your reasons, particularly if you disagree.

84. Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response There is a need for a national spatial strategy to reflect and/or encourage growth areas which will inevitably extend across local government boundaries and need to be considered at the regional and national scale.

85. Do you agree with the approach to meeting the need for business land and premises in policy E2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

86. Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree.

The policy lacks a spatial framework for delivery and/or steering development to best locations – encouraging clusters, economies of scale etc.

87. Do you agree with the approach to rural business development in policy E4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

88. Do you agree with the proposed changes to policy for planning for town centres? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.* **Disagree**

a. Please provide your reasons, particularly if you disagree.

LPA Response: TC1(d) – watering down sequential test – lacks clear spatial control.

89. Do you agree with the approach to development in town centres in policy TC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. If not, please explain how you would achieve this aim differently?

90. What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

LPA Response: The introduction of Use Class E has made it impossible to operate some elements of policy for centres, in particular ensuring that key frontages retain a retail element to underpin the vitality and viability of those centres. It is also no longer possible to accurately monitor changes of use within centres, which means that it is difficult to keep track of exactly the impact that it has had.

Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. The sequential test should be retained, as it is one of the key tools in ensuring the continued viability of existing centres. It has been hugely successful in limiting out of centre development over the last few decades, and it is not clear why it should be abandoned.

92. Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

93. Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: The key issue is that permitted development rights have been extended under Part 24 to such an extent that most of the matters raised by Policy CO1 would not be controllable by the LPA.

94. Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.* **Agree**

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree (but see above re. lack of control)

95. Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

96. Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

LPA Response: Not clear about degree to which utility company requirements are a material consideration. Should not be left to individual utility companies and LPAs – again – requires national spatial planning – especially energy supply and water supply.

97. Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

98. Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

99. Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: See above (96)

a. Please provide your reasons, particularly if you disagree.

100. Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

101. Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

102. Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

103. Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

104. Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

105. Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

106. Please provide your reasons, particularly if you disagree.

107. Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

108. Please provide your reasons, particularly if you disagree.

109. Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

110. Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No

111. If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

112. Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

113. Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

114. Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

115. If not, what further guidance is needed?

116. Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

117. Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Disagree

a. If not, what typologies should be added or removed and why?

LPA Response: Disagree - Permitted development rights have created a confused approach whereby these 'typologies' can be achieved without planning permission being applied for. If design quality is important, any changes to policy should be matched by improvements to PD rights where these could otherwise lead to undesirable outcomes – including poor design, harm to neighbouring amenity and importantly a lack of contributions to local infrastructure.

L2.2 – simultaneous conditions - far too detailed for national policy.

118. Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

119. Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as

corner plot redevelopment and upwards extensions. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree – please see above.

a. Please provide your reasons, particularly if you disagree.

120. Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: See above

121. Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. If not, please explain how guidance could be clearer?

122. Do you agree with the minimum density requirements set out within policy L3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

b. Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

123. Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

124. Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons and preferred alternatives.

125. Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? *Yes/No*

a. If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

126. Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?

127. **If so, what should that range be, and which locations should it apply to?**
128. **Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- LPA Response:** Disagree. Unnecessary. Leave to local development plans/documents.
- Perhaps change focus towards potential for annexes for intergenerational living and supporting those with restricted mobility /disabilities
129. **Please provide your reasons, particularly if you disagree.**
130. **Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
131. **Please provide your reasons, particularly if you disagree.**
132. **Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
133. **Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
134. **Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
135. **Please provide your reasons, particularly if you disagree.**
136. **Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
137. **Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
138. **Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**
139. **Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**

140. With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

141. Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

142. Please explain your answer, including your view on the appropriate approach to setting a ‘floor’, and the right level for this?

143. Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please explain your answer.

144. Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

145. Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Leave to individual site circumstances – rather than prescriptive arbitrary approaches.

147. Do you agree with the approach to design tools set out in policy DP2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

148. Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

149. Do you agree with the proposed approach to using design review and other design processes in policy DP4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. If not, what else would help secure better design and placemaking outcomes?

150. Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

151. Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

152. Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

153. Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

154. Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

155. Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly disagree

Please provide your reasons, particularly if you disagree.

LPA Response: The current NPPF provides a clear indication at Paragraph 115 d) that any detrimental impacts will need to be mitigated, see existing NPPF paragraph below.

'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.'

The updated paragraphs provide very little reference to developments having to mitigate their detrimental impacts with point 3 of Policy TR6 only stating the following:

All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.

By watering down the requirement for developments to mitigate their own impact it will make it harder for Local Authorities in negotiating mitigation schemes.

156. Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

157. Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly Agree

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

159. Do you agree that Local Green Space should be 'close' to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

160. Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

161. Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?

162. Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

163. Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

164. Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

165. Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly agree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Need to add light pollution and noise (including vibration).

166. Are any additional tools or guidance needed to enable better decision-making on contaminated land?

167. Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

168. Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

169. Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

LPA Response: Agree

170. Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

171. Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

172. Do you agree with the proposed clarifications to the sequential test set out in policy F5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Partly Disagree - at 2b – appears to be confusing a spatial policy (steering development to areas at lower risk of flooding) with a technical policy. The aim should remain to avoid development worsening flood risks in an area (not simply a site) known to be at risk of flooding.

2c3 – Conversions of existing buildings being exempted from the sequential test is an anomaly – a change of use is still increasing flood risk.

173. Do you agree with the proposed approach to the exception test set out in policy F6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree

174. Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly Agree

175. Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly Agree

a. Please provide your reasons, particularly if you disagree.

176. Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

177. The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

178. Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

LPA Response: Agree

179. Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Neither agree nor disagree.

a. Please provide your reasons, particularly if you disagree.

180. In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

LPA Response: Urban sites often have very little biodiversity value and a 10% uplift from such a low baseline achieves very little. It would not be practical to list all sites separately and many will fall not be subject to mandatory BNG when the thresholds change. Also need to consider Urban Greening Factors.

181. Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: There is very little reference to species or assessing the ecological value of a development site within planning documents. A definition of 'significant harm' would be helpful

182. Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, including how policy can be improved to ensure compliance.

183. Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning

system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. **Please provide your reasons, particularly if you disagree.**

184. Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

185. Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. **Please provide your reasons.**

186. Do you have any evidence as to the impact of implementing the additional regard duties for development?

187. Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree, but please note the following:

a. **Please provide your reasons, particularly if you disagree.**

LPA Response: This is the first part where the concept of ‘heritage assessment’ emerges, and this is not explained or included anywhere in the document (not in the glossary). There is a need for either a footnote or an entry in the glossary that defines ‘heritage assessment’. For the avoidance of doubt, the emphasis should be on both the significance assessment and the impact assessment, which are both covered under ‘heritage assessment’, to clarify and use the correct terminology. If the Plan Making Policies only require significant assessment, this should also be noted.

188. Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

189. LPA Response: Partly agree

Please provide your reasons, particularly if you disagree.

LPA Response:

Policy provision (1) is Para 207 of the current NPPF. Given the often low quality of heritage assessment documents submitted for planning applications, there is a need for a stronger description of professional advice, as there are many statements prepared by applicants without a conservation perspective. This has been an ongoing issue and should be explained further. ‘where necessary’ makes documents vague and open to discussion.

Similarly, provision (3) appears to be put to encourage larger-scale development, as the emphasis is only on ‘scale’ and there is no reference to other aspects of development, such as height, form, or design. Because these are conservation policies, there should be more emphasis on how to conserve assets, not how to accept developments. Whilst the scale does not define the proposed development on its own, mentioning it alone causes some problems. There could be more explanation or description with reference to the urban design.

189. Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Understand that the rationale for the change to 'substantial weight' can result in consistent language in the historic environment section of the NPPF. However, the existing wording 'great weight' meets the statutory requirement of 'special regard' and 'special attention' by the Planning (Listed Buildings and Conservation Areas) Act. Under the current NPPF, decision makers must give considerable importance and weight to the conservation of the heritage assets. Contrary to this, 'substantial weight' may be interpreted as more flexible within planning decision-making and could therefore be perceived as diluting the strong protection required by the statutory duties.

There is a need for more explanation and definition of terms in this section. What does 'substantial public benefit' or 'heritage benefit' mean? In practice, when there is no heritage benefit, what is expected should be clearly defined. There are so many ambiguous sentences that may be interpreted in favour of development by providing more flexibility. There is a risk that not everyone is a heritage specialist, and loss of heritage values may increase if there is no clear description or definition.

Provision (3) makes a connection to energy efficiency, but again, this is the only place in the historic environment section that needs further explanation. From the practical point of view, under the 'energy efficiency works', public benefit might be described by an applicant, while the nature of the works is not suitable for the historic environment. I think contradictions should be reduced as much as possible in this section.

Provision (5) is too long, and the connection between significance and harm is confusing.

190. Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: With reference to H4, note that there is another new term/wording, 'consistent use', proposed in the document, while it is 'optimum viable use' in the current NPPF. We assume that because the most viable use of a heritage asset is its original use and the draft NPPF provides more flexibility, this new term (not in the glossary) requires explanation. Adaptive reuse could be emphasised that conservation professionals know about, including impacts and assessing them. However, again, an application may be seen with a consistent use when the original use of the building is commercial, which was converted into two flats at some point in history and proposed for an HMO.

There is another wording, 'conservation benefits', in this part of the draft NPPF. Is this 'heritage benefit'? There is a need for definition and maybe more use of this benefit when assessing the impacts of the proposals. The main emphasis of the conservation should be on gaining 'heritage benefit' or 'conservation benefit'. The new NPPF, with a better structure, can be more descriptive and clear about not only heritage-related terminology (commented on in the previous sections) but also how the public benefit umbrella works for the historic environment. Is the heritage benefit part of the environmental benefit? Or is it a social benefit? This document could provide a better understanding for the local authority officers, planning inspectors, planning

agents and the public if the glossary includes more definitions for the historic environment and the sentences are clear, short and easy to understand, without any inconsistent interpretation.

191. Do you have any other comments on the revisions to the heritage chapter?
192. Do you agree with the transitional arrangements approach to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please provide your reasons, particularly if you disagree.
193. Do you have any further thoughts on the policies outlined in this consultation?
194. Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please provide your reasons, particularly if you disagree.
195. Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please give reasons.
196. Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? *Yes/No*
- a. If so, what do you believe would be the appropriate threshold? Please provide your reasons.
197. Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.
198. Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? *Yes/No*
- a. Please provide your reasons.
199. What benefits or risks do you foresee from making this change? Please provide your reasons.
200. Would you support the use of growth testing for strategic, multi-phase schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
201. Would you support the optional use of growth testing for regeneration schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please explain your answer.

202. Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a. Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing.

LPA Response: Developers vary widely, in terms of required hurdle rates for profit and return, and therefore a one size fits all approach would not be appropriate. The ownership status of the development site and its performance, now and expectations into the future also impact expected profit, whilst we review the Viability of potential development sites within the wider market and within reasonable market expectations, there are countless variables and expectations for future market trends which will impact profit rates, including securing funding, and to set a standard rate would not be helpful as funding availability changes much quicker than policy can, and the lags in allowing policy to catch up, is one of the predominant challenges to unlocking development sites.

We have robust evidence indicating that some developers able to proceed with many new-build, build-to-sell schemes at profit levels below 15% on GDV. Applying a higher profit rate—such as 17.5%—would therefore negatively affect the delivery of affordable housing on schemes that inherently operate with lower profit margins. In many cases, it would also effectively set the profit level at an artificially high threshold, and would not necessarily unlock developments sites and would certainly not maximise affordable housing delivery.

203. Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

LPA Response: Yes, most definitely

a. Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

LPA Response: Types of Development which alternative profit levels should apply

Lower profit levels than the 15–20% profit on Gross Development Value (GDV) referenced above would be both reasonable and necessary for Build to Rent (BTR) developments and for conversion schemes. Profit should be proportionate to risk, and where risk is lower, a lower profit allowance is appropriate.

BTR schemes typically involve significantly reduced risk because they are usually forward-funded, with a purchaser already contracted at an early stage. Staged payments are commonly made throughout the construction period, fully mitigating sales risk in a manner similar to affordable housing delivery. BTR developments are not built speculatively, and the current policy framework should be updated to reflect the increasing prevalence of BTR in the market. The 15–20% on GDV benchmark has always been a rule of thumb for new-build, build-for-sale schemes, but developers may incorrectly apply this standard to other development types where it is not appropriate.

This profit rate is also unsuitable for conversion schemes, as the scope of works varies enormously. Some conversions involve construction costs similar to a full new build, while others involve minimal expenditure, for example, a change-of-use scheme returning a property to its original function. Applying a flat profit allowance of 15–20% on GDV therefore overstates

the required level of profit and does not reflect the actual risk profile. Similar to RICS valuation guidance, a profit on costs, is more suitable.

6% for Affordable Housing

We can confirm that a 6% profit level is appropriate, and suitable widely accepted industry standard, for affordable housing. This reflects the substantially lower risk, as affordable housing is commonly pre-sold with staged payments throughout the development period. As a result, the risk profile is materially lower than that of speculative open-market development. This is the profit level applied within 'Red Book' Valuations for development of standard affordable housing, as designated under the s106.

204. Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

Please explain your answer.

LPA Response: It would be beneficial for further guidance to be published that recognises different development typologies and developer models. For example, indicative profit benchmarks could include:

- **Build to Rent:** 10–12.5% profit on GDV
- **Conversions:** 15–20% profit on cost

Such categorisation would help ensure greater consistency and reduce the frequent misapplication of profit assumptions. Alignment with **RICS valuation guidance** is essential, as we often encounter biased application of profit rates, even within the same viability assessment—typically with unrealistically low profit assumptions used to justify a reduced Benchmark Land Value, and overly high rates used to depress the Residual Land Value. This practice can distort results and undermine transparency.

Consideration should also be given to linking profit levels to developer performance, differing profit hurdles across the sector, and the varying expectations developers hold about future market conditions. Developer return requirements are not uniform, and policy should reflect this diversity rather than impose a single standard rate.

The only consistent aspect across all schemes is that the negotiation of affordable housing forms a standard part of the planning process; and, these negotiations are often detached from the actual profit requirement of the development. More detailed and nuanced guidance would therefore help to produce more accurate viability assessments and ultimately support improved affordable housing delivery.

We consider it essential that guidance clearly states that affordable housing negotiations should only take place where it is evident that the affordable housing policy itself is the reason the scheme is not viable. The appropriate test should demonstrate that the development would achieve a reasonable profit level were the affordable housing policy requirements to be relaxed.

All too often, schemes are presented with implausible deficits which—despite scrutiny in accordance with RICS viability guidance—persist even after review, raising concerns about the reliability of the submitted evidence. For this reason, the application of a clear **common-sense test** should be emphasised. Current practice has drifted away from this fundamental principle, and reinstating it would help re-introduce proportionality, transparency, and trust into the viability process.

205. Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

Disagree

LPA Response: This will not be possible. What would be more helpful, is a far more detailed categorisation that reflects both the development type, with regard given to developer type. Profit expectations are market-led and highly specific to each individual scheme, influenced by a large number of variables, some of which are evident, some which won't be. Among those evident, the availability and terms of funding are particularly critical. As a result, it is not possible to apply a single, fixed approach across all developments.

206. Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a. Please explain your answer.

LPA Response: Developer return is an appropriate and established metric for Valuation, for Development appraisal, for land purchase, and therefore should remain for viability assessment. Further changes to this accepted approach would create uncertainty in the market and undermine development deliverability. Stability is fundamental to viability testing, and profit must remain aligned to the specific risk profile of a given scheme.

For example, the use of standardised land values would be similarly vulnerable to manipulation over time and would not provide the flexibility needed to support the delivery of development. A rigid approach would fail to reflect real-world market dynamics and could act as a barrier rather than an enabler to bringing sites forward. No two development sites are the same.

207. Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

a. Please explain your answer.

LPA Response: Mixed-use schemes, including those combining residential and a range of commercial uses—with a particular emphasis on community facilities or public realm improvements—may justify a different viability approach, but only where this is developed in close consultation with the local authority. Local authorities are best placed to understand the scale of wider community benefits associated with a scheme and the specific local needs at that time. They should therefore be able to apply existing flexibility tools fairly to support genuinely beneficial developments. However, approving schemes that offer limited community value simply because they pass a standardised viability test should not be treated as an acceptable or automatic outcome.

Planning viability originally emerged as a mechanism to unlock developments that were clearly essential for the economic or social wellbeing of an area. This underlying principle of Viability has unfortunately been diluted over time. Viability was intended to unlock stalled development sites to be applied where necessary, and the significance of individual developments varies considerably. To maximise affordable housing delivery, decision-making discretion must remain with the local planning authority—and this principle should be reinforced consistently through PINs decisions.

208. Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree

a. In what circumstances might a premium, or the usual premium, not be required?

LPA Response: Strongly agree. A landowner premium should be applied sparingly, as in reality the market determines the highest-value use of an asset. Even a 20% premium would not override the open market's assessment of best use. If a property is a strong commercial asset, market conditions will dictate that it is sold as such. Conversely, if residential use generates the highest value, a planning consent for residential use would naturally be pursued. In this context, applying an additional landowner incentive would only serve to erode affordable housing delivery unnecessarily.

In practice, a robust marketing process and up-to-date market intelligence already reveal the true market position, making a landowner premium largely redundant. Incentivisation rarely, if ever, outweighs the offers available in the open market. Where an asset is unsuitable for its existing use—such as being vacant, loss-making, or failing to meet statutory compliance—any uplift applied through a landowner premium would simply reduce affordable housing contributions further, without providing any genuine market-based justification.

b. What impact (if any) would you foresee if this change were made?

LPA Response: Overall, the effect would be positive to remove Landowners incentive, as it won't impact potential developments being brought forward, but is likely to improve Viability., it will improve viability and improve delivery of affordable, for reasons stated above.

209. Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree

a. Please explain your answer.

LPA Response: Partly agree. It is essential to first understand why the previous consent was not implemented. If there is a specific underlying reason preventing delivery, which relates to physical, legal, or other practical constraints, then that consent should not be considered an Appropriate Alternative Use Value (AUV). We also encounter cases where successive consents are sought explicitly to reduce or remove affordable housing requirements, and such situations should be treated with caution.

Where a consent is genuinely implementable—in market, physical, and funding terms—it may be appropriate to treat it as AUV.

If a consent has lapsed and no alternative use exists, then the previous consent may be accepted as AUV, but only where it can be demonstrated that it still aligns with current plans and policies. This approach would apply only where there is no existing use value during the intervening period.

210. If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*

- a. **If another metric, please set out your preferred approach and rationale.**

LPA Response: Not applicable, please see above

211. **What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?**

LPA Response: Adjustments are essential for land comparable sales data, to rebase against policy compliant schemes. This will take into account the actual delivery of affordable housing, and the necessary calculation should be applied to reduce the average plot value to compare to equivalent as policy compliant schemes.

Both plot values and sq ft values should be assessed when using land / development comps. Other adjustments should be applied to account for the specifics of the development in question.

Greater openness and transparency around land values and site-specific details is essential to improve the availability and reliability of comparable land data. At present, securing sufficient, high-quality land comparable evidence—particularly outside London—is extremely challenging, which limits the effectiveness and accuracy of land-based benchmarking within viability assessments.

212. **Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values and land transaction data of comparable schemes and/or the subject site; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

LPA Response: Strongly agree

- a. **Please explain your answer.**

LPA Response: Where genuinely comparable land evidence exists and can be clearly demonstrated as such, land values are tremendously important. They provide a vital benchmark against which the reliability of a residual valuation can be tested—particularly given how easily residual valuations can be manipulated to prove a desired outcome. When high-quality data is available, it helps to identify and challenge artificially inflated costs or depressed sales values, including those resulting from selective assumptions about specification or abnormal costs. If a Molior / London Residential Research database was available outside of London for development projects this would help delivery of affordable housing within the regions.

213. **Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a. **Please provide your reasons, particularly if you disagree.**

214. **Do you agree that a unit threshold of between 10 and 49 units is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a. **Please provide your reasons, particularly if you disagree.**

215. **Do you foresee risks or operability issues anticipated with the proposed definition of medium development? *Yes/No.***

216. **If so, please explain you answer and provide views on potential mitigations.**

217. Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?
- a. Please provide your reasons.
218. If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?
- a. Please provide your reasons.
219. If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.
220. If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.
221. What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.
222. Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- Disagree**
- a. Please provide your reasons, particularly if you disagree.
- LPA Response:** Disagree - Concerns that this overly simplistic approach doesn't take into account the types of constraints and considerations associated with medium sites and will result in unexpected delays and frustration for developers where these types of applications are applied for but are unsuccessful.
223. Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?
224. Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?
- a. If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.
225. Is there anything that could be done to mitigate any impact identified?

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Planning Applications Committee

29 April 2026



Reading
Borough Council
Working better with you

Title	PROPOSED POLLARDING OF FOUR WILLOW TREES AT ROSE KILN LANE / LAUD CLOSE, READING
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee
Report author	Sarah Hanson, Natural Environment Officer
Lead councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council Priority	Deliver a sustainable and healthy environment and reduce our carbon footprint
Ward	Coley
Recommendations	The Committee is asked: 1. To approve the proposed tree works.

1. Executive summary

- 1.1. To report to Committee on the proposed pollarding of four, Council Willow trees at Rose Kiln Lane / Laud Close, those being within G5 of TPO 2/05 (copy of TPO plan attached – Appendix 1).

2. Policy Context

- 2.1. Local Plan policy EN14: TREES, HEDGES AND WOODLANDS includes the aim for

‘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’.

- 2.2. The protection of Council trees where appropriate to do so contributes to this policy aim.
- 2.3. The Reading Borough Council adopted Tree Strategy (2021) sets 12 Objectives, which can be viewed here: [Reading Borough Council Tree Strategy, March 2021](#) . Appropriate management of Council, protected trees meets the aims of Objective 1.

3. The Proposal

- 3.1 The Willow trees are located on Council land west of the A33 / east of Rose Kiln Lane and south of Laud Close, adjacent to the Holy Brook. Following an inspection by Streetscene, an application was received on

2 March 2026 seeking consent for the pollarding of four Willow trees to 2m above ground level (application reference PL/26/0275). The trees are multi-stemmed or of poor form, have a poor rooting environment and are located direct adjacent to the weir, where trees need to be appropriately managed to avoid failure into the watercourse. Given the general structurally weak nature of Willow, exacerbated in this case by their form, pollarding at 2m is deemed appropriate, with the intention to manage the trees as pollards in the future. This allows their retention as part of the treescape of the brook and benefit to wildlife, whilst managing them appropriately for their surroundings.

- 3.2 For information, a separate application has been approved for the same works to the adjacent privately owned Willow trees north of Rose Kiln Court that form the remainder of G5 of the TPO (application reference PL/25/1709).
- 3.3 As the Council-maintained trees in question are subject to a Tree Preservation Order, a formal tree works application is required for the works to be approved.
- 3.4 The Town and Country Planning Act 1990 requires applications for works to protected Council owned or maintained trees to be decided by a Committee of the Council which is not responsible for managing the land to which the application relates.
- 3.5 The law also requires a public notice to be displayed for at least 21 days giving details of the proposed works and contact details for any comments to be sent.
- 3.6 The works proposed are necessary in order to appropriately manage the risk these trees present to the watercourse and to enable their retention as part of the tree-lined feature along the Holy Brook. As no objection or comments have been received as a result of the public notice, it is recommended that the works be approved.

4. Contribution to Strategic Aims

- 4.1. Trees within the Council's ownership improve the quality of its open spaces and provide multiple environment benefits, including improvement of air quality. The retention, planting and appropriate management of Council trees promotes a sustainable and healthy environment in Reading and helps to reduce its carbon footprint, one of the five priorities of the Council Plan 2025/28.

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. Trees have multiple environmental benefits that include flood alleviation, wildlife benefits, air pollution mitigation and air cooling. The replacement planting overall represents a net gain in tree number hence contributed to the Council's aims.

6. Community Engagement

- 6.1. A site Notice was placed on the bridge across the Holy Brook on Rose Kiln Lane on 20 March 2026 and left for the required 21-day period, i.e. until 10 April 2026. No objections or comments were received.
- 6.2. The application has also been available to view via Public Access

7. Equality Implications

- 7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to -
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.2. No implications identified.

8. Other Relevant Considerations

- 8.1. None

9. Legal Implications

- 9.1. Service and administration of Tree Preservation Orders falls under the Town & Country Planning Act 1990 and The Town and Country Planning (Tree Preservation)(England) Regulations 2012.
- 9.2. Preparing, serving confirmation and contravention of TPO's are services dealt with by the Council's Legal Section.
- 9.3. Determination of applications affecting work to protected trees is delegated to officers except where the proposal has been submitted by or on behalf of the Council.

10. Financial Implications

- 10.1. None of this report. It is understood that works to the tree would be funded by the Council from existing budgets.

11. Timetable for Implementation

- 11.1. Once issued, tree work approvals last for a period of 2 years, i.e. must be carried out within that period.

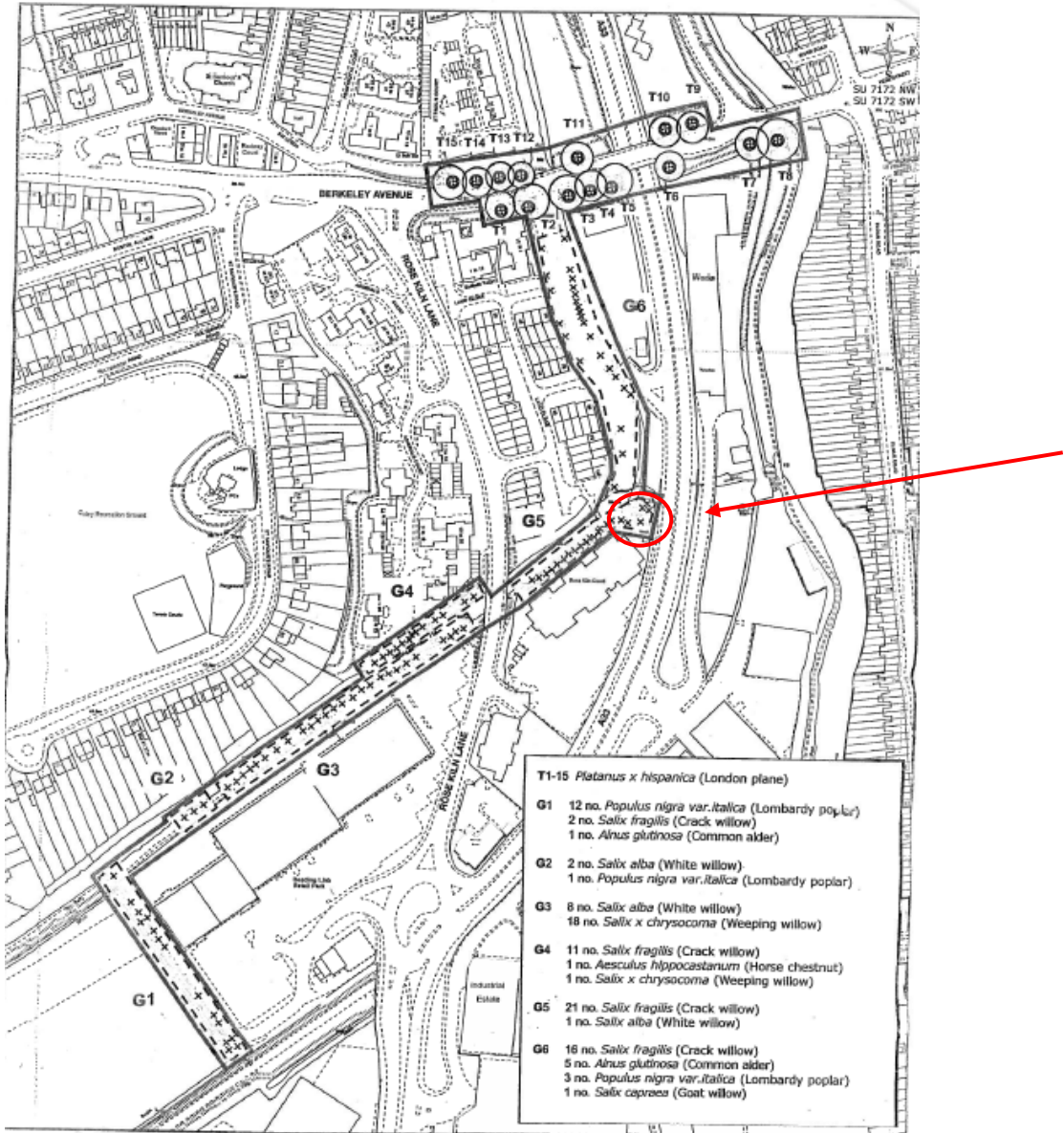
12. Background Papers

- 12.1. Register of Tree Preservation Orders

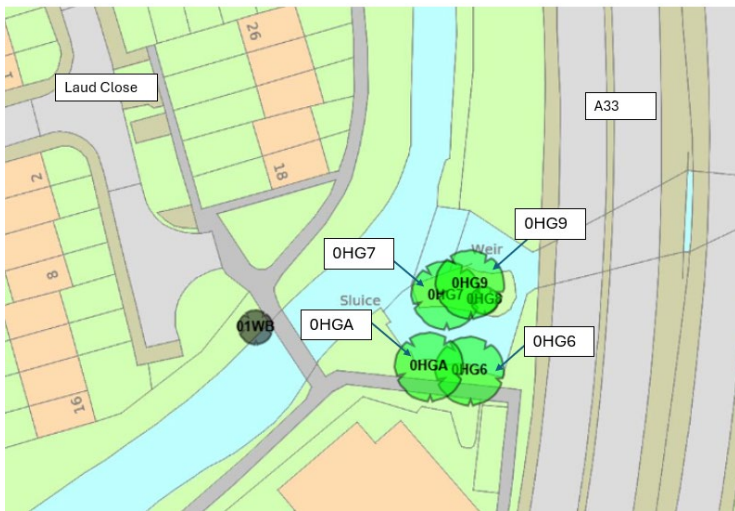
Appendices

- 1. TPO plan of TPO 2/05 & Location Plan**
- 2. Photographs**

Appendix 1 – TPO 2/05 (plan) & Location Plan




Location of Council Willow trees within G5



Appendix 2 – Photographs





29 April 2026	 <b style="font-size: 1.2em;">Reading Borough Council <i>Working better with you</i>
Title	PLANNING APPLICATIONS REPORT
Ward	Thames
Planning Application Reference:	PL/24/0846/FUL
Site Address:	Napier Court Napier Road Reading
Proposed Development	Demolition of existing buildings and erection of new buildings of 11 storeys to provide 570 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works (amended description)
Applicant	Peveril Securities Ltd
Report author	Matt Burns, Principal Planning Officer
Deadline:	Extension of time date: 26 th February 2026
Recommendation	<p>REFUSE planning permission for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed development, by reason of its failure to provide Affordable Housing either on or off-site via a completed legal agreement fails to address the housing needs of Reading Borough, contrary to Policies H3, H4 and CC9 of the Reading Borough Local Plan (2019), the Council's Adopted Supplementary Planning Documents on Affordable Housing (2021) and Planning Obligations under Section 106 (2015) and paragraphs 9, 11, 12, 39, 48, 56, 58, 59, 61, 63 and 64 of the National Planning Policy Framework (December 2024 as amended). 2. The proposed development fails to demonstrate that it would adequately safeguard land for future Mass Rapid Transit/Bus Rapid Transit , harmful to the strategic major transport projects aims of the Borough and contrary to Policies TR1, TR2, CR11 and CR11i of the Reading Borough Local Plan (2019), and paragraphs 109, 115 and 117 of the National Planning Policy Framework (December 2024, as amended). 3. The proposed development fails to demonstrate that Active Travel implications have been adequately considered and therefore the Local Planning Authority are unable to determine whether the additional pedestrian and cycle movements generated by the proposal would adversely affect the safety and flow of users of the existing Highway network within Reading. This is contrary to Policies TR1, TR3 and TR4 of the Reading Borough Local Plan (2019), paragraphs 109, 115 and 117 National Planning Policy Framework (December 2024, as amended). 4. The proposed development does not comply with the adopted standards of the Local Planning Authority in respect of the

design of the proposed footway/cycle to the front of the site along Napier Road. The proposal fails to demonstrate that satisfactory high quality design and form of the pedestrian and cycle route can be provided which would be detrimental to pedestrian and cyclist safety and fail to facilitate greater pedestrian and cycle permeability within the Station/River Major Opportunity Area. This is contrary to Policies TR1, TR3, TR4, TR5 and CR11 of the Reading Borough Local Plan (2019), paragraphs 109, 115 and 117 of the National Planning Policy Framework (December 2024, as amended).

5. The proposed development fails to demonstrate that adequate provision for cycle parking has been made to meet the Council's adopted standards for a development of this size and type thereby failing to provide adequate sustainable transport options for future occupiers. This is contrary to Policies TR5 and CC7 of the Reading Borough Local Plan (2019), paragraphs 109, 115 and 117 of the National Planning Policy Framework (December 2024, as amended).
6. The proposed development does not comply with the Local Planning Authority's standards in respect of servicing, refuse collection and building maintenance, as a result this would likely result in on street servicing and/or service vehicles reversing to or from Napier Road to the detriment of Highway safety on and off site and in conflict Policies TR2, TR3, TR4 of the Reading Borough Local Plan (2019), and paragraphs 109, 115 and 117 of the National Planning Policy Framework (December 2024, as amended).
7. The proposed development fails to demonstrate that by reason of its siting and scale, it would not result in harm to or future pressure to fell or prune five protected Norway Maple trees (TPO ref. 13/10). The trees are of high visual amenity value and harm to their health would be of detriment to their longevity, whilst felling of the trees would result in harm to surrounding visual amenity. This is contrary to Policy EN14 of the Reading Borough Local Plan (2019), Reading Borough Council adopted Tree Strategy (2021), paragraphs 136 and 187 of the National Planning Policy Framework (December 2024, as amended).
8. The proposed development does not make appropriate provision for open space or to improve access to open space to meet the recreational needs of future occupiers; neither is there a legal agreement to secure an appropriate financial contribution towards off-site improvements at Kings Meadow and to secure provision of highway works to improve access to this area of public open space. Therefore, the proposals fail to meet the open space needs of the development. This is contrary to Policies EN9, EN10, CR3 and CC9 of the Reading Borough Local Plan (2019), Planning Obligations under S106 SPD (2015) and paragraphs 98 and 103 of the National Planning Policy Framework (December 2024, as amended).
9. The proposed development does not make appropriate provision for landscaping either on or off-site (where both are considered to be required). This would fail to mitigate the visual

impact of the development. Furthermore, in the absence of a legal agreement to secure an appropriate financial contribution towards off-site tree planting within Kings Meadow the development fails to provide an appropriate landscaped setting for development or to adequately improve tree coverage within the Borough. This is contrary to Policies EN14, CC7 and CC9 of the Reading Borough Local Plan, Planning Obligations under S106 SPD (2015) and paragraphs 136 and 187 of the National Planning Policy Framework (December 2024, as amended).

10. In the absence of a completed legal agreement to secure an appropriate financial contribution towards carbon off-setting in Reading Borough, the proposal would not acceptably adapt to climate change, achieve zero carbon homes standards and not provide appropriately towards energy infrastructure, contrary to Policies CC3 (Adaptation to Climate Change), CC9 (Securing Infrastructure) and H5 (Standards for New Housing) of the Reading Borough Local Plan (2019) and the Sustainable Design and Construction SPD (2019), Planning Obligations under S106 SPD (2015) and paragraphs 166 and 167 of the National Planning Policy Framework (December 2024, as amended).
11. In the absence of a completed legal agreement to secure an acceptable Employment and Skills Plan (construction phase only; employment and skills plan, or financial contribution), the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm, contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019) and the Employment Skills and Training SPD (2013) and Planning Obligations under Section 106 (2015).
12. In the absence of a completed legal agreement, to secure an appropriate contribution towards primary medical care facilities the proposals fail to accommodate for the increase in population as a result of the development and impact this would have upon primary medical infrastructure within the Borough. The proposal is therefore contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019), Planning Obligations under Section 106 (2015) and paragraph 96 of the National Planning Policy Framework (December 2024, as amended).
13. In the absence of a completed legal agreement, to secure an appropriate contribution towards alterations to the loading restrictions along Napier Road the proposals fail to demonstrate that the development would not result in ad hoc loading, unloading and servicing of the development taking place from the Public Highway which would be detrimental to highway safety. This could be contrary to Policies TR3 and CC9 of the Reading Borough Local Plan (2019), Planning Obligations under Section 106 (2015), alongside paragraph 101 of the National Planning Policy Framework (December 2024, as amended) and alongside paragraph 116 of the National Planning Policy Framework (December 2024, as amended).

	<p>14. In the absence of a completed legal agreement to secure that the development would operate in accordance with the Council's standard terms for Build to Rent accommodation as described within Policy H4 of the Reading Borough Local Plan (2019) the proposals fail to demonstrate that they would provide an acceptable standard of residential accommodation or meet the identified housing needs of the Borough. This would be contrary to Policy H4 of the Reading Borough Local Plan (2019), Planning Obligations under Section 106 SPD (2015), alongside paragraphs , 11, 12, 39, 48, 56, 58, 59, 61, 63 and 64 of the National Planning Policy Framework (December 2024 as amended).</p> <p>15. In the absence of a completed legal agreement to secure submission and approval of a completed legal agreement to investigate the feasibility of the proposed development connecting to a Reading Centralised Heat Network the proposals fail to make adequate provisions in respect of incorporating decentralised energy infrastructure and fails to support sustainable energy consumption, reduce dependence on a centralised network and to adequately tackle climate change contrary to Policy CC4 of the Reading Borough Local Plan (2019), the Sustainable Design and Construction SPD (2019), the Planning Obligations under Section 106 SPD (2015) and paragraph 166 of the National Planning Policy Framework (December 2024, as amended).</p> <p>Officers request that the Planning Applications Committee confirms that it gives delegated authority to the Assistant Director of Planning, Transport and Public Protection Services to make changes to add or to remove the above reasons for refusal.</p>
<p>Informatives</p>	<ol style="list-style-type: none"> 1. Positive and Proactive Working – refusal 2. Confirmation of refused plans and documents 3. Reasons 8, 9, 10, 11, 12, 13, 14 and 15 could be overcome by entering into a satisfactory s106 legal agreement or unilateral undertaking (UU), including the necessary highways agreements, as required. 4. Bio-diversity Net Gain requirements

1. Executive summary

- 1.1 The report considers a planning application for the proposed redevelopment of Napier Court, proposing the demolition of three existing office buildings and construction of 570 Build-to-Rent (BtR) apartments across four linked 11-storey blocks, with associated amenity spaces, landscaping and parking. The application site is allocated for residential development under Policy CR11i of the current Reading Borough Local Plan (2019) and sits within the wider Station/River Major Opportunity Area (MOA).
- 1.2 The principle of a high-density residential development in this sustainable, town-centre-edge location is supported and would provide much needed new housing for the Borough, however the proposals fail to meet several critical strategic and policy requirements.
- 1.3 In particular the development fails to demonstrate that it would safeguard land required for a future Mass Rapid Transit (MRT) route, as well as failing to provide an acceptable pedestrian/cycle route to Napier Road or adequate on site cycle parking. These shortfalls of the proposals conflict with strategic transport policies and undermine the vision for the

wider Station/River MOA. Furthermore, the application also fails to adequately meet the critical housing needs of the Borough by way of failing to provide any affordable housing, including failure to secure an affordable housing deferred payment mechanism. The proposals also fail to demonstrate that they would not result in harm of future pressure to fell or prune five protected TPO trees of high amenity value.

- 1.4 While the scheme delivers other notable benefits such as good quality architecture, sustainable construction, significant on-site biodiversity net gain and a net gain in on-site tree planting, these benefits are not considered to outweigh the identified harms and it is recommended that planning permission should be refused.

2. Introduction

- 2.1 The application site is 1.26 hectares in size and is a long and narrow piece of land located on the south side of Napier Road, containing three, two storey office buildings with a car park to the rear accessed from Napier Court. (See location plan in figure 1 and photographs in figure 2 below).
- 2.2 To south the site directly abuts the railway line and to the east is an existing National Rail depot. To the west of the site is Thames Quarter, a build to rent (BTR) residential development of between 12 and 23 storeys and to the north on the opposite side of Napier Road is Kings Meadow, an area of public open space forming part of the Thames Valley Major Landscape Feature. Thames Lido, a grade II Listed Building and the Napier Road pay and display car park site opposite the site within Kings Meadow.

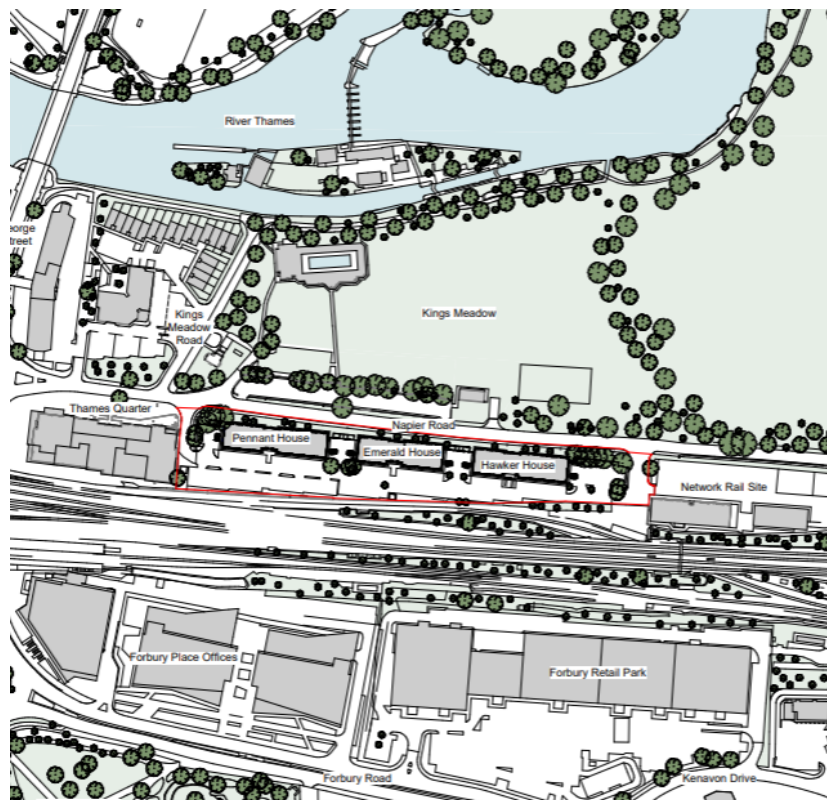


Figure 1 Application Site Location Plan



Figure 2 - photographs – front of existing office building viewed from Kings Meadow from the opposite side of Napier Road



Figure 2 – photographs – rear of existing office building (right side of photo) shown looking west from rear car park towards Thames Quarter. Railway line can be seen to the left side of the photo.

- 2.3 Napier Road is identified as being part of a future mass rapid transit route (MRT) within the Borough and Policy TR2 of the Reading Borough Local Plan 2019 and the Reading Transport Strategy (2024) require that development safeguards land for this purpose. The cycle way to the application site along Napier Road is also identified for improvement.
- 2.4 There are 5 x large, protected Norway Maple trees (TPO ref. 13/10) located at the far western end of the site frontage adjacent to the existing vehicular access to the site from Napier Road. The site is located within flood zone 2, contains contaminated land, is within an area with potential for archaeological remains and is located within an air quality management area (AQMA).
- 2.5 The application site is located within the Reading Central Area but is located outside of the Central Core, Primary Shopping Area and Office Core of the Central Area as defined by Policy CR1 of the Reading Borough Local Plan 2019. The site also forms part of a larger site that is allocated for residential development under Policy CR11i (Napier Court) which also includes the National Rail depot site to the east and forms part of the wider Station/River Major Opportunity Area (MOA) defined by Policy CR11 which allocates various parcels of land around the station and river for major developments. Policy CR11 outlines that the vision for this area is to extend the centre and provide a mixed use destination centred on the station and public transport interchange and to integrate the transport links areas to the north towards the River Thames and into the heart of the centre. Figure 3 below shows the Station/River MOA area. Parcel I on this plan shows the land allocated for residential development under Policy CR11i at the Napier Court/depot site allocation.

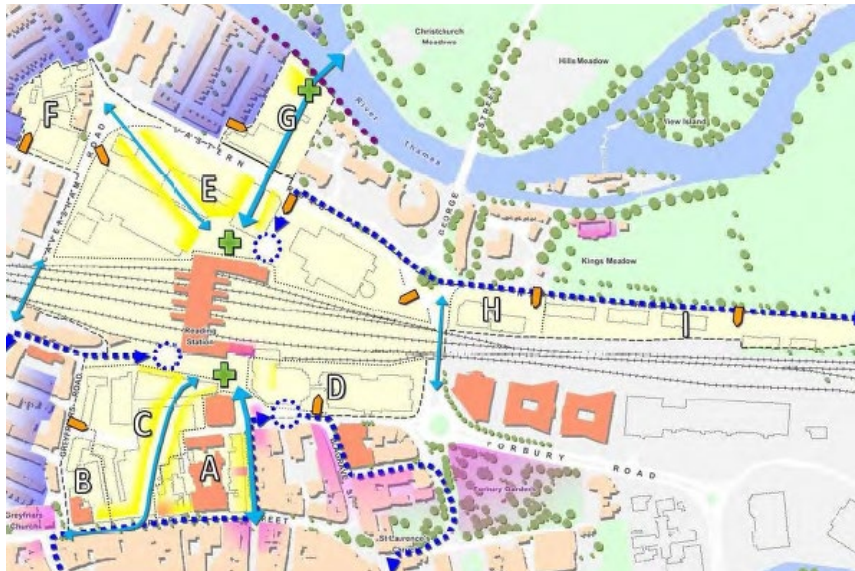


Figure 3 – Map showing the Station/River Major Opportunity Area

- 2.6 Members made an accompanied visit to the site on 16 April 2026.
- 2.7 The application is being report to PAC as a ‘major’ category planning application.

3. The Proposal

- 3.1 A full planning application for construction of new 11 storey buildings, to provide 570 residential dwellings consisting of 1, 2 and 3-bedroom apartments. The development would include ancillary facilities for residents, including residents’ lounge, gym and communal workspace. The buildings are to be set in landscaping to the rear , a pocket park between buildings, public realm fronting Napier Road, and roof terraces. Parking is proposed for 33 cars and 6 motorbikes . Three internal storage spaces are proposed at ground floor for 316 bicycles, and an additional 20 cycle spaces are provided externally for visitors.
- 3.2 The residential element of 570 dwellings comprises:
 - 211 (37%) x 1 Bedroom Apartments
 - 305 (53.5%) x 2 Bedroom Apartments
 - 54 (9.5%) x 3 Bedroom Apartments
 Of which 29 apartments would be M4(3) Accessible Apartments
- 3.3 All dwellings are proposed to be provided under the Build to Rent (BtR) tenure. Build to Rent dwellings are defined within the glossary of the NPPF (December, 2024) as, *‘Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control’.*
- 3.4 The proposal being presented in this report is the outcome of considerable dialogue with officers and two presentations to Design Sout East. The proposed development description has been amended to acknowledge the reduction in height from ‘up to 12 storeys’ to ‘up to 11 storeys’ and consequently a reduction in the number of dwellings from 576 to 570.
- 3.5 In appearance, the proposed new buildings would create a series of 4 x 11 (Blocks A – D going to west to east) storey linked buildings running parallel to the street and Kings Meadow – see figure 4 below.



Figure 4 – Visual of the proposed development from Kings Meadow

- 3.6 Blocks A & B and C & D are connected by 5 storey high blocks set between and slightly behind as shown in figure 5 and 6. Between Blocks B and C is proposed a “pocket park” as shown in figure 7. Further on site amenity space is proposed on roof terraces where the design includes raised planters with integrated top-mounted seating. A 1.5-metre-high parapet will wrap around the entire edge of the terrace, primarily serving as a safety barrier. See figure 8.



Figure 5 – Five storey high link blocks



Figure 6 – Elevation



Figure 7 – Proposed Pocket Park

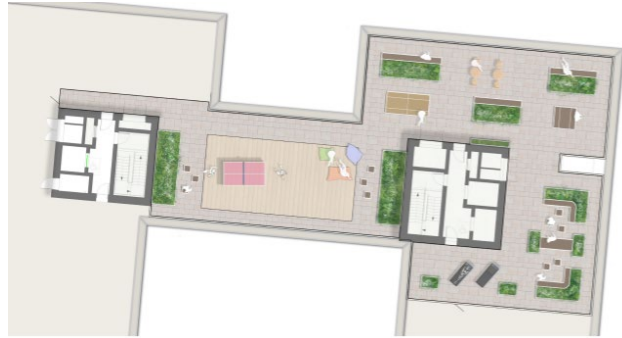


Figure 8 – Roof Terrace

- 3.7 Parking for 33 cars and 6 motor cycles are proposed. Waste storage and collection facilities also to be provided for each block.
- 3.8 The proposed development was subject to pre-application discussions with the applicant, including a pre-application stage independent design review by Design: South East (D:SE), albeit the current planning application was submitted before pre-application discussions concluded and no formal advice letter was issued.

Environmental Impact Assessment Matters

- 3.9 Prior to submitting the planning application the applicant submitted an application requesting (ref. PL/23/1216) an Environmental Impact Assessment (EIA) Screening Opinion from the Local Planning Authority (LPA). This application sought the LPA's determination as to whether the proposed development would be likely to have significant effects on the environment such as to warrant an Environmental Statement being submitted with a future planning application. The LPA's decision on the Screening Opinion application was that the development would be unlikely to have significant impacts upon the environment that could not be reasonably mitigated or managed as part of the development. Notably the site forms part of a wider site that is allocated for residential development under Policy CR11i (Napier Court) of the Reading Borough Local Plan 2019. As such a negative screening opinion decision was issued advising that the proposed development was not considered to be 'EIA development' within the context of the EIA Regulation 2017 and that an Environmental Statement was therefore not required.

Community Infrastructure Levy

- 3.10 In terms of the Community Infrastructure Levy (CIL), in accordance with the Council's adopted CIL Charging Schedule (2015) all new residential floor space is CIL liable. Existing floor space to be demolished can be off-set against the proposed new floor space subject to meet certain occupancy criteria. Overall, it is projected that the levy due for application would be approximately £9,648,408. The actual levy payable may in reality be less or more than this figure, given, subject to the Applicant completing the appropriate forms, any floorspace provided as affordable housing would be exempt and providing that any exemptions relating to existing floor space are correctly applied for and valid.

4 . Relevant Planning History

- 4.1 PL/23/1264 - Request for EIA Screening Opinion from Reading Borough Council (RBC) in accordance with Part 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) in relation to the proposed redevelopment of Napier Court, Napier Road, Reading for erection of a building of up to 11 storeys to include 570 residential apartments (use class C3) – Not EIA development (Environmental Statement not required). 3rd October 2023.

- 4.2 PL/24/1173 - Application for prior notification for demolition of three two-storey office buildings and substructure. The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 11, Class B – Prior Approval Given. 17th June 2025. Not implemented at the time of writing this report.

5 Consultations

5.1 RBC Transport – Object to the application for the following reasons:

- Insufficient information has been submitted with the planning application to enable the Active Travel implications of the proposed development to be fully assessed. The Highway Authority are therefore unable to determine whether the additional pedestrian and cycle movements generated by the proposal would adversely affect the safety and flow of users of the existing Highway network within Reading. This is contrary to Policies TR1, TR3 and TR4.
- The proposed development does not comply with the Local Planning Authority's standards in respect of pedestrian/cycle provision, as a result, is in conflict with Policies TR1, TR3, TR4 and TR5.
- The proposal fails to demonstrate that the future MRT bus provision within the land set aside by the development could be adequately provided and, as a result, is in conflict with Policy TR2.

The proposed development does not comply with the Local Planning Authority's standards in respect of secure cycle storage provision. This is in direct conflict with Policy TR5.

- The proposed development does not comply with the Local Planning Authority's standards in respect of servicing and, as a result, this would result in on street servicing and / or service vehicles reversing to or from Napier Road to the detriment of Highway safety and in conflict Policies TR2, TR3 and TR4.

5.2 RBC Natural Environment – Object to the application for the following reasons:

- The proposed development fails to demonstrate that it would not result in harm to or future pressure to fell or prune protected trees of high amenity value contrary to Policy EN14.

5.3 RBC Ecology Adviser – No objection subject to conditions to secure submission and approval of a biodiversity net gain plan and scheme of biodiversity enhancements prior to commencement of development, submission and approval of a wildlife friendly external lighting scheme prior to occupation of the development and to stipulate that vegetation clearance shall only take place outside of the bird nesting season.

5.4 RBC Conservation Officer – Objects. Considers that the proposed development's scale, massing, large footprint, and lack of open/green spaces would detract from and result in less than substantial harm at a moderate to low level to the setting of the Grade II Listed Thames Lido building within Kings Meadow opposite the site on Napier Road.

5.5 RBC Environmental Protection Officer – No objection subject to conditions to secure:

- Submission and approval of a contaminated land assessment and remediation scheme prior to commencement of development
- Submission and approval of a remediation verification report prior to commencement of development above foundation level
- Submission and approval of a construction method statement
- Submission and approval of a noise assessment and mitigation scheme in respect of gym noise prior to occupation of any dwelling

- Implementation of all other noise mitigation measures, including those to protect against noise from the adjacent railway station, in full prior to occupation of any dwelling.
 - Submission and approval of details of the proposed bin stores, including measure to secure the stores from pests and vermin
 - That noisy construction works only takes place during the Council's recommended standard working hours (0800 to 1800 hours Mondays to Fridays) and 0800 to 1300 hours on Saturdays and not at all on Sundays or Bank Holidays.
 - That there shall be no burning of waste on site
- 5.6 RBC Leisure/Parks – Seek a financial contribution towards off-site open space and leisure facilities within the Borough given the limited on-site provision of open space and to mitigate for the increased use of existing off-site public open spaces within the Borough that the additional population that would be created by the development would generate.
- 5.7 RBC Waste Services – No objection, subject to the developer entering into a formal agreement to secure weekly refuse collection by private refuse contractor.
- 5.8 RBC Housing – No comments, given at the time of writing this report no information regarding the proposed dwelling mix of distribution of affordable dwellings within the development has been provided.
- 5.9 Historic England – Does not wish to comment on the application but recommends that advice from the Council's Conservation Officer is sought.
- 5.10 Sport England – Consulted as the development is for over 300 dwellings. No objection.
- 5.11 Royal Berkshire Fire and Rescue Service – Provides general comments and recommends that the developer takes these into account before seeking the necessary Building Regulations approvals.
- 5.12 Crossrail – Does not wish to comment on the application.
- 5.13 Berkshire Gardens Trust – Advise that the proposed development is sufficiently distant from the nearest Registered Park and Garden (Forbury Gardens) such that there would be no impact upon its setting. Recommend that the impact of the development upon the setting of the Grade II Listed Thames Lido building is given consideration as well as the access for future residents of the development to on-site and off-site open space.
- 5.14 Environment Agency – No objection.
- 5.15 Health and Safety Executive - Fire Safety – Advises that they are content with the proposed fire safety design in respect of planning land use considerations but identifies some detailed matters that it is recommended the applicant addresses in advance of seeking necessary Building Regulations approvals.
- 5.16 Network Rail – No objection. The applicant will need to engage with the National Rail Asset Protection before commencing development and secure any necessary licenses.
- 5.17 NHS Integrated Care Board (ICB) – No objection, subject to a contribution of £492, 480 towards primary healthcare facilities being secured as part of a s106 legal agreement to mitigate for the impact of the additional population that would be generated by the development upon Local GP surgeries.
- 5.18 Thames Valley Police Designing Out Crime Officer (DOCO) – Recommend a condition to secure an access and security strategy.
- 5.19 Thames Water – Recommend a series of conditions to secure submission and approval of details confirming that foul, waste and clean water capacity to the serve the

development exists off-site or a development and infrastructure phasing plan agreed with Thames Water and that all foul water upgrades necessary to serve the development have been completed. A condition is also recommended to require submission and approval of a piling method statement prior any piling taking place. A series of informatives are also recommended to advise the applicant of works potentially requiring a Thames Water works license.

5.20 Berkshire Archaeology – No objection subject to conditions to secure submission and approval of a written scheme of archaeological investigation (WSI) prior to commencement of the development and to secure that the development shall then only take place in accordance with the approved WSI.

5.21 Active Travel England – Refers the LPA to its Standing Advice.

Design: South East Advice

5.22 The proposed development has been subject to independent review by Design South East at both pre-application and application stage. The Design South East comments provided at application stage are summarised below:

- Commends the level of design development since pre-app stage and welcomes omission of the previously proposed basement car park
- The scale of the development is appropriate for its location
- The relationship of the building to, and enhancement of, the park, are fundamental to the success of the development.
- Supportive of how the massing contains the park but the development should form a more consistent and continuous edge, reinforcing closure and creating a strong backdrop.
- Welcome the consistent height but recommend this strengthened by creating a more horizontal emphasis in the built form and maintaining a consistent tone in brickwork. There should be greater linking between the 4 blocks.
- Not possible to specify a correct height for the proposed development but consider height should be similar through the development and no higher than Thames Quarter.
- The proposal neither forms a sufficiently well-defined edge to the park required to create a sense of enclosure and a strong backdrop, nor enables ease of pedestrian movement for residents to and from this important public amenity. There is also no clear vision for the future of Napier Road, through which residents will move to and from the park and the lido.
- There should be multiple crossing points to Napier Road providing access to Kings Meadow. Landscape design should transform the character of the road.
- The reserved MRT buffer should be improved with tree planting and grass even if temporary.
- Further work is also needed on the massing and the architecture, including further consideration of the proportions of the blocks and their articulation.
- The south/rear side of the building should not be neglected. The current service yard and parking function to this area will be inhospitable to residents. Recommend a more radical approach to the railway embankment wall to provide more greenery and better outlook, particularly to the ground floor rear flats. A variety of surface treatments could also be used to articulate and vary character throughout its length and further tree planting.
- A single muted brick tone is more successful than a mixture of brick tones.
- Flank elevations of the proposals are not well considered and need further articulation to carry details from the front around the corner.
- Welcome how the blocks are joined at ground floor by colonnade/screen and this should be used across and link the full width of the building frontage.
- The proposed central entrance porch and ramp/steps and balustrade are too large and out of character and should be redesigned.

5.23 The above comments were provided to and considered by the applicant prior to submission of the latest set of amended plans which form the proposal that are under consideration as part of this report. How successfully the comments have been addressed by the latest plans will be considered in the Appraisal section of this report below.

Public Notification

5.24 The following neighbouring properties were notified of the planning application by letter:

- Reading Railway Station, Station Approach
- First Great Western Trains, Station Approach
- Thames Lido Napier Road
- 1 to 38 Kingfisher Place
- The Lodge 22 Kings Meadow Road
- 100 Napier Road
- Kings Meadow House Kings Meadow Road

5.25 5 x site notices were also displayed at the site along Napier Road on 9th August 2024.

5.26 1 x letter of representation has been received from Caversham and District Residents Association (CADRA) who object to the application for the reasons summarised below:

- The proposed building heights will dominate the Meadow and listed Thames Lido building
- The proposed building frontage is repetitive across the full development and results in monolithic appearance
- Given the need for family accommodation within the Borough a greater proportion of 2 and 3 bed dwellings should be provided.
- More on-site play facilities are needed for future residents
- Taxi and delivery vehicles will stop on Napier Road and result in obstructions to the road and pavement
- Any improvements to Kings Meadow must serve the wider community and not just residents of the proposed development
- Inadequate flood risk management proposals

Statement of Community Involvement

5.27 A statement of community involvement (SCI) has been submitted with the application which sets out the applicant's own consultation process with the local community before submitting the planning application. This details that the applicant held a an in-person public consultation event attended by 50 people at Thames Lido on 6th November 2023 which was publicised via letter distribution to 630 nearby properties and advertisements in local newspapers and online and a website with details about the proposed development was also set up. Feedback following the public consultation event was collected in person at the event, via online forms or dedicated email address and a total of 37 responses were received.

5.28 The feedback the applicant received set out in the SCI is summarised as follows:

- The proposals and use of materials would improve the setting of Kings Meadow
- Welcome the pedestrian and cycle route to the front of the development and suggested pedestrian crossing over Napier Road
- Support the gaps between the proposed blocks facilitating views of Reading Abbey
- The site is a good location for housing on a brownfield site opposite Kings Meadow open space
- The site is well located for transport links and close to a supermarket
- Clarifications sought regarding the proposed build to rent model of accommodation, the sustainability, energy efficiency, noise and fire safety measures to be incorporated within the development, measures to prevent disturbance to existing surrounding occupiers during construction and what social

infrastructure would be provided as part of the development (eg. healthcare services).

- Too few parking spaces proposed and too many cycle parking spaces
- Concern as to how delivery vehicles will be managed to avoid on-street parking and the impact of the development upon traffic in the local area
- There is existing inadequate street lighting on Napier Road
- The visual impact of the proposals together with separate proposals at Forbury Retail Park will be significant
- Concern regarding impact of noise from the railway line and station upon future occupiers of the development
- Concerns regarding impact upon occupiers of Thames Quarter in terms of receipt of daylight and sunlight and overlooking/loss of privacy
- The proposed design is not appropriate for a rural area
- Concerns regarding the quality of the dwellings to be provided
- There should be more variation to the design and proposed buildings heights
- Concern regarding the impact on the setting of the grade II Listed Thames Lido building on the opposite side of Napier Road
- Concerns regarding flooding
- Concerns regarding the impact on the development upon Kings Meadow

6. Legal Context

- 6.1 Section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 6.2 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).
- 6.3. 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).
- 6.4. Accordingly, the latest NPPF and the following development plan policies and supplementary planning guidance are relevant:

National Planning Policy Framework (December 2024, as amended)

The following chapters are the most relevant (others apply to a lesser extent):

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 5 – Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

National Planning Practice Guidance (2014 onwards)

Reading Borough Local Plan 2019 - Policies:

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
EN9: Provision of open space
EN10: Access to open space
EN12: Biodiversity and the green network
EN13: Major Landscape Features
EN14: Trees, hedges and woodland
EN15: Air quality
EN16: Pollution and water resources
EN17: Noise generating equipment
EN18: Flooding and drainage
EM3: Loss of employment land
H1: Provision of housing
H2: Density and mix
H3: Affordable housing
H4: Build to rent schemes
H5: Standards for new housing
H10: Private and communal outdoor space
TR1: Achieving the transport strategy
TR3: Access, traffic and highway-related matters
TR4: Cycle routes and facilities
TR5: Car and cycle parking and electric vehicle charging
CR1: Definition of central reading
CR2: Design in central reading
CR3: Public realm in central reading
CR6: Living in central Reading
CR11: Station/River Major Opportunity Area
CR11i: Napier Court

Supplementary Planning Documents:

Sustainable Design and Construction (2019)
Revised Parking Standards and Design (2011)
Affordable Housing SPD (2021)
Employment, Skills and Training SPD (2013)
Planning Obligations Under s106 SPD (2015)

Other relevant guidance:

Reading Open Space Strategy (2007)
Reading Tree Strategy (2021)
Reading Biodiversity Action Plan (2021)
Reading Tall Building Strategy (2008)

Local Plan Partial Update

- 6.5 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. The submission draft of the Local Plan Partial Update was submitted on 9th May 2025 and examined earlier this year.

- 6.6 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example. Officer advice in respect of the Local Plan policies pertinent to these applications listed above is that, other than Policy H1 (Provision of Housing) they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’. Policy H1 is out of date because the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in National Planning Practice Guidance (NPPG) (as required now Policy H1 is out of date) or for the provision of Affordable Housing.

7. Appraisal

- 7.1 The main matters to be considered are:

- A. Land Use Principles
- B. Development density, unit mix and affordable housing
- C. Design considerations including effect on character and heritage and public realm considerations
- D. Amenity Matters
- E. Flooding, Drainage and Natural Environment
- F. Transport
- G. Sustainability and Energy
- H. Other Matters
- I. Equalities impact

A. Land Use Principles

- 7.2 The National Planning Policy Framework (NPPF) (December 2024) sets out a presumption in favour of sustainable development (Para. 11) with three overarching objectives, economic, social and environmental. Sustainable development should therefore be approved where it accords with the development plan unless the adverse impacts of doing so would significantly outweigh the benefits of development. The NPPF also encourages the effective use of land by reusing land that has been previously developed; (Para. 124).
- 7.3 The NPPF has identified an increased need for housing across the country, including Reading. The emerging Local Plan Partial Update includes provisions for an increased housing target in Reading.
- 7.4 The site is allocated for development under Policy CR11i (Napier Court) which allocates a wider parcel of land to the south of Napier Road, and north of railway line and east of Thames Quarter for residential development within the Station/River Major Opportunity Area (MOA). The wider parcel of land includes the Network Rail depot located the east of Napier Court and is shown in figure 9 below outlined in light blue labelled I with the current planning application site area shown outlined in red. Thames Quarter is shown labelled H.

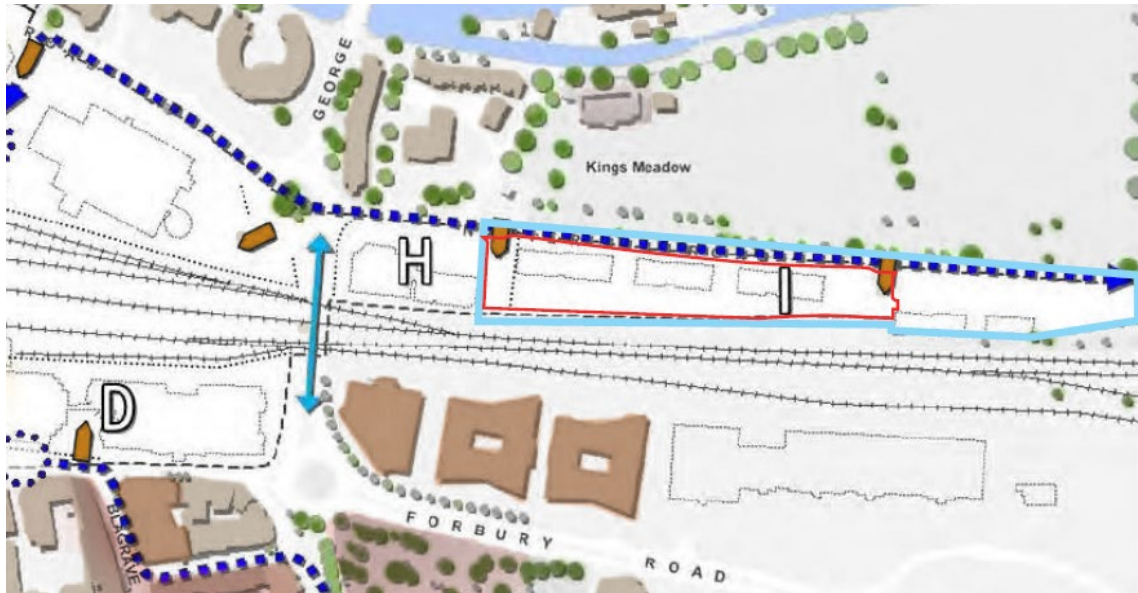


Figure 9 – Proposed Policy CR11i site allocation area

7.5 Policy CR11i specifically allocates the wider allocation area for development as follows:

CR11i, NAPIER COURT:
This area will be developed for residential. The design must avoid detrimental effects on the adjacent Thames Valley Major Landscape Feature, and building heights should reduce from west to east across the site. Land on the Napier Road frontage will be safeguarded for Mass Rapid Transit. Development of the Network Rail depot will be dependent on an alternative location at the railway triangle to the west of the centre becoming available. Development should take account of mitigation required as a result of a Flood Risk Assessment.

Site size: 1.62 ha Indicative potential: 210-310 dwellings.

7.6 The loss of the existing office use (Class E(g)i use class) at the Napier Court was envisaged as part of the site allocation within the Local Plan (2019). The three existing office buildings at Napier Court have been partly vacant for the last 3 years with the final tenants vacating in summer 2025. Given the proposals seek to redevelop the site solely for residential use (Class C3 use class) in line with the Local Plan allocation for the site there are no land use principle concerns with the loss of the existing use office use at the site in the context of this planning application, retention of which would not align with the vision for this part of the Reading Central Area as set out within Policy CR11i above.

7.7 In terms of proposed land uses the proposed residential use of the site aligns with that envisaged for the site under site allocation Policy CR11i. Furthermore, the provision of new dwellings would also align with Paragraph 61 of the NPPF (December 2024) which states that the Government's objective is to significantly boost the supply of housing and would contribute to the Borough's housing needs. It is noted that the Council is not currently meeting its annual targets for provision of general housing as calculated using the 'standard method' (based upon local housing stock and affordability levels within the Borough) in National Planning Practice Guidance (NPPG) which is required now Policy H1 (Provision of Housing) of the Local Plan is considered to be out of date or for the provision of affordable housing. Policy CR6 (Living in Central Reading) also supports proposals for residential development within Central Reading subject to meeting specific criteria in terms of mix of proposed dwellings, affordable housing provision and demonstrating that future occupiers of new residential dwellings would not be adversely affected by noise and other disturbance from town centre uses or poor air quality, which are considered later in this report.

- 7.8 This report will also considered how the proposals align with the overarching strategy for development within the wider Station/River MOA as detailed under Policy CR11 which are as follows.

Development within 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.

- 7.9 More specifically the site allocation Policy CR11i provides an indicative development capacity for the wider allocation site of 210-310 dwellings (a density of xxx). This proposal for 570 dwellings on only part of the land included within the site allocation area would therefore far exceed this indicative potential given for the wider site. However, it is pertinent to acknowledge that paragraph 5.4.5 of the supporting text to Policy CR11 states:

5.4.5 Policy CR11 includes some figures for indicative development capacity. It should be noted that, to an even greater extent than other areas, development capacity can vary significantly on high density town centre sites, and these figures are therefore an indication only. Of greatest importance will be the creation of a high-quality, well-designed mixed use destination, and there is potential for development figures to vary in order to achieve this aim.

- 7.10 With the above in mind, the other sections of this Appraisal will consider whether or not the proposed development achieves these aims in order to justify the proposed number

of dwellings, as well as how the proposals would comply with the other requirements of the site allocation Policy CR11i.

- 7.11 It should be noted that the emerging Policy CR11i with the draft Local Plan Partial Update proposes to increase the indicative development capacity for the same wider allocated site to 250-370 dwellings. However, as discussed earlier in this report, given ongoing Local Plan update is at an early stage, limited weight can be attributed to the updated Policy, albeit it indicates an anticipated direction of travel for the Policy in the future of a modest x% increase in capacity). As such the proposals must be assessed against Policy CR11i within the current 2019 adopted version of the Local Plan.
- 7.12 The development proposes that all 570 residential dwellings would be provided as Build to Rent (BtR) residential accommodation, which is an established and accepted form of housing provision at the national and local level. Policy H4 (Build to Rent Schemes) clearly sets out the circumstances in which such developments will be supported. This includes, but is not limited to single institutional ownership of the development as a whole for a minimum 20 year term from occupation, providing minimum three year tenancies for private renters, a high standard professional on-site management and meeting RBC's voluntary Rent with Confidence Standards. All the requirements are required to be secured within a s106 legal agreement in order to demonstrate full commitment of the applicant to these requirements of the RBC Housing Team.
- 7.13 From a general land use principles perspective, the proposed BtR residential use of the site is considered to broadly align with relevant policies of the Local Plan (2019). Whether or not the proposals comply the more detailed requirements of Policy CR11i, the overarching strategy for the Station/River MOA detailed under Policy CR11 and other relevant policies of the Local Plan (2019) will be considered in the following sections of this report below.

B Development Density, Dwelling Mix and Affordable housing

Density

- 7.14 The application site is 1.26 hectares in size, and the proposed development of 570 dwellings would deliver a development density of 452.4 dwellings per hectare. This density of development meets the minimum 'above 100 dwellings per hectare' density indicatively specified at figure 4.5 of Policy H2 (Density and Dwelling Mix) for sites within the town centre. Policy H2 is clear that it is particular characteristics of a site will determine whether development density is appropriate.
- 7.15 Throughout relevant policies of the Local Plan (2019) it is clear that high density development is envisaged at the site. Part i) of Policy CR11 (as set out under paragraph 7.8 above) specifies in the context of the Station/River MOA as a whole that development will 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. Policy CC6 (Accessibility and the Intensity of Development) is also clear in detailing that the scale and density of development should relate to its accessibility level, by walking, cycling and public transport to a range of services and facilities and supports the approach that the densest and largest scale development should take place in the most accessible locations. The proposed location, within the Reading Central Area and close to the station, inner distribution road and transport interchange and when also considered within the context of the need to maximise the efficient use of land, means that the high density nature of the development is considered appropriate in principle in this location.

Dwelling Mix

- 7.16 In terms of dwelling mix, Policy CR6 (Living in Central Reading) requires that residential developments within the Central Area should contribute towards providing a mix of different sized units and that as a guide a maximum of 40% of units should be one

bedroom dwellings and minimum of 5% of units should be at least three bedroom dwellings. The application proposes to provide 211 x one bedroom dwellings (37%), 305 x two bedroom dwellings (53.5%) and 54 x three bedroom dwellings (9.5%) which is considered to be an appropriate dwelling mix for development within the Reading Central Area and complies with Policy CR6.

- 7.17 Policy H2 also explains that the dwelling mix of residential development should contribute towards meeting the identified housing needs of the Borough. Figure 4.6 within the supporting text to Policy H2 sets out that there is most need within the borough for family sized units of two and three bedrooms. The proposed development would provide 359 of the 570 dwellings proposed as two and three bedroom units which would account for 63% of the total dwellings. In this respect the proposed dwelling mix is acceptable, complies with Policy H2 and would contribute appropriately to the housing needs within the Borough which is a demonstrable benefit of the proposed development.

Affordable Housing

- 7.18 Policy H3 (Affordable Housing) requires developments to make an appropriate contribution towards affordable housing to meet the needs of the Borough. For the proposed development of 570 dwellings, the policy requires that 30% of the total number of dwellings shall be provided as on-site affordable housing and if proposals present an offer which falls short of the 30% policy requirement, then the applicant must clearly demonstrate the circumstances justifying a lower contribution through an open-book viability assessment. Additionally, the supporting text to Policy H4 (Build to Rent Schemes) (at para. 4.4.31) clarifies that *“The Council will expect rental levels for the affordable housing or Affordable Private Rent housing to be related to Local Housing Allowance (LHA) rate levels (including service charges) and be affordable for those identified as in need of affordable housing in the Borough. The Council will expect such housing to remain affordable in perpetuity”*.
- 7.19 A viability assessment was submitted with the application which concluded that it was unviable for the development to incorporate any affordable housing. The viability assessment has been independently reviewed and also reviewed by RBC Valuations Officers and the advice received is that they concur that it is unviable for the development to incorporate any affordable housing. This application has had varying affordable housing offers at different points of its consideration; indeed the offer a week ago was 10% on-site affordable housing (with no DPM), but on 15 April 2026 that offer was reduced to zero (and no DPM mechanism either) and it is on the basis of this current zero offer which the applicant wishes the application to be considered. The applicant’s explanation for this is to ‘protect the deliverability of the scheme in light of the viability challenges’.
- 7.20 Planning viability guidance (contained within Policy H3, including as proposed to be updated in the Local Plan Partial Update and as set out in the adopted Affordable Housing SPD) does not require the LPA to negate or reduce affordable housing provision where developments are found to be unviable but allows greater flexibility to agree a position which would maximise delivery of affordable housing and support delivery of a development which would give wider economic benefits. A key part of such delivery is the provision of a Deferred Payment Mechanism (DPM), where there would be a sharing of unexpected profits (for the developer in terms of returns, but also a share to the Council via a commuted housing sum). This capturing of profit only becomes due if the development fares better than expected in terms of build costs, rents, returns, etc. It is therefore considered inappropriate for the application to be considered only on its current economic situation at the time of its determination; when a better situation has existed during the consideration of this application and equally, may also occur after this application is reported to your meeting.
- 7.21 There is a significant shortfall in provision of affordable housing within the Borough compared with the identified and persistent need. Paragraph 4.4.19 of the Reading Borough Local Plan provides some background to the policy and summarises the large

amount of evidence that the Council has in respect of the critical need for Affordable Housing that exists within the Borough:

“The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA, 2016) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The SHMA identified a need for 406 new affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can.”

7.23 Para 4.4.23 states *“The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.*

7.24 An up-to-date assessment of the need for Affordable Housing that exists in the Borough is within the supporting text for Policy H3 (para 4.4.21) of the Reading Borough Local Plan Submission Draft Partial Update May 2025 which states the following:

“The Reading Housing Needs Assessment (HNA, 2024) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can”.

7.25 Current Policy H3 includes provision for viability considerations at para 4.4.24 which states that *“...the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement...”*

7.26 The NPPF and the Council’s policies allow for viability considerations to reduce the provision but only in specific circumstances. Paragraph 59 of the NPPF 2024 states that *“The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.”*

7.29 Given the demonstrated critical need for Affordable Housing in Reading, significant harm is identified to the Borough as a result of the proposals not providing any affordable housing. In this respect the development would fail to meet Policies H3 and H4 and the Affordable Housing SPD requirements and their associated aims of achieving mixed and balanced communities within the Borough. This significant harm would need to be weighed carefully within the overall planning balance, against other material

considerations and benefits of the development. The planning balance assessment is carried out in the conclusion at the end of this report.

Relationship between Affordable Housing and BtR

7.30 BtR dwellings are defined within the glossary of the NPPF (December 2024) as, '*Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control*'. Policy H4 (Build to Rent Schemes) outlines various specific criteria to ensure BtR developments provided a good standard of accommodation and deliver a supply of rental housing to the market as intended, including affordable housing. This includes securing BtR development in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should this requirement not be met.

7.32 The supporting text to Policy H4 under paragraphs 4.4.29 to 4.4.32 explains why securing BtR accommodation on a long-term basis (i.e. 20 years) is needed.

4.4.29 Build to Rent developments are long term investment vehicles that it is hoped will be attractive to financial institutions. Financial institutions will be looking for large-scale, professionally managed developments. Such developments will bring new providers into the UK housing market (financial institutions play major roles on housing provision in much of Europe and North America), thus increasing competition. They will bring higher quality and better managed accommodation and associated services to the private rental market. They will operate with longer tenancies as the model seeks to retain occupants for as long as possible.

4.4.30 Private rented sector (PRS) housing meets the housing needs of residents who cannot afford to buy or do not want to buy private homes or who cannot get access to social housing or subsidised housing in Reading. It can benefit the local and regional economy as it enables greater household mobility. However, there are many issues associated with private renting in the Borough revolving around poor quality and poorly managed accommodation with limited security of tenure and unjustified rent increases.

4.4.31 The Council wishes to encourage a private rented sector which provides high quality, professionally managed accommodation and a greater level of security for tenants than that which is offered by much of the current PRS market. We will support institutional investment in the sector where benefits are secured for residents and the economy of the Borough and where this produces high quality development with positive benefits for the Borough. Such schemes will normally be larger scale developments of more than 50 units to achieve the level of quality and facilities and to efficiently provide the high quality of management that is needed to support such accommodation.

4.4.32 It is accepted that as Build to Rent developments are dependent on long term rental income rather than early sales, their funding is inevitably long term, and operates to different viability models compared to for sale schemes. Government policy therefore sees a need for some flexibility, particularly in relation to affordable housing provision. Nevertheless, where such justification is being made, the Council will expect the viability appraisal to also provide information on the viability of the development as a for sale scheme.

7.33 In the event that in the initial 20 year period of providing the dwellings as BtR units, the owner of a BtR development notifies the Council that it intends to sell or otherwise transfer some or all of the units so that they no longer qualify as build to rent accommodation then

they would need to obtain written agreement to this taking place from the Council. This requirement as well as a mechanism to secure that in the event this happens, the Council receives an equivalent financial contribution to share in any increase in value as a result of the dwellings changing from build to rent to general market sale dwellings is required to be secured as part of a s106 legal agreement. This is required because the affordable housing proposals for the development were considered solely on the basis as the dwellings being BtR accommodation. The mechanism would not apply if the dwellings were to change from build to rent to market sale outside of the 20 year period.

- 7.34 In the absence of an agreement to secure that the development would operate in accordance with the Council's standard terms for Build to Rent accommodation as described within Policy H4 of the Reading Borough Local Plan (2019) by way of a s106 legal agreement the proposals fail to demonstrate that they would provide an acceptable standard of residential accommodation or meet the identified housing needs of the Borough. By not agreeing to any type of BtR controls, the Council would have no control over any aspect of the accommodation, and it would be entirely controlled by the developer. This means that all of the normal advantages of BtR developments – including a proportion of these 570 units being under suitable rent controls (or service charges) for those who require it – would not be secured.

C Design considerations and effect on character and heritage

- 7.35 The NPPF (December 2024) states that good design is a key aspect of sustainable development and is inextricably linked to good planning. In determining planning applications, local authorities should ensure developments are sympathetic to local character, including the surrounding built environment and landscape, whilst not preventing or discouraging appropriate change.
- 7.36 In addition to the site specific requirements for development set out within the site allocation policy CR11i and those sought by the Policy CR11 for the wider Station/River MOA that are discussed above, Policy CC7 (Design and the Public Realm) requires that all development is of high design quality that maintains and enhances the character and appearance of the area. Policy CR2 (Design in Central Reading) requires development to provide appropriate relationships between buildings, spaces and frontages within the Central Area and Policy CR3 (Public Realm in Central Reading) requires development to make a positive contribution toward the quality of public realm in Central Reading.
- 7.37 Policies EN1 (Protection and Enhancement of the Historic Environment) requires proposals to safeguard the significance of heritage assets and their settings, avoiding harm unless justified by clear public benefits. Policy EN13 (Major Landscape Features) states planning permission will not be granted for development that would detract from the character of appearance of a Major Landscape Feature.

Demolition of Existing Buildings

- 7.38 The three existing buildings on site are proposed to be demolished under this application. Photographs of the existing buildings are shown in figure 2 in the introduction of this report. The existing buildings are not considered to be of any special architectural or historic merit that their demolition would be an inhibitor to development, whilst as discussed above the site is allocated by Policy CR11i for high density redevelopment. The demolition of the existing buildings could therefore be supported, subject to the proposed replacement building being considered appropriate as discussed below.
- 7.39 It is also pertinent to note that a separate prior approval consent (ref. PL/24/1173) under permitted development rights for full demolition of the existing buildings has already been granted such that demolition of the buildings could already take place independently of this planning application. At the time of writing this report the prior approval demolition consent has not yet been implemented but if it was then the fall-back position as a result of that consent would be a cleared site.

Layout, Scale and Massing

Integration within the Station/River Major Opportunity Area

- 7.40 As discussed above, Policy CR11i outlines a number of principles and criteria that development of the site allocation area should adhere to whilst Policy CR11 also outlines similar principles for development and how this should integrate within the wider Station/River MOA. A key requirement of both policies is that development safeguards land which is needed for potential future mass rapid transit routes (MRT). Policy TR2 (Major Transport Projects) also requires development safeguards necessary land for this purpose. Figure 10.2 of the Local Plan (2019) identifies Napier Road/Kings Meadow Road as a location for the East Reading MRT which would be a *Dedicated express, limited stop bus-based rapid transit connecting Reading town centre/Reading Station and Thames Valley Park and Ride* (in Wokingham Borough). The emerging Local Plan Partial Update refines the wording of Policies TR2, CR11 and CR11i to specify that the requirement for land to be safeguarded relates to Bus Rapid Transit (BRT) routes.
- 7.41 In this respect, the layout of the development proposes to incorporate a 3m wide strip of land to the front of the site between the proposed buildings and the Napier Road kerb line which is shown as free from built development, and which is proposed to be safeguarded for future MRT proposals. The proposed safeguarded land is shown as the hashed area in figure 10, together with zoomed in sections shows the eastern and western ends of the site frontage.

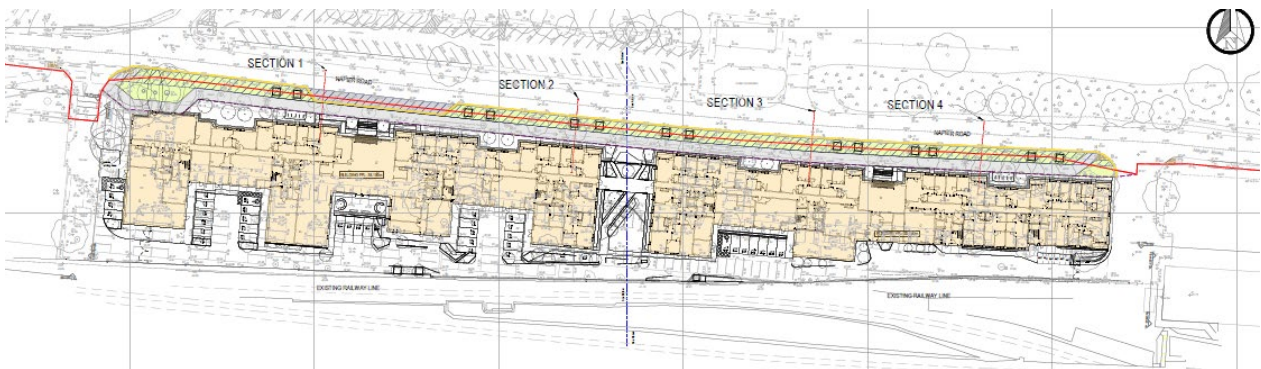


Figure 10 – Proposed land to be safeguarded for future MRT route



Figure 10 – Proposed land to be safeguarded for future MRT route

- 7.42 The proposed development would be set back from the Napier Road kerb line a minimum of 6m, with this set back increasing to up to 13m in places as a result of the road alignment and variations in the proposed building footprint. This is compared to the three existing office buildings at the site which are set back between 5m and 8m from the Napier Road kerb line. This is because in addition to safeguarding of land for the MRT route the minimum 6m set back is also proposed to incorporate widening of the part of the existing shared pedestrian and cycle route which runs across the front of the site along Napier Road and does not currently meet up to date highway design standards. This is shown as the grey line in figure 10 above, below the proposed safeguarded MRT strip of land. Napier Road provides the only access to and from the site and facilitates connection to the rest of the MOA and town centre to the east via Vastern Road or via the railway pedestrian underpass to the west which links to Kenavon Drive. The proposals would in

principle align with criteria ii) and iv) of Policy CR11 which seeks that development within the MOA helps facilitate greater pedestrian permeability and safeguards land for the MRT.

7.43 However, RBC Transport Officers have reviewed the proposals for both the safeguarding of the MRT land and for widening the existing shared footway/cycle and whilst the principle of what is proposed is supported, in line with the above policies, they have identified a number of technical failures of the proposals. This is in terms of the proposals not meeting national highway design standards and meaning that the application fails to demonstrate that the development would safeguard land for a future MRT route or facilitate greater pedestrian and cycle permeability within the MOA. This is contrary to parts ii) and iv) of Policy CR11 and Policy CR11i and the proposals would not align with these key strategic aims for development within the Station River/MOA. These are considered to be a significant shortfalls and disbenefits of the proposed development. The technical reasons as to why the proposals are considered unacceptable are considered in the Transport section of this report below. Should the proposed works to the shared pedestrian cycle route and to safeguard land for future MRT use have been considered to be acceptable then it would have been necessary to secure as part of a s106 agreement, for the applicant to enter into Highway Works agreements to carry out and provide the works to an agreed design and standard and for the safeguarded MRT land to remain as such in perpetuity.

7.44 Notwithstanding the above, in terms of pedestrian permeability, the development also proposes to provide a new pedestrian crossing on Napier Road to improve connectivity to Kings Meadow located directly opposite the site which is one of the major areas of Public Open Space within the Borough. Kings Meadow is very likely to be the primary area of public open space used by occupiers of the proposed development. There is no pavement to the north side of Napier Road opposite the application site and therefore the proposed pedestrian crossing would link directly into Kings Meadow. On the south side of Napier Road the crossing point would be accessed from the footway in front of Block C of the proposed development as shown in figures 11 and 12 below.



Figure 11 – Proposed pedestrian crossing

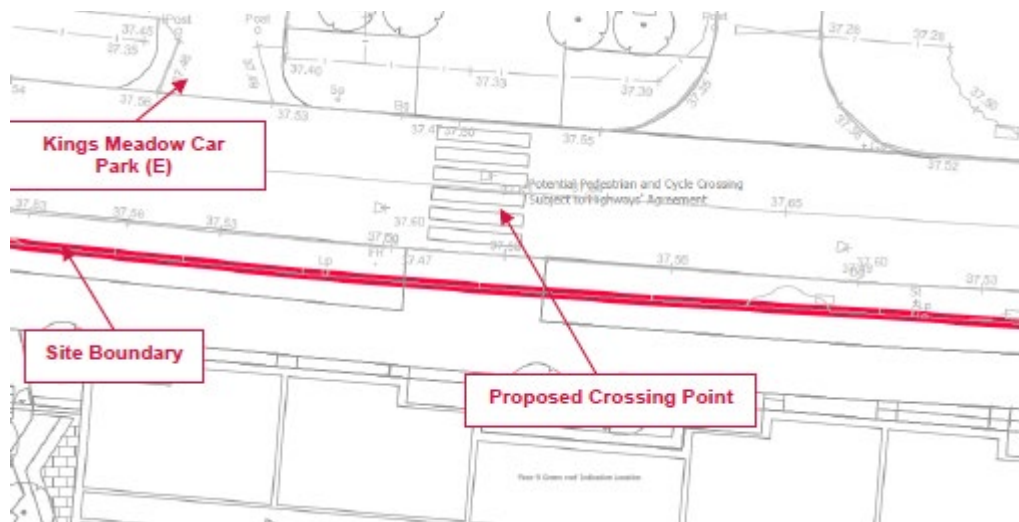


Figure 12 – Proposed pedestrian crossing

- 7.45 The principle of a new pedestrian crossing in the general location as proposed in the location above by the applicant is generally supported by RBC Transport and Leisure/Parks Officers. The full detail of the crossing design and connection into Kings Meadow is required to be submitted and agreed as part of the s106 agreement and also requires the developer to enter into appropriate highway works agreements to provide the crossing prior to occupation of the development in accordance with an approved specification. The proposed pedestrian crossing would be a significant benefit of the proposed development providing direct access to Kings Meadow Public Open Space and facilities within and facilitating a more direct route to access the Thames Path along the River Thames further north within Kings Meadow. This is considered of particular benefit given the current limited formal crossing opportunities on Napier Road to access Kings Meadow. The proposed crossing would align with criteria ii) of Policy CR11 in the development facilitating greater pedestrian permeability as well as Policy EN10 (Access to Open Space) which requires 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 off-road routes to parks.
- 7.46 The layout of the proposed development would retain the two existing vehicular access/egress points from Napier Road located at the western and eastern ends of the site which would provide access to vehicle parking and servicing areas which are proposed to be located to the rear of the site shielded by the proposed buildings and not visible from the public realm areas to the front of the site on Napier Road. Access to the site would be via the eastern access creating a one way loop with vehicles exiting the site as the western access as shown in figure 13 below.

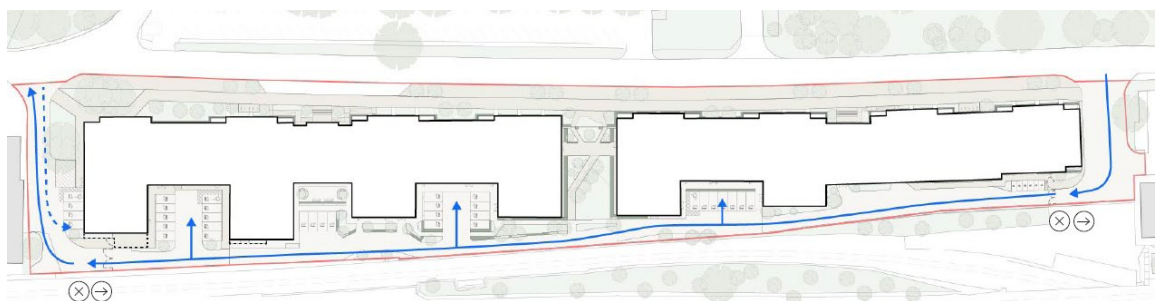


Figure 13 – Proposed vehicular access arrangements

- 7.47 Primary pedestrian access to the development would be obtained from Napier Road with two main access points proposed, one serving proposed blocks A and B and one serving proposed blocks C and D. The location of these entrances are shown by the red circles in figure 14 below. Secondary pedestrian entrances to the building would be located to the

rear of the site which are shown by the green circles in figure 14 below providing direct access from the vehicle and cycle parking spaces located to the rear of the site.

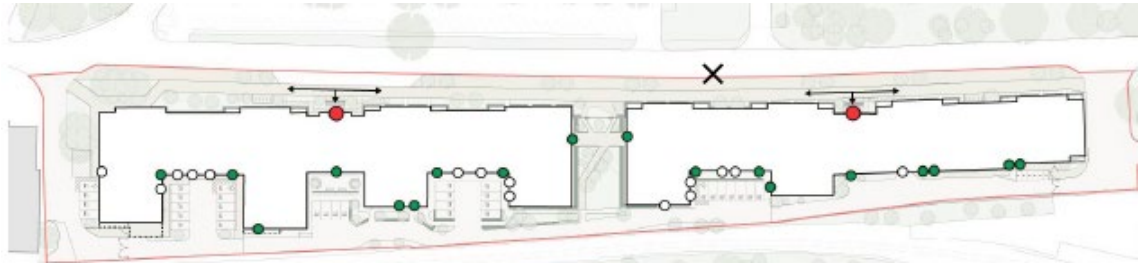


Figure 14 – Proposed pedestrian access arrangements

Pattern of Development and Layout

7.48 In terms of pattern of development within the site the proposed residential development forms a linear pattern and layout with four linked buildings proposed fronting onto Napier Road. The linear pattern of the development is informed by the long and narrow nature of the application site sandwiched between the railway line to the south and Napier Road to the north. In general terms the linear pattern of development reflects that of the three existing office buildings at the site. Existing and proposed site layout plans are shown below in figures 15 and 16.

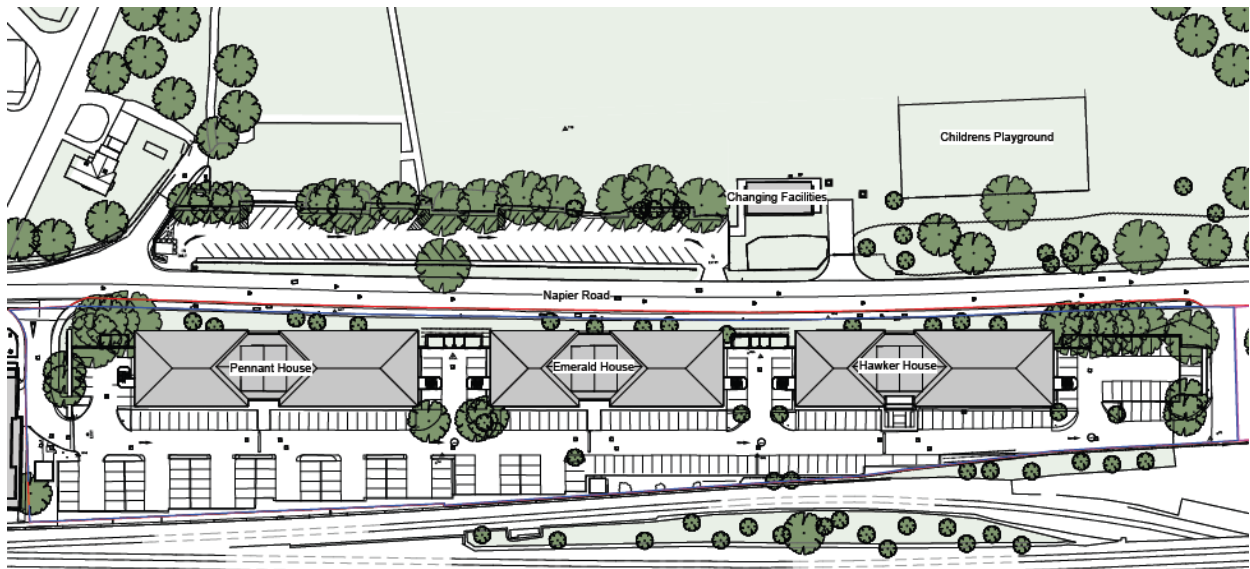


Figure 15 – existing site layout plan

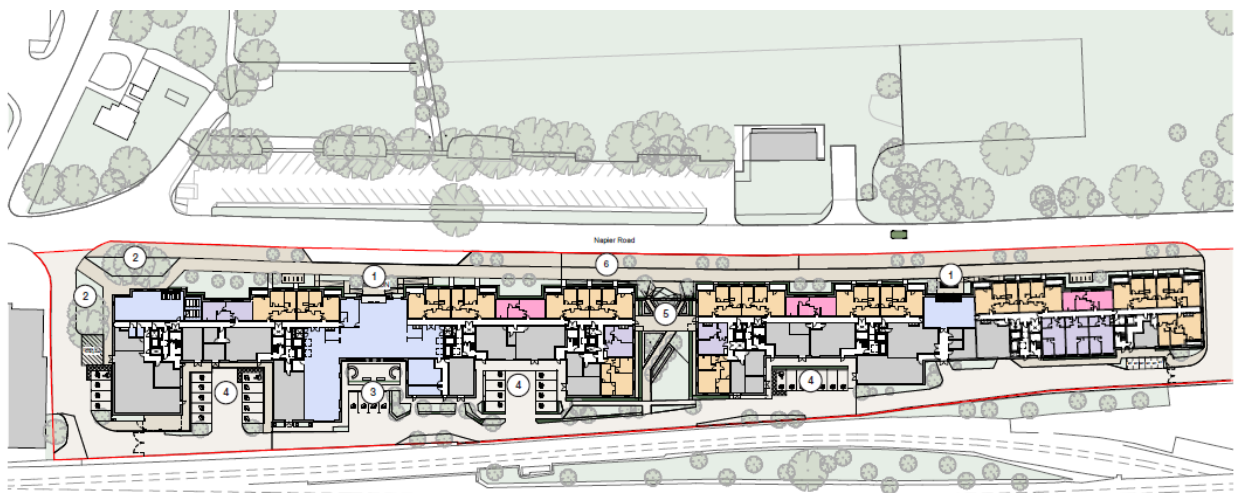


Figure 16 – proposed site layout plan

- 7.49 As can be seen in figures 15 and 16 above the proposals would result in a larger footprint of development compared to the existing buildings with the development extending closer to the east and west side boundaries of the site with the Network Rail depot and Thames Quarter respectively, and also closer to the rear (south) boundary with the railway line and bordering retaining wall/embankment on the parts of the site currently used for car parking for the existing office use. Unlike the three separate existing office buildings, the proposed development whilst described as four blocks, would all be linked at ground floor level resulting in a continuous block across almost the entire part of the site fronting Napier Road.
- 7.50 As discussed above, to the front (ie. north) of the site the proposed development is set back further from the Napier Road kerb line (between 6m and 13m) than the existing buildings (between 5m and 8m) as a result of the proposals, in order to safeguard land to the front of the site for the future MRT use and to provide a widened pedestrian/ cycle route. The application site tapers and become narrower from west to east, gradually reducing from a site depth of 50m to 30m, with the proposed building having a similar tapered layout and the building footprint also becoming narrower the further east in the site it extends (as is shown in figure 16 above). Notwithstanding this, the siting of the building is such that parts of the front elevations of proposed blocks C and D to the eastern part of the site would sit very close and in places directly abut the edge of the proposed cycle and pedestrian route along Napier Road, with limited or no set back or soft landscape buffer in front of the building proposed to be provided to this part of the development. Officers consider the relationship of blocks C and D with the front of the site and footway to be cramped. For reference, the existing buildings at the site and the eastern end of the site maintained a minimum 2.7m landscape buffer and set back from the existing narrower Napier Road footway (see photograph in figure 17 below)



Figure 17 – Existing site frontage with Napier Road

- 7.51 To the wider west part of the site, the proposed wider building footprint means that set back from the proposed widened cycle and footway to the front of the site remains limited for Block B. Proposed Block A at the far west end of the site provides the most relief between the building and proposed widened cycle and footway with a gap of between 3m and 4m facilitating provision of a more significant soft landscaped buffer area including more generous tree planting. This is considered to present a more spacious relationship between the building and the front of the site to this part of the site.
- 7.52 At its closest point the west flank elevation of the building (block A) would be located 15m from the side boundary with the Thames Quarter Site separated by the retained circulation road within the site exiting onto Napier Road as well as retained trees to this part of the site. The Thames Quarter building sits very close to the shared boundary set off by only 1m, such that separation from the west flank elevation of proposed Block A to the east flank elevation of the Thames Quarter building would be 16m. To the west of the site the flank elevation of the proposed building (block D) would be located 16m from the Network Rail depot separated by the retained western site access from Napier Road and internal circulation road to the site.

7.53 To the rear of the site the proposed buildings would project closer to the railway line and Network Rail retaining wall than the existing buildings. The existing buildings are located between 25m (at the wider western end of the site) and 10m (at the narrower eastern end of the site) from the boundary retaining wall (see figure18) whilst the staggered rear elevation of the proposed building would be sited between 10m and 5m away from the retaining wall (see figure 16 above).



Figure 18 – Existing view looking west and east from the rear car park showing the Network Rail retaining wall

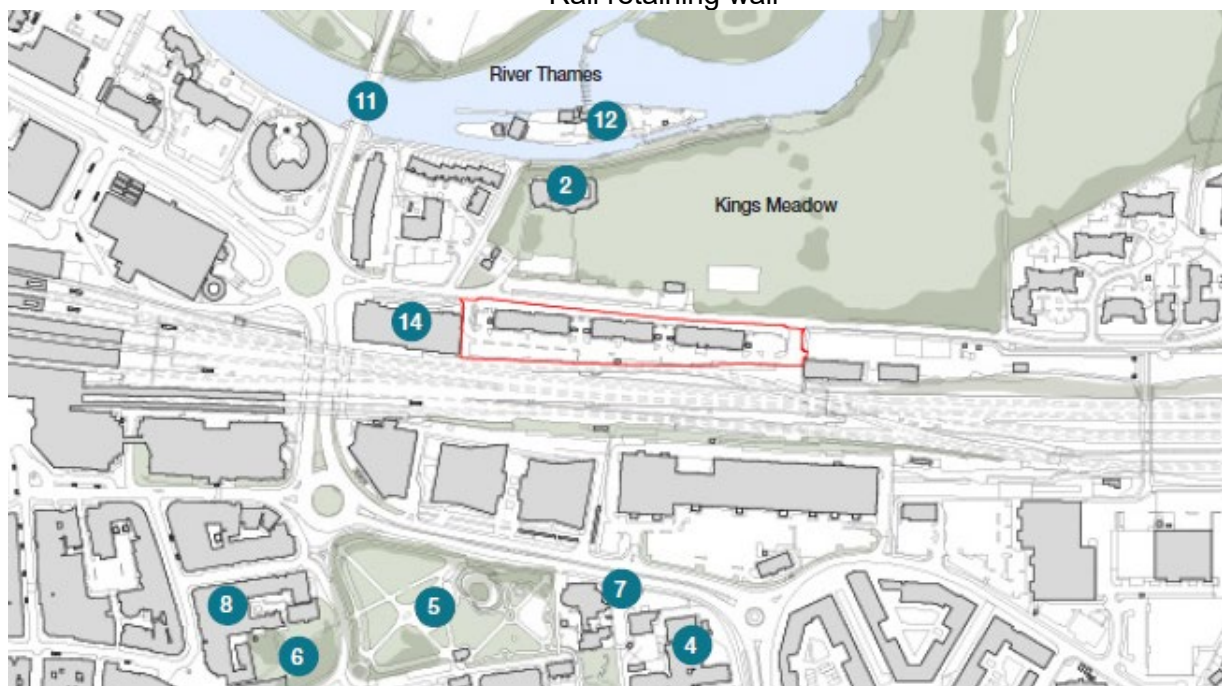


Figure 19 – Existing Urban Grain

7.54 As can be seen in figure 19 above, the character of the immediate area surrounding the site and this part of Napier Road is dominated by the Kings Meadow green open space. In terms of urban grain and pattern of development, the railway line to the rear severs connection with the Central Core of the Central Area to the south and the more grid-like pattern of development. The long and narrow nature of the application site and other side sandwiched between the railway line and Napier Road inevitably means a more linear pattern of development materialises here as evidenced by the existing office buildings at the site.

7.55 Along Napier Road generally, the development pattern and layout is mixed with the more modest lower density Network Rail depot building and yard to the east where built form is set back from the Napier Road and the side boundaries of the site but sited very close to the railway line to the rear. Albeit the Network Rail depot site also forms part of the same site allocation Policy CR11i as the application site and is also allocated for high density residential redevelopment. To the west the higher density Thames Quarter development is similarly sited close to the railway line to the rear but also to the side boundaries of the

site (including that shared with Napier Court) but provides a more generous set back from Napier Road.

- 7.56 Further to the east along Napier Road as can be seen in figure 19 above are Luscinia View flats and the large Tesco Extra superstore building whilst to the west along Vastern Road are Reading Bridge House, Clearwater Court and Norman Place which are medium/large block form developments similar to no.1 Forbury Place and Forbury Retail Park to the south directly the other side of the railway line. A separate planning application ref. PL/25/1706 has been submitted at the site of Forbury Retail Park for redevelopment of the site to provide up to 700 residential units and 3000m² of commercial floors. The indicative image shown in figure 20 below from the design and access statement for that application provides an indication of the nature of likely development layout. That proposal is an outline planning application with all matters reserved for consideration in detail at reserved matters stage expect for access arrangement so details of the proposals are not full defined at this stage but given the description of development and indicative image below it is considered fair to conclude that proposals here would be for high density medium/large block form development.



Figure 20 – Indicative proposals at Forbury Retail Park

- 7.57 Given the mixed pattern, grain and density of existing (and proposed) development near the site, officers to not consider the proposed layout and linear pattern of the proposed development to be out of keeping with its surroundings. However, officers do have concerns regarding the close relationship and limited set back of parts of the building from Napier Road and cramped nature of this layout.
- 7.58 Overall, from a layout perspective it is considered that the proposed buildings within the site would broadly integrate with the site's surroundings in terms of pattern and grain of development, but there are concerns that the limited set back of parts of the building from the Napier Road frontage would result in a cramped relationship. The proposed pedestrian crossing to Napier Road providing a direct link between the development and Kings Meadow is a public benefit of the development. However, under more detailed scrutiny, the proposals fail to demonstrate that they would safeguard land for future MRT use or facilitate greater pedestrian and cycle permeability along Napier Road to the front of the site. This is contrary to the strategic vision for the Station/River MOA set out under Policies CR11 and CR11i which seek to improve connectivity within the MOA and are considered to be significant shortfalls and disbenefits of the proposed development.

Scale, Massing and Townscape Views

- 7.59 The four proposed blocks of development would each have a height of 11 storeys. The blocks are all connected by smaller scale link elements creating one overall building. The central linking element that connects blocks A and B with blocks C and D is a single storey façade only element behind which would be the proposed on-site residents only 'pocket park accessible from within the site or from Napier Road. The linking elements connecting Blocks A and B would be 5 storeys in height. This is shown in the context of the Napier Road street scene in figure 21 below. Aside from the linking elements the development presents a consistent 11 storey height.

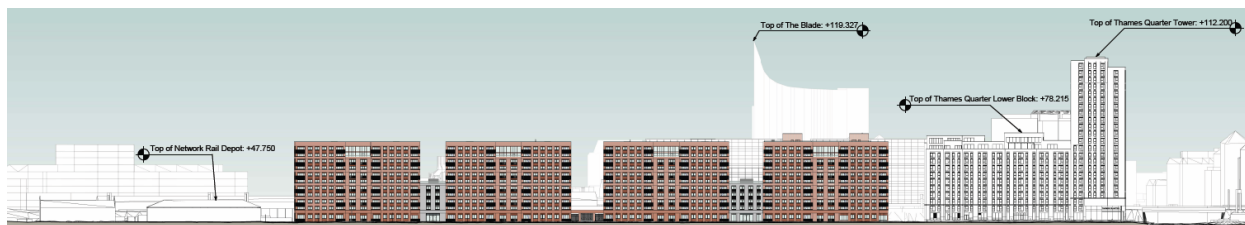


Figure 21 – Proposed development within Napier Road street-scene.

- 7.60 As can be seen in figure 21 above the 11 storey building height would be set just below the 12 storey height of the lower shoulder element of the adjacent Thames Quarter building to the west. The taller tower element of Thames Quarter is 23 storeys in height. Unlike the application site, Thames Quarter is located within the Station Area Tall Buildings Cluster which is one of three defined areas within the Central Area that are considered appropriate to accommodate tall buildings. This is defined by Policy CR10 which is clear that tall buildings will only appropriate within these specific areas. The application site is not located within a tall building cluster and therefore is not considered appropriate for tall buildings. Policy CR10 defines a tall building as 12 storeys for residential development and therefore the proposed development at 11 storeys is not considered a tall building in the context of the Local Plan (2019) but is the maximum storey height of a building that could be considered appropriate outside of the defined tall building cluster areas. When originally submitted, the planning application did propose Block A, located closest to Thames Quarter, at 12 storeys and therefore a 'tall building' (with blocks B, C and E at 11 storeys). Officers highlighted the clear conflict of the 12 storey element with Policy CR10 to the applicant and amended plans were submitted resulting in the current proposals which present a consistent 11 storey building height. It is pertinent to note that the above does not mean that a building of the maximum height appropriate for areas outside of the tall buildings area is automatically considered appropriate in terms of scale. It must be demonstrated in the context of the other relevant Local Plan policies that the development is appropriate, for instance, suitable architectural quality.
- 7.61 In this respect Policy CR11i specifies that for the wider site allocation area (which is formed from the application site at Napier Court and the Network Rail depot to the east) *The design must avoid detrimental effects on the adjacent Thames Valley Major Landscape Feature building heights should reduce from west to east across the site.* Kings Meadow opposite the site forms the south east edge of the wider Thames Valley Major Landscape Feature which extends west along the river towards The Warren in Caversham and also includes areas of green open space to the north such as Caversham Park. Primarily encapsulating land either side of the river the character the Major Landscape Feature is of flat and open lowland with much of the land forming part of the flood plain of the River Thames. Policy EN13 (Major Landscape Features) states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.
- 7.62 Apart from the linking elements connecting the four blocks the proposals maintain a consistent 11 storey height across the development site. Policy CR11i is not specific as to where or by how much building heights should reduce across the wider allocated site of which the application site forms just over 50% of in terms of site area, with the Network Rail depot site making up the rest of the allocation area. In this respect officers do not identify conflict with Policy CR11i in terms of the building heights reducing west to east across the allocation area and the proposed development would not prevent any future redevelopment of the Network Rail depot site from satisfying this requirement should that site come forward for development. Notwithstanding the above the appropriateness of the scale and massing of the proposed development still needs to be considered in the context of other relevant policies of the Local Plan (2019), including its impact upon Kings Meadow and the Thames Valley environs (i.e the Major Landscape Feature).

7.63 The design and access statement submitted with the application shows what indicative redevelopment of the entire site allocation area (the application site plus the Network Rail depot) could look like what is shown in figure 22 below and shows building heights within the Network Rail depot site reducing to satisfy the broad CR11i requirement for building heights to reduce across the allocation area from West to East. The applicant's view is that Kings Meadow can be broadly split into 3 zones defined by existing tree lines, and they suggest that a reduction in building heights could align with these zones. Figure 22 below indicatively shows lower building heights could align with zones 2 and 3 in front of the Network Rail site where Kings Meadow is deeper and has a more open character, with zone 1 in front of Napier Court characterised more by built development at Thames Lido and the Napier Road car park and nearby larger buildings to the west. Officers note this indicative masterplan approach but consider that this is not the only possible approach and that a proposal which incorporated building heights reducing from West to East within the application site would also accord with the requirements of Policy CR11i.

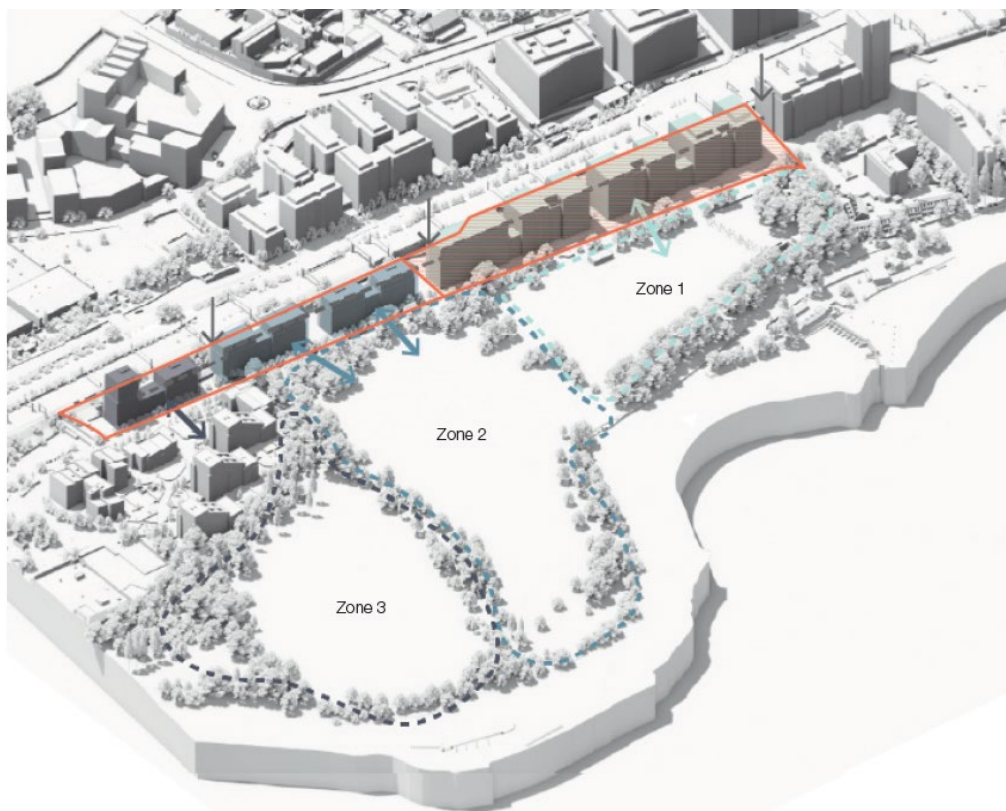


Figure 22 – Applicants indicative masterplan for the CR11i site allocation area

7.64 The application site is considered to be 'transitional' in a visual sense, being located at the north edge of the Reading Central Area where building heights and densities reduce away from the Central Core of the Central Area and then transition to the lower scale and more suburban development within Caversham further to the north of the railway line. However, as discussed above, the site is allocated for residential development within the Station River MOA where high density development is envisaged and where the supporting text to Policy CR11 identifies that current low density development represents inefficient use of one of the most accessible locations in the South East.

7.65 The scale of surrounding buildings includes the directly adjacent Thames Quarter development which is a large single block building that sits just 1m from the west side boundary of the application site at 12 storeys in height before increasing to 23 storeys further west along Kings Meadow Road at the Vastern Road roundabout. To the south of the application site, separated by the railway line, are three office buildings at Forbury Place which are of similar scale at between 8 and 10 commercial storeys. Forbury Retail Park is also located to the south of the application site on the other side of the railway line which as discussed above, contains large footprint but lower scale warehouse-style retail buildings but is currently subject to planning outline planning application ref. PL/25/1706

for a major mixed use residential led development for up to 700 dwellings with buildings ranging from 5 to 11 storeys. The Biscuit Factory development at Kenavon Drive further to the south east, also includes buildings up to 10 storeys in height. The contrast to the above is the Network Rail depot adjacent to the east of the site which contains a two storey building but as set out above is allocated for high density redevelopment under Policy CR11i.

- 7.66 Located 100m to the west along Napier Road at the junction the Vastern Road roundabout is the 11 storey Reading Bridge House office building and 6 storey Kings Meadow House (Environment Agency offices), whilst located 200m further to the west along Napier Road are the residential flats at Luscinia View which extend up to 9 storeys. There are some lower scale buildings nearby with a two storey detached dwelling at 22 Kings Meadow Road and the three storey townhouses at Kingfisher Place located directly to the north west of the application site on Kings Meadow Road, as well as the two storey Thames Lido building. However, with regard to the visual relationship of the proposed development with existing surrounding buildings and particularly its immediate neighbours it is considered that the 11 storey building height would integrate with the pre-dominant scale of buildings to this edge of the town centre location.
- 7.67 Whilst the scale of the proposals may be broadly in-keeping with that of surrounding buildings the relationship of the development with Kings Meadow directly opposite the site is also significant as one of the major Thames Parks and areas of public open space within the Borough, as well forming part of the Major Landscape Feature. Kings Meadow is also a designated Local Green Space (LGS) within the Borough as designated by Policy EN7Cd. LGSs are defined by the NPPF as green spaces which are in close proximity to the local community, special or significant to the local community in terms of beauty, recreational value, tranquillity or richness of wildlife and is local in character and Policy EN7 states that LGS's will be protected from development and proposals that result in 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.
- 7.68 The application explains that the proposals are based around providing a 'mansion block style' development. Mansion block development is characterised by series of buildings of rhythmic consistency and uniform massing, lining and forming a hard edge to, and looking out onto a park or open green space. Mansion block style developments historically date back to the Victorian and Edwardian era and typically consisted of residential apartment buildings of 4 to 8 storeys with grand and ornate facades looking out over town centre parks. The applicant provides examples (shown in figure 23 below) of more contemporary and larger scale mansion block style development that has occurred in London such as at One Hyde Park, Brent Cross and Kings Cross.



One Hyde Park, London – RSH-P



East Village, London – Eric Parry Architects



Brent Cross Town, London – Maccreanor Lavington



Brent Cross Town, London – Allies and Morrison



Brent Cross Town, London – Allies and Morrison



Flimsoll Building, London – David Morley Architects

Figure 23 – Mansion block development examples

7.69 The proposed development presenting four 11 storey blocks will have a significant visual impact on Kings Meadow as a result of its scale and location directly opposite the open space. The application is accompanied by a Townscape and Visual Appraisal which consider the impact of the development upon the Borough’s townscape, including upon a number of short, medium and long range views. Figures 24 and 25 below show existing and proposed views looking south from the centre of Kings Meadow.



Figure 24 – Existing view looking south from Kings Meadow



Figure 25 – Proposed view looking south from Kings Meadow

7.70 The proposals would result in a significant change in the relationship of the application site with Kings Meadow appearing visually prominent to views south from within Kings Meadow when compared to the existing two storey office buildings at the site. However as can be seen in figure 24 above given the modest scale of the existing buildings at the site the taller buildings to the south of the site on the opposite side of the railway line are already prominent to views centrally from within Kings Meadow where the 8 to 10 storey office buildings at Forbury Place can be seen, as can The Blade albeit this is more distant and Thames Quarter to the north side of the railway line is also visible to the east of this view. Figure 26 below shows a more distant existing view looking towards the application site from the Thames Path along the river where these existing buildings also appear prominent.



Figure 26 – View from the Thames Path looking towards the application site

7.71 Figures 27 and 28 below show an even more distant view of the application site looking south east from the Thames Path to the rear of Luscinia View flats. Similar to the more centrally located view from Kings Meadow shown in figure 25 above, this view shows that the level of change experienced to the more distant view would be lower with the roofscape of the buildings visible in the proposed view not significantly different to the roofscape of the office buildings to the rear of the application site on the south side of the railway line shown in the existing view. The view also shows that from this part of Kings Meadow; the scale of the proposed development would not appear out of keeping when viewed between the Luscinia View flats to the west and Thames Quarter to the east and the existing tree coverage within Kings Meadow provides a good degree of screening to more distant views from this location towards the application site.



Figure 27 – Existing view looking south east from the Thames Path behind Luscinia View flats



Figure 28 – Proposed view looking south east from the Thames Path behind Luscinia View flats

7.72 The visual impact that the scale of the development would have upon views and the open character of Kings Meadow is therefore considered to be tempered given this existing context resulting in a lesser degree of change from central and more distant northern parts of the area of open space. The visual impact of the development will be most pronounced when viewed directly from Napier Road itself and from the southern perimeter of Kings Meadow closest to the application site as shown in figures 29 and 30 below. From here, views of the neighbouring buildings to the south side of the railway line are still possible within the existing and proposed site context, but the immediacy of the relationship with the application proposal would be such that the proposed scale of the development will be significant in terms of visual impact. The scale of the proposals and visual impact from the close up views at a human scale is considered to exacerbate the officer concerns raised above in respect of the cramped layout and lack of setback of blocks C and D in relation to the Napier Road frontage.



Figure 29 – Existing view looking west along Napier Road



Figure 30 - Proposed visual looking west along Napier Road

- 7.73 Officers highlighted concerns to the applicant during discussions at both pre-application and at application stage regarding the lack of visual permeability of the development when viewed from the Kings Meadow and following the submission of amended plans the massing of the development was altered to reduce the scale of the linking elements between blocks A and B and between blocks C and D by two storeys (reducing from 7 to 5 storeys). This has facilitated greater visibility through the development allow views of the existing buildings on the south side of the railway line to be experienced from both the more distant views of the development from Kings Meadow and also from the close up views. This is considered to have resulted in some success in 'breaking up' the massing of the development which is considered important given the significant length of the block and creates greater visibility of sky between the individual blocks reducing visual dominance.
- 7.74 The proposed development has also been independently reviewed by Design South East (DSE) at both pre-application and application stage. Advice provided was that it is not possible specify a 'correct' height for the development, but they considered that the proposed scale was appropriate for the site's location and context. DSE also considered that the height of the proposals should be similar across the development and no higher than the shoulder element of Thames Quarter. In terms of the relationship with Kings Meadow DSE were supportive of the applicants proposed mansion block design approach and how the massing would contain Kings Meadow and of the approach to creating consistent edge and strong backdrop to the area of open space given its expanse.
- 7.75 In respect of more medium range views of the development, the applicant's Townscape and Visual Assessment (TVIA) identifies the development would be visible from Reading Bridge and Christchurch Bridge to the north east of the application site. This is shown in figures 31, 32, 33 and 34 below. From Reading Bridge, the development would sit in the backdrop behind the 3 storey townhouses at Kingfisher Place and the view from here would continue to be dominated by the 11 storey Reading Bridge House. From the more distant Christchurch Bridge, the development would be visible above the middle of Reading Bridge behind the large conifer trees that sit adjacent to the north elevation of Reading Bridge House, which also remains prominent in the foreground. Officers do not identify any significant harmful impacts to these views.



Figure 31 – Existing view from Reading Bridge



Figure 32 – Proposed view from Reading Bridge



Figure 33 – Existing view from Christchurch Bridge



Figure 34 – Proposed view from Christchurch Bridge

7.76 To the south, the applicant's TVIA identifies that there would be glimpses of the proposed development when viewed from Forbury Gardens across the railway line and between The Forbury office buildings as shown in figures 35 and 36 below. Given the separation between the application site and Forbury Gardens the visible part of the development is of diminished scale compared to the existing foreground buildings with sky still visible between them. Officers do not identify harmful impact to views from this location.



Figure 35 – Existing view from Forbury Gardens



Figure 36 – Proposed view from Forbury Gardens

7.77 Visibility from other identified medium range views of the proposals spread throughout the Borough including from Forbury Road and Mount Pleasant to the south, Kennetside footbridge to the east, Christchurch Meadows and Great Knollys Street to the west, The Horse Close (a residential cul de sac in Emmer Green) to the north are also considered within the Townscape and Visual Appraisal but visibility of the development would be limited within the context of the existing townscape and tree cover. A long range views is also provided from Dunsden Green further to the north beyond Caversham (in South Oxfordshire), which is a strategic view towards the Central Area identified within the Reading Tall Building Strategy (2008), but the distant nature of the view is such that no harmful impacts of the proposed development are considered to result with the taller Thames Quarter (tower) and The Blade being the prominent buildings within this viewpoint.

7.78 It is considered that the scale and massing of the proposals would sit appropriately within the prevailing scale and character of buildings that surround the site and within the wider Borough townscape. The more immediate impact of the scale of the development in relation to the open character of Kings Meadow and Napier Road to the north would, however, be more significant. The applicant's Townscape and Visual Appraisal considers that the proposed development would result in a high magnitude of change for Kings Meadow but concludes that the overall impact upon views and character of Kings Meadow would be 'moderate' and as a result of the high quality design approach consider this would be reduced to a neutral impact. The applicant's design approach, which is supported by DSE, is to provide a mansion block style development which creates a strong defined edge and backdrop to the open space. Officers consider that the success of such an approach will be dependent upon the design detail and treatment of external areas of the site in order to mitigate for the developments scale. This is considered below.

Building Design

7.79 The Reading Tall Buildings Strategy (2008) identifies that the limited combination of building heights and style along Napier Road, none of which are distinctive townscape elements, means that the area has an overall weak townscape character. Reflecting this, nearby buildings are a wide mix of contrasting styles and materials. Most prominent is Thames Quarter which presents itself with a simplistic form with grey and red brick slips

to the lower shoulder element closest to Napier Court and lighter grey/white tile slips to the tower element and uniform window proportions. Reading Bridge House opposite Thames Quarter is a 1960's flat roof office building with buff brick and concrete finish with green spandrel panels between windows. To the east of Reading Bridge House is Kings Meadow House (occupied by the Environment Agency) is an orange/pink brick flat roof building with arched windows and the more modest town houses at 6 Kingfisher Place which are mottled buff, orange and red brick with pitched slate roofs. Thames Lido opposite the application site within Kings Meadow is a smaller Grade II Listed Building, a predominantly red brick building incorporating a contemporary glazed extension. The blocks of flats within Luscinia View at the eastern end of Napier Road present buff brick elevations with blue and white render panels have distinctive blue sloping roofs.

- 7.80 To the south, the railway embankment presents an imposing plain buff brick retaining wall. To the other side of the railway line, the three modern office buildings at The Forbury have a contemporary and entirely glazed appearance. The Network Rail depot building adjacent to the application site is a modest two storey building with pitched tile roof, and white render/, timber-clad elevations. Kings Meadow dominates the character of Napier Road and has a strong open, green and tree lined character with small open air park in the south west corner directly opposite the application site fronting the road.
- 7.81 In keeping with the proposed mansion block typology and consistent scale and massing of the proposals the four blocks present a uniform grid like appearance showing a strong horizontal and vertical emphasis to the long front façade fronting Napier Road. This articulation is considered to tie in visually with the similar grid like appearance to the Thames Quarter shoulder element and continues this to the east along Napier Road as is shown in figure 37 below.

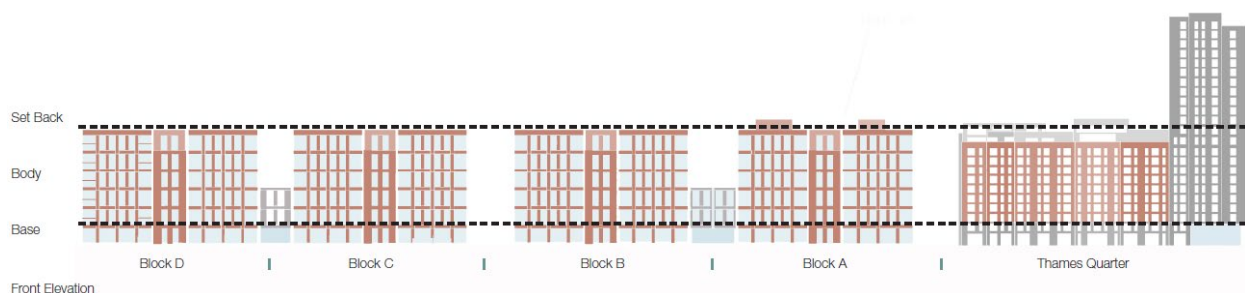


Figure 37 – horizontal emphasis of the design along Napier Road

- 7.82 The materials palette for the development references Reading's strong history and character of brick built buildings and in particular use of red brick. The proposed design incorporates varying brick bonds and mortars to provide variation, texture and visual interest to the elevations. DSE advice was that the proposals should maintain a consistent brick tone to align with the proposed mansion block typology and create a strong consistent backdrop to Kings Meadow. A red multi brick is proposed (see figure 38 below) which provides a mottled appearance with the bricks displaying varied darker and lighter red tones providing some variation to the building's appearance. A mixture of stretcher and 'stack bond' is proposed to the brickwork to distinguish between the vertically and horizontally of the grid appearance of the elevations. The proposed predominant red colour palette is also reflected with the proposed use of both darker red copper and lighter rose coloured aluminium window frames and reveals and copper red aluminium rail balconies. Varied use of both red copper and lighter rose coloured vertically ridged aluminium cladding and louvres are also proposed above and below windows (see figures 39, 40 and 41 below). The use of different red tones of brick and metal work give the building a distinctive appearance aligning with the proposed mansion block typology in creating a bold character.
- 7.83 Light grey brick, also typical of Reading, is proposed to the linking elements between the blocks which would assist in breaking up the horizontality and massing of the development. A light grey multi red brick is proposed which presents a similar mottled

appearance together with light grey windows surroundings, metal cladding panels and louvres, providing depth and texture to the elevations of the link elements as well (see figures 38 and 41 below).

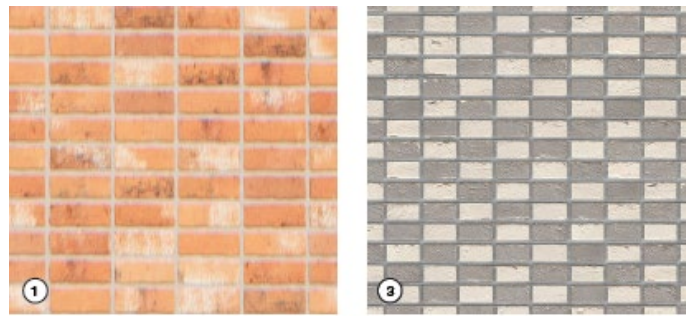


Figure 38: Proposed red and light grey multi brick

7.84 Whilst a uniform grid like appearance to the development is proposed there is variation to this within each of the blocks. Both the front and rear elevations of the building step in and out, resulting in depth and visual interest to these facades, whilst differing window proportions, balcony sizes and insets provide more intricate articulation to the elevations (see example bay study below in figure 39). The two uppermost floors of the development show greatest variation and incorporate significant recesses with windows to the recessed parts of the upper floor presenting full height glazed windows (see figure 40 below). Both aspects are also shown in context of the full height of part of the proposed front elevation in the visual in figure 41 below.



Figure 39 – Example bay study – lower floors

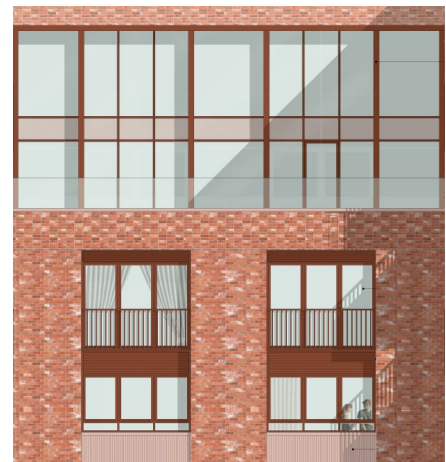


Figure 40 – Example bay study – top 2 floors

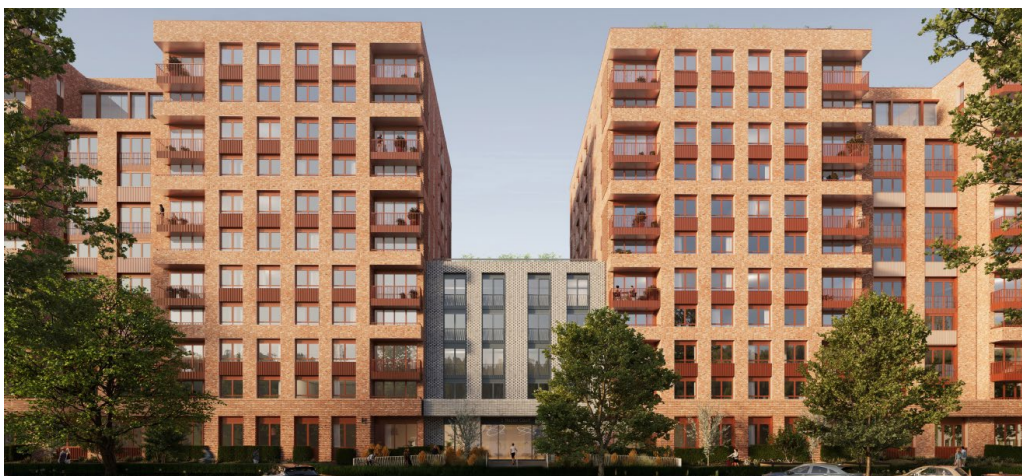


Figure 41 – CGI visual of front elevation

7.85 A criticism of the proposals from the application stage DSE review was that the articulation proposed to the front elevation was of the proposals did not turn the corner to the side

elevations including those internal side elevations to the individual blocks visible above the lower height linking elements. Amended plans were submitted to address this incorporating open sided balconies to the corners, greater varied window proportions to the side elevations and further varied use of brick bonds with feature panel bands of stack bond brick with alternating projecting courses providing varied texture to the brickwork. This is considered to be successful in continuing the grid like appearance and articulation of the front elevations around the side elevations of each of the blocks. This can be seen in figure 42 below. Similar articulation and details are proposed to continue to the rear elevation of the blocks (see figure 43 below).



Figure 42 – Visual showing side elevations of the blocks and close up of the feature brick panel bands of projecting brick courses



Figure 43 - Visual showing rear elevations

7.86 At street level the front elevation of the building towards Napier Road would present a continuous plinth/colonnade across the entire ground floor of the building linking all four blocks. This was introduced to the development by the applicant as a result of DSE advice who considered that this would create a coherent threshold to the development and give the building a strong street-level presence; more so than if the vertical elements of the grid pattern to the upper floors continued straight down to the ground level. The brick colour tone of the plinth/colonnade and its forward projection to different parts of the frontage would relate to the appearance and configuration of the corresponding upper floors of the building and would be constructed from the feature panel bands of stack bond brick with alternating projecting courses providing varied texture to the brickwork

and contrast with the upper floors. Officers consider that the plinth provides a strong street level presence and visual interest and is also successful at framing the entrances to the building from Napier Road. The visual in figure 44 below shows the plinth/colonnade from Napier Road.



Figure 44 – Visual showing the proposed ground floor level plinth/colonnade

- 7.87 The plinth also creates the entrance/exit point to the proposed residents' pocket park which would sit centrally within the development between Blocks B and C behind railings and gates allowing street-level visibility to the pocket park area (see figure 45 below). The two other entrances to the building from Napier Road (to blocks A and B and to blocks C and D) provide both stepped and ramped access to elevated ground floor of the building which is required as a part of the flood mitigation measures for the development (see figure 44 above).



Figure 45 – Proposed plinth/colonnade and access to residents pocket park from Napier Rd

- 7.88 Taking into account the independent design advice provided by DSE, officers consider that the proposed building presents a suitably high standard of design quality as required by Policy CC7 and would also align with criteria iii) of Policy CR11 which states that within the MOA developments should front on to and provide visual interest to existing and future pedestrian routes and open spaces. However, given the concerns set out above in respect of the layout and massing of the development impacts upon views and character from Napier Road and the closest parts of Kings Meadow, it is also important to consider the treatment of external areas within and surrounding the site to fully understand the relationship that the development would present to these areas. The following section of this report will consider the design of external areas and public realm and open space matters.

Design of External Areas, Public Realm and Open Space

- 7.89 Napier Road is the only route to and from the site and together with Kings Meadow is where views of the development would be primarily experienced. Treatment of the external areas within the application site to the building's frontage with Napier Road will therefore be important in creating a pleasant residential environment but also in attempting to mitigate the scale of the development and its limited set back from Napier Road. The design proposals for the application site frontage are led and also constrained by the requirement for the development to safeguard land to the front of the site for possible future provision of an MRT route along Napier Road, as well as the proposals as part of the application to widen the existing shared cycle and footway that runs along the front of the building to bring this up to current standards. As discussed above, these elements of the proposal are welcomed in principle, but the application does not demonstrate that they can actually be achieved whilst meeting national highway design standards. Notwithstanding this, these proposals do also reduce space within the site frontage for meaningful hard and soft landscaping. The proposed siting of the building with limited or no set back from the cycle and footway at 'pinch-points' exacerbates this issue and is a function of the constrained nature of the site frontage with Napier Road and the unwillingness of the applicant to adjust the building's footprint, as advised by officers.
- 7.90 To the front of the site the proposed safeguarded MRT land, widened shared cycle, and footway would be surfaced in black tarmac with limestone chippings. This material treatment is required in order to meet adoptable highway standards. The entrances to the buildings and pocket park including steps and ramps would be demarcated with a change in surfacing to light grey block paving incorporating tactile elements for inclusive access. Soft landscaping to the front of the application site is set within the thin strip of land between the building and the edge of the proposed widened shared cycle and footway. As discussed above this strip of land is widest at the west end of the site in front of Block A at around 4m but the width of this strip gradually reduces to the east in front of Blocks C and D where in parts the building directly abuts the southern edge of the cycle and footway with no scope for meaningful soft landscaping. The staggered and varied footprint of the front elevation of the building create a series of recessed bays and these areas can be soft landscaped.
- 7.91 The soft landscaping proposals are shown in figure 46 below and consist of varied ornamental planting beds along the strip of the land and recesses to the front of the building as well as around the building entrances. A 1.7m high hedgerow is also proposed along the entire building frontage following the building's staggered footprint. The coloured dots in figure 47 below show proposed tree planting to the frontage which includes 16 trees of 2 species (*Amelanchier arborea* 'Robin Hill' and *Cornus kousa varchinensis*). Whilst trees are supported in this location, the RBC Natural Environment Officer raises concern over the proposed species which are relatively small and would be dwarfed by the scale of the proposed building. It is considered that taller and narrower trees would be required in this location to provide meaningful softening to the visual impact of the development. In terms of existing trees 6 'B' category trees (of moderate quality), 4 'C' category (of low quality) trees are proposed for removal to the Napier Road frontage to accommodate the proposed development, as well as full and part removal of 2 'B' category groups and 1 'C' category group (a mixture of beech, alder and birch, rowan and English oak species). 5 'B' category protected trees (all Norway Maples) located at the western end of the site frontage are proposed to be retained as part of the development. Loss and retention of existing trees is considered in the Natural Environment Section of this report below.
- 7.92 14 trees are also proposed to be provided in intervals along the strip of land safeguarded for the MRT. As a result of the presence of underground services under this strip of land trees in this location are proposed set in extra-large planters. This planting would add additional softening and depth to the landscaping which combined with the trees proposed adjacent to the building would result in trees set either side of the widened shared cycle and footway creating a pleasant route past the front of the building. Albeit should the MRT

proposals ever come to fruition then the trees along this strip of land would be lost. Therefore, this planting to the MRT strip of land cannot be considered on the basis of retention in perpetuity but would provide visual mitigation for the length of time it would remain in place.

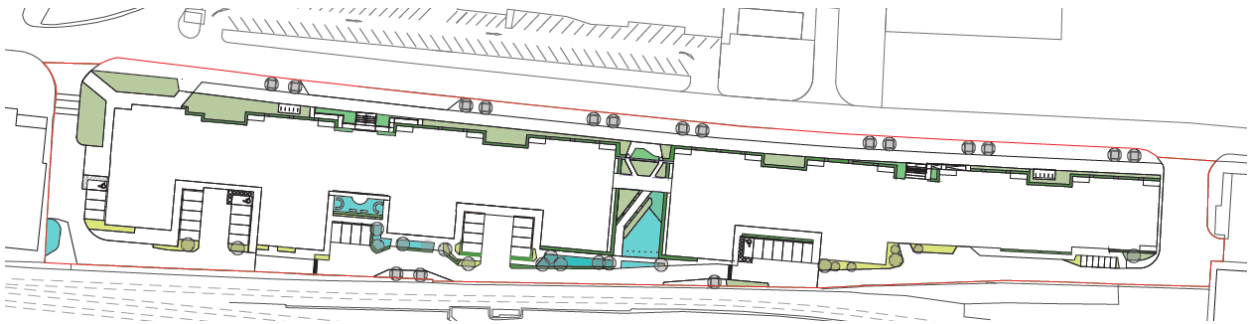


Figure 46 – Proposed soft landscaping



Figure 47 – Proposed tree planting

7.93 Centrally within the development between blocks B and C an open air 'pocket park' is proposed which the application describes as a green heart to the development (see figure 45 above). This is a 300m² area of open space containing amenity grass, ornamental shrubs, tree planting, incidental children's play equipment and seating. The pocket park would be for residents only accessed via secure fob access or internally from within the development. However, sited in a 16m wide gap between the 11 storey elevations of blocks B and C the pocket park will suffer from overbearing impacts from the scale of built form to either side.

7.94 For similar reasons the pocket park would also not be optimally served in terms of access to sunlight. Receipt of sunlight to the pocket park (and other outdoor amenity areas within the development) has been considered within a daylight and sunlight assessment submitted with the application. This assessment has been independently reviewed by the BRE who set the national guidance for such matters and their advice is that receipt of sunlight to the pocket park and all external amenity areas within the development is that the development would meet minimum requirements (i.e. receive at least 2 hours of sunlight at the spring equinox (21st March) which is the time most representative of average solar conditions throughout the year). Officers attach limited benefit to the value of the pocket park for future residents given concerns about its usability and quality of the space that would be provided. Set behind railings the pocket park would also have limited visibility from Napier Road. Other than facilitating a gap down to ground floor level at the centre of the development, and notwithstanding the green wall proposed by climbing plants to the entrance railings, the fact that there is a park and area of open space would not be readily observable from outside of the site and has limited benefit in terms of softening and mitigating views of the development and the scale of the proposed buildings.

7.95 How external areas to the rear of the site are treated is also considered key to the development given the significant constraint of the railway line and its retaining wall. The area to the rear of the building is proposed to be multifunctional providing a secure barriered one way route for vehicles providing access to 33 vehicle and 6 motorcycle resident parking bays and for servicing vehicles accessing bins stores and collection

points. The area is also proposed, in addition to the pocket park, to function as a communal amenity area for residents, is described as a 'play street' by the applicant and includes a 100m² courtyard garden with seating, other sporadic small areas of amenity grass, shrub planting, planting of 26 trees, play along the way equipment and seating areas. Block paving hard surfacing is proposed to demarcate the shared function of the area; hedgerow is also proposed to demarcate the community areas from the road and parking space and planters set upon granite sets are proposed as traffic calming measures. Figure 48 below shows the proposed courtyard garden area to the rear of Block B.



Figure48 – Proposed courtyard garden to the rear of block B.

7.96 The retaining wall to the railway line is tallest at the western end of the site to rear of Block A at around 5.8m and gradually reduces in height to around 1.8m to the rear of block D at the eastern end of the site. Given the height of the retaining wall particularly to the rear of Blocks A and B where the courtyard garden is proposed officers have concerns regarding how confined this area would be and the visual quality of the environment that would be created with the space set between the retaining wall and 11 storey rear elevations of the proposed development as well as the dominance of hardstanding. The varied footprint of the building to the rear means separation between the rear of the building and retaining wall ranges from 20m to 6m. The shared relationship with the road, car parking and servicing route exacerbates these concerns. Whilst the proposed tree planting, play equipment are welcomed officers attribute limited benefit to the treatment of external areas to the rear of the site which do little to mitigate for the scale of the proposed building and its relationship with the railway line retaining wall. It is understood that Network Rail would not permit alterations such as addition of a green wall to the retaining wall given it is an infrastructure asset which they must be able to access and maintain.

7.97 A large paved 530m² communal amenity terrace area is proposed to the roof of Block A (see figure 49 below), containing seating, tables, incidental furniture (such as table tennis tables) and soft landscaping elements set behind a 1.5m high parapet wall to the perimeter of the terrace. The terrace area is considered to create a high quality external environment within the development for future occupiers but would not be readily visible from outside of the application site. Flat roof areas to the other blocks would provide biodiverse green roof areas.

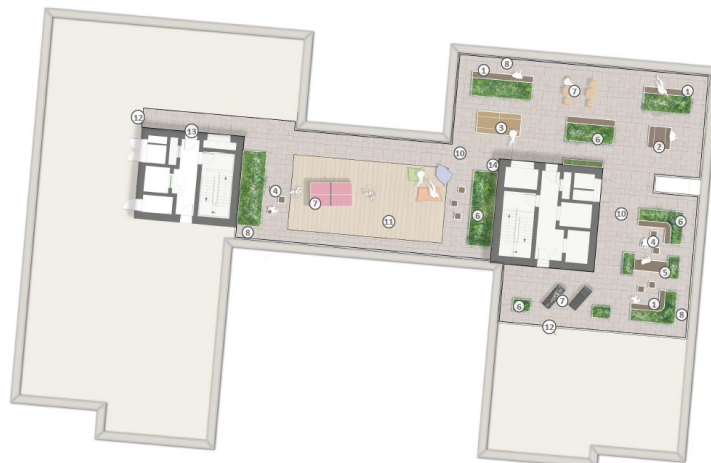


Figure 49 – Proposed roof terrace
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- 7.98 As is the case with many high density developments within the Central Area there is often limited open space on site for residents, including space for provision of play facilities and are reliant upon roof terraces or courtyards. As discussed above the proposed development does incorporate a range of on-site outdoor spaces for residents with the roof terrace area being a particular benefit in this respect, however officers have concerns regarding the usability of the ground level pocket park and courtyard garden and how pleasant these areas would be for future occupiers.
- 7.99 Policy CR3 (Public Realm in Central Reading) requires that proposals for new development in the Central Area make a positive contribution towards the quality of public realm in the Central Area, including open space. Policy EN9 (Provision of Open Space) is clear that public open space should be publicly accessible so whilst the on-site outdoor residents only area are of benefit for residents their function is limited in terms of recreation, and the development is also expected to provide and contribute to publicly accessible open space and play facilities. More specifically Policy EN9 requires that new development makes provision for appropriate open space based on the needs of the development, either through on or off-site provision, contributions or improvements to existing leisure and recreation facilities.
- 7.100 With the proposed introduction of a significant residential use, additional creation or improvement to existing off-site open is considered to be necessary to serve the needs of the development and proposed residential occupiers. Such wider open space provision or improvements is also required to mitigate for the failure of the proposals to provide any formal children's play facilities (beyond those ad hoc play along the way facilities proposed within the on-site pocket part and courtyard garden) whilst private balconies within the development are primarily only provided for flats to the corners of each block, which as per Policy H10 (Private and Communal Outdoor Space) heightens the importance of alternatives to the proposed on-site communal facilities for future occupiers in terms of access to open space. In this instance future residents are very likely to look to Kings Meadow for their open space and outdoor recreation needs. Furthermore, improvements to off-site open space, and in particular Kings Meadow given the direct relationship with the application site, could also incorporate additional landscaping to provide some visual mitigation for the development given the limited landscaping proposed to the building frontage as discussed above.
- 7.101 Following discussions with RBC Parks and Leisure Officers a contribution of £500,000 towards improvements to the existing Kings Meadow children's play area for renovation of the play area, improvements to its accessibility and creation of an additional section within the play area for toddler & junior age ranges is considered to be justified. Given the direct relationship of the development to Kings Meadow the improvements to the existing play area would benefit future residents of the development. In conjunction with the proposed new pedestrian crossing to be secured as part of the application as discussed above, the proposals would provide enhanced access to Kings Meadow Local Green Space (Policy EN10) and the proposed enhanced play area. Both these elements of off-site works are considered to be benefits of the proposed development and would ensure compliance with Policies (EN9, EN10, CR3). Creation of more direct access into Kings Meadow and the enhanced play facilities would create greater connection, both in terms of pedestrian links but also visually, of the development to Kings Meadow. Given the limited extent of soft landscaped public realm to be provided as part of the development to the Napier Court frontage of the proposed building, creation of a direct link for residents into one of the Borough's major Local Green Spaces and areas of Public Open Space would be a valuable option for future residents in terms of quality of residential environment to be created by the development as well as for members of the wider community seeking to access Kings Meadow from this part of Napier Road. At the time of writing this report the applicant has not confirmed agreement to provide the necessary contribution towards Kings Meadow Play Area or the pedestrian crossing. Failure to do so would result in conflict with Policies EN9, EN10 and CR3 and the proposals would be considered to fail provide appropriate provision towards open space and access to open space to serve the needs of the development.

Heritage Matters

- 7.104 Kings Meadow Swimming Pool (known as Thames Lido), a Grade II Listed Building is the closest heritage asset to the application site. The application is accompanied by a heritage statement which notes this. The heritage statement also references several heritage assets to the south of the railway line, including Forbury Gardens a Grade Listed Registered Park and Garden and the Grade I Listed Abbey Ruins. However, the statement concludes that given these heritage assets do not derive their significance (or setting) from Napier Road or Kings Meadow, there would be no loss of heritage significance as a result of the proposed development. The RBC Conservation Officer agrees with this conclusion also noting there would be no direct impact of the development on these heritage assets to the south of the railway.
- 7.105 In respect of Thames Lido the heritage statement identifies that the Grade II Listed Building's significance derives from the building being an extremely rare and very fine example of a complete Edwardian lido and being a communally important facility with a local history going back to c.1860 and that in terms of setting it has contextual relationships with the River Thames and King's Meadow, but that it does not derive any significance from Napier Road or Napier Court. As such the applicant's Heritage Statement concludes that no harm to the Grade II Listed building's significance or setting would result from the proposed development. An addendum heritage note provided by the applicant considers that whilst the Lido has a meaningful setting relationship with Kings Meadow and the development can be seen from the Kings Meadow, those two interactions are discrete and do not harm the significance of the Lido.
- 7.106 The RBC Conservation Officer disagrees with the above findings and considers the large scale of the proposals compared to the existing modest buildings at the application site together with the direct relationship the proposed development would have with Kings Meadow would result in harm to the Listed Building's setting. The Conservation Officer concludes that the harm would be less than substantial at a low level. Officers have considered the impact on the lido and given the separation to the proposed development, located 90m to the south on the opposite side of Napier Road and separated by Napier Road car park, the lido car park and an existing tree line to the north of the car parks, are of the view that the setting of the lido would not be materially affected. In terms of the setting the lido derives from within Kings Meadow, this would remain as existing, benefiting from the surrounding open parkland setting. As such, officers conclude that the setting of the Grade II Listed lido building would be preserved and no conflict with Policy EN1 is identified.

Design considerations and effect on character Conclusions

- 7.102 In overall design terms officers conclude that the scale and massing of the proposed development would sit appropriately within the prevailing scale and character of buildings that surround the site and within wider townscape views. The proposal would also align with the principles of the type of high density development sought to take place within the Station/River MOA and the architectural detail to the building is considered to be of good quality. However, officers have identified concerns regarding the proposed direct relationship of the development with Napier Road and with the closest parts of Kings Meadow designated Local Green Space also forming part of the Thames Valley Major Landscape Feature. Officers' concerns are in respect of the visual impact of the development as a result of its siting and scale with very limited set back from the proposed footway and cycle way to the front of the site provided for parts of the building and how this would impact on the quality of environment that would be created to the front of the site along Napier Road, particularly given the presence of a high-density residential use of the site. The siting of the building and its scale in relation to the railway line retaining wall/embankment to the rear of the site also create some similar issues in respect of the quality of the communal spaces to be created to the rear of the development.

7.103 The close proximity of parts of the building and pinch points created to the Napier Road frontage also create a number of conflicts with the landscaping and public realm aspects of the proposals to the site frontage due to lack of adequate space for these elements between the building and the footway/cycleway to the front of the site. This adversely impacts upon the ability of the development to provide meaningful soft landscaping (including tree planting) to all of the site frontage, means that the proposed footway/cycleway is not provided to an acceptable standard, and that the proposals fail to adequately safeguard land required for future strategic MRT/BRT routes within the Borough.

7.013 The proposed long street-scene sections, site layout plans and CGI visuals in figures 49A to F below show the relationship of the building with Napier Road and the closest part of Kings Meadow. Figures 49C and 49E show the relationship of blocks A and B with Napier Road where the development is considered to provide a reasonable relationship with the footway/cycleway to the front of the site with small, landscaped buffer areas with existing and proposed trees to be accommodated between the front elevation of the building and the footway/cycleway. However, the RBC Natural Environment Officer objects to the application due to the proximity of proposed Block A to five existing protected Norway Maple trees that are proposed to be retained as part of the development (shown in the CGI visual in figure 49E), and considers the close relationship would result in harm to the root protection areas of these trees and future pressure to prune (this is discussed in more detail in the Natural Environment Section of this report below). The space that would be provided to the front of the site to accommodate landscaping, the footway/cycleway and land to be safeguarded for future MRT/BRT is shown by the vertical dotted line to the front of the building which delineates the edge of the strip of land proposed to be safeguarded for the MRT/BRT in figure 49A. Notwithstanding, the conflicts with the five retained TPO trees the relationship to the front of Blocks A and B (the western end of the site) is considered to provide an adequate set back and spaciousness to mitigate for the 11 storey scale of the proposals.

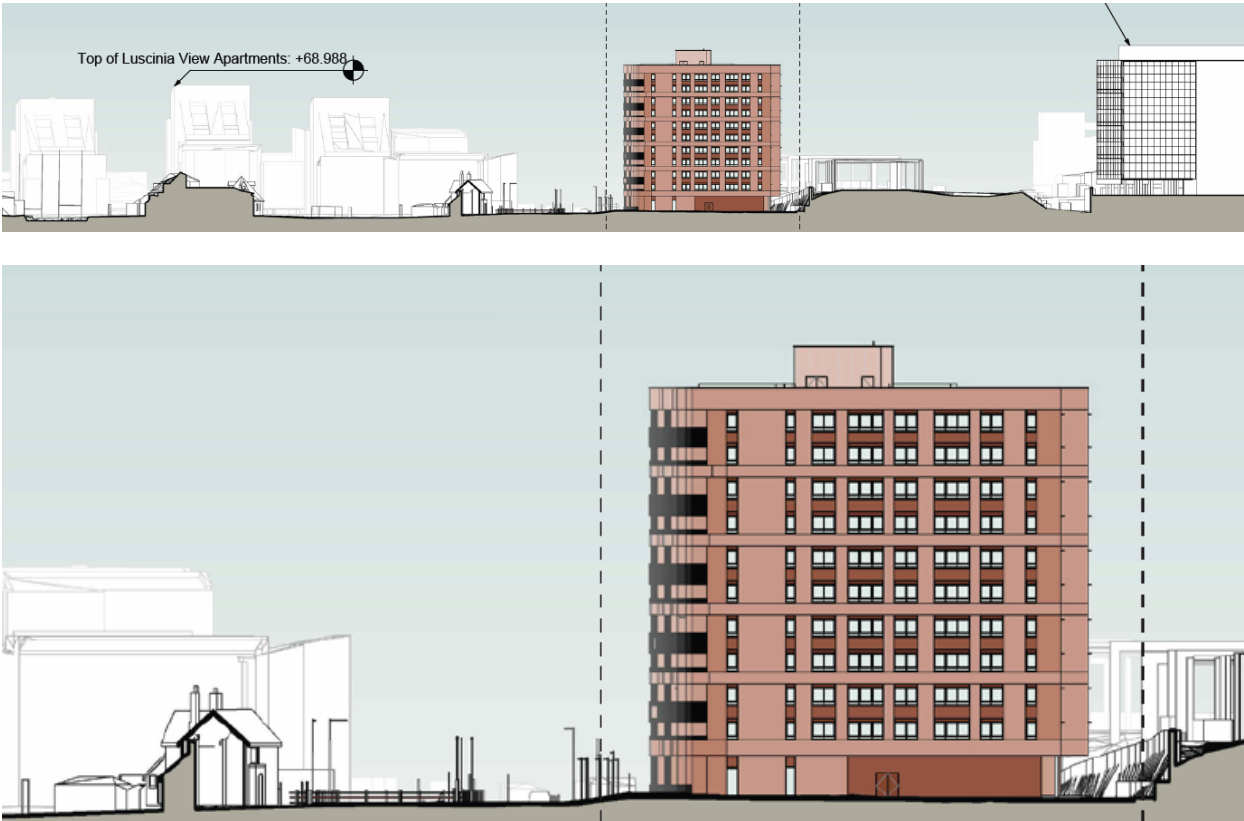


Figure 49A - Proposed Napier Road street-section looking east

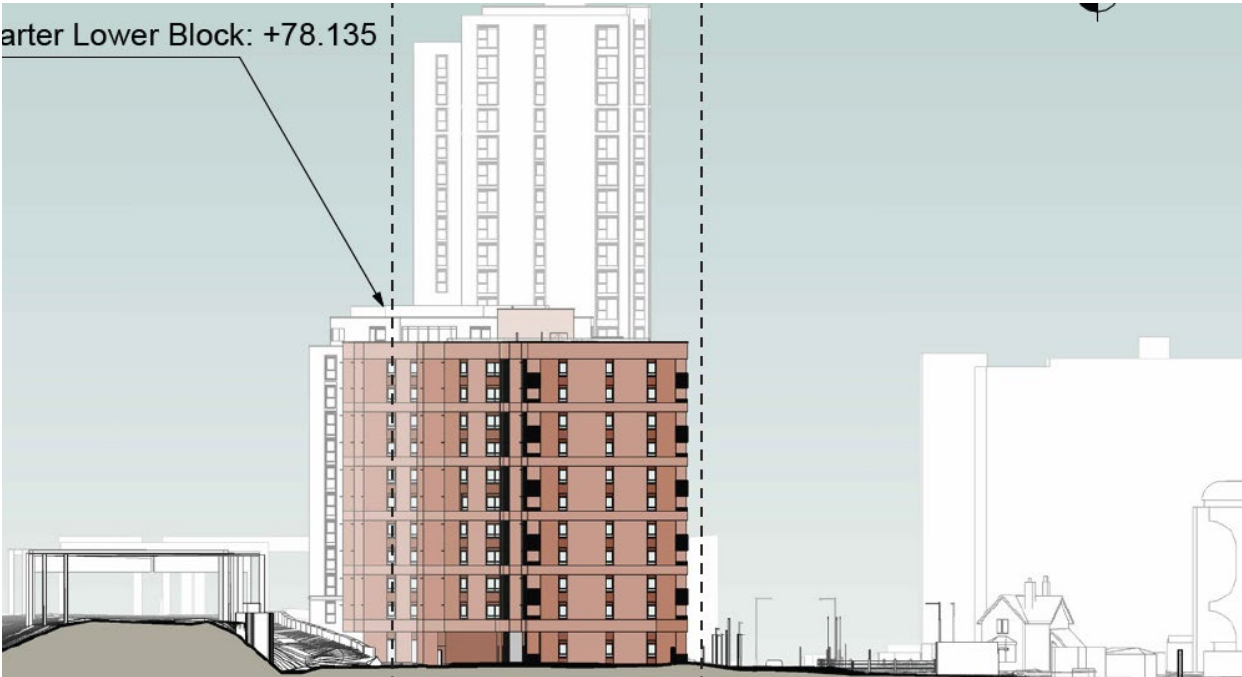
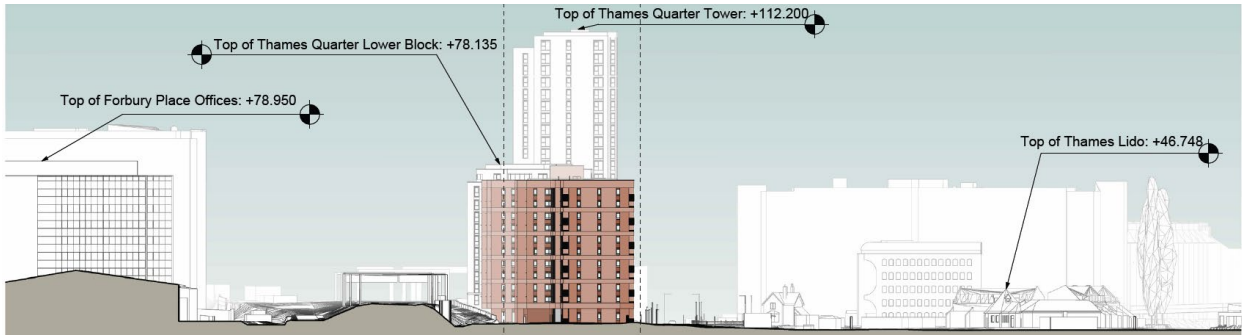


Figure 49B – Proposed Napier Road street-section looking west

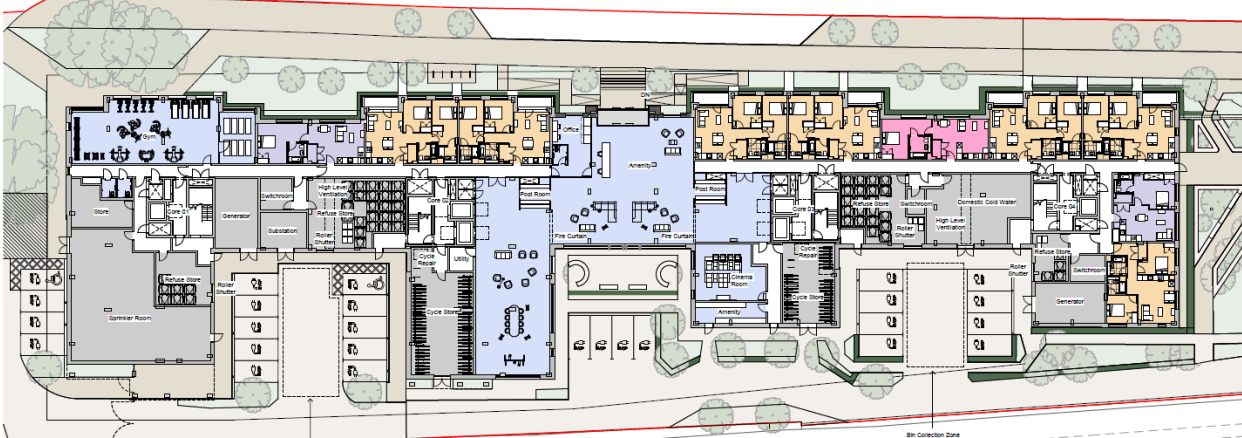


Figure 49C – Layout of proposed Blocks A and B

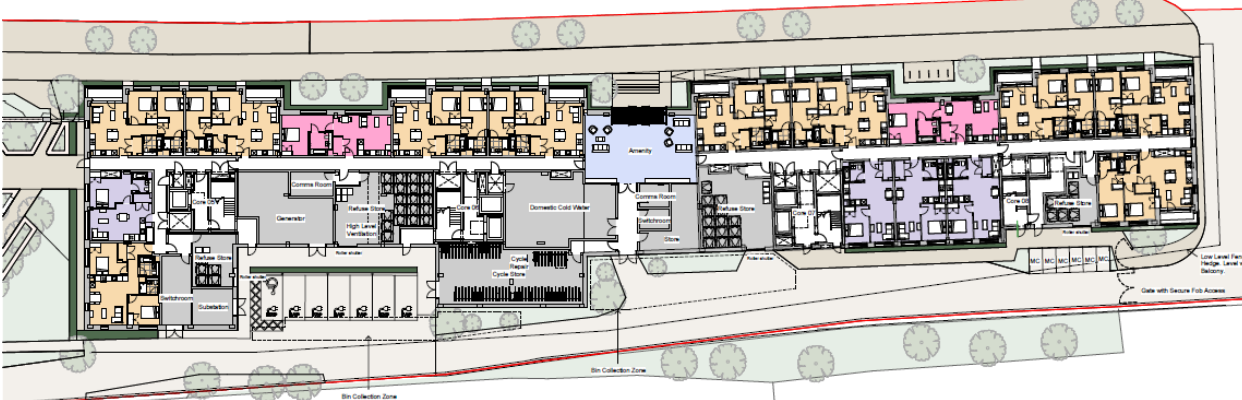


Figure 49D – Layout of proposed Blocks C and D



Figure 49E – Proposed Napier Road CGI visual



Figure 49F – Proposed Napier Road CGI visual

7.104 The proposed arrangement for Blocks A and B is considered to share some similar characteristics with that of the example Mansion Block developments discussed and shown in figure 23 above which predominantly incorporate landscaping, including tree planting to the front between the buildings and the road, with areas of green open space set beyond the other side of the road providing expansive views. At this part of the development officers consider that the proposals do adequately achieve the mansion block style of development that is being proposed. As discussed above, the proposals would have a significant visual impact upon views from Napier Road and the closest parts of Kings Meadow as a result of the immediacy of the relationship, but in part this is as a consequence of the proposed mansion block approach which by its nature looks to provide a hard and strong edge to facing areas of open space. To this part of the site it is considered that the set back of the building and landscaping to the frontage provides adequate buffer and spaciousness to accommodate the 11 storey scale of the proposals and provides an adequate balance between this and providing a strong edge to Kings Meadow such that it avoids detrimental visual overbearing impacts upon the public realm

areas to Napier Road and from within Kings Meadow. The frontage relationship here reflects that of the Napier Road frontage of Thames Quarter, albeit the Thames Quarter building is set back in the site a further 2.5m compared to block A of the proposals so does present an even more spacious relationship with Napier Road.

- 7.104 The vertical dotted line shown in figure 49B above together with the site layout plan in figure 49D and CGI visual in figure 49F show how the space that would be provided between the front of the building and the Napier Road frontage reduces to eastern part of the site for proposed blocks C and D. Here much more limited frontage landscaping is able to be provided and in parts just a narrow strip of hedgerow between the building elevation and edge of the footway/cycleway. Some tree planting is still able to be provided but only where the sections of the frontage where the building line recesses. As a result of this it is considered that this part of the development falls short of providing the landscape buffer that would be expected for a mansion block proposals. This lack of set back and landscaping to the front of blocks C and D means an appropriate balance between providing a hard edge to Kings Meadow and softening of this with a landscaped buffer is not adequately achieved and presents as a cramped overdevelopment of this part of the site. However, given the open expanse of Kings Meadow and close proximity of Napier Road car park as well as the presence of large buildings nearby at Thames Quarter, Kings Meadow House and Lucinia View with close relationships to the open space which can be seen in the sections in figures 49A and 49B officers do not go as far as to conclude that blocks C and D of the proposals would be so imposing as to be considered overbearing or harmful to the character of Kings Meadow or Napier Road. Tree planting is proposed in planters to the MRT strip which provides some additional softening of the site frontage, remembering that this mitigation will only be present for a temporary basis.
- 7.105 The limited space proposed to be provided to the front of blocks C and D and perceived overdevelopment also exacerbates the technical highway design standards failures in respect of the proposed widened footway/cycleway to the front of the development and in respect of how the development propose to safeguard land for future MRT/BRT use with there being too little space to the front of the site to adequately deliver these infrastructure measures to an acceptable standard. The failures are discussed in more detail in the transport section of this report below.
- 7.106 Expansive views over open space are a key characteristic of mansion block developments and such a relationship inevitably means that the open space forms a key part of the character of such development and their attractiveness. However, it is not considered that such a relationship should be what a development relies upon entirely in order to provide good quality aspect, outlook and landscaped setting. In this respect it is considered that Blocks C and D would be borrowing more aspect, outlook and landscape setting from Kings Meadow than they should be and that this part of the development fails to provide its own adequate on site buffer, set back and landscaping relative to its scale.
- 7.107 The proposed communal areas for residents to the rear of the site including courtyard garden area, 'play on the way' facilities as well as the central pocket park are also considered to be compromised, in terms of the quality of outdoor spaces and environment that they would provide as a result of their constrained layout in between the buildings significant elevations and between the building and the railway line retaining wall/embankment. The roof top terrace would be a more pleasant spacious environment. The proposed new pedestrian crossing providing improved access to Kings Meadow is therefore necessary in respect of improving access from the site to public open space and play facilities within .
- 7.107 The site's allocation within the Station River MOA means that any development that would come forward on this site would be for a high density development and it is considered any development is very likely to take its cues in respect of scale and massing from Thames Quarter given the close relationship between the two sites and the adjacent development to the south of the railway line. The proposals present a challenging

consideration for officers with half of the development considered to present a reasonable relationship with public realm areas to Napier Road and the parts of Kings Meadow closest to the site, but with the other half of the development failing to fully acknowledge that the site tapers in width to the west, meaning that the proposed building sits too close to Napier Road and presents as an overdevelopment of this part of the site. Officers consider that a greater set back and buffer could and should have been provided here between the building and Napier Road frontage to provide a higher quality environment to this part of the site.

- 7.108 In terms of the visual impacts of the development, overall officers reach a conclusion that the development is adequate. Notwithstanding the localised issues at pinch-points in respect of Blocks C and D, the proposals are considered to be appropriate in terms of their impact upon medium and longer range views of the development, including those more distant views from within Kings Meadow. The proposals would integrate satisfactorily with these wider townscape views, given the site's location with the Reading Central Area and surrounding density and scale of buildings. Officers also attach merit to the architectural design of the proposals and consider this to be of good quality and present suitable articulation and variation to provide visual interest when viewed from street level as well as to longer range views, and are not considered to be detrimental to Kings Meadow as a designated Local Green Space or to jeopardise enjoyment of this space. The proposals have also been sited such that they are not considered to place undue burdens on the remainder of the site allocation area (Network Rail depot site) in that site coming forward for development in the future.
- 7.108 The application describes and includes an indicative masterplan showing a variety of off-site works to enhance Kings Meadow as part of the application, this includes those improvements to Kings Meadow playground and the proposed pedestrian crossing discussed above and RBC Parks/Leisure Officers are generally supportive of these aspects of the masterplan proposals and have proposed a contribution to secure the works to the playground as part of a s106 agreement. At the time of writing this report, the applicant has not confirmed to officers' agreement to this contribution being secured by way of s106 agreement. Failure to secure this would be significant shortfall of the proposals, as the development lacks suitable on-site open space and lack of formal play provision would be considered to fail to provide appropriate open space for the occupant's needs contrary to Policy EN9. The proposals to secure that the developer provide the new pedestrian would also be secured as part of the s106.
- 7.109 However, the submitted indicative landscape masterplan plan also includes a number of landscaping improvements to Kings Meadow but does not detail how all these proposals could be provided or the feasibility of doing so. Officers have explored the proposed options with RBC Parks/Leisure Officers, and a number of the proposals are not considered feasible (such as a proposals to plant trees in the grass verge to the front of Napier Road Car Park given the presence of significant below ground services in this location), as well as proposals to plant trees within Napier Road car park itself (given this would result in a loss of parking spaces). However, one aspect of the proposed master plan in respect of off-site landscaping that is considered feasible, which would be welcomed by RBC Parks/Leisure Officers and that would be of benefit to the development, is for some additional tree planting to reinforce and thicken the existing tree line to the north of Napier Road car park within Kings Meadow which is currently sparse in places. This would assist in reinforcing this tree band and to softening views of the development from within Kings Meadow, in addition to associated benefits in respect of increasing the Borough's tree canopy coverage and wildlife benefits. This off-site landscaping would accord with Policy EN14 and the RBC Tree Strategy (2021) which seeks to increase tree coverage within the Borough and particularly within the Central Area and would provide some mitigation for the failure of the proposals to provide adequate on-site landscaping to the frontage of blocks C and D. RBC Parks/Leisure Officers are working up a costing for this tree planting to put to the applicant for agreement, which officers would propose to secure as a s106 obligation. Officers will advise in an update report of what this figure is and if the applicant agrees to this being

secured as a section 106 obligation. The above measures are considered feasible to achieve, align with RBC Parks/Leisure wider aspirations for Kings Meadow and to be reasonable, justified and directly related to the proposed development to mitigate for its impact upon Open Space within the Borough in accordance with Policy CC9 (Securing Infrastructure).

- 7.107 No harm to the setting of the Grade II Listed Thames Lido Building located within Kings Meadow is identified.
- 7.108 However, significantly the proposals fail to demonstrate that they would safeguard land for future MRT use or facilitate greater pedestrian and cycle permeability along Napier Road to the front of the site. This is contrary to the strategic vision for the Station/River MOA set out under Policies CR11 and CR11i which seek to improve connectivity within the MOA and these failures are considered to be significant shortfalls and disbenefits of the proposed development.

D Amenity Matters

- 7.109 Policy CC8 (Safeguarding Amenity) and CR6 (Living in Central Reading) seek to protect the amenity of existing surrounding and future occupiers. Policy EN16 (Pollution and Water Resources) seeks to protect surrounding and future occupiers from the impacts of pollution, including contamination. Policy EN15 (Air Quality) seeks to protect existing and future occupiers from the impact of poor air quality. Policy EN17 (Noise Generating Equipment) seeks to control and mitigate noise impacts from plant equipment.

Daylight, Sunlight and Overshadowing

Existing Surrounding Residential Occupiers

- 7.110 The applications are accompanied by a daylight, sunlight and overshadowing report which considers the impacts of both proposals upon existing surrounding residential properties in relation to the standard Building Research Establishment (BRE) guidelines. Due to the technical nature of the report, this has been independently reviewed on behalf of the LPA by a specialist daylight, sunlight and overshadowing consultant (BRE themselves). The report has identified nearby residential properties at Thames Quarter, 1-8 Kingfisher Place, and 22 Kings Meadow Road as potential sensitive receptors that could be impacted by the proposed development.
- 7.111 In respect of impacts of the proposed development upon the single detached dwelling at no. 22 Kings Meadow Road to the north west of the application site, the BRE report identifies that 8 of the 19 windows to this dwelling would be below the BRE vertical sky component (VSC) guidelines. VSC measures the percentage of the total unobstructed view that is available once the development is placed within the view, calculated from the centre of a window, measuring the amount of light available following the introduction of the new buildings. BRE conclude that there would be an overall minor adverse impact to daylight receipt to 22 Kings Meadow Road noting that whilst some windows that would be below the target VSC are in general close to the target values and that in terms of distribution of daylight within the impacted rooms this would meet BRE guidelines. In respect of impact of the development upon sunlight to this dwelling BRE conclude that probable sunlight hours guidance would be comfortably satisfied which is the amount of direct sunlight windows would receive throughout the year. However, in terms of direct sunlight received to windows during winter months BRE identify a major adverse impact to 4 windows at ground floor and 7 at first floor level. A major adverse impact is also advised in respect of receipt of sunlight to the garden of this dwelling, albeit the report acknowledges that there is a dense hedge and thick tree cover surrounding much of the garden which are likely to have a measurable impact on sunlight amenity to the garden.
- 7.112 Located further to the north-west of the application site are the townhouses at no. 1-8 Kingfisher Place, where as a result of the proposed development, BRE confirms any

impact would be negligible in respect of both daylight and sunlight, largely due to the intervening distance involved.

- 7.113 The closest and most direct relationship with neighbouring dwellings to the application site is that with the flats to the east-facing elevation of Thames Quarter. BRE conclude that 72 windows to the east elevation of Thames Quarter would be below the VSC guidelines, including all 10 windows to the 1st to 5th floors of the building and all but one windows (9) on the 6th floor, 7 windows on the 7th floor, 5 on the 8th floor and 1 on the 9th floor, around half of these affected rooms served by these windows would also fail to satisfy BRE daylight distribution guidelines. Around 1/3 of these affected windows would also fail to achieve recommended probable sunlight hours as a result of the proposed development and BRE conclude a major adverse impact upon the east elevation of Thames Quarter in terms of receipt of both daylight and sunlight. However, BRE confirm that the major adverse impacts in respect of both daylight and sunlight are as a result of the relevant windows at Thames Quarter being located unusually close (just 1m away) from the shared boundary with the Napier Court site (16m away from the closest part of the proposed development) and taking more than their fair share of light from over the application land. BRE advise that in such circumstances a different approach to daylight and sunlight impact is appropriate, referred to as a 'mirror-image assessment' which measures whether or not the impacts would be worse than if the existing development was looking at a mirror of itself. In this instance, BRE advise that when considered using the mirror image assessment, impacts of the proposed development upon the east elevation of Thames Quarter would meet relevant guidelines and adverse impacts are not identified.
- 7.114 The daylight /sunlight report submitted with the application also considers the potential cumulative impact of the proposed development on the east façade of Thames Quarter together with the separate prospective development at Forbury Retail Park which is being considered under planning application PL/25/1706. The advice received is that since the Forbury Retail Park scheme would be located some distance across the railway line impact cumulative impacts upon Thames Quarter would not be significant and that similarly impacts between both the proposed Forbury Retail Park and Napier Court developments would also be unlikely to be significant. In terms of the relationship with the Network Rail Depot site the eastern elevation of block D of the proposed development would be set back 15m from the boundary with the Network Rail site which forms the rest of the Policy CR11i site allocation area to the east. As such it is not considered that the proposed development would result in any unacceptable daylight/sunlight impacts upon the depot site which would prevent its development in the future for residential use.
- 7.115 The impact of the development upon receipt of sunlight to the existing playground within Kings Meadow is also considered which BRE confirm would meet recommended guidelines. BRE also advise that Kings Meadow as a whole would not be significantly impacted by loss of sunlight as a result of the development given its large expanse.
- 7.116 In overall terms officers consider the impact of the development upon receipt of daylight, sunlight and overshadowing to existing surrounding dwellings is considered to be acceptable. The adverse impacts upon receipt of daylight/sunlight to no. 22 Kings Meadow Road are acknowledged, however BRE advise that in terms of receipt of daylight, levels would only be just below those recommended, whilst receipt of sunlight is already impacted by the existing hedging and trees surrounding the dwelling such that officers do not conclude any significant unacceptable impacts to this dwelling. The application site is allocated for high density redevelopment within the Local Plan and given the close relationship of the dwelling to the site, some impact upon daylight and sunlight is likely to result from the site being redeveloped for the nature of development sought by Policy CR11it.

Future Occupiers of the Development

- 7.117 The daylight, sunlight and overshadowing report also considers the standard of accommodation to be provided for future occupiers of the proposed developments in the context of relevant BRE guidelines. This part of the report also has also been independently reviewed on behalf of the LPA by the BRE.
- 7.118 The independent review concludes that the development performs well in terms of receipt of daylight with 79% of the shared living room/kitchen/dining rooms and 97% of bedrooms within the development being able to meet recommended guidelines. Where rooms do not meet standard, this is largely those located to the rear (south) of the site to the lower floors around the courtyard areas and close to the railway embankment retaining wall. In respect of receipt of sunlight 67% of living rooms/kitchen/dining rooms would meet BRE standards. BRE advise this is a reasonable overall result for a development of given north facing rooms are naturally limited in the sunlight they receive. The two open spaces for residents within the proposed development (central pocket park and rear courtyard garden) would adhere to BRE standards in terms of receipt of sunlight.

Overlooking and Privacy

- 7.119 The closest residential occupiers to the proposed development which could receive a less than ideal privacy situation would be those flats within Thames Quarter which have windows on its 12 storey east elevation. Flats within the proposed development with windows to the west elevation would face these windows at Thames Quarter separated by a distance of 16m. Policy CC8 (Safeguarding Amenity) recommends a minimum separation distance between facing habitable room windows of 20m to prevent overlooking and loss of privacy for residential occupiers. However, within the Central Area, separation distances are often less than this given the higher density of developments. In this instance the separation distance to Thames Quarter is considered adequate and not unusual for the Central Area such that no unacceptable overlooking or loss of privacy is considered to result. As discussed above, Thames Quarter is considered to be 'unneighbourly' in being built so close to the boundary with Napier Court and effectively borrowing its daylight and outlook from over neighbouring land.
- 7.120 The closet other neighbouring residential properties are all located more than 20m away from the proposed development such that no unacceptable relationships are considered to exist in terms of any loss of privacy or overlooking. The closest other dwelling(s) is that at no.22 Kings Meadow Road located 30m to the north of the site on the opposite side of Napier Road. The eastern elevation of block D of the proposed development would be set in 15m from the boundary with the Network Rail site which forms the rest of the Policy CR11i site allocation area. This is considered adequate separation to ensure that the proposals would not prevent future development of this adjacent site to fulfil the aspirations of the site allocation. There would be a separation of over 70m to the proposed Forbury Retail Park development on the other side of the railway line such that no adverse overlooking would result should this separate development subject to an as yet undetermined planning application come forward.
- 7.121 Within the proposed development itself separation distances between windows to each of the four proposed blocks and projections of the buildings would generally achieve a minimum separation of 16m which, as discussed above in relation to neighbouring properties is considered to be adequate within the Central Area to ensure future occupiers of the development would not be subject to unacceptable living conditions in terms of overlooking or loss of privacy. The exception to this would be in relation to proposed Blocks C and D where separation between facing windows to a small number of flats would be at their minimum, 12.5m. In this instance the majority of facing windows would be secondary windows with primary windows facing the front or the rear of the building such that a condition is recommended to secure the secondary side facing windows as obscurely glazed which would be sufficient to prevent overlooking and loss of privacy. However, the proposed layout does result in a situation where one flat in block C and one flat in block D to each floor (1st to 10th) (a total of 20 flats, 10 in block C and 10 in block D) would face each other with primary habitable rooms (bedroom/living room kitchen diners)

directly across from each other at a distance of 12.5m. This relationship is shown in figure 50 below.



Figure 50 – relationship between proposed blocks C and D

- 7.122 It is considered that this relationship would result in potential for overlooking and a loss of privacy between these specific flats. Whilst, as discussed above, close relationships between buildings within the Central Area and within high density developments are not uncommon the closeness of these particular flats is considered sub-optimal in terms of privacy and overlooking considerations, albeit this situation would relate to a small proportion of flats within the development as a whole (20 of 570).
- 7.123 Figure 51 below also shows the relationship of blocks C and D with Napier Road where there is limited set back of a number of ground floor flat windows from the footway cycle way that would run along the front of the building. As can be seen in the figure some flats notably to Block C (left hand side of the figure) would - apart from a narrow hedgerow - directly abut the edge of the footway cycleway. Aspect on to the footway/cycle way would be the only outlook for some of the ground floor units which is likely to result in potential for loss of privacy to these units from passing pedestrians and cyclists and poor outlook for occupiers. This situation affects units to the ground floor of Block C and further evidences that the proposals would be an overdevelopment of this part of the site and provided inadequate space between the front of the building and Napier Road to accommodate the proposed building, infrastructure and landscaping requirements of the development. The set back from the edge of the footway/cycle way increases to a minimum of 1m to block D shown on the right hand side of the figure 51 below and a more spacious relationship with the front of the site is provided for Blocks A and B.



Figure 51 – relationship of proposed Block C and D within Napier Road

- 7.124 Notwithstanding the sub-optimal arrangement proposed for a small number of units in terms of the relationship between blocks C and D and the relationship of some ground floor units with Napier Road, overall, officers consider that the development would provide adequate conditions for future occupiers and in relation to existing surrounding occupiers in respect of overlooking or privacy matters.

Standard of Accommodation to be Provided and Accessibility

- 7.125 Part a. of Policy H5 (Standards for New Housing) requires that all new building housing outside of the Central Area complies with the Nationally Described Space Standards (NDSS). The policy does not require new build housing within the Central Area to adhere to these standards, however all dwellings within the development would meet and exceed the NDSS. This is considered to be a benefit of the proposed development in terms of providing a good standard of spacious accommodation.
- 7.126 The proposals incorporate measures within the accommodation and landscaped areas to meet the accessibility needs of all users. Whilst level approach cannot be provided to the main entrances to the building from Napier Road as a result of a raised ground floor level to combat flooding, both main entrances would incorporate DDA-compliant ramped entrances in addition to stepped access. Once inside the building there are lifts within the main stair/lift cores which provide inclusive access throughout and once inside there are no level changes on each floor of the development. The application proposes that in accordance with part f. of Policy H5, 5% of the total number of dwellings (19 x one bedroom dwellings and 10 x two bedroom dwellings) would be provided as accessible units in accordance with Part M4(3) of The Building Regulations.
- 7.127 Entrances to the proposed accessible dwellings would meet necessary minimum widths and provide suitable clearance for wheelchair users with motion activation lighting whilst communal hall way widths throughout the development would also be wide enough for access by wheelchair users. A variety of other measures are included such ensuring adequate clearance between intern doors such that wheelchair users can navigate through once door before opening the next as well as user of appropriate door handles which would not conflict with wheelchair wheels. Step-free access would also be provided within the external areas of the site including level access to the Pocket Park from Napier Road and within the courtyard garden area to the rear of the site. There would be a step free route from the proposed 33 car parking spaces (including the 3 accessible car parking space) into once the secondary pedestrian entrance to the rear of the building which would lead to the lead to the two lift cores shared by the four blocks to provide access to and from the upper floors of the building and the car park and external amenity areas within the development.
- 7.128 All public realm areas and entrances to residential lobby areas within the proposed developments are considered to benefit from good surveillance and access arrangements and to provide appropriate safe access for all. The ground floor and upper floors of the building present windows to all facades of the development providing passive surveillance of exterior spaces. The development is proposed to include a CCTV system whilst the main reception of the building would be staffed by 24 hour concierge. All entrances at ground floor will be included in this CCTV coverage and will have access control for entry to residents or building management only. Gated secure access to both sides of the building at the rear will provide egress and a secure boundary for residents and ground floor areas. A detailed security strategy for the development could be secured by condition.
- 7.129 The proposed BTR residential accommodation within the development is considered to provide a good standard and choice of communal accommodation for future occupiers, in particular by providing access to the large roof terrace, pocket park and rear courtyard garden, whilst within the building the ground floor residential lobby areas include residents lounge, communal workspace, on-site gym and cinema room and 24 hour on site management concierge services.

External Lighting

- 7.130 The proposals would incorporate external lighting to ensure safe access arrangements to and around the building and indicative external lighting is shown to the building on the various visual of the development provided. To ensure future occupiers of both developments are not adversely impact by the proposed external lighting, a condition is recommended for each proposal to secure submission and approval of a detailed external

lighting scheme to ensure all lighting is designed such that lux levels would not exceed those recommended in close proximity to residential dwellings. Subject to the recommended condition it is considered that external lighting impacts upon future occupiers at both sites can suitably managed to ensure no harm results to residential amenity.

Noise and Disturbance

- 7.131 The application is accompanied by a noise and vibration impact assessment which considers how future occupiers would be impacted by noise. Noise from the railway line to the south including vibrations and road noise from Napier Road to the north are the main potential sources of disturbance. RBC Environmental Protection Officers have reviewed the submitted details and have been in direct discussion with the applicant's acoustic consultant in respect of consideration of impacts from the railway line. The advice received is that subject to the achieving the recommended standards in terms of building fabric construction, windows and ventilation then the proposed development would suitably mitigate against noise and vibration impact and ensure future occupiers would not be adversely impact in this respect. Mechanical Ventilation Heat Recovery (MVHR) is proposed as part of the mitigation scheme to provide future occupiers with the option of an alternative form of ventilation to open windows. The noise assessment also includes mitigation in respect of noise and vibration impact from the proposed resident's gym located on the ground floor of the development which is considered to be acceptable. Conditions are recommended to secure submission and approval of the exact specifications of all noise mitigation measures prior to the development commencing.
- 7.132 A condition is also recommended to prevent any externally-located mechanical plant being installed prior to a noise assessment being submitted to ensure such equipment would not generate unacceptable noise impacts up on future or existing surrounding occupiers.
- 7.133 It is not considered that the proposed development itself would result in any adverse noise impacts to existing surrounding dwellings. The increase in general activity at the site would be significant due to the introduction of such a high number of residential units. However, due to the nature of the site, in the town centre, it is not considered that there would be any undue increase in noise or disturbance for existing neighbours.
- 7.134 Likely noise and disturbance impacts are also identified from the developments at demolition and construction phase as well as a range of other impacts including from dust and vibration. In this respect conditions are recommended to secure submission and approval of a detailed construction and demolition method statement prior to the commencement of either development to ensure suitable mitigation measures are put in place and adhere to through the development. Further conditions are also recommended to ensure all construction, demolition and associated deliveries takes place within normal daytime working hours only and that there should be no burning of waste on site which could adversely impact upon air quality.
- 7.135 Subject to the above recommended conditions it is not considered that the proposals would result in any unacceptable impacts upon existing or proposed occupiers. The conditions discussed above would be relevant to attach in the event that planning permission were to be granted.

Air Quality

- 7.136 The application is accompanied by an air quality impact assessment. RBC Environmental Protection Officers are satisfied that this demonstrates that level of pollutants at the application site, including those from the adjacent railway line, and those increased emissions that would occur as a result of the proposed development, would likely be within recommended levels and that additional air quality mitigation is not required as part of the development. In terms of increased emissions these would be low given the

additional trips that would be generated by the development are low and would not have a significant impact.

Contaminated Land

- 7.137 A contaminated land assessment has been submitted with the application. RBC Environmental Protection Officers note that the assessment concludes that further assessment is required post demolition to determine what remediation measures are required. Therefore, conditions are recommended to secure submission and approval of a more detailed contamination assessment followed by a remediation strategy and remediation verification report was the remediation has been completed. The recommended conditions would, in term of potential contamination, ensure that the development would be suitable for the proposed residential use. This would accord with Policy EN16 (Pollution and Water Resources) which seeks to protect existing and future occupiers from sources of pollution including contamination.

Bin Storage

- 7.138 Policy CC5 (Waste Minimisation and Storage) requires that new developments incorporate facilities for storage of all type of waste and recycling. RBC Waste Officers have reviewed the bin storage proposals for the development and are satisfied that the stores and bin collection points proposed are of suitable size to accommodate the necessary number of bins for the development. However, this would be based upon a weekly collection of waste from the development, and this frequency of collection would require the developer to enter into a private arrangement with a commercial waste collection company as the stores would not be of adequate size for the standard fortnightly Local Authority waste collection service. This requirement could be secured by way of condition if planning permission were to be granted.
- 7.139 As discussed in the Transport section of this report below it is considered that the refuse collection arrangements in terms of how bin lorries would enter and leave the site are considered to be acceptable. A condition is recommended to secure submission and approval of vermin and pest control measures for all bin stores to ensure to ensure the stores are secure and do not generate pollution in terms of odour.

Wind and Microclimate

- 7.140 A technical report assessing the microclimate/wind impacts of the development within the site application site and its surrounds has been submitted with the application. Given the technical nature of the report, it has been independently reviewed on behalf of the LPA by a specialist consultant. Advice received from the independent review is that with the development in place, the wind microclimate in and surrounding the application site would remain suitable for the planned uses within the boundaries of best practice for wind microclimate assessments within the UK. A condition is recommended (in the event of a permission) to ensure the proposals are carried out in accordance with the submitted wind/microclimate report which includes provision of appropriate safety balustrades to the edges of upper floor external terraces and suitably sited landscaping at ground floor level.

Fire Safety

- 7.141 The proposals are accompanied by a Fire Statement. The Health and Safety Executive (HSE) have reviewed both proposals and the Fire Statement and advise that they are content with the fire safety design the proposals in respect of the land uses proposed. Both the HSE and the Royal Berkshire Fires and Rescue Service advise that the Applicant will need to address further matters at the later regulatory stages of the build but for the planning stage the submitted information is considered to be satisfactory. The Fire Statement outlines a number of fire safety measures for the development which includes dual stair cores for each block, provision of protected escape routes and firefighting and

evacuation lifts. Fire alarms and sprinklers will also be provided throughout the development.

- 7.142 Overall the proposal is considered to provide a satisfactory standard of accommodation for future occupiers and the applications are considered to satisfactorily demonstrate that they would not result in any significant adverse impacts upon existing surrounding occupiers. Both proposals are considered to demonstrate compliance with Policies CC7, CC8, EN15, EN16, EN17, CR11.

E Flooding, Drainage and Natural Environment

Flooding

- 7.143 Policy EN18 (Flooding and Sustainable Drainage Systems) states that development will be directed to areas at lowest risk of flooding and that where development in areas at risk of flooding is necessary it will not reduce the capacity of the flood plain, impede flow of flood water or in any way increase risks to life and property arising from flooding and that wherever possible should be designed to reduce flood risk both on and off-site. All major developments are also required to incorporate SuDS to ensure that, as a minimum, run-off rates are no greater than existing conditions of the site.
- 7.144 The application is accompanied by a detailed Flood Risk Assessment (FRA). This identifies that the application site is located within Flood Zone 2 (land at a medium probability of flooding). As per National (NPPF chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change) and Local Planning Policy and Guidance, development should be directed to areas at the lowest risk of flooding (i.e. Flood Zone 1) and the applicant is required to carry out a sequential test to try to demonstrate that there are no other suitable sites available where the development could be carried out that are at a lower risk of flooding. However, the supporting text to Policy EN18 confirms that the sequential test has already been carried out as part of the Local Plan preparation process for sites that are allocated for development within the Local Plan and that on such sites a sequential test is not required as part of a planning application. Therefore, a sequential test is not required in this instance, but the development must still demonstrate that it would be safe in terms of flood risks.
- 7.145 The FRA submitted with the application has been reviewed by the Environment Agency (EA) who are a Statutory Consultee for developments major residential development within flood zone 2. The EA raise no objection to the proposed development or flood risk assessment which includes a variety of site specific flood mitigation measures including provision of an elevated ground floor level to all parts of the building set above the modelled flood level for the site as well as details of the flood warning and evacuation plan for the development in the event of an extreme flooding event. A condition is recommended to ensure that the development is carried out and maintained in full accordance with all the mitigation measures set out within the submitted FRA in order to satisfactorily protect future occupiers from flooding and to ensure compliance with Policy EN18. In respect of flooding the proposals are considered to comply with the site allocation Policy CR11i which requires development within the allocation area to take account of necessary flood mitigation measures.

Drainage

- 7.146 A sustainable drainage strategy (SuDS) for the development is included within the submitted FRA. This has been reviewed by the Lead Local Flood Authority (LLFA) who advise that the strategy adequately demonstrates that the development would result in a significant reduction in surface water run-off from the site compared to the existing situation as a result of the proposed areas of on-site soft landscaping and therefore would in principle satisfy the requirements of Policy EN18. The strategy proposes to provide attenuation tanks, areas of permeable paving together with the areas of soft landscaping. A condition is recommended to secure submission and approval of full details of the SuDS

strategy prior to commencement of the development to ensure that the detailed strategy aligns with the principles that have been proposed.

Ecology and Biodiversity

- 7.147 An ecological report and assessment of the site and surrounding area have been submitted with the application. This identifies that the proposals would be unlikely have any direct adverse impacts upon protected species other than potential disturbance to nesting birds within the small amount of on-site vegetation. The RBC Ecology Adviser has reviewed the ecology report and considers it has been prepared to an appropriate standard and agrees with its findings. In respect of nesting birds, a condition is recommended to stipulate that no vegetation clearance shall take place within the bird nesting season (March to August).
- 7.148 Beyond the application site is the railway line to the south and Kings Meadow and the River Thames to the north are of value for wildlife and likely to be used by foraging and commuting bats, also a protected species. A condition is recommended (were permission to be granted) to secure submission and approval of details of all external lighting prior to installation to ensure this is designed in a wildlife friendly manner and to limit the impact of light pollution from artificial light on bats .
- 7.149 Subject to securing the above conditions in a planning permission it is considered that the proposals would not adversely impact upon existing habitats and protected species at and near the application site.
- 7.150 The proposed development also includes provision of biodiversity enhancement features including bat and bird boxes and green roof areas, full details and specifications of which could be submitted Authority by condition.
- 7.151 The application is also accompanied by a biodiversity net gain (BNG) metric calculation. There is a statutory requirement for all proposals to demonstrate that a minimum 10% net gain in biodiversity would be achieved as part of a proposed development. The metric submitted with the application demonstrates that the development would result in a 51.84% net gain in biodiversity habitat units at the site as well as a 192.41% net gain in hedgerow units. The RBC Ecology Adviser has reviewed the metric calculation, and is satisfied that this has been correctly carried out. The BNG that would be achieved by the proposed development significantly exceeds the statutory requirement. Whilst this is largely as a consequence of the limited biodiversity present at the existing site this significant BNG as a result of the on-site landscaping proposed within the development is considered to be a benefit of the proposals. The application would be required to submit a BNG plan prior to commencement of the development (secured by condition) to confirm how this would be achieved as per the metric calculation.
- 7.152 Subject to the recommended conditions above there are the development is considered to accord with Policy EN12 (Biodiversity and The Green Network) which requires ecology and protected species to be protected and for development to achieve a net gain in biodiversity.

Trees and Landscaping

- 7.153 A Tree Survey and Arboricultural Impact Assessment (AIA) has been submitted with the application. This states there are currently a total of 17 individual trees, five groups of trees and two hedgerows within the application site (a mixture of beech, alder and birch, rowan and English oak species). The individual trees are made up of 12 'B' category trees (trees of moderate quality) and 5 'C' category trees (trees of low quality); with the 5 groups made up of 3 'B' category and 2 'C' category groups. There are 5 protected trees (all Norway Maples) located at the west end of the site (all 'B' category) which are of high amenity value to the street-scene as a result of their size, age and appearance.

- 7.154 To accommodate the proposed development and larger built footprint of buildings it is proposed to remove 6 'B' category trees, 4 'C' category trees, and full and part removal of 2 'B' category groups and 1 'C' category group, along with full/part removal of two hedges. Overall, the development would result in removal of 10 individual trees, removal of 3 full/part tree groups and full/part removal of two hedges. These are primarily located along the building frontage with Napier Road, where all but the five protected Norway Maple trees are proposed to be removed.
- 7.155 The 5 protected trees at the western end of the site are proposed to be retained as part of the development. In relation to these trees the applicant's AIA states that a new 'tree friendly' path will be constructed with the root protection areas (RPAs) of the trees as part of the hard and soft landscaping for the development and to provide a pedestrian route around the perimeter of the building, the feasibility of which is unclear, that 'facilitation pruning' would be required to each of the TPO trees to allow sufficient room for construction purposes and overall crown reduction proposed to create a sustainable relationship between the trees and building. As shown in figure 52 below the proposed building would be located closer to these trees than the existing small two storey office building.

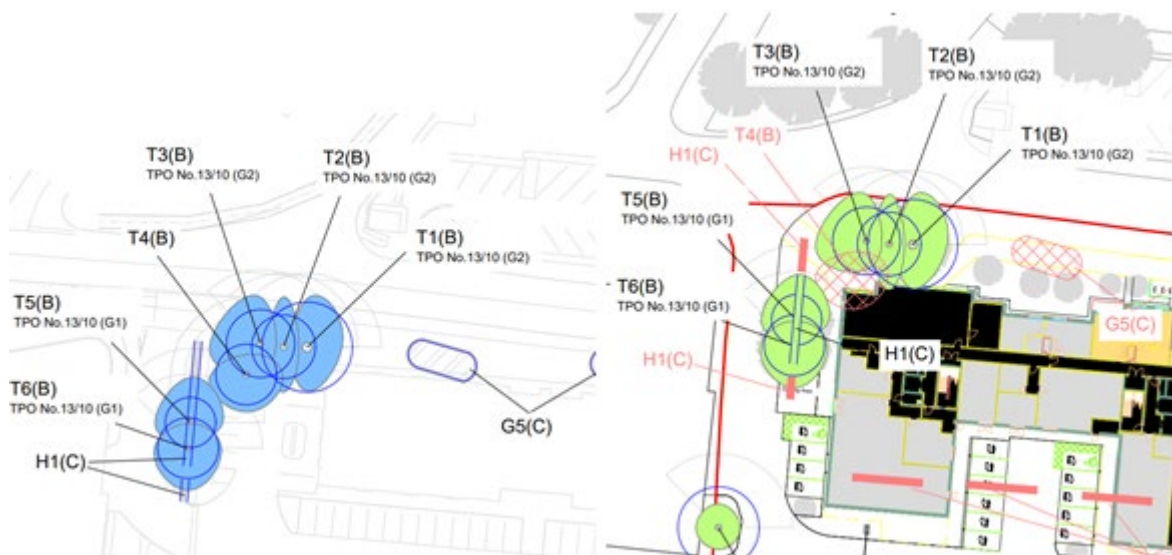


Figure 52 – Existing (left) and proposed (layout) in relation to TPO trees

- 7.156 The RBC Natural Environment Officer considers that western elevation of Block A of the development is located too close to these trees, as evidenced by the need to carry out facilitative pruning during construction, a crown reduction to improve the relationship, and there is likely to be further pressure to prune them in the future, to the detriment of their long term health or fell, to the detriment of the street-scene. The applicant was advised of the conflict with these trees at pre-application stage and also application stage but has not adjusted the building layout in order to provide sufficient room within the site or provide any adequate justification or mitigation for officers to be satisfied that the trees would not be harmed, directly or indirectly as a result of the proposed development. The RBC Natural Environment Officer also raised concern as to the accuracy of the RPAs that have been drawn for the TPO trees within the AIA given they are drawn as circular RPAs, incorporating the foundations of the existing building, whereas good arboricultural practice advises to adjust RPAs to omit areas where roots are unlikely to have proliferated (therefore these appear representative rather than accurately plotted).. Notwithstanding this, based on the proposed RPAs which would appear to abut the closest elevations of the proposed building, it is considered that the foundations required for this part of proposed Block A would be very likely to impinge on the RPA area and result in further harm to the health and long term survival of these protected trees.
- 7.157 Policy EN14 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. As evidenced by their TPO status the protected trees at the western end of the site are of importance to the Borough as a result of the visual amenity value they provide as a result of their age, size and appearance. On this basis, the RBC Natural Environment Officer objects to the application because the proposals fail to demonstrate that they would not result in harm or result in future pressure to fell or prune protected trees of high amenity value contrary to Policy EN14.

- 7.158 In terms of proposed landscaping, the RBC Natural Environment Officer advises that it is not possible confirm a net gain in tree planting as a result of the proposed development given the submitted Tree Survey and AIA document does not detail the number of trees to be removed within the 3 tree groups that are identified for removal, this is despite the Natural Environment Officer seeking exact numbers of trees involved. The submitted landscaping plan shows that a total of 64 new trees to be provided as part of the development located to the building frontage and to the courtyard garden area to the rear of the development. On this basis officers, are satisfied that a net gain in tree numbers on the site would occur and further details including planting of a minimum 64 trees could be appropriately secured as part of a detailed landscaping scheme condition to ensue this.
- 7.159 The RBC Natural Environment Officer considers that the siting of the proposed building so close to Napier Road means that there is limited space for meaningful soft landscaping. In respect of the landscaping that is proposed to the building frontage, concern is raised regarding tree species selection (*Amelanchier arborea* 'Robin Hill' and *Cornus Kousa Varchinensis*) which are small trees (5-7m at maturity). The Natural Environment Officer's view is that taller but narrower trees species should be considered here given the scale of the proposed building in order to provide any meaningful visual mitigation of softening of the building's elevations. Officers consider that a condition would be required to secure submission and approval of a full detailed landscaping scheme for the proposals as part of which more detailed discussion with the applicant regarding proposed tree species could be carried out and finalised.
- 7.160 The RBC Natural Environment Officer supports the proposed additional tree planting within Kings Meadow that is discussed above and securing this via s106 obligation. . This is in terms of the additional visual mitigation this would provide to views of the development from Kings Meadow area of public open space and public realm, as well as in terms of the broader targets within the Reading Tree Strategy (2021) to increase tree canopy cover within the Borough and particularly within the Central Area.
- 7.161 The RBC Natural Environment Officer also identifies that the submitted SuDS principles for the site do not demonstrate how the drainage system would be linked to soft landscaping features within the development as required by Policy EN18. The Lead Local Flood Authority (LLFA) also identified this issue but is satisfied that full details of this can be secured as part of the full and final drainage strategy for the development which could be secured by way of condition.

F Transport and Highways

- 7.162 Policies TR1 (Achieving the Transport Strategy), TR2 (Major Transport Projects), TR3 (Access, Traffic and Highway related matters), TR4 (Cycle Routes and Facilities) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters for new development.
- 7.163 The site is located on the edge of the Central Area, towards Caversham. As per the adopted Parking Standards and Design SPD (2011) the site falls within Zone 2, the primary core, which is the part of the Borough that directly surrounds the Central Core of the Central Area and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone and other local centre facilities. A Transport Statement has been submitted with the application.

Access

MRT and Proposed Widened Cycle/Footway

- 7.164 As discussed above the development proposes to provide a minimum 6m depth to the site frontage to facilitate widening of the part of the existing footway and cycle way than spans across the front of the site along Napier Road together with safeguarding of a strip of land for a future MRT route. This is required for development on this site in accordance with Policies CR11, CR11i and TR2. Whilst RBC Transport Officers consider that the principle of the widened footway/cycle way and safeguarding of MRT land to be welcomed they have identified a number of technical shortfalls of the proposals which mean the application currently fails to demonstrate that both the widened footway/cycleway and safeguarding of MRT land could be provided to an acceptable standard.
- 7.165 The applicant's proposed scheme for the widened footway/cycleway would align with the existing footway/cycleway to the front of the adjacent sites along Napier Road (i.e those to the front of Thames Quarter to the west and the Network Rail depot to the east). At the eastern boundary of the site, land is also to be dedicated as Public Highway to enable the footway to be realigned in the future should the MRT to the east come forward. However, the RBC Transport Officer identifies that the extent of the proposed adoption does not continue across the full width of the road, which would create a barrier for the Local Highway Authority to bring forward the MRT route in the future and that this proposed arrangement would fail to provide the necessary safeguards to facilitate the Council's strategic aims for a future MRT route along Napier Road.
- 7.166 Furthermore, to the western end of the site the proposed plans show that the footway/cycleway would reduce in width to 1.8m and also do not illustrate a connection of the footway/cycle way to the existing crossing point over the western site vehicular entry/exit from Napier Road. National highway design standards (LTN 1/20) require a minimum 3m width to the footway/cycleway and the proposals are therefore not considered to be designed to an acceptable standard nor to adequately connect to the existing footway/cycle way network along Napier Road.
- 7.167 RBC Transport Officers also considered the proposed gradients of the widened footway/cycleway. Whilst these are considered to be acceptable the proposed gradients do not continue along the footway/cycleway to the crossing facilities at the western and eastern extents of the development. This is not considered to be acceptable, and the proposed gradient is required to be maintain along the full route to the front of the site. Furthermore, the proposed gradient for the strip of land proposed to be safeguarded for a future MRT route is considered to be unacceptable (1:30). RBC Transport Officers advise that a gradient of not less than 1:40 is required for this land.
- 7.168 In addition it is identified that the proposed gradient would create a low point between the grass verge to the front of the building and the proposed footway/cycleway which, as per national highway design guidance (LTN 1/20) could have adverse implications in respect of surface water drainage and would necessitate the provision of gullies to collect surface water run off. RBC Transport Officer advise that the proposed width of footway/cycleway is insufficient to accommodate drainage gullies whilst also maintaining a minimum 3m width to the route.
- 7.169 The siting and width of the proposed footway/cycleway in relation to the proposed building is also considered to be unacceptable. As discussed above there are parts of the site frontage where the proposed building would directly abut the southern edge of the route. Should the MRT route come forward in future the footway/cycle way would also be up against the MRT kerb edge to its north side. RBC Transport Officers advise that these proposed arrangements would not be in accordance with national highway design requirements (LTN 1/20) which required an additional 200m width where routes are adjacent to kerb edges and 500m additional width when adjacent to vertical features which are 600mm and above in height (i.e. the front elevation of the proposed building) Such buffers are required in order to provide for safe use of the proposed pedestrian/cycle

route without risk of interference/obstructions from adjacent built form (such as from open windows) or from vehicular traffic on a future MRT/BRT route passing too close to the proposed footway/cycle route resulting in a cyclist/pedestrian hazard.

- 7.170 Therefore the proposed footway/cycleway is not considered to be designed to an acceptable standard and as proposed, would be detrimental to the safety of pedestrians and cyclists by way of providing insufficient width or connection to existing routes either side of the site to ensure the route is usable and safe along its length. The unacceptable design of the proposed footway/cycleway route also means that the development fails to adequately implement or promote measures to support sustainable transport and facilitate greater pedestrian and cycle permeability within the Station/River MOA. In this respect the proposals are contrary to Policies TR1, TR3, TR4 and CR11.
- 7.170 The development also proposes to provide a loading bay in front of the site along Napier Road which would be located within the strip of land proposed to be safeguarded for the future MRT route. The proposed location for the layby and its use for servicing of the development is not acceptable as this would conflict with the safeguarded MRT land contrary to Policies TR2 and CR11. The application sets out that this is proposed as a temporary arrangement with provisions proposed for the bay to be relocated to the rear of the site should the MRT route come forward, however this is not considered acceptable and in order to adequately safeguard this land, the RBC Transport Officer advises that all servicing must take place from within the development. Notwithstanding this, the proposed siting of the loading bay to the site frontage would also be unacceptable given its position alongside the proposed footway/cycleway where national highway design guidance (LTN 1/20) requires the footway to provide a 0.5m buffer when passing loading bays and the current proposed width of the footway/cycleway does not achieve this standard resulting in further unacceptable relationships in respect of highway safety for pedestrians and cyclists contrary to Policies TR1, TR3 and TR4.
- 7.171 RBC Transport Officers do not object to the principle of the proposed temporary landscaping (trees set in large planters) being provided along the proposed strip of land to be safeguarded for a future MRT route but as above highlight that the width of the proposed cycle/footway would be currently insufficient given its proximity to the proposed trees along its route, failing to provide adequate buffer to the trees to ensure they do not interfere within and create hazards for pedestrians and cyclists. Full details of the size of the proposed planters has also not been provided to ensure these would be located sufficient distance from the kerb edge. Furthermore, all trees along the site frontage (both those proposed to be planted at the front of the site and those temporary trees in planters) will need to be crown lifted to ensure that a clearance of 2.4m is provided for cyclists along the footway/cycleway. In addition, it would need to be confirmed that the canopy of the tree will not come into contact with vehicles travelling along Napier Road. The application fails to demonstrate that the safeguarded MRT land and cycleway/footway could be provided to an acceptable standards and would not be detrimental to highway safety resulting in further conflict with Policies TR1, TR2, TR3 and TR4.
- 7.172 In respect of the above matters the proposed development does not comply with the Local Planning Authority's standards (National Guidance – Local Transport Note 1/20) in respect of pedestrian and cycle provision. This is contrary to Policy TR1 which require major development proposals to implement measures to promote or improve sustainable transport such via walking or cycling, Policy TR3 which requires works to the highway to comply with the adopted standards of the Local Highway Authority and not be detrimental to the safety of users of the transport network, including pedestrians and cyclists and Policy TR4 which requires development to make full use of opportunities to improve access for cyclists to, from and within development. The Natural Environment Officer agrees with the above concerns.

- 7.173 The failure of the proposals to adequately safeguard land for future MRT proposals is contrary to Policy TR2, which requires land identified for major transport projects within the Borough (such as MRT) to be safeguarded for this purposes.
- 7.174 The Government department, Active Travel England (ATE) became a Statutory Consultee on major planning applications from 1st June 2023. Active Travel England were consulted on this planning application and provided their Standing Advice which is to be considered by the Local Planning Authority when assessing the planning application. Paragraph 1.8 of the standing advice notes that ATE has produced a planning application assessment toolkit that aids developers with their submission and active travel requirements of new development. At the time of writing, no assessment of the surrounding active travel routes has been prepared in accordance with the Active Travel Route Check Tool. Consequently, the proposals fail to adequately assess the pedestrian and cycle implications of the development and as a result of the LPA is unable to determine whether the additional pedestrian and cycle movements generated by the proposal would adversely affect the safety and flow of users of the existing Highway network within Reading, contrary to Policies TR1, TR3, TR4 and TR5.

Vehicle Access

- 7.175 Vehicle access arrangements to the development would utilise the existing entrance and exit junctions onto Napier Road which is considered to be acceptable. Further information is required to be provided regarding the proposed access barriers to the entrances to include details of how the barriers will be operated and to ensure there is sufficient space that allows for appropriate access and egress. Submission and approval of these details could be secured by way of condition should the application be approved.
- 7.176 The Transport Assessment submitted with the application indicates that a one-way system is being proposed within the site with vehicles entering at the eastern end of the site and exiting at the western end of the site. However, conflicting proposed plans have been supplied which show vehicles travelling in both directions within the site. This is also referred to within the submitted design and access statement (sections 7.17 and 7.3) which illustrates 2-way refuse vehicle movements 'Indicative Mobile Elevating Work Platform (MEWP) (for building maintenance and cleaning purposes) Access Route' as being two-way. RBC Transport Officers advise that two way movements within the site would not be acceptable as insufficient width is provided to the proposed circulation route within the site to facilitate this and vehicles to safely pass.
- 7.177 Following submission amended plans increased landscaping has been proposed to the rear of the site with the proposed courtyard garden and additional tree planting. However, an updated swept path analysis for a refuse vehicle serving the site has not been provided. The bin stores and collection points are location and accessed to the rear of the site and therefore the proposals fail to demonstrate that refuse and other servicing vehicles can safely manoeuvre within the development. The proposals therefore are considered unacceptable in respect of proposed servicing access and would result in on-street servicing taking place or service vehicles reversing to or from Napier Road which would be to the detriment of highway safety contrary to Policies TR2, TR3 and TR4.

Pedestrian Access

- 7.178 As discussed above the proposals includes provision of a new pedestrian crossing on Napier Road to provide a direct pedestrian route from the footway to the front of the development on the south side of Napier Road to Kings Meadow on the north side of Napier Road. The principle of the new crossing in this location is accepted by RBC Transport Officers but full details of the design of the crossing would need to be submitted and approved as part of a s106 agreement as well as to require the applicant to enter into the necessary highway works agreements to carry out the works and provide the crossing to an acceptable standard.

Vehicle and Cycle Parking

- 7.179 In accordance with the Council's current Parking Standards and Design SPD (2011) a total of 654 vehicle parking spaces are required to serve the development. The development proposes to provide 33 vehicle parking spaces, which includes 3 disabled parking bays and 6 motor bike spaces. Whilst the proposed vehicle parking is well below the Council's current required standards the site is in a highly sustainable location and the extensive parking restrictions in place along Napier Road in the form of double yellow lines already prevent unauthorised on street parking in the area. As such the proposed lower provision in terms of vehicle parking spaces provision can be accepted.
- 7.181 The Council's residential parking permit scheme operates in the surrounding roads. Under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area: therefore, if this application is approved there should be an assumption that any future occupants of the proposed residential units will not be issued with resident or visitor parking permits which will be covered by condition and an informative applied. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.
- 7.182 The Council's Local Transport Plan 3 Strategy 2011 – 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. The Council's Local Plan was adopted in November 2019, and this includes a requirement at Policy TR5 that communal car parks for residential and non-residential developments 10% of spaces should be provided with an active charging point. All 33 proposed parking spaces are shown to be EV charging points which is in excess of the required 10% and is therefore acceptable.
- 7.183 The proposed vehicle parking provision also incorporates 3 disabled parking bays. This meets the standards set out within the Revised Parking Standards and Design SPD (2011) which requires 5% of total number of spaces to be accessible and in terms of size and design of the space. This is therefore considered to be acceptable.
- 7.184 The applicant states that provision of 316 cycle spaces on the site which would be provided in excess of the 313 spaces required to comply with the Council's SPD. This provision is made of mainly two tier cycle racks with some Sheffield stands also provided which is acceptable in principle. However, having reviewed the cycle parking areas proposed, RBC Transport Officers advise that only 308 cycle spaces have been illustrated. In addition to this, the cycle store for Blocks A and B is of insufficient size to accommodate the proposed number of Sheffield stands. The size of this store as currently proposed would in reality mean a total of only 306 cycle parking spaces could be provided. Furthermore, no information is provided as part of the application to demonstrate that the proposed cycle stores are of adequate size to accommodate the proposed two tier cycle parking facilities, meaning that the number of cycle parking spaces the development is able to provide could reduce even further. The level of cycle parking proposed is therefore considered inadequate and fails to provide the development and future occupiers with appropriate sustainable transport options contrary to Policies TR1 and TR5.
- 7.185 The development also proposes to provide visitor cycle stands which is welcomed albeit not required as per the Council's adopted standards within the SPD. However, the visitor parking is proposed to be located to the frontage of the site, directly adjacent to the footway/cycle way and as a result, and as discussed above in details, means the width of the footway/cycleway is inadequate due to conflict with the visitor cycle spaces. Details of the location of the visitor cycle store could be secured by condition if planning permission were to be granted.

Trip Generation

- 7.186 The applicant has undertaken a trip rate analysis as part of the Transport Assessment. Given the limited number of car parking spaces proposed the development would generate less vehicle movements than the existing office use of the site. This is considered to have an overall beneficial effect on the wider road network.

Servicing Arrangements

- 7.187 The unacceptable nature of the loading bay proposed to the site frontage is discussed above. Even without such a loading bay there is considered to be potential for ad hoc servicing/deliveries to take place along the site frontage to Napier Road, as is referred to in CADRA's comments on the application. Such ad hoc servicing would be hazardous to highway safety. Therefore, a contribution of £5,000 towards alterations of the loading restrictions along the site frontage is considered to be justified to mitigate against such ad hoc activities occurring and to be able to allow prosecution, as necessary. At the time of writing this report the applicant has not confirmed agreement to secure this contribution as part of a s106 legal agreement. Failure to do so means the development would fail to adequately mitigate for adverse highway safety impacts likely to result from ad hoc servicing of the development from Napier Road contrary to Policies TR2, TR3 and TR4.
- 7.188 Refuse collection is proposed to take place on-site from the rear of the block with an on-site management team coordinating waste collection including being responsible for moving the bins to the collection point on collection day. This is considered acceptable from a Transport perspective.
- 7.189 The design and access statement submitted with the application details that cleaning and maintenance of the building will be undertaken by way of abseil cleaning. RBC Transport Officers advise that the applicant should note that this would require them to apply for a licence for any structure that would over sail the Public Highway, given the proposed footway/cycleway is located directly adjacent to the building at several locations along the frontage. This also raises further conflict with the position of the proposed widened cycleway/footway to the front of the site and risk that pedestrians/cyclists could be splashed with dirty water and is a further reason why the footway/cycle way must be separated from the building. This demonstrates further conflict within Policies TR1, TR3 and TR4.
- 7.190 The application references Mobile Elevating Work Platform (MEWP) access around the whole building for cleaning and maintenance which would also include the site frontage at street level which would entail the footway/cycleway. Use of the footway/ cycleway for these purposes would result in the closure of the only footway/cycleway along Napier Road which could not be supported by the Highway Authority and would not be an acceptable arrangement. Furthermore, MEWP areas have also been illustrated to the rear of the development with significant space required in several areas that will likely restrict egress from the development. Given that a one-way route through the rear of the site is proposed the application fails to demonstrate that the proposed MEWP would not be detrimental to safe egress from the site, contrary to Policies TR1, TR3 and TR4.

Construction Matters

- 7.191 A construction and demolition method statement would be required to be submitted and approved to demonstrate measures to ensure the development can be carried out without adversely impacting upon the highway networks near the application site. This could be secured by way of pre-commencement condition.

G Sustainability and Energy

- 7.192 Policy H5 (Standards for New Housing) requires that all new-build housing is built to high design standards. In particular, new housing should adhere to water efficiency standards in excess of the Building Regulations and achieve Zero Carbon homes standards (for

major schemes), 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) requires developers to consider inclusion of decentralised energy infrastructure, in particular any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider 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.

- 7.193 In accordance with the adopted RBC Sustainability and Design SPD (2021) adherence to the Zero Carbon Homes standards requires a minimum 35% improvement in the dwelling emission rate over the 2013 Building Regulations standard, and a financial contribution towards carbon offsetting within the Borough to off-set the remaining dwelling emission rate to zero. The Building Regulations were updated in 2021 to require a higher standard dwelling emission rate performance from all dwellings which is already a 31% improvement over 2013 Building Regulations Standards. The Sustainability and Energy Statement submitted with the application models/predicts that the proposals will achieve over a 70% improvement in the 2021 Building Regulations emission rate which equates to an even higher performance when compared to the 2013 Building Regulations standards as required by Policy H5. As per Policy H5 and the SPD a financial contribution to off-set the dwelling emission rate performance of the development to zero is required to be secured by way of s106 financial contribution obligations.
- 7.194 If planning permission were to be granted a series of planning conditions would be required to secure design stage and as built stage final SAP assessment for all dwellings to confirm the actual performance of the development and amount of carbon off-setting contribution required. The projected dwelling emission rate performance of the development has also been reviewed on behalf of the LPA by a specialist independent consultant who confirms that the applicant's energy performance projections have been carried out to an appropriate standard and are reasonable and achievable and that the LPA can have confidence that the development will achieve a dwelling emission rate performance which exceeds the standards required by Policy H5.
- 7.195 The submitted sustainability and energy statement measures to be incorporated within the development satisfy the above requirements. In demonstrating compliance with the above standards, the proposals have been designed to incorporate a range of sustainable construction techniques and measures to adapt to climate change including use of sustainable and thermally efficient materials, high efficiency water fittings, low energy usage light fittings and the extensive on-site ecological and soft landscaping enhancements discussed earlier in this report to comply with Policies CC2 and CC3.
- 7.196 Key to achieving these standards is also provision of sources of decentralised energy within the development in accordance with Policy CC4. The proposals for the development include provision of on-site air source heat pumps (ASHPs) for provision of hot water to each of the proposed dwellings (with electric panel heaters proposed for heating) together with roof mounted photovoltaic panels for on-site provision of electrical energy. The applicant's sustainability and energy statement explores potential use of ground source heat pumps (GSHPs) (which are sequentially favoured within the Council's Sustainable Design and Construction SPD) but identifies issues in respect of the constrained nature of the site and available space such that ASHPs were instead pursued as a preferred priority and which are also supported by the SPD.
- 7.197 Policy CC5 (Waste Minimisation and Storage) requires that development minimises the generation of waste in the construction, life and use of buildings. The application proposes demolition of three existing office buildings which date from the 1980's and are not particularly old and whilst they are not of any notable architectural merit, they are not an eyesore or harmful to the existing visual amenity of the site. In this instance given the site is allocated for high density redevelopment within the Local Plan (2019) it is

considered reasonable to accept that this Borough's aspirations for future development on this site would not be achieved via retention/conversion of the existing modest two storey buildings. It is also pertinent to note that there is a separate extant prior approval consent for demolition of the three existing building which could be implemented in isolation from the current planning application without any consideration of any waste that would result. Given the above and the good overall performance of the proposed development in respect of sustainability, energy efficiency and tackling climate change it is not considered that any unacceptable concerns in respect of construction waste arise as a result of the development. If planning permission for the development were to be granted, then a demolition and construction method statement would be required to be secure by condition which would include a requirement to demonstrate re-use and recycling of construction waste where possible. No conflict with Policy CC5 is identified.

- 7.198 Overall, with the proposed level of CO2 emission reduction, thermal efficiency measures and provision of on-site decentralised energy sources are considered to comply with policies CC2, CC3, CC4, CC5 and H5 and achieving these standards is considered to be a benefit of both proposals.
- 7.199 The Council has plans for a Reading Centralised Heat Network, as outlined with the SPD which in paragraph 8.8 identifies development at Napier Court as being potentially suitable for heat network schemes. Such plans are evolving but a s106 obligation is included with the heads of terms at the top of this report to require the developer to undertake a feasibility study for the development to connect to such a centralised heat network prior to commencement of the development. At the time of writing this report the applicant has not confirmed agreement to such an obligation. Failure to do so would present conflict with Policy CC4 and the SPD which require development to link to existing decentralised energy networks or demonstrate why this is not feasible.

H Other Matters

Employment Skills and Training

- 7.198 As a major category residential development and in line with the adopted Employment Skills and Training SPD (2011), the development is required to provide or contribute towards a construction phase employment and skills plan to benefit the local employment market. This would be secured as part of any 106 legal agreement with the applicant having the option of whether to provide a plan or an equivalent financial contribution as per the formula set out in the SPD. In the event that the applicant chooses to make a financial contribution towards providing this training, officers have calculated the required amount to be £128,112.50. Securing this as an obligation as part of a s106 agreement would comply with Policy CC9 (Securing Infrastructure) which requires development that would provide employment to provide mitigation in line with its impacts on labour and skills.

Archaeology

- 7.199 Policy EN2 (Areas of Archaeological Significance) requires developments to ensure that they do not have an unacceptable impact on archaeological remains, and for proposals to undertake appropriate safeguarding. The applicant has submitted a desk-based archaeological assessment of the site with the application which has been reviewed by Berkshire Archaeology who advise that the site lies within Thames Valley adjacent to the river which is known to be a focus for human activity since prehistory and that there are numerous record that indicate survival of archaeology in this area which could be damaged by ground disturbance as a result of the proposed development. As such a condition is recommended to secure submission, approval and implementation of a written scheme of archaeological investigation to ensure the identification and recording of any buried archaeological remains, in accordance with Policy EN2 and Policy CR11.

Medical facilities:

7.200 The addition of the 570 new residents will have an impact on medical facilities in the Borough. The NHS Integrated Care Board has sought a financial contribution towards the provision of extra primary clinical capacity to mitigate the increased impact of both developments on primary care function in local GP practices. A relevant contribution of £492,480 is sought to be secured through S106 obligation. This is sought to offset the additional impact of the proposals on medical facilities as a result of the population increase via the development in accordance with Policy CC9 and also reflects emerging requirements in respect of (new) Policy CC10 (Health Impact Assessment) H11 within the draft Local Plan Partial update (2025) which requires developments to mitigate negative impacts upon health. Other developments in the central area may also contribute towards this facility (as may be appropriate to those developments' individual circumstances and impacts). At the time of writing this report the applicant has not confirmed agreement to secure this contribution as part of a s106 agreement. Failure to do so would mean the development would fail to mitigate for the impacts it would have upon local healthcare infrastructure contrary to Policy CC9.

I Equality implications

- 7.201 a. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- b. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues, and priorities in relation to this particular application.

J. CONCLUSION

7.202 As with all planning applications considered by the Local Planning Authority, the application is required to be determined in accordance with the Development Plan unless material considerations indicate otherwise, as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004.

7.203 Any harmful impacts of the proposed development are required to be weighed against the economic, social, environment and any other public benefits in the context of national and local planning policies, as detailed in the Appraisal above.

7.204 The proposed development would deliver a number of benefits for the Borough. Officers' summary of these is set out below:

- Provision of 570 dwellings towards meeting the Council's housing needs on an accessible brownfield site and in an appropriate mix of dwellings sizes (Policies H1, CC6 and CR6). This is particularly important given that the Council is currently not meeting its housing targets.
- Provision of a generally appropriate high density residential development in a sustainable location aligning with the strategic vision for the site and its location within the Station/River MOA (Policies CR11 and CR11i)
- Provision of a building of good architectural quality and visual interest (Policies CC7, CR2 and CR11)
- A net gain in on-site tree planting and soft landscaping proposals within the site and roof top amenity terrace (Policies CC7 and EN14)

- Good performance of the development in respect of energy efficiency, carbon off-setting and provision of on-site sources of decentralised energy (Policies CC3, CC4 and H5)
 - Creation of a good standard of residential accommodation for future occupiers in respect of all units meeting or exceeding national described space standards and provision of on-site communal facilities (Policies H5 and CC8)
 - Construction phase – creation of jobs, contribution to the local economy, apprentice schemes and commitments to utilise local labour and agreement to provide a construction phase employment and skills plan (Policy CC9)
- 7.205 The following matters to be secured by way of s106 legal agreement are considered justified and acceptable to the Local Planning Authority to mitigate for the impacts of the proposed development and would also be considered benefits of the development if secured as part of a s106 agreement. At the time of writing this report the applicant has not confirmed agreement to these obligations
- Off-site public realm and open space enhancements to Kings Meadow, including provision of a new pedestrian crossing over Napier Road, additional tree planting and contributing towards improvements to the existing Kings Meadow children’s play area (Policies CC7, CR3, EN9, EN10 and EN14)
 - Zero carbon off-setting contribution (Policy H5).
 - Provision of a financial contribution towards healthcare facilities within Thames and adjacent wards (Policy CC9)
 - Submission, approval and implementation of a feasibility study for connection of the developments to a future Reading Centralised Heat Network (Policy CC4).
- 7.206 Notwithstanding the above, there are considered to be several unresolved harms resulting in policy conflicts. The proposals fail to provide adequate space to site frontage of the building with Napier Road, resulting in a number of pinch points and conflicts between the proposed building, existing and proposed landscaping, the proposed footway/cycleway and land required to be safeguarded for future MRT use.
- 7.207 Significantly, the proposed development fails to demonstrate that it can adequately safeguard land required for future Mass Rapid Transit (MRT) which is a prioritised major transport project within the Borough and strategic requirement for development on this site, which is contrary to Policies TR2, CR11 and CR11i and harmful to the Borough’s strategic and sustainable transport infrastructure needs. The proposals would also fail to deliver an acceptable shared pedestrian and cycle route to the front of the site along Napier Road resulting in pedestrian and cyclist safety concerns, or provide adequate on-site cycle parking facilities contrary to Policies TR1, TR3, TR4 and TR5 failing to adequately support or promote sustainable transport within the Borough. The development’s failure to facilitate greater pedestrian and cycle permeability within the Station River MOA is also contrary to Policy CR11, and the strategic vision set out within this policy for connectivity within the MOA.
- 7.208 Furthermore, given the demonstrated critical need for Affordable Housing in Reading significant harm is identified to the Borough as a result of the proposal’s failure to provide any affordable housing and means the development would fail to meet the requirements of Policies H3 and H4 and the Affordable Housing SPD and their associated aims of achieving mixed and balanced communities within the Borough. Failure to provide adequate affordable housing would fail to make the most appropriate use of the land resource. This situation both in isolation, and if replicated within other developments, would reduce the accessibility to appropriate housing within Reading. It is not considered reasonable to expect other developments to compensate for the shortfall in provision. The absence of a completed s106 legal agreement to secure the provision of Affordable Housing, together with associated obligations regarding a deferred contribution mechanism is a significant shortfall of the proposal.
- 7.209 The proposals also fail, as a result of the insufficient space provided to the front of the building, to demonstrate that the development would not harm or result in future pressure

to fell or prune five protected Norway Maple TPO trees of high visual amenity value located at the western end of the site, contrary to Policy EN14.

- 7.210 Failure of the applicant to agree to secure the s106 obligations set out in paragraph 7.205 above also results in further policy conflicts and harm to the Borough. Failure to secure necessary off-site public realm and open space enhancements to Kings Meadow, including provision of a new pedestrian crossing over Napier Road, additional tree planting and contributing towards improvements to the existing Kings Meadow children's play area means the development would not mitigate the additional strain on social and economic infrastructure and fail to make appropriate provision towards improvement of and access to existing open space based on the needs of the development. The proposals also fail to make adequate provision for appropriate off-site tree planting in order to improve the level of tree coverage within the Borough and in order to provide an appropriate landscape setting for the development, contrary to Policies CC7, CR3, EN9, EN10 and EN14.
- 7.211 Failure to secure a zero carbon off-setting contribution as part of a s106 agreement means the development is contrary to Policy H5 and the Sustainable Design and Construction SPD (2021) and means the development would fail to provide an appropriate standard of new housing and fail to contribute to the Borough's contribution to tackling climate change; whilst failure to secure a feasibility study for the development to connect to a future Reading Decentralised Heat Network would conflict with Policy CC4 and the Sustainable Design and Construction SPD which require development to link to existing decentralised energy networks or demonstrate why this is not feasible.
- 7.212 Failure to secure an appropriate contribution towards medical facilities within the Thames Ward (or adjacent wards) also means the development would fail to mitigate for the impact of the development and associated population increase would have upon healthcare infrastructure within the locality, contrary to Policy CC9.
- 7.212 Carefully weighing all of the above matters in the balance, officers consider that the benefits of the proposed development would be significantly and demonstrably outweighed by the identified harms. This position is reached having particular regard to the failure of the development to safeguard land for a future MRT route, a major strategic transport project in the Borough which would be detrimental to the Borough's transport infrastructure needs, as well as the failure of the proposals to meet the Borough's identified critical housing needs as a result of the failure to secure appropriate provision in relation to affordable housing.
- 7.213 At this point, it is also pertinent to outline the position in respect of the status of the Local Plan, the current version of the Local Plan (adopted in November 2019) which turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest needed to be considered for updating to reflect changing circumstances and national policy. The submission draft of the Local Plan Partial Update was submitted in May 2025, and the Local Plan hearings took place in February 2026. Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become "out of date" when they are five years old. It is considered in respect of the Local Plan policies pertinent to this application that they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan, aside from Policy H1 (Provision of Housing) which is accepted to be out of date. Therefore, they can continue to be afforded weight in the determination of this planning application and, aside from Policy H1, are not considered to be 'out of date'. Policy H1 is out of date because the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in National Planning Practice Guidance (NPPG) (as required now policy H1 is out of date) or for the provision of Affordable Housing.
- 7.214 It is important to consider that the emerging Local Plan Partial Update, and the NPPF, both require an increased provision of housing, rather than any reduction. Noting that the

existing Local Plan, the emerging Local Plan and the NPPF are all aligned in their overall objective of creating mixed and balanced communities, and the delivery of an appropriate mix of housing types for the local community which includes affordable housing (NPPF Para 63). When considering the relative weight to be given to the various benefits and harms identified, it should be in the context of this need for housing which meets identified needs.

7.215 It is also considered that any harm in respect of meeting identified housing need, once identified, is far from being an abstract concept and will have direct impacts on the housing of local residents. This is not to deny or lessen any benefits which might outweigh this harm and could, if sufficient, still outweigh the harm, but must be clearly demonstrated.

7.216 Notwithstanding the above and for completeness, in terms of the status of the Local Plan, para 11 of the NPPF sets out a framework for decision making where policies are considered out of date:

11. For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.

7.217 Footnote 7 confirms that “*The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.*”

7.218 Areas and Assets of particular importance in respect of the current proposal are Kings Meadow a designated Local Green Space as per Policy EN7, the location of the application site within flood zone 2 and Thames Lido located on the opposite side of Napier Road, a Grade II Listed Building. However, in these respects the proposals are not considered harmful.

7.219 In addition, Footnote 9 confirms that the relevant key policies are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12 of the NPPF.

7.220 Considering each of these in turn the following is advised:

7.221 Paragraph 66 – Affordable Housing – This major development conflicts with paragraph 66 in that, as per the appraisal above, it does not proposal to provide any affordable housing, failing to meet the Policy H3 and H4 requirements and together with the applicants failure to agree to an affordable housing deferred payment mechanism the proposals do not meet identified local needs in respect of affordable housing. This is a significant shortfall of the proposed development.

7.222 Paragraph 84 – Rural housing – Not applicable to this proposal.

7.223 Paragraph 110 and 115 – Sustainable transport – The proposal is within a sustainable location near to services and facilities. However, this would be true of any housing in this location and does not in itself justify the particular form of development proposed and is largely neutral in terms of weight. However, the development fails to prioritise sustainable transport modes through failure to safeguard land for a future MRT route, failure to provide pedestrian and cycle route of an acceptable standard and to provide insufficient provision

for cycle parking. These failure are considered to be significant shortfalls of the proposed development.

- 7.224 Paragraph 129 – Achieving appropriate densities – Whilst the density is high, it is considered appropriate given the sustainable location and in the interests of making efficient use of the land. However, the viability information submitted by the applicant, suggesting that despite the high density of development, local market / site conditions equate to a negative viability position (in the viewpoint of the applicant), with this representing a barrier to the delivery of development.
- 7.225 Paragraphs 135-139 – Achieving well-designed places – Whilst the proposed building design is considered acceptable the development fails to demonstrate that it would not result in harm to five protected TPO trees which is a shortfall of the proposals.
- 7.226 The LPA’s view, as described above, is that the relevant policies of the Local Plan are not out of date, nevertheless for completeness the ‘tilted balance’ engaged by paragraph 11 of the NPPF is also addressed above. Even if relevant policies were considered out of date (which, for completeness, they are not) it is considered that the provisions of NPPF paragraph 11 still do not support the granting of planning permission in this specific instance and taking account of the Framework as a whole (Reading Borough Local Plan 2019 and the NPPF December 2024), it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the identified harms.
- 7.227 The officer recommendation is to refuse planning permission for the reasons listed in the recommendation box at the top of this report.

Plans and drawings considered:

<u>Plan/ Drawing Number</u>	<u>Plan/ Drawing Title</u>
READ-5PA-ZZ-ZZ-DR-A-000001_P14	Existing Site Plan
READ-5PA-ZZ-ZZ-DR-A-001000_P14	Existing Site Location Plan
READ-5PA-ZZ-ZZ-DR-A-000100_P15	Demolition Plan - Masterplan
READ-5PA-ZZ-ZZ-DR-A-042100_P12	Demolition Elevations - Masterplan
READ-5PA-ZZ-00-DR-A-022200_P26	GA Masterplan - Ground Floor Plan
READ-5PA-ZZ-01-DR-A-022200_P21	GA Masterplan - First to Fourth Floor Plan
READ-5PA-ZZ-07-DR-A-022200_P21	GA Masterplan - Fifth to Eighth Floor Plan
READ-5PA-ZZ-09-DR-A-022200_P20	GA Masterplan - Ninth to Tenth Floor Plan
READ-5PA-ZZ-11-DR-A-022200_P20	GA Masterplan - Eleventh Floor Plan
READ-5PA-ZZ-RF-DR-A-022200_P19	GA Masterplan - Proposed Roof Plan
READ-5PA-ZZ-ZZ-DR-A-042000_P12	Existing Elevations, Sheet 1 of 2 - Masterplan
READ-5PA-ZZ-ZZ-DR-A-042001_P12	Existing Elevations, Sheet 2 of 2 - Masterplan
READ-5PA-ZZ-ZZ-DR-A-042200_P17	Proposed Elevations - Masterplan
READ-5PA-ZZ-ZZ-DR-A-052000_P12	Existing Sections - Sheet 1 of 2 - Masterplan

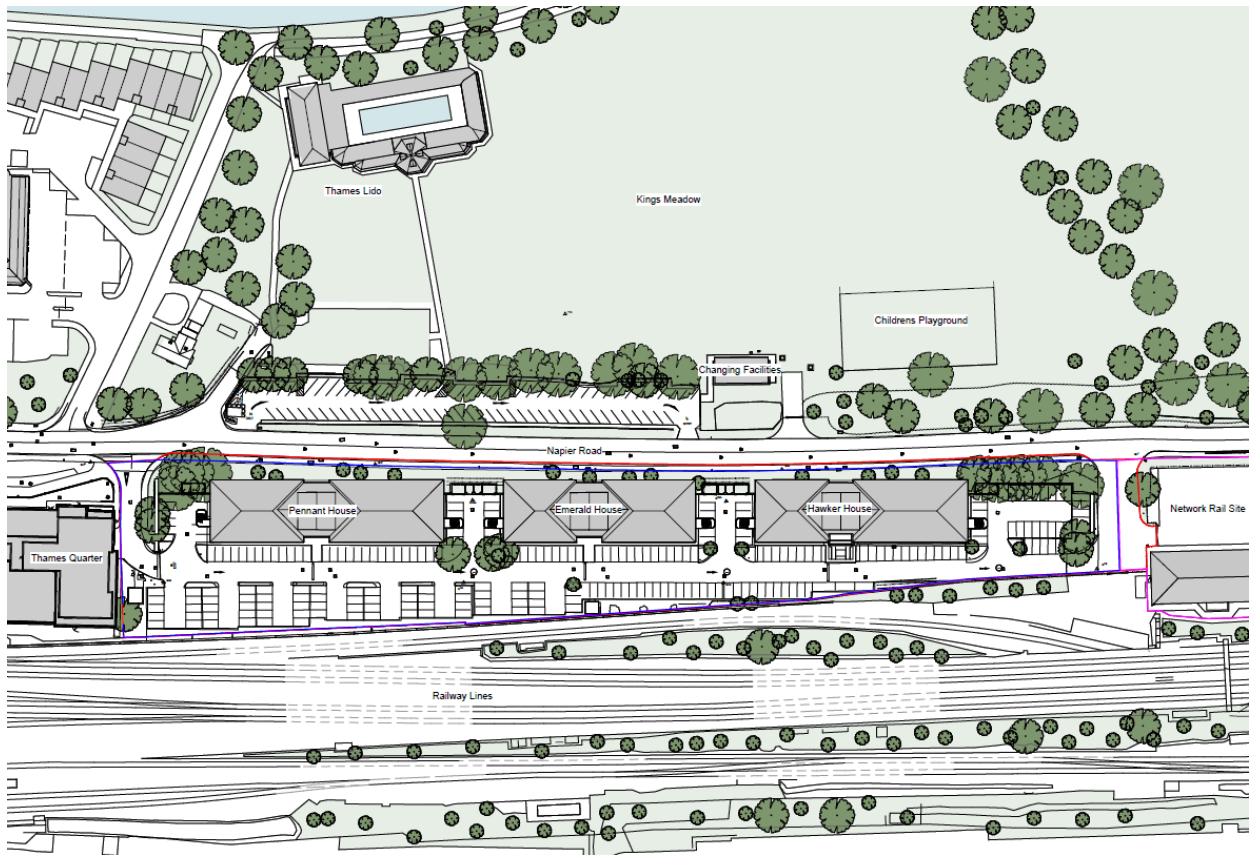
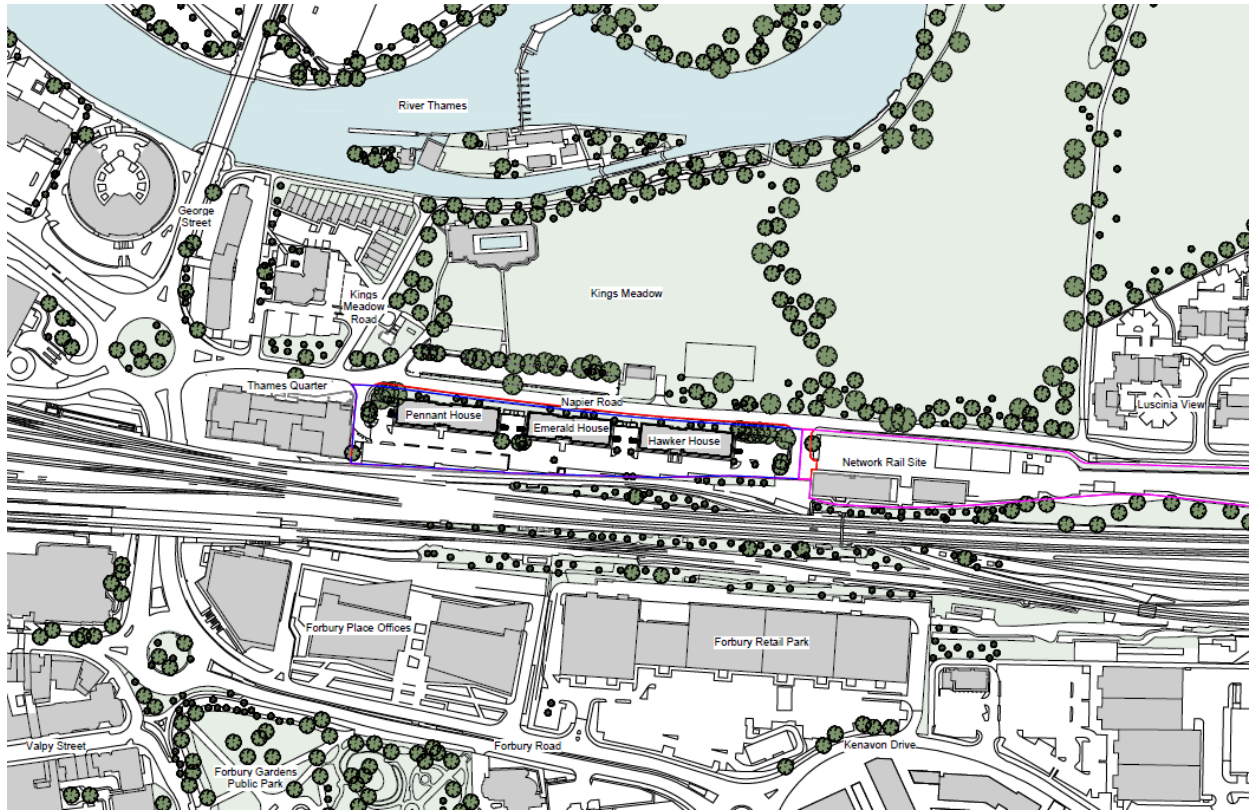
READ-5PA-ZZ-ZZ-DR-A-052001_P12	Existing Sections - Sheet 2 of 2 - Masterplan
READ-5PA-AB-GF-DR-A-022200_P26	GA Plan - Ground Floor - Block A & B
READ-5PA-AB-01-DR-A-022200_P21	GA Plan - First Floor - Block A & B
READ-5PA-AB-02-DR-A-022200_P21	GA Plan - Second Floor - Block A & B
READ-5PA-AB-03-DR-A-022200_P21	GA Plan - Third Floor - Block A & B
READ-5PA-AB-04-DR-A-022200_P21	GA Plan - Fourth Floor - Block A & B
READ-5PA-AB-05-DR-A-022200_P21	GA Plan - Fifth Floor - Block A & B
READ-5PA-AB-06-DR-A-022200_P21	GA Plan - Sixth Floor - Block A & B
READ-5PA-AB-07-DR-A-022200_P21	GA Plan - Seventh Floor - Block A & B
READ-5PA-AB-08-DR-A-022200_P21	GA Plan - Eighth Floor - Block A & B
READ-5PA-AB-09-DR-A-022200_P22	GA Plan - Ninth Floor - Block A & B
READ-5PA-AB-10-DR-A-022200_P22	GA Plan - Tenth Floor - Block A & B
READ-5PA-AB-11-DR-A-022200_P21	GA Plan - Eleventh Floor - Block A & B
READ-5PA-AB-RF-DR-A-022200_P19	GA Plan - Roof Level - Blocks A & B
READ-5PA-CD-GF-DR-A-022200_P26	GA Plan - Ground Floor - Block C & D
READ-5PA-CD-01-DR-A-022200_P21	GA Plan - First Floor - Block C & D
READ-5PA-CD-02-DR-A-022200_P21	GA Plan - Second Floor - Block C & D
READ-5PA-CD-03-DR-A-022200_P21	GA Plan - Third Floor - Block C & D
READ-5PA-CD-04-DR-A-022200_P21	GA Plan - Fourth Floor - Block C & D
READ-5PA-CD-05-DR-A-022200_P21	GA Plan - Fifth Floor - Block C & D
READ-5PA-CD-06-DR-A-022200_P21	GA Plan - Sixth Floor - Block C & D
READ-5PA-CD-07-DR-A-022200_P21	GA Plan - Seventh Floor - Block C & D
READ-5PA-CD-08-DR-A-022200_P21	GA Plan - Eighth Floor - Block C & D
READ-5PA-CD-09-DR-A-022200_P21	GA Plan - Ninth Floor - Block C & D
READ-5PA-CD-10-DR-A-022200_P21	GA Plan - Tenth Floor - Block C & D
READ-5PA-CD-11-DR-A-022200_P20	GA Plan - Roof Level - Block C & D
READ-5PA-AA-ZZ-DR-A-042201_P20	Proposed Elevations - Sheet 1 of 2 - Block A
READ-5PA-AA-ZZ-DR-A-042202_P20	Proposed Elevations - Sheet 2 of 2 - Block A
READ-5PA-BB-ZZ-DR-A-042201_P20	Proposed Elevations - Sheet 1 of 2 - Block B
READ-5PA-BB-ZZ-DR-A-042202_P20	Proposed Elevations - Sheet 2 of 2 - Block B

READ-5PA-CC-ZZ-DR-A-042201_P20	Proposed Elevations - Sheet 1 of 2 - Block C
READ-5PA-CC-ZZ-DR-A-042202_P19	Proposed Elevations - Sheet 2 of 2 - Block C
READ-5PA-DD-ZZ-DR-A-042201_P20	Proposed Elevations - Block D
READ-5PA-AA-ZZ-DR-A-052202_P17	Proposed Sections - Block A
READ-5PA-BB-ZZ-DR-A-052203_P17	Proposed Sections - Block B
READ-5PA-CC-ZZ-DR-A-052204_P17	Proposed Sections - Block C
READ-5PA-DD-ZZ-DR-A-052205_P17	Proposed Sections - Block D
READ-5PA-ZZ-ZZ-DR-A-043200_P15	Typical Bay Studies - Sheet 1 of 4 - Bay Study 1
READ-5PA-ZZ-ZZ-DR-A-043201_P15	Typical Bay Studies - Sheet 2 of 4 - Bay Study 2
READ-5PA-ZZ-ZZ-DR-A-043202_P15	Typical Bay Studies - Sheet 3 of 4 - Bay Study 3 & 4
READ-5PA-ZZ-ZZ-DR-A-043203_P16	Typical Bay Studies - Sheet 4 of 4 - Bay Study 5
READ-5PA-ZZ-ZZ-DR-A-900031	Bike Store Section
1.0 Rev 00	Two tier CAD Model
READ CUR XX XX DR C 090044_P02	Section 278 Footway Tie-in Longsections
READ CUR XX XX DR C 090043_P06	Section 278 Layout and Sections
READ CUR 00 00 D C 95001_P03	Vehicle Tracking Panel Van

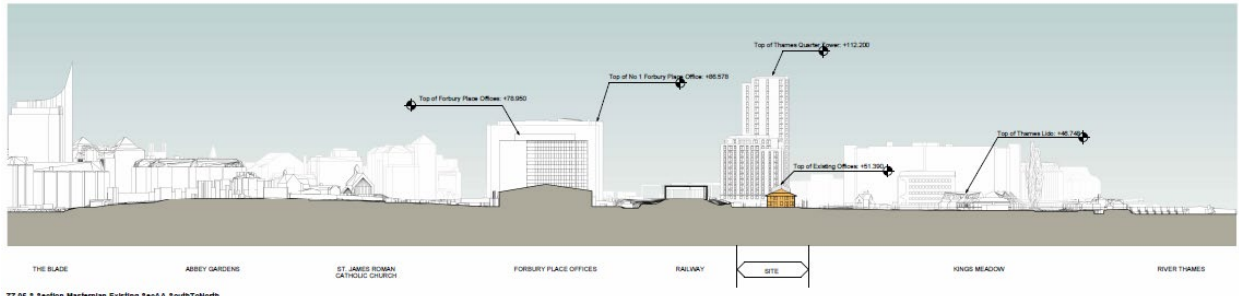
Supporting Documents:

- Design and Access Statement (5plus Architects)
- Planning Statement, including Affordable Housing Statement (CarneySweeney)
- Air Quality Assessment (Air Quality Consultants)
- Acoustics Report (CPWP)
- Arboricultural Assessment and Method Statement (FPCR)
- Archaeological Desk Based Assessment (Orion Heritage)
- Contamination - Phase 1 Preliminary Risk Assessment and Phase 2 Ground Investigation Report (Curtins)*
- Daylight and Sunlight Report – Assessment of Proposed Development (MES Building Solutions)
- Daylight and Sunlight Report – Assessment of Impact on Neighbours (MES Building Solutions)
- Ecological Appraisal and Biodiversity Net Gain Metric (FPCR)

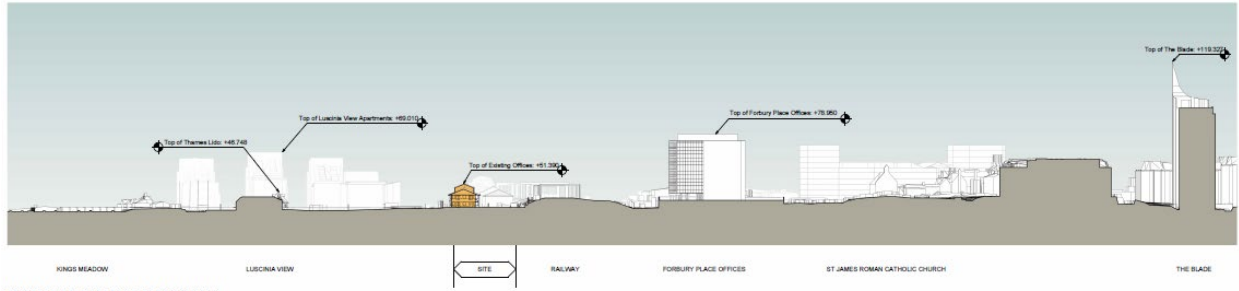
- Energy and Sustainability Statement (CPWP)
- Fire Statement (Design Fire Consultants)
- Flood Risk Assessment, SuDS and Drainage Strategy (Curtins)
- Heritage Impact Assessment (HCUK)
- Statement of Community Involvement (CarneySweeney)
- Transport Assessment (Curtins)
- Framework Travel Plan (Curtins)
- Townscape and Visual Appraisal (HCUK)
- Utilities Statement (HVSS)
- Wind Microclimate (Urban Microclimate)



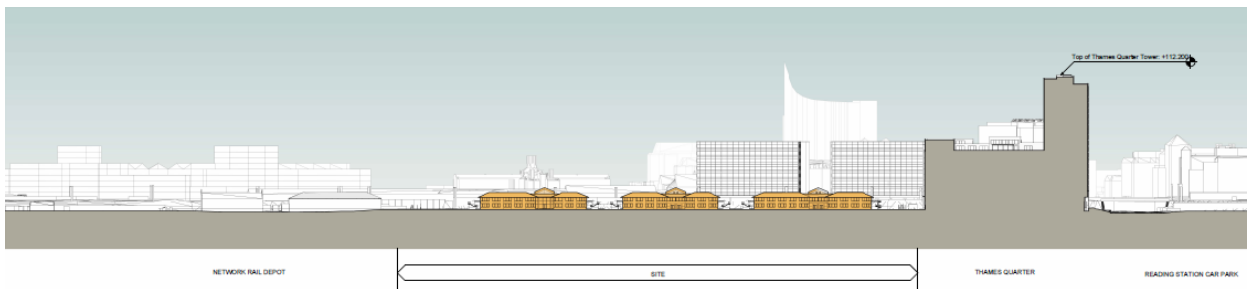
Existing Site Plans



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1:1000



ZZ-05-0-Section-Masterplan-Existing-SeeBB-NorthToSouth
1:1000

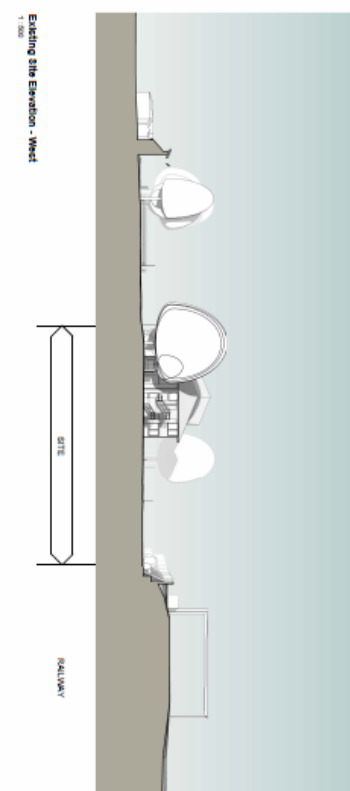
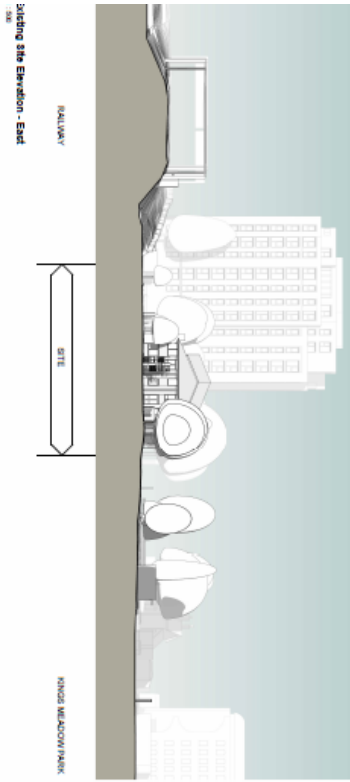
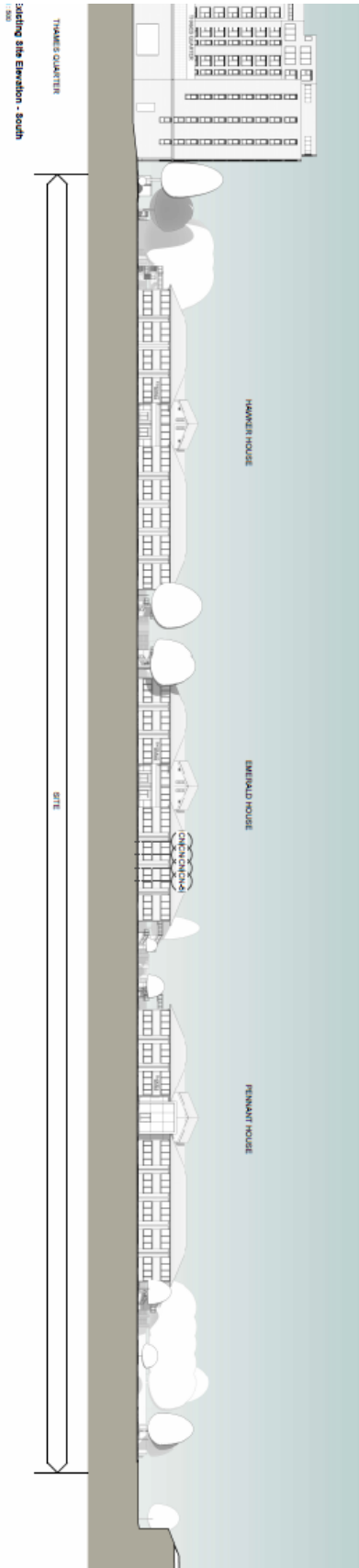
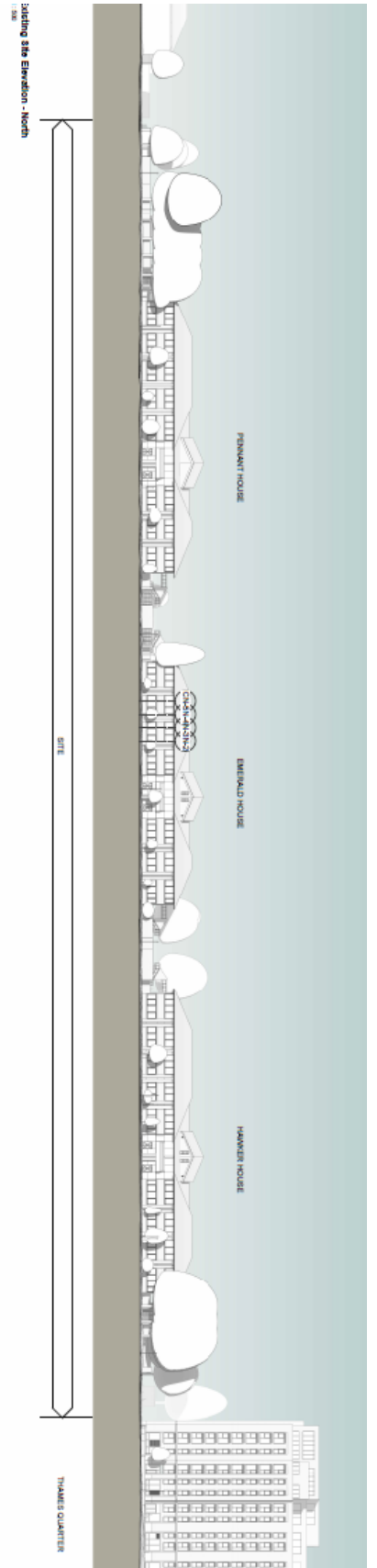


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ZZ-05-0-Section-Masterplan-Existing-SeeDD-WestToEast
1:1000

Existing Site Sections



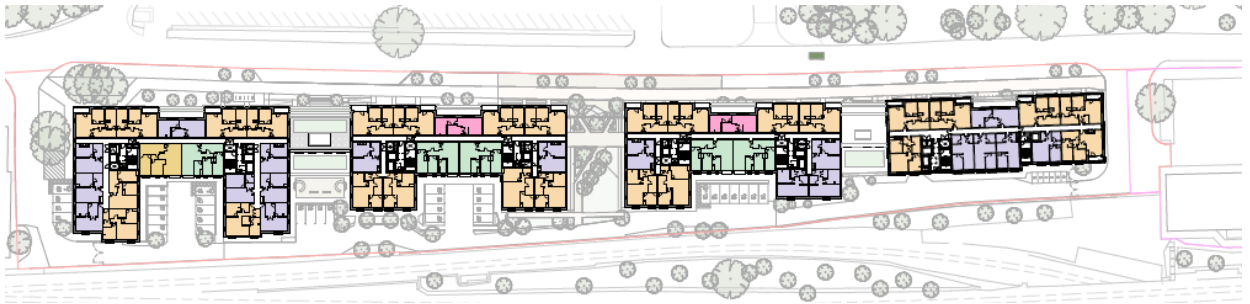
Existing Elevations



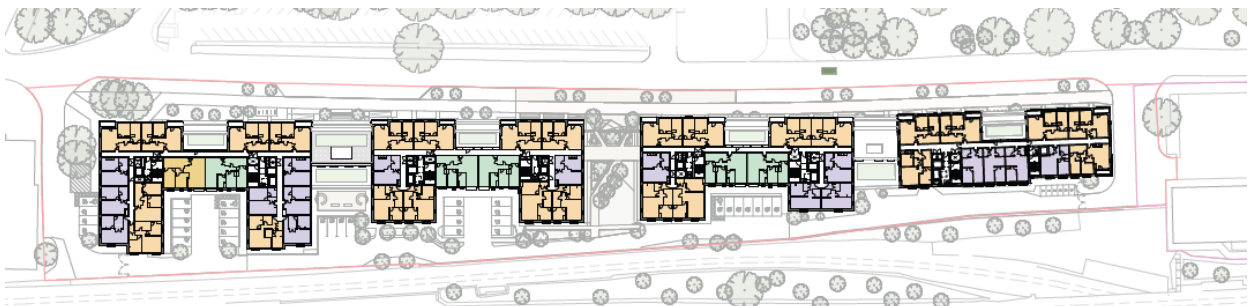
Proposed Ground Floor Site Plan – whole building



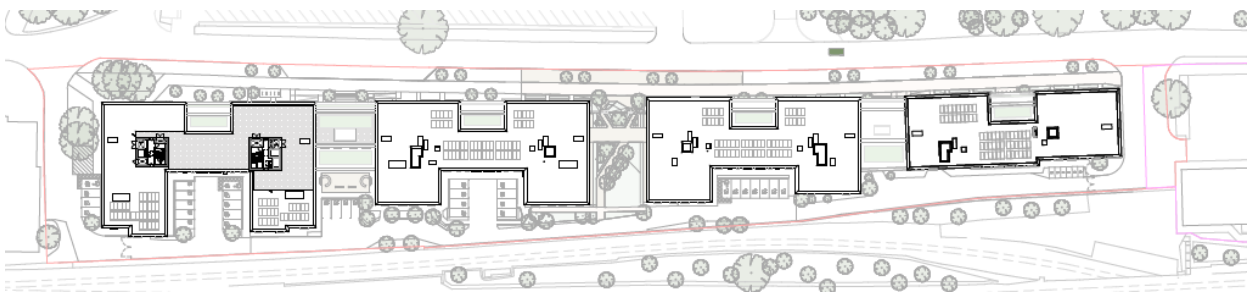
Proposed 1st to 4th floor plan – whole building



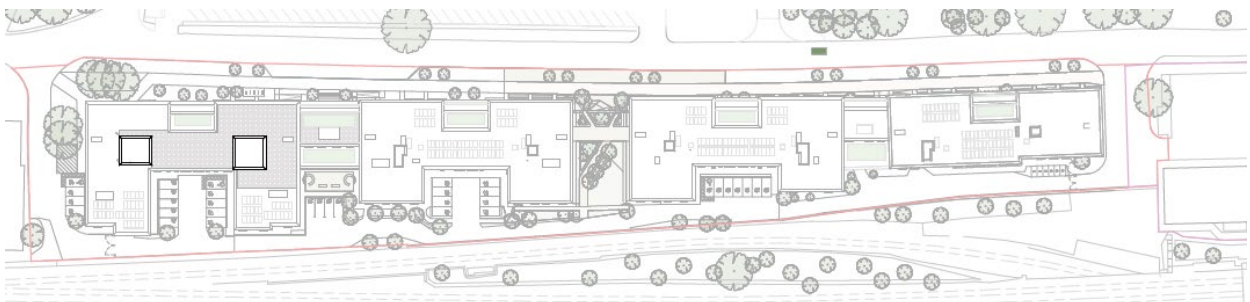
Proposed 5th to 8th floor plan – whole building



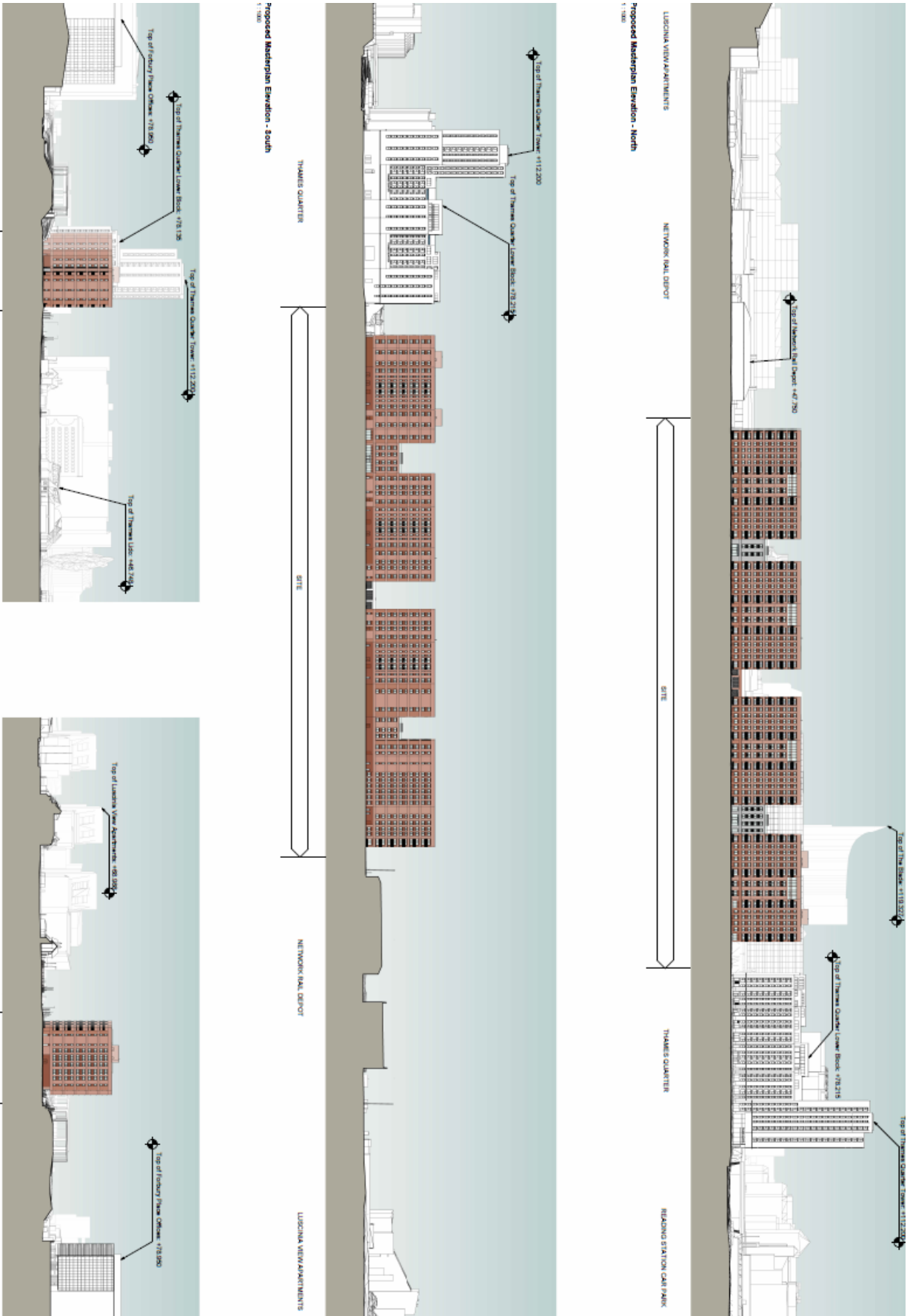
Proposed 9th to 10th floor plan – whole building



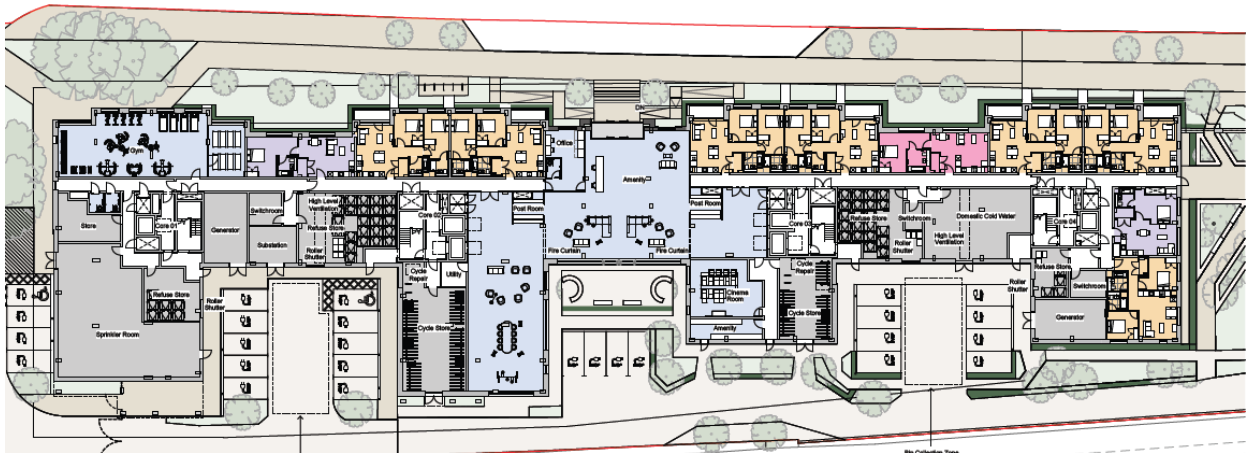
Proposed 11th floor plan – whole building



Proposed roof plan – whole building



Proposed elevations – whole building



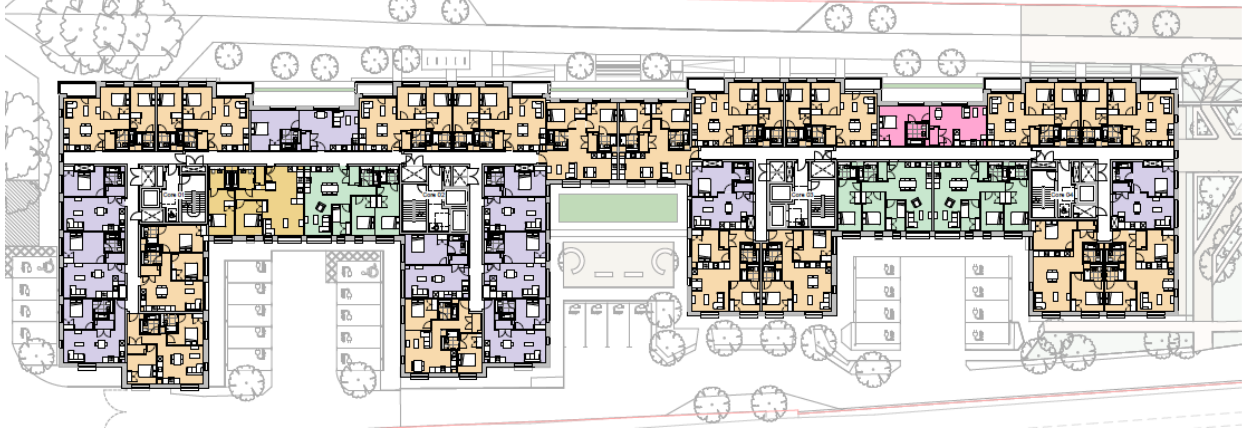
Proposed ground floor plan – blocks A and B



Proposed 1st floor plan – blocks A and B



Proposed 2nd floor plan – blocks A and B



Proposed 3rd floor plan – blocks A and B



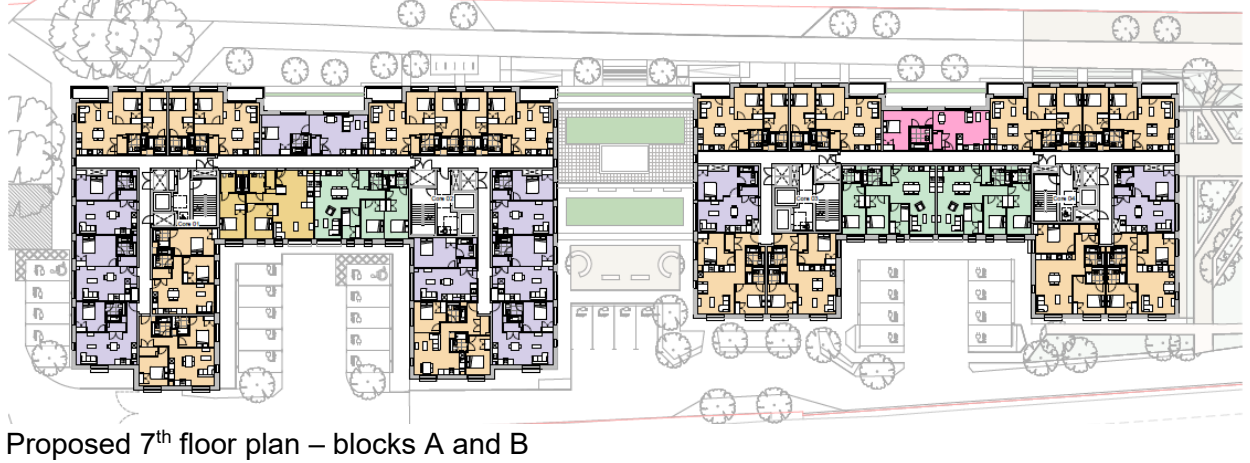
Proposed 4th floor plan – blocks A and B



Proposed 5th floor plan – blocks A and B



Proposed 6th floor plan – blocks A and B



Proposed 7th floor plan – blocks A and B



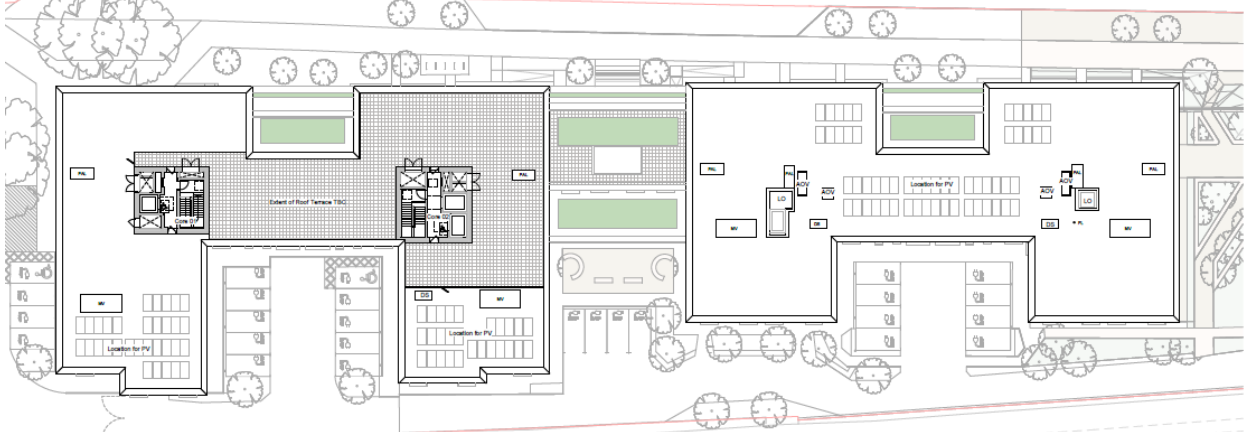
Proposed 8th floor plan – blocks A and B



Proposed 9th floor plan – blocks A and B



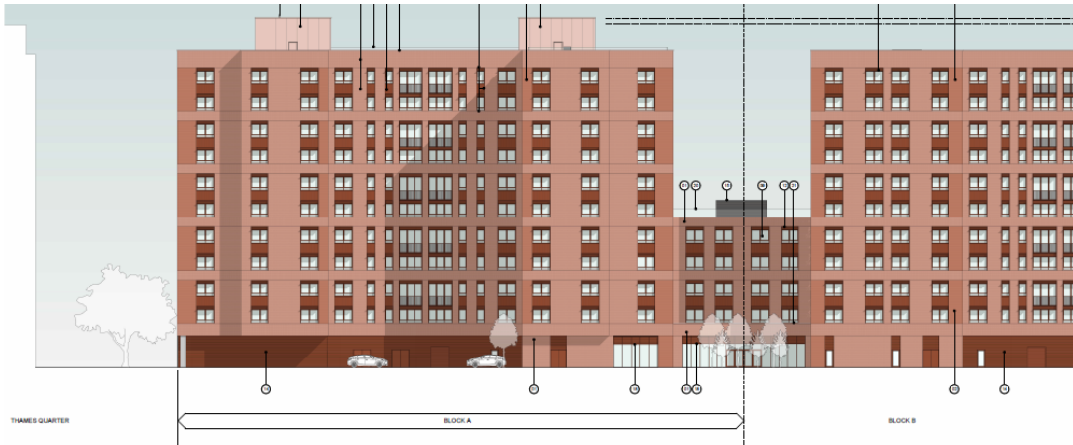
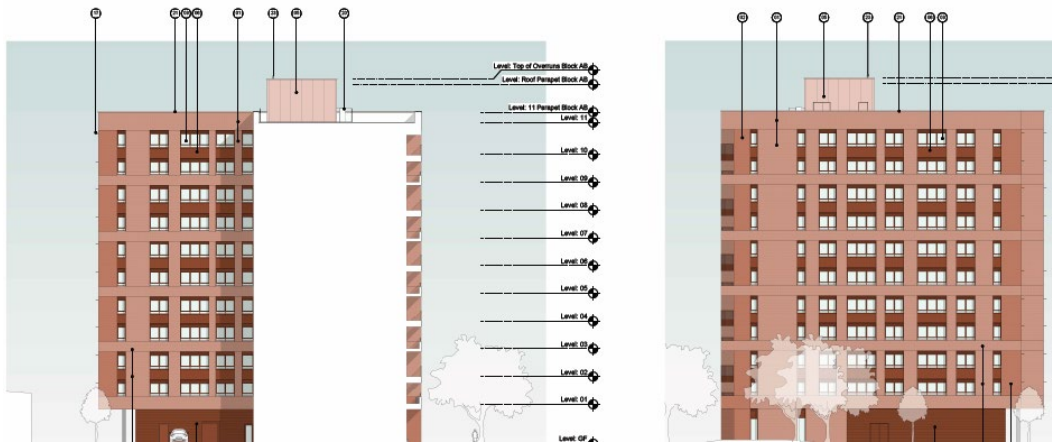
Proposed 10th floor plan – blocks A and B



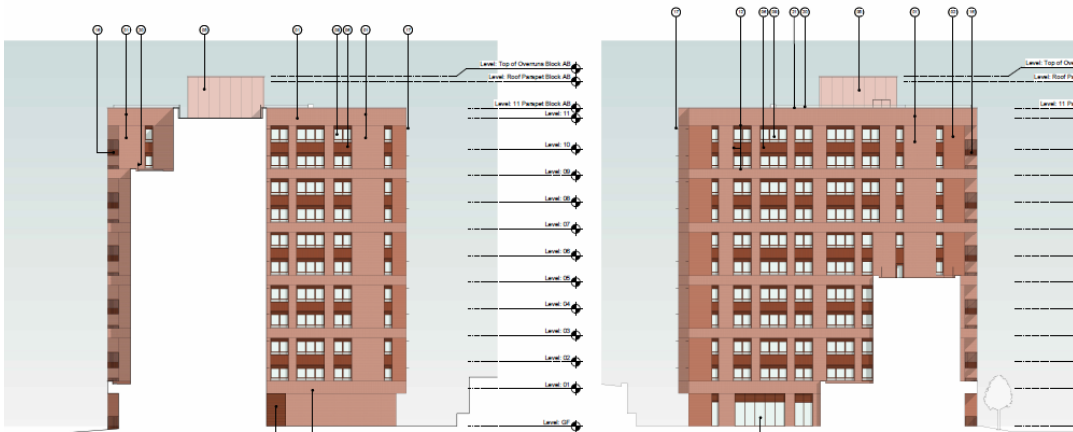
Proposed 11th floor plan – blocks A and B



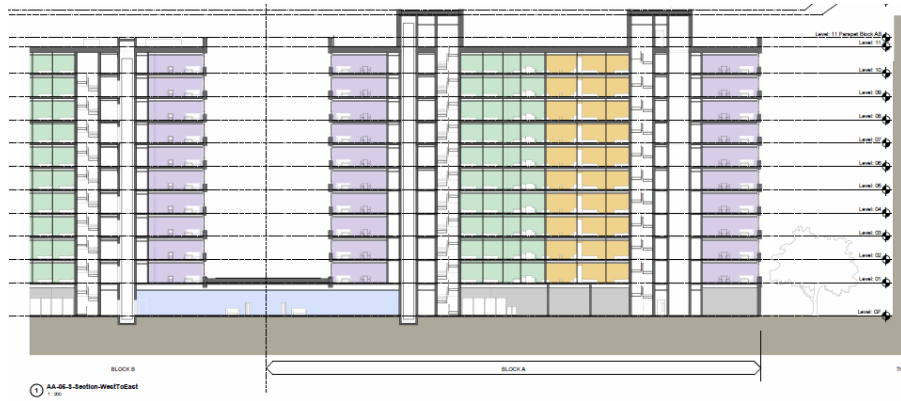
1 North Elevation - Block A
1:200



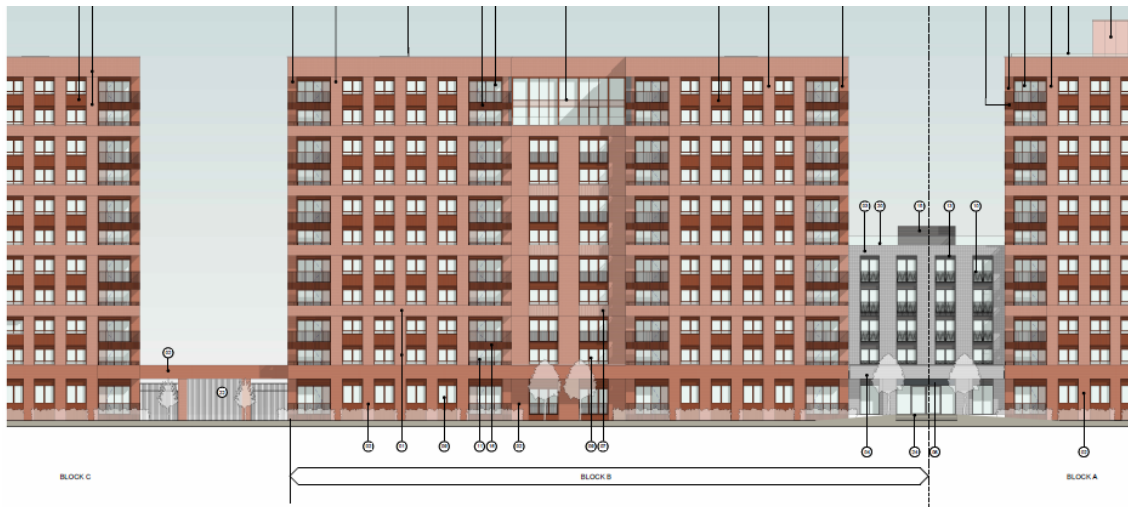
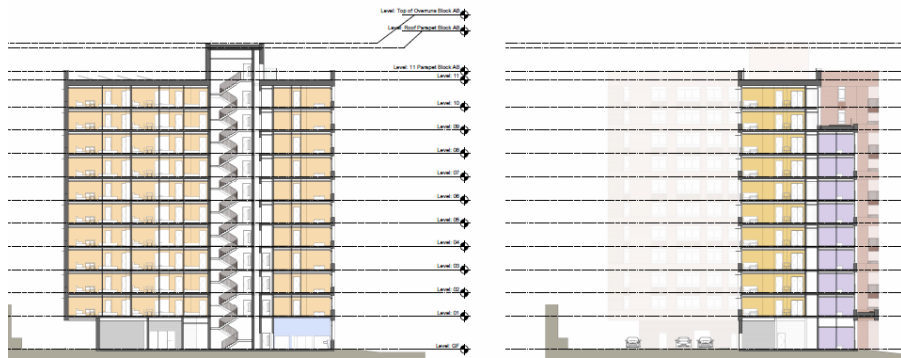
South Elevation - Block A
1:200



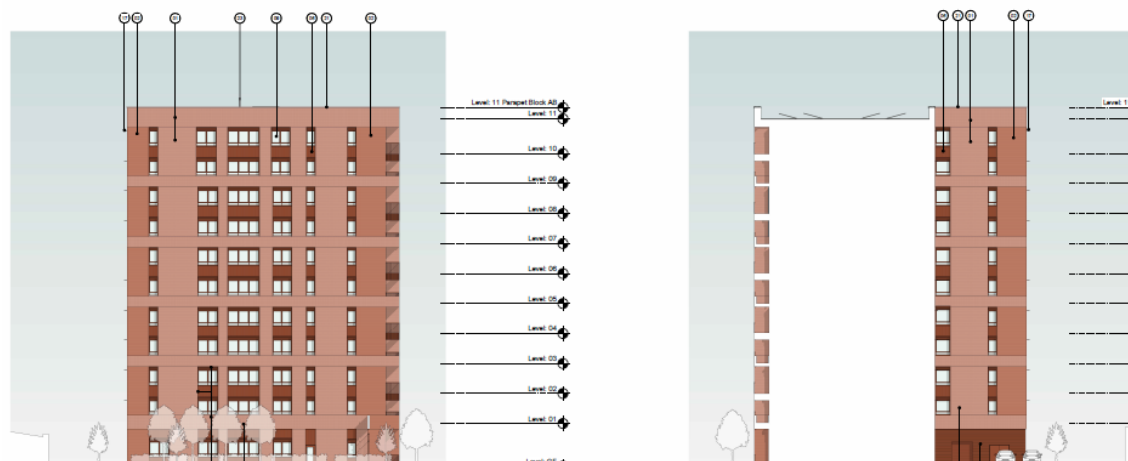
Proposed elevations- block A

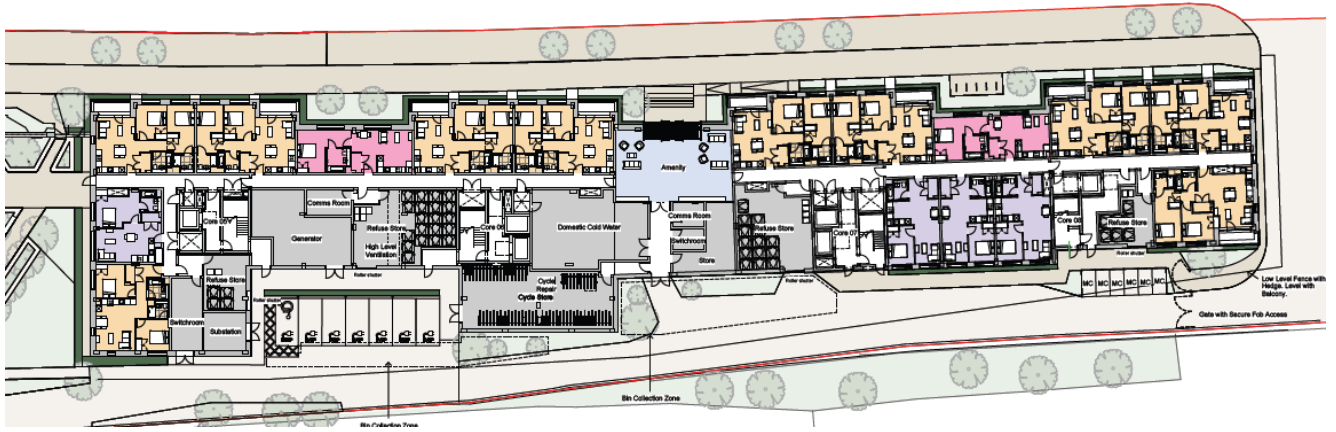


Proposed building section – block A



Proposed elevations – block B





Proposed ground floor plan – blocks C and D



Proposed 1st floor plan – blocks C and D



Proposed 2nd floor plan – blocks C and D



Proposed 3rd floor plan – blocks C and D



Proposed 4th floor plan – blocks C and D



Proposed 5th floor plan – blocks C and D



Proposed 6th floor plan – blocks C and D



Proposed 7th floor plan – blocks C and D



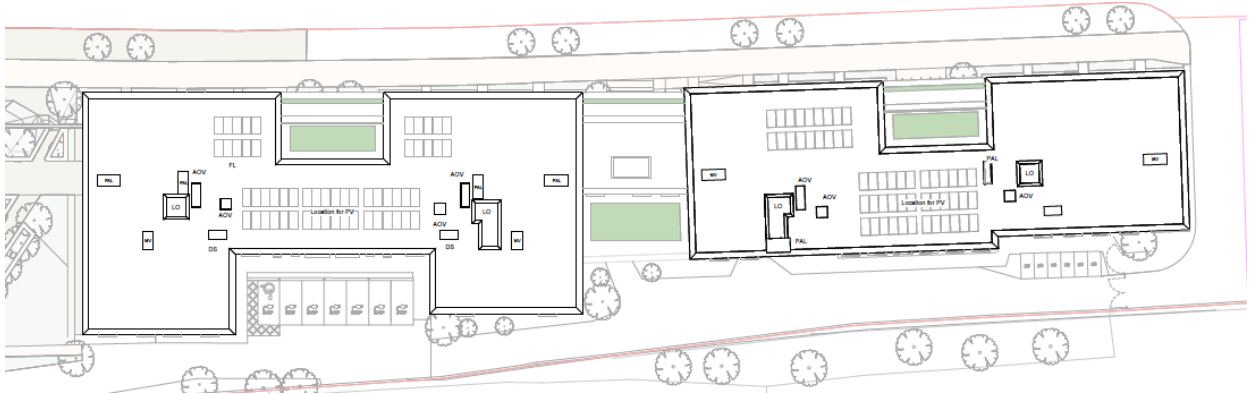
Proposed 8th floor plan – blocks C and D



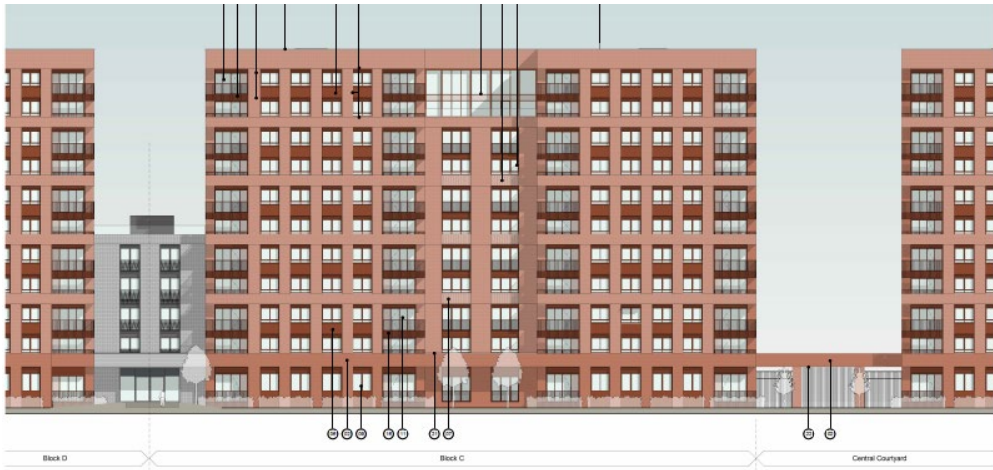
Proposed 9th floor plan – blocks C and D



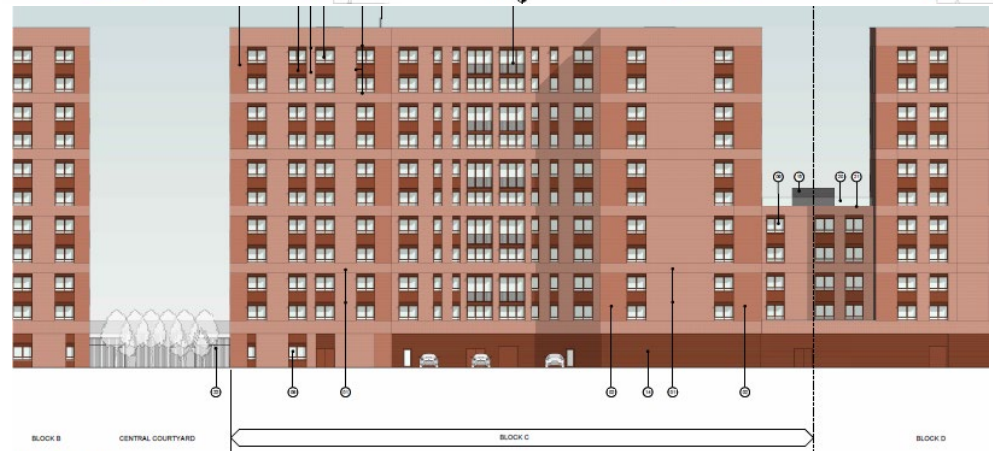
Proposed 10th floor plan – blocks C and D



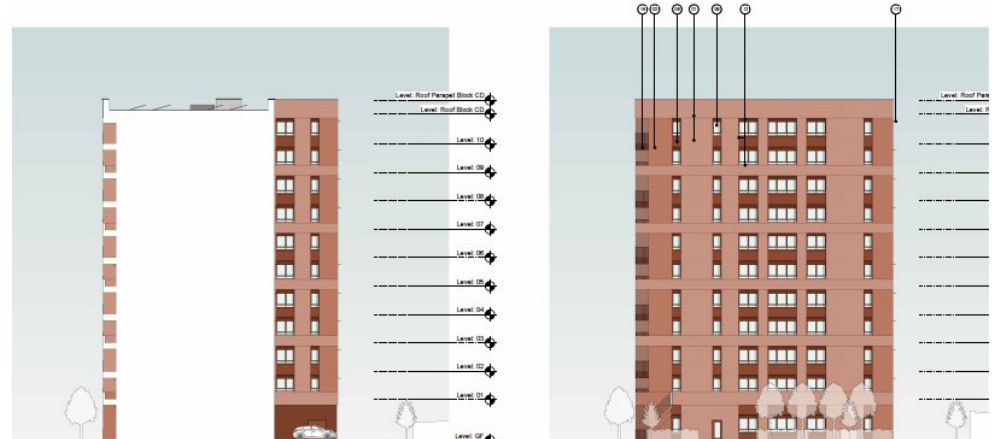
Proposed roof plan – blocks C and D



North Elevation - Block C
1:200



South Elevation - Block C
1:200



Proposed elevations – block C



OC-04-3-section-WestToEast
1:200



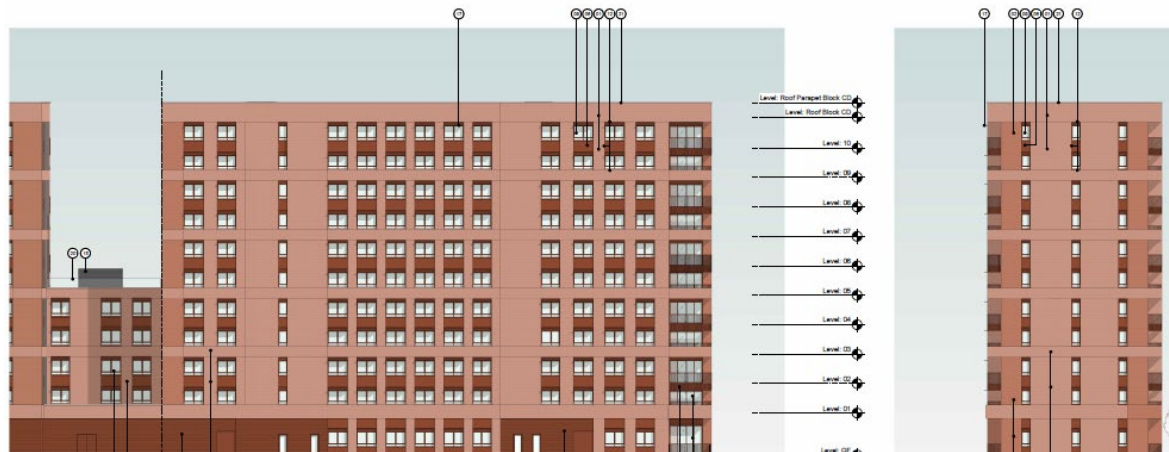
Proposed building sections – block C



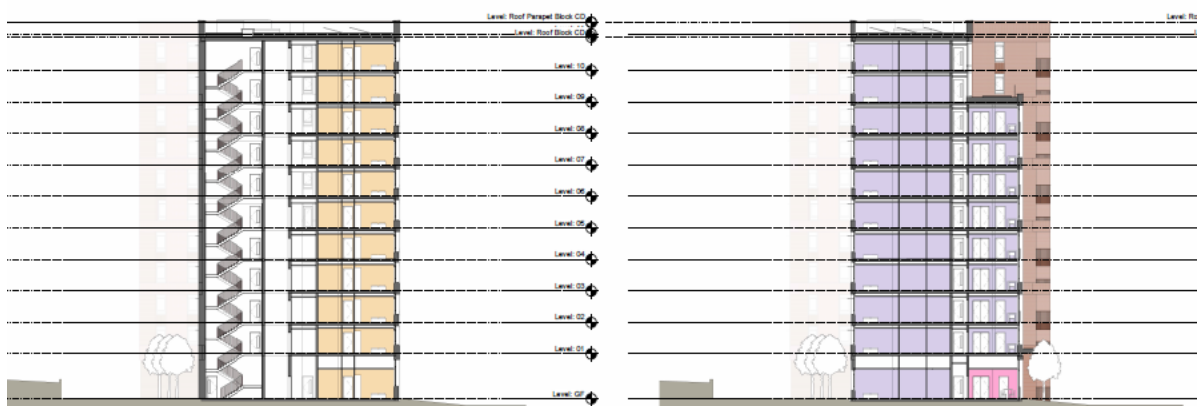
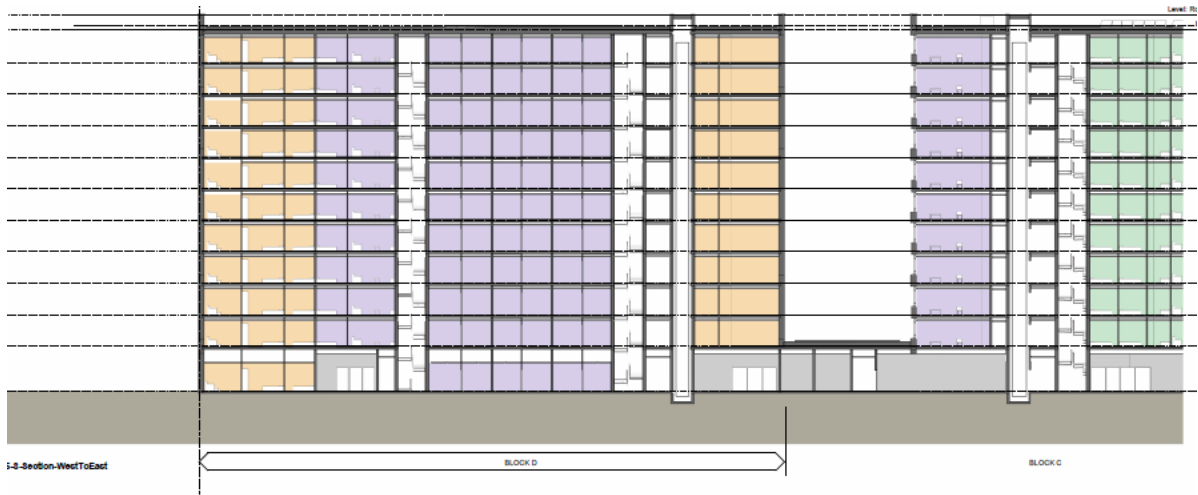
DD-04-E-Elevations-North.1
1:200



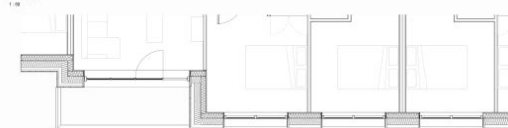
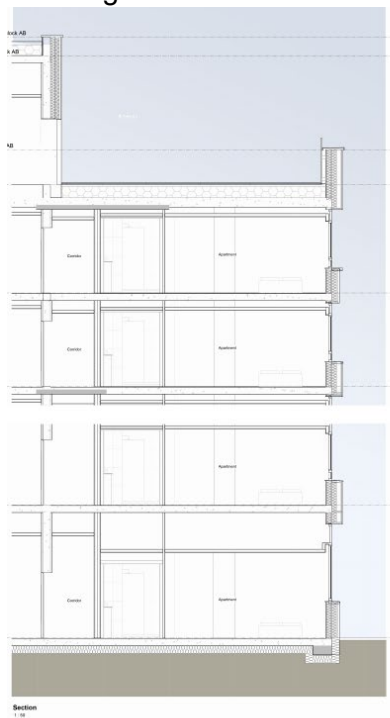
West Elevation - Block D
1:200



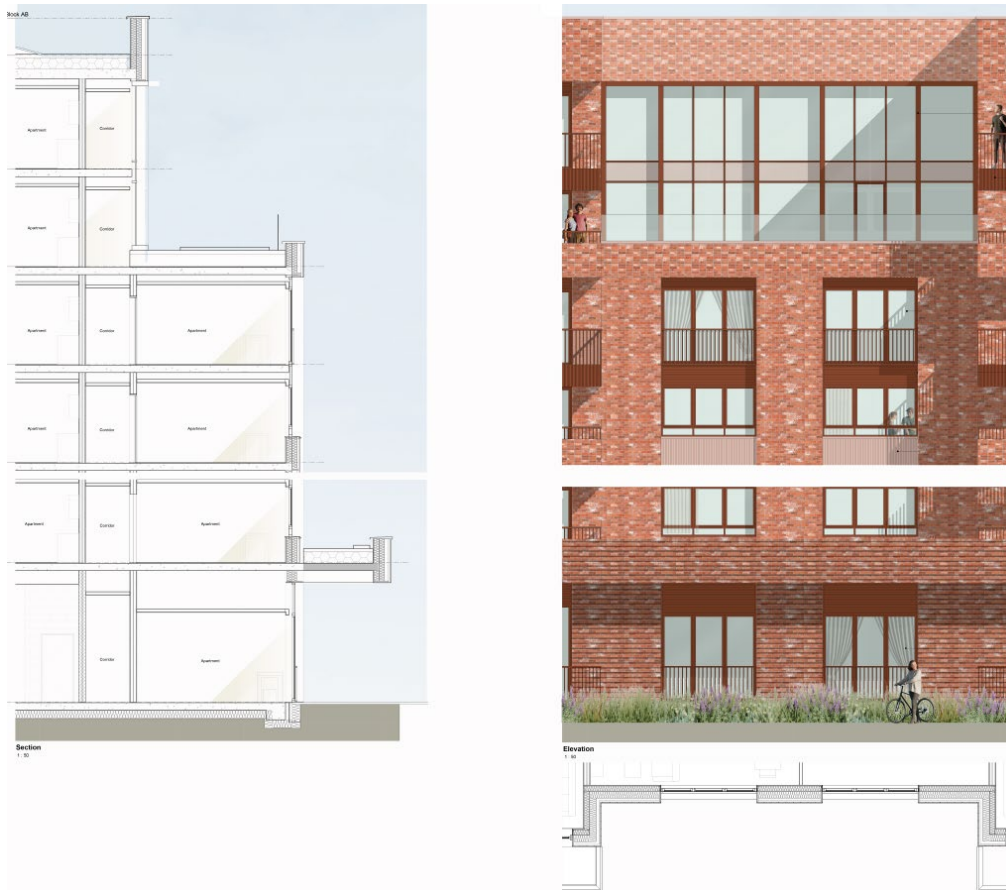
Proposed elevations - block D



Proposed building sections – block D



Example proposed bay study 1



Example proposed bay study 2



Example proposed bay study 3



Section
1:20



Elevation
1:20



Example proposed bay study 4

Apartments layouts to the nationally described space standard. All layouts shown indicatively.

Typical 1 Bed Apartments -



Typical 2 Bed Apartments -



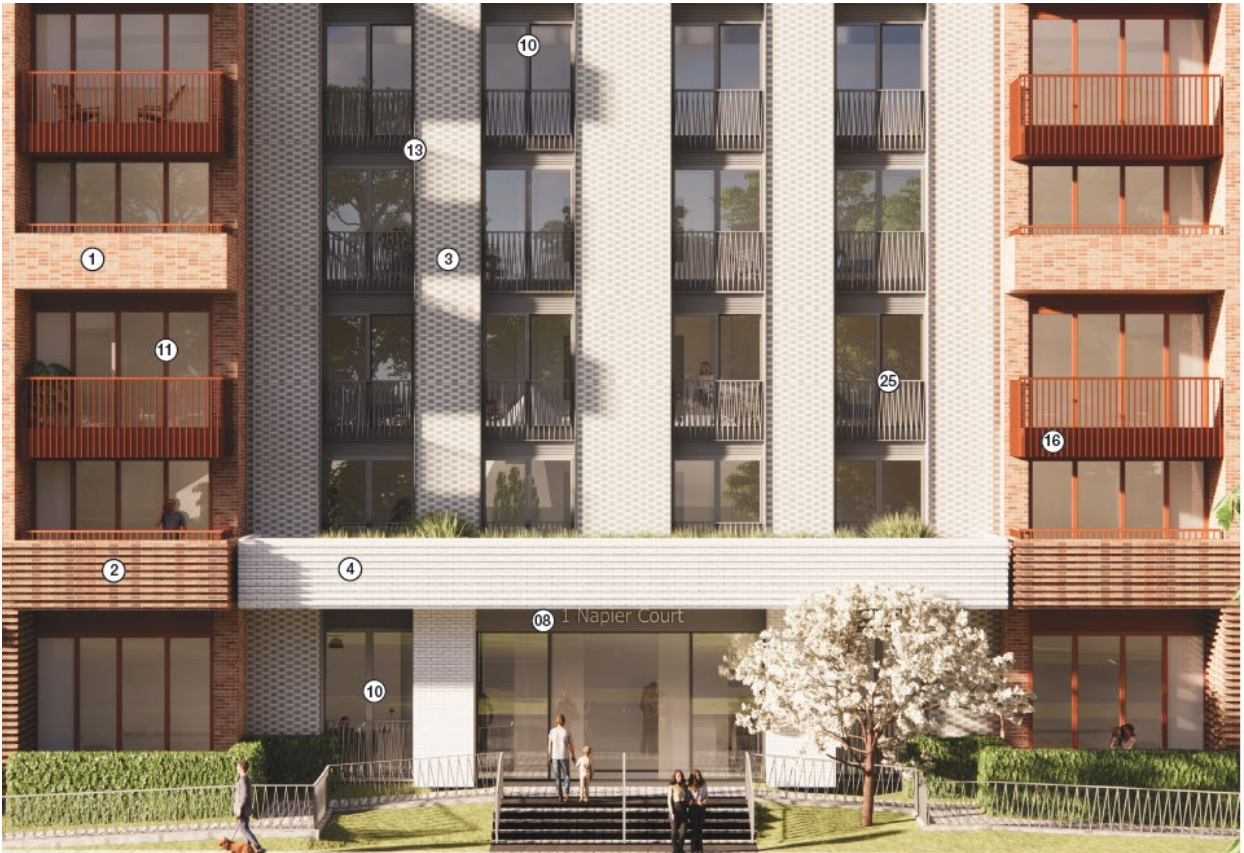
Typical 3 Bed Apartments -



Typical proposed 1, 2 and 3 bedroom apartment layouts



Proposed visual from Napier Road (trees in foreground to Napier Rd Car Park are not existing and are shown indicatively but are not to be provided as part of the development)



Proposed visual – entrance to blocks A and B



Proposed visual – corner of proposed block A



Proposed visual – sectional view of corner of proposed block A



Proposed visual – pocket park section between proposed blocks B and C



Proposed visual from Kings Meadow (trees in foreground to Napier Rd Car Park are not existing and are shown indicatively but are not to be provided as part of the development)



Proposed visual from Kings Meadow (trees in foreground to Napier Rd Car Park are not existing and are shown indicatively but are not to be provided as part of the development)



Proposed visual – rear of proposed block B



Proposed visual – rear of proposed block C



Proposed visual – front of proposed block C from Napier Road (trees in foreground to Napier Rd Car Park are not existing and are shown indicatively but are not to be provided as part of the development)



Proposed visual – entrance to block C