COMMITTEE REPORT

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

Ward: Abbey
App No.: 200188/FUL
Address: 55 Vastern Road, Reading, RG1 8BU
Proposal: Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road
Applicant: Berkeley Homes
Deadline: Originally 15/06/2020 – Extended to 18/01/2021

RECOMMENDATION:

REFUSE planning permission for the following reasons:

- Failure to provide a high quality north-south link through the site and related public realm, safety and directness concerns largely due to the alignment of the site/buildings primarily contrary to Policies CR11ii and CR11g and the RSAF, but also policies EN11, CC7, CR2, CR3 and TR3 and TR4.

- The combination of the proposed height and proximity of Blocks D & E to the Thames Path will harm the setting and character of the path and The River Thames and thus harm the quality of the public realm in this area to the detriment of the value of this part of the Thames, an identified Major Landscape feature and leisure and tourism destination and therefore is contrary to Policies CR4, CR11v and CR11g and the RSAF, but also policies CC7, CR2, CR3 and EN11.

- By virtue of its height, massing and proximity to the river, the development will shade the River Thames and impact on its marginal habitats. There would also not be sufficient space within the riverside buffer for a sustainable long-term relationship between the riverside buildings and the proposed new large canopy trees. The proposed development is therefore contrary to Policy EN11 in particular, and also EN12, CC7 and CR2, EN13, EN14, para 175 NPPF and objectives of the adopted and revised the adopted Tree Strategy and Biodiversity Action Plan

- The proposed development has failed to demonstrate that a suitable quality of accommodation can be provided for all future occupiers as the mitigation measures submitted would not be sufficient to minimise the impact of nearby noise pollution thereby contrary to policies CC8, EN16, CR6.

- The proposal would result in the complete loss of 55 Vastern Road, a Non-Designated Heritage Asset and building of local significance. The proposal has failed to demonstrate adequately that retention and reuse of the building has been explored fully. In this regard, the benefits of the proposal are not considered to significantly outweigh the harm caused to the asset's identified significance. Therefore, the development is contrary to Policy EN1, EN4 and Section 16 NPPF.

- Lack of a section 106 legal agreement for affordable housing, ESP, open space contribution, various transport related works, ecological mitigation contrary to Policy CC9, EN9, EN11, EN12, H3, TR1, TR3, TR5.

1. INTRODUCTION

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

Site Location Plan

1.2 Immediately to the north of the site is the southern bank of the River Thames, which is a public right of way. Christchurch Bridge provides a pedestrian and cyclist link to the north side of the river and Christchurch Meadows at this point. To the east of the application site is the remaining Southern & Scottish Electricity transfer station, which serves Reading. Beyond this are the 4-storey Thames Court (Norman Place) residential flats, which front onto the river, and the predominantly 3-storey (and roofspace) Sovereign House office building, which fronts onto Vastern Road.

1.3 To the south of the site is Vastern Road, which forms the northern element of the town's Inner Distribution Road (IDR). Beyond this is Vastern Road Retail Park and associated buildings leading to Reading Station. To the west of the site are the 2-storey terraced properties of Lynmouth Road, with the 3-storey Lynmouth Court properties closest to the river. No's 1-6 Lynmouth Court front onto the river, with No's 7-12 a continuation of the Lynmouth Road terrace and parking spaces between the two blocks.

1.4 As already mentioned, the site is part of Policy CR11g sub-area allocation. Accordingly, the site is also within the designated wider CR11 Station/River Major Opportunity Area. This overarching element of this policy specifies a

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

Station/River Major Opportunity Area

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

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

Development in the Station/River Major Opportunity Area will:

i) Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix;

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

iii) Provide developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces;

iv) Safeguard land which is needed for mass rapid transit routes and stops;

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

vi) Give careful consideration to the areas of transition to low and medium density residential and conserve and, where possible, enhance listed buildings, conservation areas and historic gardens and their settings;

vii) Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;

viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space; and

ix) Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

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

> ***CR11g, RIVERSIDE:***
> ***Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.***
>
> ***Site size: 1.24 ha*** ***Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices.***

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

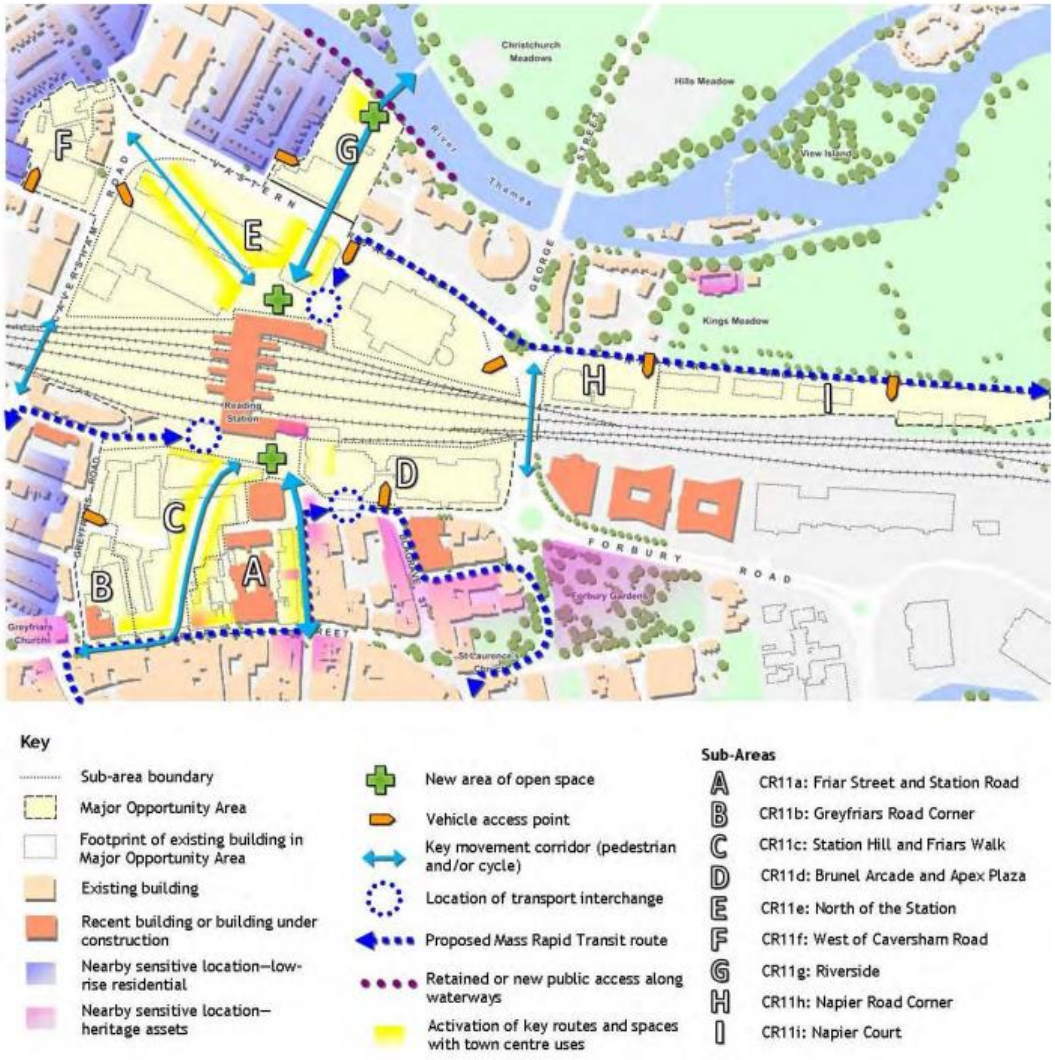


Figure 5.3: Station/River Major Opportunity Area Strategy

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

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

Proposed CGI of the Thames View from Christchurch Bridge

Extract from Applicant's Brochure

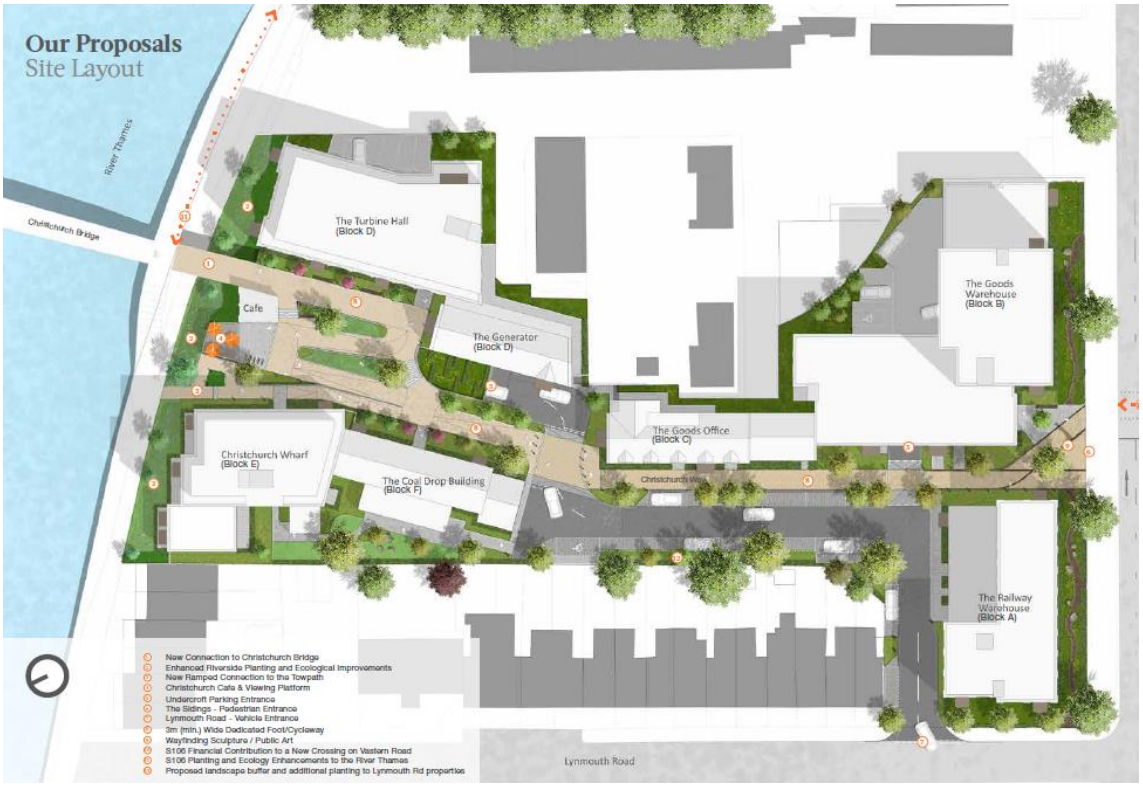
Site as appears now (extract from The Old Power Station Brochure)

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

2 PROPOSAL

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

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



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

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

Block A

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

Block B


Street view from Vastern Road of Blocks A & B.

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

Block C

Block C & Block B as seen from west

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

Block D

View from north

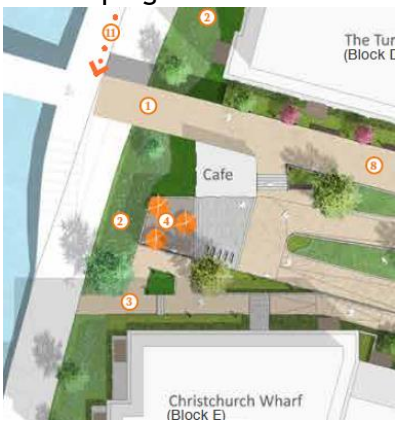
2.6 Block E is referred to as “Christchurch Wharf” and is on the north west corner of the site close to the Thames. With 32 apartments is has 6 main storeys with 2 storeys set back from the eaves.

Block E

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

Block F & Plot G

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



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

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

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

Affordable Housing

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

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

Revisions to improve day/sunlight levels for future occupiers

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

Addressing transport consultation response (10th June submission):

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

Off-site mitigation planting and biodiversity proposals

- Off-site options submitted for consideration

Energy Strategy

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

2.12 Various other revisions to seek to address consultee feedback have also been provided, such as updated technical reports in support of matters such as day/sunlight, wind/microclimate, energy, landscaping and tree planting and various other transport related components.

2.13 Discussions and negotiations were on-going with the applicant until the applicant advised on 19th January 2021 a request to "draw matters to a close" and "determine the application in its current form" by 22nd January 2021. This was considered by officers to be a somewhat surprising and disappointing turn of events, given that only three working days earlier the applicant had submitted further information for consideration and confirmed their position regarding a number of other matters. In addition, just a week previous to this a further review of a revised energy strategy had been agreed by the applicant, with the timeframes for this to be undertaken going well beyond the date by which the applicant then sought for the application to be determined by.

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

Community Infrastructure levy (CIL):

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

2.16 Submitted numerous drawings and documents. Please refer to lists appended to this report.

3. RELEVANT PLANNING HISTORY

3.1 Application site (or part of the application site)

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

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

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

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

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

3.2 Close-by the application site:

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

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

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

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

4. **CONSULTATIONS**

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

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

A) Planning Policy

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

Relevant Local Policy

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

Reading Borough Local Plan

Design

4.3 Policy CC7 of the Local Plan provides general design policy across the Borough (including in the centre), and states that five components of development form, including "layout: urban structure and urban grain" should be assessed to ensure that a positive contribution is made to urban design objectives including "Quality of the public realm and provision of green infrastructure and landscaping", "Quality of the public realm and provision of green infrastructure and landscaping" and "Legibility - clear image and easy to understand".

4.4 Policy CC7 also states that developments will be assessed against other criteria including that they:

• "Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;

• Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;

• Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping."

4.5 Policy CR2 includes additional policy for design of schemes in central Reading, which should be considered in addition to CC7. This emphasises the importance of the grid structure and ease of movement in criterion a, well designed public realm and convenient linkages in criterion b and the incorporation of green infrastructure in criterion c.

Open space and public realm

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

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

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

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

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

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

Cycling

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

Central Reading Strategy

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

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

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

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

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

Site-Specific Policy

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

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

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

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

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

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

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

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

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

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

Reading Station Area Framework

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

Status of the Framework

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

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

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

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

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

Overall priorities

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

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

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

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

Public realm

4.23 Chapter 5 on Public Realm deals with the issue of north-south connections across the site. The aims of the section include "'Stitching' together the various development sites within the Area both visually and physically" and "Creating more opportunities for sustainable forms of transport, particularly walking and cycling, by enhancing the connectivity and legibility of the area" (paragraph 5.4).

4.24 Paragraph 5.5. recognises the challenges of enhancing connectivity due to changes in level across the area, but nevertheless states that it should be achieved insofar as is possible.

4.25 Paragraph 5.6 (and Figure 5.1) identify the Kennet-Thames spine as being one of the public realm priorities. Specific guidance on this spine is set out in paragraph 5.9:

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

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

Views

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

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

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

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

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

Urban Design Framework

4.30 In setting out an overall urban design framework, the RSAF identifies five key concepts, and once again the north-south connections are emphasised: "Creating permeable development that strengthens north-south links and improves connectivity across the area" (paragraph 8.3).

4.31 Figure 8.5, the Framework structure, shows the north-south link as the only 'major path/pedestrian link', and shows a direct link across this site linking two public spaces or important intersections at either end of the site, and then beyond across the Thames to the north and south to the station. This high-quality direct link is further developed in Figure 8.6, the Framework diagram.

4.32 In dealing with the Northside area in more depth, the three key elements of the public realm are identified as being the "north-south spine between the station and Thames (and across the river), and two public spaces along the spine – a new Station entrance square, and a public space on the southern bank of the Thames" (paragraph 8.16).

4.33 In paragraph 8.21, the Riverside site is identified as one of seven key sites in achieving the urban design framework.

Transport

4.34 Chapter 11 deals with Transport, and this further emphasises the importance of the north-south connections, in this case for cycling. Paragraph 11.24 states that:

"In particular, the development of the Northside area can provide new cycle links approaching the northern Station entrance, potentially separated where necessary. These should link in with the route network shown on the map accompanying the Cycling Strategy, and improve north-south crossing of Vastern Road."

4.35 Figure 11.11 shows that a new cycle route along this north-south axis directly through the site is expected.

Summary

4.36 In summary, the following are the clear takeaways from local policy relating to the north-south link within the site:

• That the link is essential to the wider strategy and is the main priority for this site (LP CR11 ii, CR11g, paras 5.2.1, 5.2.3, 5.4.6, Figures 5.1, 5.2; RSAF paras 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.5, 8.6)

• That it should be high-quality (LP EN11, CR11g)

• That it forms an important part of overall public realm (CR3, CR11 v, paras 5.6, 5.9, Figure 5.1)

• That it is direct and legible (LP CC7, CR3, CR11 v, Figure 5.1; RSAF paras 5.9, 7.10, Figures 5.5, 8.5. 8.6),

• That it provides visual links (LP para 5.4.6; RSAF para 7.10)

• That it is landscaped (LP CR2, CR11 v, CR11g; RSAF para 5.6)

• That it provides enhanced cycling through the site (LP TR4, CR11 ii, paras 5.2.1, 5.4.6, Figure 5.1; RSAP para 11.24, Figure 11.11)

Proposed link in context of local policy

4.37 It is recognised that the proposals represent an improvement over the current situation, where there is no access through the site at all. However, the development of this site is a one-off opportunity to secure a truly high-quality link through the site that must be seized. It is important to state that the quality of this link is not simply one of a number of competing priorities that must be weighed on this site, but, as Local Plan paragraph 5.4.6 makes clear, the main priority for the site, and must be considered accordingly.

4.38 The artificial division of the site into two ownerships and the retention of the electricity equipment clearly compromises the ability of the site to meet these priorities. However, even within the proposed site boundary, it is my view that not enough emphasis has been placed on the importance of achieving this high-quality direct link to reflect local policy, and this element of the proposal does not therefore comply with the policy on this link.

Directness

4.39 The proposed link is not the most direct link possible, even when accounting for the shape of the application site.

4.40 The main problem is the presence of the 'Goods Office' plot, and the need to bring the route around this building and then further bend round to meet the end of the Christchurch Bridge. The northern end of this building protrudes into the proposed route, and creates additional deviation. In my view, the presence of the Goods Office building in this location is not compatible with achieving the most direct link through the site possible.

4.41 The extent of the Goods Warehouse also accentuates this issue, as it also extends westwards into the most direct route and presents a particular issue with directness for those crossing Vastern Road.

4.42 The switchbacks at the northern end of the site also contribute to the lack of directness. Planning Policy are not best placed to comment on how this will work for cyclists from a technical point of view, but the presence of steps onto bends in the cycle route seem to lead to potential for pedestrian-cycle conflict. Wheelchair users would also be required to use the less direct cycle route. It is recognised that there is an issue with changes of level to land directly onto the footbridge, which is clearly a desirable outcome, and that an elevated walkway through much of the site would create issues in terms of relationship with building frontage, but a gentle, direct, DDA-compliant slope through the site would be easier to achieve, once again, without the Goods Office building.

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

Visual link

4.44 Contrary to paragraph 4.3 of the Policy Assessment Note, a visual link through the site and beyond was indeed envisaged by the Local Plan and RSAF, as highlighted in Local Plan paragraph 5.4.6 and, in particular, RSAF paragraph 7.10. The wider issue of legibility of the route is highlighted throughout both documents.

4.45 A consequence of the subdivision of the site is that it appears that a single visual link from the Station to the Thames would be very difficult to achieve. However, even if this is not achievable in full, efforts should certainly be made to keep visual fragmentation of the route to an absolute minimum. On the basis of the current layout, there seems to be at least three visual 'stages' between the station and Thames – from the south side of Vastern Road it appears that a pedestrian would be able to see into the site about as far as the Goods Office; once entering the site, visual links would extend to the southern edge of the Coal Drop Building; and only when approaching the crossing of the vehicular route might the Thames start to become visible. Once again, the main issue affecting visual links will be the Goods Office building, particularly its northwestern corner, although this also relates to the western extent of the Goods Warehouse.

4.46 Regardless of signage and wayfaring, for the route to be successful, the visual links should be as clear and direct as possible. Without such links, the route will be less attractive and therefore less successful.

Quality

4.47 The comments on directness and visual links above also relate to the quality of the route. However, there is one additional point Planning Policy would wish to make on the quality of the link.

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

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

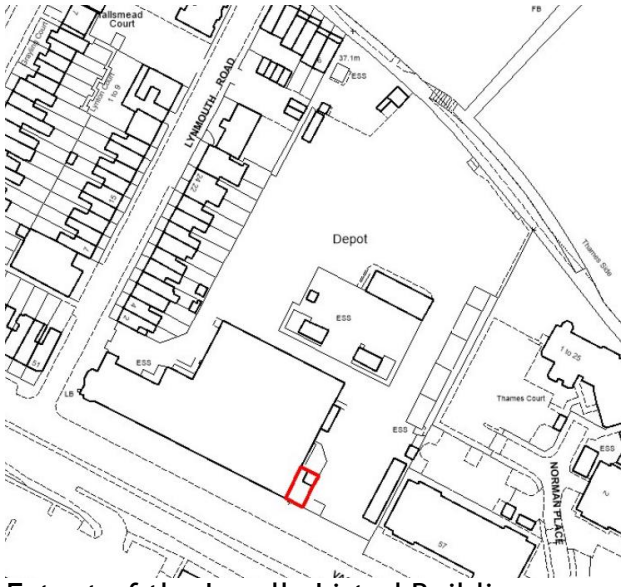
4.49 The narrowness of the site also very much limits the potential of the route to be anything other than a through route, and will not help it to be a useable part of the public realm for example sitting.

Summary

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

B) RBC Historic Buildings Consultant

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



Extent of the Locally Listed Building

4.1.2 The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '…protecting and enhancing our…historic environment' (DCLG et al, 2018).

4.1.3 The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2018, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2018, Annex 2: Glossary).

4.1.4 The associated Planning Practice Guide (PPG) identifies heritage assets as:

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

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

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

4.1.6 The NPPF (paragraph 189) requires that:

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

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

4.1.8 Paragraph 197 states that:

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

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

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

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

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

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

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

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

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

• Listed Buildings;

• Conservation Areas;

• Scheduled Monuments;

• Historic parks and gardens; and

• Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.

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

4.1.14 Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

4.1.15 Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

4.1.16 Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

4.1.17 The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

4.1.18 Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

4.1.19 EN4: Locally Important Heritage Assets - Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.

4.1.20 Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.

4.1.21 EN6: New Development in a Historic Context - In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:

a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);

b. Sensitivity to historic context;

c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);

d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.

4.1.22 Proposals - The proposed re-development of the former SSE site on Vastern Road, involves the demolition of a number of structures, including the locally Listed No. 55 Vastern Road, and the erection of a series of buildings to form a residential scheme from between 1 and 11 storeys with a dwellings for 209 residents, approximately 17.9sqm of leisure floorspace (café), and a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road and on towards Reading Station.

4.1.23 The proposed industrial-style residential blocks fronting onto Vastern Road would be up to 11 storeys high. The design for these proposed buildings are considered to be good quality, and encompass a variety of local architectural motifs from the Victorian and Edwardian housing and industrial structures in the vicinity. These features would include a mix of red with grey brickwork detailing, especially at ground floor level, arched window openings with stone coloured arches, external metal balconies and brick arched headers, set with recessed panels. Further windows would include flat stone coloured arches and stone coloured sills, a multi-coloured arched feature-window and corbelling at the upper storeys. All of these features are well designed and harmonised and based on distinctive local features and would help to reduce the bulk and mass of these multi-storey blocks.

4.1.24 Within the main body of the proposed scheme would be a central street with smaller linking buildings, again based around local architectural precedent. This would include a 2 storey element (Coal Drop Terrace), designed to sit alongside the existing 2 storey residential housing and 3 and 4 four storey buildings, based on the designs of the smaller scale warehouses and office structures, with slate pitched roofs. Again the bespoke designs are considered to work well within the historic context.

4.1.25 The design of the proposed multi-storey blocks alongside the river are of a different character to those alongside Vastern Road. These reflect the differing context of these buildings and would consist of buff brickwork, with some light stone-coloured detailing forming banding and window arches, with external metal balconies and glazed roof top extensions.

4.1.26 The proposals also include a feature footbridge over the Thames alongside the scheme to provide more direct access to Reading station and the town centre.

4.1.27 Discussion - The existing Locally Listed No. 55 Vastern Road within the proposed site is an example of an early 20th century office building built as part of the former industrial depot complex on Vastern Road. The building is clearly architecturally separately identifiable and distinct from the adjacent buildings and was built in connection with an electric works and was designed by the locally prominent architectural practice of Albury & Brown. F W Albury also designed the Grade II Listed Caversham Free Public Library. This is particularly reminiscent of 55 Vastern Road and is designed

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

4.1.28 The Heritage Statement states the building at the eastern end of the present No. 55 Vastern Road was probably built as a new entrance for the Electric Works, with the eastern side of the building accommodating a carriage arch. The 1894 share issue prospectus for the Reading Electric Supply Co. Ltd shows that Albury was one of the company's directors, reinforcing this association and likelihood that his firm was responsible for the design of all of its buildings. The new stores for the Reading Electric Supply Company were built at Vastern Road in 1903, and that these were designed by the architect Frederick William Albury (1845-1912). Albury was therefore working at the site and had many connections with the company. The locally listed building at 55 Vastern Road, which is reminiscent of his style, is therefore likely to have also been designed by Albury.

4.1.29 As part of pre-application meeting it was recommended that options to retain the Locally Listed building were examined together with the re-directed pedestrian link-path. Façade retention was examined and a range of options for façade retention are illustrated in the Design and Access Statement (pp. 34-35 and pp. 40-43). These options were discounted due to the constraints of the site and instead the industrial heritage of the site has been used to inform the scheme design, to be branded as the "Old Power Station".

4.1.30 Conclusions - In conclusion, the bespoke design proposals are considered to be a good quality response to the historic context of the proposed development. Whilst the mass and scale of the buildings is extensive, the historic setting is not especially sensitive to change and the quality of the design would go some way to mitigate these impacts.

4.1.31 However, the proposals would result in the loss of the locally listed building at 55 Vastern Road, which is a well-designed and good quality building built by a locally renowned architectural practice.

4.1.32 As stated in the NPPF, local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions, but which are not formally designated heritage assets (DCLG et al, 2014, para. 39). As stated in paragraph 197 of the NPPF:

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

4.1.34 The proposed justification for the demolition of the locally listed building, therefore, rests on the benefit of the proposals in relation to the wider public benefits of the scheme against the heritage value of the non-designated heritage asset in the planning balance.

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

C) Design South East

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

Summary

4.2.2 The panel broadly supports the scheme and has no major issues with use, quantum, height and massing. The attention given to the points made at the previous review is welcome and have gone some way to meeting our concerns, but there is further to go.

4.2.3 The panel's key observation, as at the first review, concerns the pedestrian and cycle link through the site. The route is now more of a street through the development but is not yet a clear and palpably public route to and from the footbridge. Points of conflict between motor vehicles and cyclists and pedestrians continue to be a concern. The buildings and public realm in the middle of the scheme are not fulfilling their role as way markers or giving a strong character. The landscape design approach could help more in making the route attractive and well-defined.

4.2.4 The scheme now relates better to the river and the connection at towpath level is welcome in principle but could be more inviting.

4.2.5 The architectural language has improved but the panel encourages a more contemporary approach to help the scheme to be assimilated into Reading and to be manifestly residential.

4.2.6 We support the proposal for a café and its location, but its design could contribute more to the scheme.

4.2.7 Key recommendations

1. A more legible gateway to the river from Vastern Road should be formed.

2. The route for cyclists and pedestrians needs to be clearer and safer and developed as a series of spaces.

3. The buildings on the route in the middle of the scheme should be stronger and more distinctive.

4. The connection at 'towpath' level could be reinforced.

5. A more contemporary approach should be taken to the architectural language.

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

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

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

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

D) Access Officer

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

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

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

E) Crime Prevention Design Advisor at Thames Valley Police

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

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

- Comment that Physical security will be critical in creating and sustaining 'Safe and accessible environments where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion'.

- Once the above is resolved it was sought for a condition be placed on any approval seeking a written strategy for access control to be submitted to, and approved by the authority.

4.4.2 Subsequent to the reply by the applicant on 20th July 2020, the CPDA noted and appreciated that the design and layout could achieve compartmentalisation. However, to ensure that this opportunity is not missed, the CPDA respectfully asked that the following Secured by Design planning condition be placed on any approval:

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

4.4.4 The applicant replied detailing that whilst SBD does play a significant part of their design process as it is incredibly important to the applicant that their customers remain safe, they do not have the full detail to know whether or not they will be able to achieve SBD on all aspects of the proposals. Accordingly, the applicant sought for the condition to simply refer to a Security Strategy to be submitted/approved, rather than one which specifically achieves the Secured by Design Award.

4.4.5 The CPDA replied advised that the SBD award element of the condition should be strongly recommended, to ensure the physical security and access control of a significant development within the town centre.

F) Reading UK CIC

4.5.1 Discussions took place with Reading UK CIC in October 2020 regarding the content and nature of any Construction Stage Employment Skills and Training Plan, or alternative financial contribution.

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

G) Berkshire Archaeology

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

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

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

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

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

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

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

H) Leisure

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

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

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

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

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

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

SU8 SUSTAINABLE DRAINAGE (AS SPECIFIED)

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

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

J) Infrastructure Monitoring / CIL Officer

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

K) Royal Berkshire Fire and Rescue Service

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

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

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

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

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

L) Historic England

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

M) Sustainability / Energy

4.12.1 The sustainability / energy credentials of the proposals, owing to the highly technical nature of the information submitted, were subject to independent review on behalf of the local planning authority by Element Energy. Two substantive reviews were required, owing to the deficiencies identified in the first review necessitating the submission of an updated strategy during the course of the application. The executive summary of the final Energy Review received by the Local Planning Authority in March 2021 is reproduced in full below:

4.12.2 Reading Borough Council (RBC) commissioned Element Energy to provide a critical review of Hodkinson's proposed energy strategy for the Vastern Road redevelopment by Berkeley Homes (the Applicant). This review was completed in June 2020, finding that the proposed energy strategy was not compliant with RBC energy and carbon policy, as well as not meeting wider council aspirations, for the following reasons:

- The thermal energy systems were not decentralised and did not use ground source heat pump (GSHP) or air source heat pump (ASHP) as a primary heating source;
- There was no decentralised hydraulic heating system proposed, therefore the development was not "connection-ready" for any future DH networks that may be deployed in the area around the development.

4.12.3 A revised energy strategy was completed by Hodkinson in December 2020, which employed a hydraulic heating system and heat pumps as the primary low-carbon heat source and natural gas boilers for top-up heat. It has been found however that the development remains non-compliant with RBC energy and carbon policy guidance, as well as not being future-proofed for incoming national policy, for the following reasons:

- Insufficient evidence to discount open-loop GSHP, which is identified in the RBC Sustainable Design & Construction Supplementary Planning Document (SPD) as the preferred heat pump technology over ASHP;
- Reliance on natural gas boilers for heat top-up in winter periods is not future-proofed for the expected national Future Buildings Standard policy, which are currently at the consultation stage.

4.12.4 The energy strategy does comply with Local Plan energy and carbon policies. It is recommended that the Applicant complete the following to address the concerns regarding non-compliance with policy guidance and future-proofing of the energy strategy:

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

N) Transport

4.13.1 The Old Power Station on Vastern Road forms part of the former SSE office and depot. It is bounded by the River Thames to the north, retained SSE electrical transformers and associated works to the east, Vastern Road to south and residential properties fronting Lynmouth Road to the west.

4.13.2 The development seeks permission for the 'Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys including residential dwellings (C3 use class) and leisure floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road.'

4.13.3 Table 3.1 sets out the development schedule for the site for the proposed 209 new homes and Café.

Table 3.1 Indicative Development Schedule

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

Leisure	Size (sqm)
Café	**17.9 sqm**

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

Accessibility

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

4.13.6 Given the excellent location of the site, walking will form a widely available and attractive method of travel for residents.

4.13.7 The site fronts onto Vastern Road which provides pedestrian footways on both sides connecting the Caversham Road / Great Brighams Mead roundabout to the west and to the Reading Bridge roundabout to the east.

4.13.8 There are currently three signalised crossings along Vastern Road all of which are of a staggered arrangement providing north/south connections.

4.13.9 South of Vastern Road, Trooper Potts Way provides access to the northern station entrance and the station underpass which leads to the main station entrance on the southern side and in turn the town centre.

4.13.10 To the north of the site, the Thames Path lines the southern side of the River Thames which leads to Reading Bridge, Kings Meadows, Tesco to the east and Caversham Bridge to the west. Christchurch Bridge is located centrally along the northern boundary of the site and provides a pedestrian and cycle connection to the northern side of the river.

4.13.11 The site has a range of existing cycling facilities available to the future occupiers of the site with access to local on and off road routes and the national cycle network.

4.13.12 Locally to the site, the northern footway on Vastern Road provides a shared footway / cycleway facility past the southern site boundary from Lynmouth Road to Reading Bridge to the east.

4.13.13 Norman Place to the east of the site currently provides the off-road cycle link from Vastern Road to the Christchurch Bridge over the River Thames which in turn leads to the cycle routes through Christchurch Meadows and Hills Meadow.

4.13.14 National Cycle Network (NCN) 5 is directly accessible from the northern boundary of the site along the Thames Path. This route connects the site with Caversham to the west via Christchurch Bridge, and Thames Valley Business Park to the east. To the east NCN 5 joins NCN 4 where the River Thames and Kennett meet. NCN 4 dissects the Reading area connecting Theale in the west through to Sonning and Charvil in the east.

4.13.15 The site fronts onto Vastern Road which forms part of Readings Inner Distributer Road (IDR). This section of Vastern Road is a two way dual carriageway with a 30mph speed limit. A kerbed central island separates each direction of traffic therefore requiring all vehicle access to the site to be from the west and all exiting traffic from the site required to travel east along Vastern Road.

4.13.16 At the western end of Vastern Road is the roundabout with Caversham Road. This junction provides the connections to Caversham to the north and west Reading and the A33 to the south. To the east of Vastern Road the Reading Bridge roundabout has five junction arms that provides access to Caversham to the north, Tesco supermarket to the east, A329 Forbury Road (continuation of IDR) to the south, and the Station Car park to the west.

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

Access and Internal Layout

Pedestrian

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

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

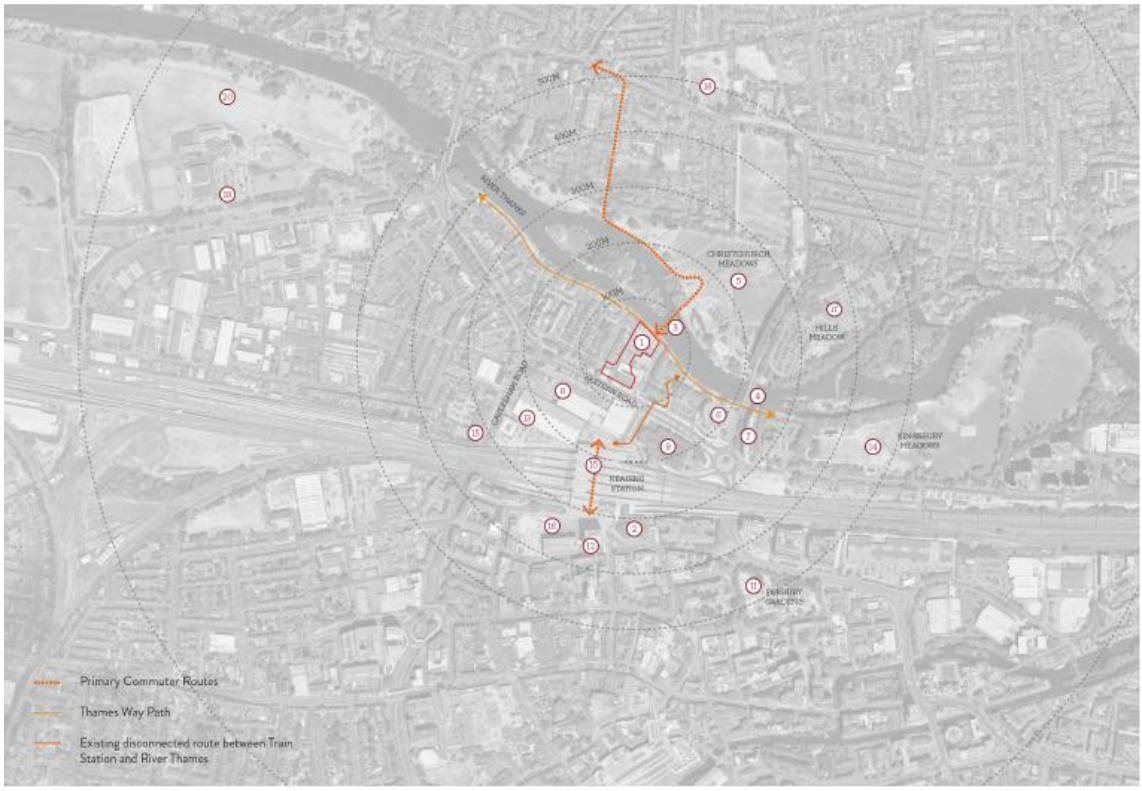
The successful development of this area hinges on improved accessibility by public transport, and improved permeability for pedestrians and cyclists. In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles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

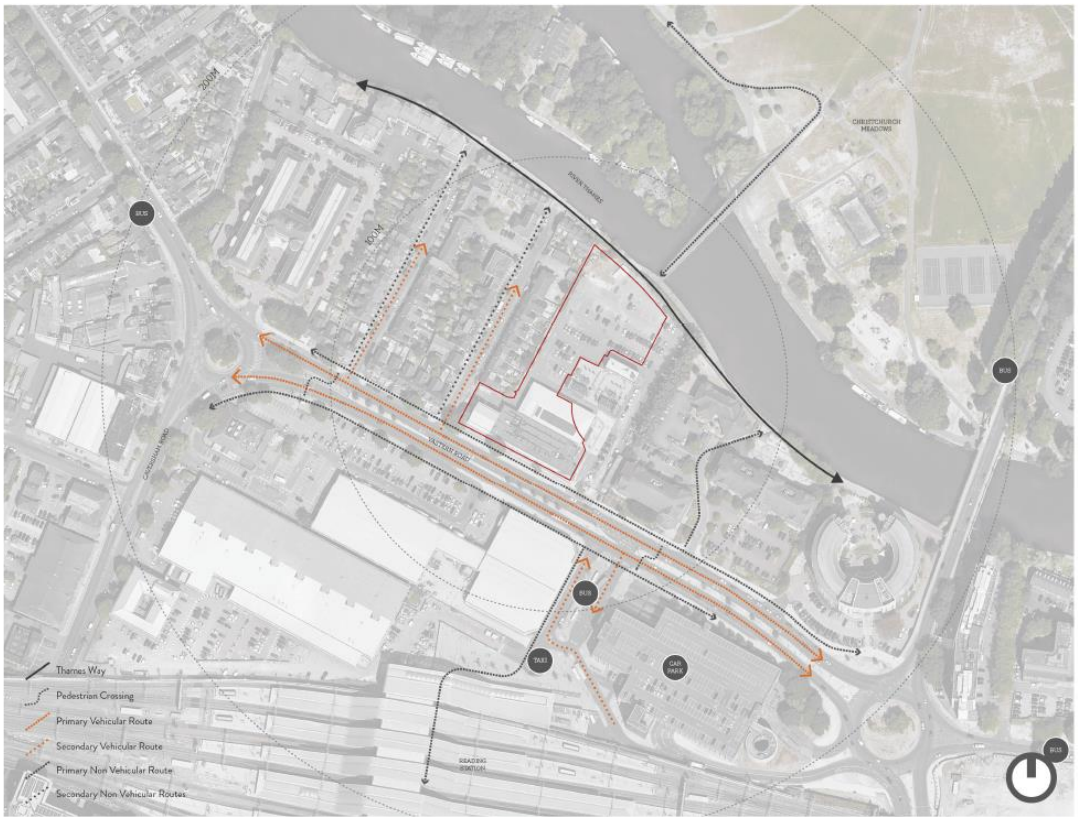
4.13.20 It is therefore clear from Figure 5.3 and Paragraph 5.4.6 from the Local Plan (both above) that an acceptable design of the north south route through the site is fundamental to any development of the site.

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

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

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





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

4.13.24 The applicant has stated that during the design consultation for the bridge it was agreed with Reading Borough Council (RBC) Officers and later endorsed by Members at planning committee that the associated connections and bridge would provide a shared pedestrian / cycle facility. This was to ensure that the route provided a free low speed connection suitable for all users, which reflected the sub-urban to urban environment which the bridge connects. Design rationale was to create a new piece of public realm with a traffic free connection suitable for all users, which reflected the wide range of people using the facility; from families with children and buggies, to wheelchair users and commuter pedestrians and cyclists.

4.13.25 Although the design does meet with some of these principles the scheme albeit traffic free from vehicles travelling along the route itself does include two points at which vehicles would have to cross the pedestrian / cycle route.

4.13.26 The Highway Authority are happy that access to The Goods Warehouse is acceptable given that vehicles entering and exiting the site would be doing so in forward gear however the access to The Turbine Hall car park is also a turning head for refuse and service vehicles.

4.13.27 The updated tracking information illustrates the turning head at the northern end of the site would require refuse and delivery vehicles to drive and reverse over the dedicated footway / cycleway. As stipulated at the pre-application stage the Highway Authority have concern over this movement given the importance of this pedestrian / cycle route and the potential for conflict with service vehicles.

4.13.28 The submitted drawings confirm that the proposed turning area to the north of the site can accommodate large cars, 4.6t light vans and food delivery type vehicles which would provide the majority of internet deliveries without impeding the pedestrian / cycle route and are therefore acceptable.

4.13.29 The movements for refuse collection will be weekly and as identified by the applicant deliveries by HGVs may be required, the applicant has stated that these will be infrequent with the applicant stating within Stantec Technical Note TN005, RBC Highway 2nd Response that between 0 and 1 HGVs per day might be expected, this includes refuse collection. Extrapolated this would equate to between 3 and 4 per week, again this includes refuse collection.

4.13.30 It has also been stated as part of Stantec Technical Note TN006 RBC Highway 3rd Response & Vastern Road Crossing that a larger 10-12m long 'white goods type' HGV delivery lorry will be able undertake the turn forwards across the foot/cycleway, so will in fact easily be able to check the path is clear prior to crossing it. It will then be 'sat' in the foot/cycleway momentarily before reversing into the turning head to complete the manoeuvre. This will occur for a matter of seconds and is a 'forward facing' manoeuvre in terms of visibility of the foot/cycleway.

4.13.31 However, following a review of the tracking diagrams provided it is noted that no tracking has been provided for a 12m HGV, given that the applicant

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

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

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

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

> *6.8.8 Reversing causes a disproportionately large number of moving vehicle accidents in the waste/recycling industry. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. BS 5906: 2005 recommends a maximum reversing distance of 12 m. Longer distances can be considered, but any reversing routes should be straight and free from obstacles or visual obstructions.*
>
> *7.10.3 Routeing for waste vehicles should be determined at the concept masterplan or scheme design stage (see paragraph 6.8.4). Wherever possible, routing should be configured so that the refuse collection can be made without the need for the vehicle having to reverse, as turning heads may be obstructed by parked vehicles and reversing refuse vehicles create a risk to other street users.*

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

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

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

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

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

4.2.2 When people are travelling by cycle, they need networks and routes that are:
a Coherent;
b Direct;
c Safe;
d Comfortable; and
e Attractive

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Longitudinal gradients

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

Table E/3.9 Maximum length for gradients

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

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

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

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

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

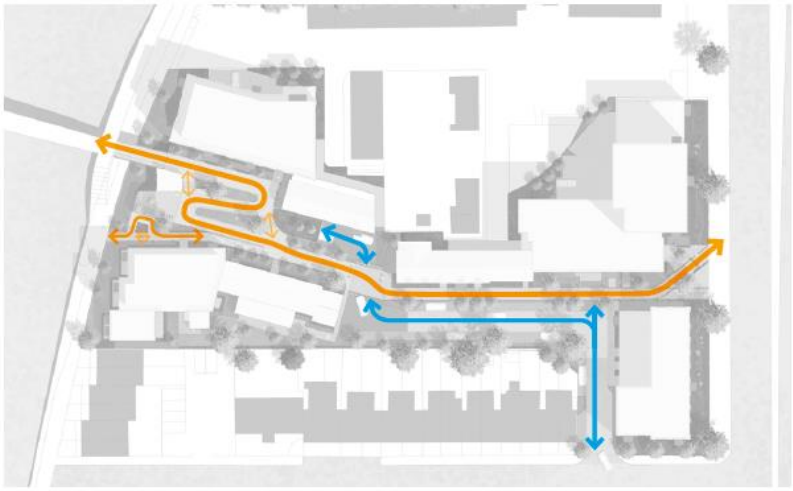
Access and Movement

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

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

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

Vehicles access the site through Lynmouth Road.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Vehicular

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

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

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

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

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

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

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

4.13.66 The 3.0m shared footway/cycleways runs adjacent the internal road and has two crossing points to allow for vehicle access into the parking courts.

4.13.67 At both of the vehicle cross over points pedestrians are to be given priority through managed vehicle speeds, signage, markings and materials. The vehicle cross overs are there to provide the required access into the parking areas and as such the vehicle trip generation is estimated to be low given the parking areas comprise of 30 spaces to the north and 13 in the southern area.

4.13.68 In principle this is deemed acceptable subject to the servicing comments found previously within this consultation response.

Trip Rate / Traffic Impact

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

4.13.70 The resulting network peak hour vehicle trip generation for the existing site is summarised in Table 5.1 below.

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

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

4.13.71 The traffic survey identifies that the existing use generated 90 and 66 two-way vehicle trips in the AM and PM peak hours respectively. Across a daily period (0700 to 1900), 466 two-way vehicle trips were recorded.

4.13.72 It is acknowledged that the substations and associated kit that will be retained on the SSE owned site which has approximately 20 car parking spaces. Vehicle trips associated with the remaining SSE kit will be minimal and associated with maintenance and storage only. Officers are therefore happy that no assessment is required to calculate the retained SSE element on the site.

4.13.73 The proposed trip generation has been calculated based on surveys of comparable sites within the TRICS database. Table 5.2 provides the total person trip rates and predicted people generation for the AM (08:00-09:00), PM peak hours (17:00-18:00) and Daily (07:00-19:00).

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

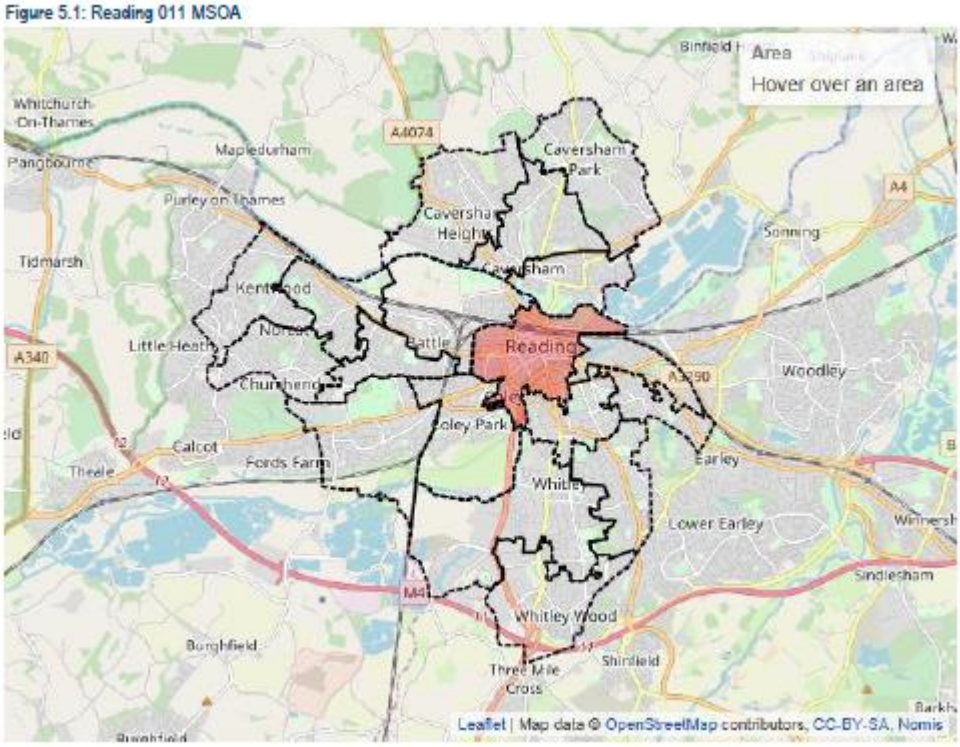
Time-Period	Trip Rate (per home)			Trip Generation (209 homes)		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
AM Peak (08:00 to 09:00	0.094	0.477	0.571	20	99	119
PM Peak (17:00 to 18:00)	0.364	0.200	0.564	76	42	118
Daily (07:00 to 19:00)	2.476	2.560	5.036	515	532	1,047

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

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

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

Figure 5.1: Reading 011 MSOA



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

Table 5.3: 2011 Census Modal Split and Multimodal Trip Generation

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

**May be some rounding errors*

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

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

Table 5.4: Net Difference Trip Generation

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

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

Parking

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

4.13.82 Based upon the accommodation mix the required car parking provision allowed on site is 111 spaces; based on all 1 and 2 bed flats having 0.5 spaces and 3 bed flats having 1 space each.

4.13.83 The development is proposing a total of 55 car parking spaces which equates to a provision of 0.26 parking spaces per dwelling which is below the required standard within the SPD. However, given the parking restrictions surrounding the application site and the good alternative transport links Officers are happy to accept the reduction in this case. This is also subject to the development not being eligible for parking permits.

4.13.84 It should however be noted that the application drawings illustrate a provision of 56 spaces with the car parking layout including the provision of tandem spaces. In principle officers have no objection to this subject to these tandem spaces being allocated to a 3 bed unit. This has been agreed by the applicant and will be dealt with by way of a condition in the event of permission being granted.

4.13.85 In line with RBC parking standards, all developments providing up to 200 spaces are required to provide 3 disabled spaces or 5% of total capacity, whichever is greater. In accordance with this, it is stated that the development will provide a total of 3 disabled spaces. The submitted drawings illustrate this provision and therefore this is acceptable in principle.

4.13.86 These spaces are to the correct dimensions but it is noted that the two on street bays will be provided with hardstanding to the west to aid access and egress to the vehicle, similar to the arrangement identified below and this is identified on drawing BHOC.448.LA.101 Landscape General Arrangement plan.

4.13.87 However, the revised plan does not include the provision of any dropped kerbs on both sides of the surrounding carriageways to provide suitable access to and from the disabled parking bays and it is noted that the route for the southern bay does not send pedestrians to a suitable footway location but towards a vehicle access point. This is contrary to DfT document Manual for streets which states the following at Paragraph 6.3.30:

> *Vehicle crossovers are not suitable as pedestrian crossing points. Blind or partially sighted people need to be able to distinguish between them and places where it is safe to cross. Vehicle crossovers should therefore have a minimum upstand of 25 mm at the carriageway edge. Where there is a need for a pedestrian crossing point, it should be constructed separately, with tactile paving and kerbs dropped flush with the carriageway.*

4.13.88 The proposed pedestrian access to and from these bays is therefore not compliant with design standards and is not supported by the Highway Authority.

4.13.89 It is stated that the provision of electric parking will be in accordance with the Reading Borough Local Plan adopted in November 2019, which states the following;

- Communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point."

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

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

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

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

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

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

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

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

Servicing and Emergency Access

4.13.97 It has been stated that the delivery and servicing strategy for the proposal has been developed in accordance with RBC guidance and MfS and that all servicing and delivery requirements will be undertaken internally within the site boundary.

4.13.98 It had previously been commented that the Design and Access Statement appeared to illustrate at least one of the refuse stores to be located in excess of 10m from where a vehicle would collect. Clarity was therefore requested to ensure that refuse storage areas are in line with MfS.

4.13.99 The applicant has responded to state that the arrangement of the internal roads and shape of the site has meant that some of the bin stores are located outside of the recommended 10m carry distance for refuse operatives. Stantec drawing 47500/5500/005 Rev A provides a swept path strategy for refuse collection from the 6 bin stores on site and the route between the store and collection vehicle.

4.13.100 The distance to the bin stores at building EFG and B (south) are only 1m over the recommended distances for operatives. Given that this is a minimal difference from the 10m carry distance this has been deemed acceptable.

4.13.101 The fire strategy for the site includes the requirement of a fire tender accessing beyond the bollards to the northern section of the dedicated footway / cycleway. Tracking diagrams have now been provided to confirm that a fire tender could get to and from the area in question and this is deemed acceptable.

4.13.102 Given the above the Highway Authority objects to the proposal on the following grounds.

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

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

4.13.103 In the event the application is approved, the following elements will be required to be secured via Legal Agreement. In the event the application is refused, these should be referenced within the reason for refusal relating to the development being in the absence of a Legal Agreement:

- Provision of a new north-south link connecting Vastern Road to Christchurch Bridge and associated infrastructure/signage
- Financial contribution of £200,000 towards a new crossing on Vastern Road

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

O) BRE – daylight and sunlight

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

> The existing residential properties most likely to be affected by the proposals have been assessed. Other nearby residential locations would be less affected.
>
> 42 windows at 2-28 Lynmouth Road would have a loss of daylight characterised as minor adverse. Some of these are secondary windows, and some of the losses would be only marginally outside the guidelines. The windows affected are principally on the end of the rear additions, with some on the main rear elevations. Number 2 and number 24 are more affected than the other properties in the terrace and would have larger losses of light which could be characterised as major adverse. These have overhangs which limit the amount of daylight they can receive, which would be a mitigating factor.
>
> There would be losses of winter sunlight outside the guidelines to three properties in the terrace. We would consider the impact on sunlight to be minor adverse.
>
> There would be a minor adverse loss of daylight to just one window at 6 Lynmouth Court. Loss of sunlight would be within the guidelines.
>
> 7-12 Lynmouth Court is the building which would be most affected by the proposals. This building would have a moderate adverse loss of daylight. Some of the rooms have less affected windows on other elevations, which would be a mitigating factor. Loss of sunlight would be largely within the guidelines.
>
> 51 Vastern Road would have a minor to moderate adverse impact to windows on its side elevation. However, drawings submitted as part of a recent planning application suggest that none of them are main windows lighting habitable rooms which would be covered by the BRE guidelines.
>
> Gardens at 2, 4 and 8 Lynmouth Road, and at 3 Lynmouth Court, would have a loss of sunlight outside the guidelines. The losses would be major for 2 Lynmouth Road, moderate for 4 Lynmouth Road and 3 Lynmouth Court, and minor with mitigating factors for 8 Lynmouth Road. 2 Lynmouth Road would be particularly affected. It would lose all of its area capable of receiving the recommended amount of sunlight, though the garden is small and has walls around it which limit sunlight.

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

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

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

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

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

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

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

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

P) BRE – wind/microclimate

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

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

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

> BRE are satisfied with the majority of the RWDI responses to the points raised. However, for completeness, the RWDI report should be updated to include the RWDI responses as suggested in the table in Appendix A.
>
> There are three outstanding residual issues. These are:
>
> i, The failure by RWDI to consider the upper 20m/s safety threshold. If this threshold is not considered then appropriate mitigation measures cannot be developed. Without this, it will be necessary to carry out a full quantitative assessment of mitigation measures. This could potentially be conditioned by Reading Borough Council.
>
> ii, The use of a limited seasonal approach to wind conditions on balconies. This matter results from a fundamental disagreement between BRE and RWDI on best practice. The appropriateness of the RWDI approach needs to be considered by RBC and the developer.
>
> iii, The RWDI response indicates that the wind conditions at the entrance to Sovereign House will remain unsuitable for entrances. This is unacceptable. Appropriate mitigation measures need to be developed to reduce the wind speeds in this area.

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

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

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

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

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

- The wind conditions in the existing public realm near to Sovereign House in Configuration 3 are shown to be unsuitable for entrances, sitting, standing and strolling and have the potential to blow pedestrians and cyclist over. No adequate mitigation measures are proposed.

- The wind conditions on several balconies are shown to be unsuitable for sitting throughout the year. Whilst balconies fall outside of the Lawson Criterion, BRE would expect balconies to be suitable, as a minimum, for sitting during the summer months.

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

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

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

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

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

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

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

Q) Valuations

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

R) Housing

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

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

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

S) Environment Agency

4.18.1 Initial response 14 April 2020: Environment Agency position

4.18.2 The Environment Agency object to the development proposed as part of this planning application due to its likely effect on the River Thames. This habitat (Rivers) is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. Insufficient information has been provided to assess the risks posed by this. We therefore recommend that planning permission is refused.

4.18.3 Reason(s) - England's Biodiversity strategy identifies those priority habitats which are also listed as being of 'principal' importance under section 41 of the NERC Act 2006. This Act states that local planning authorities must consider these habitats in their decision-making, because of their duty to conserve biodiversity (section 40).

4.18.4 In this instance, the proposed development may have a detrimental effect on a priority habitat that we have a role in protecting. The application does not include adequate information about the measures proposed to assess and address the risk to ensure protection of the river in this location. In particular the application fails to address adequately the issue of tall buildings shading the river and its marginal habitat.

4.18.5 This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

4.18.6 The Design & Access Statement (DAS) refers in paragraph 2.8.5 to an Environment Agency No Build Zone 8m from the river edge and a Reading Borough Council Policy Buffer 10m from the river edge. It should be noted that the 8m buffer refers to the Land Drainage Byelaws, but for ecological purposes, this buffer should be a minimum of 10m, and depending on the site and circumstances, could be more.

4.18.7 Paragraph 2.8.4 of the DAS shows building heights along the river on either side of the application site as being three or four storeys tall, with the anomalies of Clearwater Court and Reading Bridge House on either side of Reading Bridge being taller. The illustration on page 90 of the DAS show the two buildings closest to the river being 10 storeys and 8 storeys high, much taller than those on either side. Being on the southern bank of the river, these tall buildings would cast shade over the river and, in particular, the marginal planting established along this southern bank as part of the mitigation measures for the construction of Christchurch Bridge.

4.18.8 In Appendix 5 (Transient Overshading) of the Daylight/Sunlight Report (EB7, 19 December 2019), the diagrams appear to suggest significant shading of the river/river banks throughout much of the year, although the full width of the river is not shown. The Ecological Assessment (Ecoconsult, December 2019) deals with shading in paragraphs 7.2.2 to 7.2.5 stating that not all parts of the river will be shaded throughout the day and that shading will be less in summer than in winter, but does not address the issue of shading of the marginal vegetation on the southern bank. This report states in paragraph 7.2.4 that the River Thames in Reading has been greatly modified, has hard banks and lacks natural riparian habitat (such as woodland, marsh, swamp, individual trees and marginal vegetation. This gives additional value to the marginal vegetation that has been established on the southern bank. Arguing that other buildings already cast shade, does not make it acceptable to cast more shade, particularly on one of the very few areas of marginal vegetation on the Thames through Reading. Referring to maps from over a hundred years ago saying that there were once trees here, and trees cast shade, is a tenuous excuse for allowing such an extent of shading now.

4.18.9 In our responses to previous consultations from the applicant and from Reading BC, we stated that the marginal vegetation in this location should not be impacted by shading and that the tallest part of the development should be towards the road in order to minimise the impacts, but this does not appear to have been taken on board.

4.18.10 With regard to the proposed green buffer between the development and the river, this should be free from built development, hard standing and formal landscaping and should be designed to provide a net gain in biodiversity. Additionally, planting should use locally native species of UK genetic provenance. Drawings 448.LA.101 Rev A (Landscape General Arrangement Plan) and 448.LA.102 Rev A show, however, that much of the buffer would have amenity grass rather than wildflower grass. Where a species rich grass mix is proposed, this uses a wet grassland mix and is further up the slope from the towpath than the amenity grass where it would be unlikely to get wet.

4.18.11 With regard to the stated ‘native’ riparian shrub mix, several species are not native, or not suitable. Cornus alba is non-native, Cornus avellana does not exist (perhaps Corylus avellana was intended) and Salix lanata is native to the UK, but is a mountain plant found in the uplands of Scotland and is not suited to this location. These should be removed from the planting mix. With regard to the trees proposed, Quercus palustris is non-native and should be replaced with one of the UK’s native oak species and the proposed Alnus glutinosa can be affected by phytophthera root disease and planting them can run the risk of importing this to areas currently unaffected. Consideration should be given to substituting this species for another native riparian tree species. Betula nigra is again non-native and should be replaced with the native Betula pendula.

4.18.12 The buffer zone along the river is very narrow in relation to the height of the buildings, particularly as this has the existing towpath within it. To give a meaningful gain in biodiversity, this buffer should be wider and have a greater emphasis on native species. The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife.

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

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

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

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

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

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

> "The scale indicated for the number of hours of sunlight on the river in the Appendix one graphics is too course to be useful. Looking back at the earlier Daylight & Sunlight Report (eb7, dated 19 December 2019) submitted with the application, this contained graphics showing transient overshadowing (Appendix 5). The use of this technique might give greater clarification of the impact of the shadowing that might result from the proposed development. We are unsure why this methodology was not used and why an hourly representation for a representative day (e.g. in April, June, August) was not included as was provided in the earlier report.
>
> Given that shading looks to be increased it would also be useful at this stage to see a shade arc on representative days (e.g. in April, June, August). This would give an idea of the height of the shadow. Does it reach the other side? The sunlight hours and shade arc should also be done for a scenario where the building is lower in height next to the river and taller buildings set back from the river to see if that increase can be avoided."

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

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

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

4.18.19 Overcoming our objection - Option 1 would be to reduce the height of the buildings and/or set them back further from the river. This has been raised previously. The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank. While this is the best option for preserving the footbridge mitigation planting and riverbed habitat, we do realise this may not be the preferred option.

4.18.20 Option 2 would be to see additional marginal planting installed as a combination of mitigation and ecological enhancement in recognition of the impact of shading. We would also like to see shade tolerant plants added to the footbridge planting area to allow for succession to a shadier environment.

4.18.21 There are a number of locations that could be explored for this additional marginal planting on either side of the river. Ideally, upstream between the footbridge and Caversham bridge. We believe that much of this land is under the ownership/control of Reading Borough Council and so any discussions regarding this should include the relevant Reading BC representative. *Officer note – see the ecologist comments below.*

4.18.22 Environment Agency Position – Flood Risk - We are pleased to see that you have used the most up to date flood model data to inform your Flood Risk Assessment (FRA). We are also pleased that the FRA includes reference to the new (as yet not yet published) Thames Mapledurham to Hurley 2019 modelling.

4.18.23 We are satisfied that the FRA confirms a design flood level of 38.30mAOD based on the 1 in 100 plus 35%. This level is used to inform mitigation proposals in the form of compensatory floodplain storage. Fig 4.1 (Modelled extents with allowance for climate change) provides a really useful illustrative drawing of how the design flood event will impact the site presently. It uses modelled levels from the River Thames in comparison with detailed topographic survey data for the site. This shows that the site is impacted by the 1 in 100 plus 35% design event to the north of the site (adjacent to the river) and to a small portion to the South East of the site.

4.18.24 We are satisfied that there is a commitment to safety of the development within the FRA by proposing to set Finished Floor Levels (FFLs) of the new buildings at a minimum of 38.60 metres AOD thereby providing a degree of resilience above the design flood level.

4.18.25 In line with best practice, we would normally expect a developer carries out level for level compensation for any loss of flood storage up to the 1 in 100 plus 35% flood level. The compensation provides an additional volume

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

4.18.26 The report notes that proposals to reduce the impacts of flooding in north Reading and Caversham are being developed. These design proposals take account of potential future flood alleviation works. This follows discussions with the developer and their consultant to ensure that the development proposals allow for integration of future works to a pre discussed design standard.

4.18.27 The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if planning conditions are included.

4.18.28 Environment Agency Position – Contaminated land - Given that the site investigation found relatively low levels of contamination it is expected that limited remedial works will be required from the perspective of controlled waters. In addition, as the proposed drainage solution is not proposing to use infiltration there is unlikely to be any mobilisation of contaminants within the soils. There is still a slight uncertainty that the cable oil leak that affected the adjacent site may have impacted the margins of proposed development site. *Officer note: The EA made recommendations for relevant conditions if permission was granted.*

T) Natural Environment

4.19.1 Original comments in April 2020: Any development on this site should meet various landscape design principles (as will current applications the retail park and former Royal Mail sites to the south), as follows:

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

4.19.3 The RSAF states (in relation to Vastern Road) that *'Potential changes to Vastern Road could reduce the dominance of speeding traffic and transform the character of the road from a by-pass at the edge of the town centre into a tree lined avenue as a central element of the town centre public realm, by planting in the central reservation and creating planted verges'*. Paragraph 5.22 states (in relation to Landscaping) that *'There should be new tree planting along Vastern Road, for instance, including the central reservation. Landscaping may also incorporate green roofs, living walls and sustainable drainage systems (see Chapter 10). The biodiversity value of landscaping is particularly significant where the elements of landscaping form green corridors that connect with existing open spaces, waterspaces and areas of biodiversity significance'*.

4.19.4 Chapter 8 (Urban Design Framework) refers to *'Promoting high quality buildings, streets and spaces; Creating permeable development that strengthens north-south links and improves connectivity across the area; Integrating public spaces and active frontages to establish vibrant, safe and enjoyable areas and create a focus to the sites*. Figure 8.2 provide guidance on where the major & minor paths and public spaces should be with figure 8.3 indicatively showing landscaping within the desired framework. 10.8 (within the Sustainability chapter) states that *'Green roofs should be considered for all developments with flat roofs in the Station Area'* 10.11 (Living walls) states: *'High quality designs for 'green walls' incorporating vegetation over a majority of a building's vertical surfaces should be considered, particularly where living roofs are difficult to achieve'*

4.19.5 Given the above, landscaping will be an integral part of any of the three current application sites to provide the 'in principle' features indicated in the RSAF and to meet local plan policies and the aims of our Tree Strategy (along with the BAP, Reading Climate Change Action Plan, to respond to Reading climate emergency and aim for a carbon zero Reading by 2030). In addition, there should be a landscaping link between the three sites through use of species. Whilst a complete repeat of species from one site to the next should be avoided in order to improve species diversity, a selection of a few common species between sites is desirable to provide a link.

4.19.6 The following principles should be applied across the three sites:

- Retention of good quality established trees where feasible
- A net gain in tree number across the sites – preferably 3 for 1
- Species link through the sites (each applicant will have to be aware what the other is proposing)
- Species selection to respond to the microclimate, e.g. shady areas, windy locations, polluted frontages
- Species selection as way-finding
- Species selective to provide diversity (including avoiding over-represented species in the Borough, e.g. Prunus and Tilia)
- Species selection to provide wildlife value
- Creation of 'avenue' planting, particularly along the north-south route which should aim for a double row
- Use of large canopy species
- Perimeter planting along the Vastern Road and Caversham Road frontages

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

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

4.19.8 Policy EN12 Biodiversity and the Green network states: *'On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should: • Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and • Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable'*

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

4.19.10 Policy EN14: Trees, hedges and woodlands states that: 'Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.'

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

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

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

4.19.13 The Sustainable Design and Construction SPD, amongst other things, reiterates the importance of considering incorporation of brown and green roofs, green walls and natural SUDs. The Tree Strategy 2021 details that the site is within a 10% or less canopy cover area and on a designated 'treed corridor' hence tree retention and planting is vital, especially on the frontage and should provide an increase in canopy cover overall on the site. The Strategy also expects a net gain in tree number, particularly as the site is in Abbey Ward which has a lower than 12% canopy cover; 12% being the minimum target for all wards by 2030.

4.19.14 Initial comments: A 'treed avenue' (or more accurately, a route with sporadic tree planting) has been provided but there is no direct visual link from Vastern Road to the river as a result of building layout. It is appreciated that the shape of the site does make this more difficult but it would appear that some measures, such as the 'shaving off' of corners of Blocks B & C could assist this. The EA comment that '*The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife'* hence there is work to be done on this route.

4.19.15 When viewed from both Vastern Road and Christchurch Meadows, the proposal presents a large scale of building frontage that is not in scale with adjacent houses or office buildings. The visuals provided within the DAS illustrate how imposing the proposal is from those viewpoints, albeit the design is much improved on the Vastern Road frontage in terms of appearance by omission of the originally proposed upper story building link between Blocks A & B (as originally proposed at pre-app stage). It is noted that the EA have expressed concern about the height of the buildings and detrimental impact on the river. Whilst an offset has been provided from the river this has only resulted in a 5m buffer strip in front of the buildings which limits meaningful tree planting in terms of large canopy species, which is what should be provided in this location to be in line with objectives of the Tree Strategy (the river being a designated treed corridor) and to enable planting to adequately soften the buildings. The EA's comments emphasise the need to increase the width of this buffer to include the 10m from the river edge and greater space for landscaping which the Natural Environment officer agrees with.

4.19.16 The landscape design principles include the need to consider green walls and roofs. It appears that, with the exception of the café, these are not included on any of the buildings. Even with the café, it is unclear as visuals in the DAS indicate a green roof but the roof plan does not. It is noted the inclusion of PV on the roof of Block A, D and somewhere on Blocks E, F & G and it is acknowledged that these also have a place on developments. However, given the policy backing for green roofs, it would be helpful to have a statement as to why these have been omitted and why green walls are not proposed anywhere. In terms of responding to the Council's climate emergency and global biodiversity loss, maximum greening of every site is

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

4.19.17 At pre-application stage it was indicated (in view of biodiversity and maximum greening) that natural SUDs provision should be the default position and I note that the Landscape GA plan (Rev A) mentions potential 'rain gardens' in one location, that being in front of Block C. However, the plan associated with the submitted drainage strategy shows only cellular storage tanks, which should be the last resort. Tree pits and water storage can be designed together to be mutually inclusive and in turn provide biodiversity benefits. Further thought on this is required in view of Policy EN18 and the Sustainable Design & Construction SPD.

4.19.18 With reference to Landscape Planting Framework Plan 448.LA.102 A, there have been some changes to tree species proposed as a result of comments given at pre-app – It is noted that the key and plan do not match in terms of tree species included. In relation to the species proposed there are some changes required (EA comments noted on this):

4.19.19 Prunus should be avoided due to over-representation in the Borough, large canopy trees should be considered in front of the café (riverside), the internal Betula nigra should be substituted with a native Birch and instead of the riverside Q.palustris proposed a Q.robur should preferentially be considered if waterlogging is not likely to be a significant issue or a Swamp cypress could be considered as that would complement those planted on the riverside at Thames prom. Whilst the latter would not meet the EA's native requirements, there is sometimes also a place for ornamental planting on development sites. The EA's concern about the use of Alder in terms of disease spread is noted and it is understood that planting Alder on river banks that are liable to flooding and where the disease occurs presents a high risk of the disease spreading. Betula pubescens could be utilised and Populus nigra (native Black poplar) both of which are native and moderately tolerant of waterlogging. The EA's comments on other planting proposals (non-tree) should be taken into account. Detailed landscaping could be secured via condition, but it is appropriate given the extent of concerns for amended details to be provided prior to a decision.

4.19.20 The tree pit provision and design will be extremely important on this site to ensure long term successful establishment of tree planting. Given the level changes through the site and the inevitable need for services, demonstration of the provision of suitable underground space (soil volume provision) for tree planting should be provided now. This should include indicative service routes. Both the Transport and Natural Environment Officers emphasised at pre-application stage the need to ensure that tree planting within the development would not conflict with vehicle movement, particularly larger vehicles (refuse trunks, emergency vehicles, delivery lorries). This is presently unclear.

4.19.21 The Contents of the Tree Survey and AIA document are acceptable. As is recommended, an Arboricultural Method Statement will need to be secured to ensure appropriate protection of off-site trees.

4.19.22 Whilst the principle of redeveloping the site is supported and there are no existing tree issues that can't be addressed, there are a number of concerns that need further consideration in order for the application to be supported in tree and landscape terms.

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

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

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

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

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

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

- Tree species / sizes – A reduced number of Prunus is noted, albeit disappointing to have them included still. The change of species along the riverside is noted – all native and large canopy. Whilst the projected 25 year canopy just about avoids direct conflict between buildings and canopies, the trees will live considerably longer and get bigger during theirs and the buildings lifespan. Close proximity requires pruning to give reasonable clearance and can result in future pressure from occupants to prune to e.g. 1) alleviate perceived safety fears, 2) to avoid direct contact, 3) improve views. It is maintained that a greater buffer for tree planting should be (and have been) provided and is justified by the need to successfully accommodate large trees, long-term, in line with the objectives of the Tree Strategy.

- In summary, the current proposals do not allow a long-term sustainable relationship between the riverside buildings and large canopy trees and therefore this can reasonably be included in an overall condition dealing with the detrimental impact on the Thames environs. Suggested that any future reason for refusal include the following: The development, by virtue of its size and proximity to the river, allows insufficient space for a successful long-term relationship with large canopy trees within the riverside buffer. This is contrary to Policies EN13, EN14 and objectives of the adopted Tree Strategy.

- In terms of trees/ clear stem heights adjacent to road accesses, any Landscape Maintenance condition will secure this.

- No revised energy strategy has been forthcoming; the location of green roofs should be agreed prior to any positive decision as part of the landscape strategy.

- In terms of servicing/landscaping, the additional information is useful. It is assumed that the applicant is satisfied that service routes can be accommodated outside all the rooting areas indicated. Query raised over the extent of the rooting provision for trees on the riverside landscape buffer.

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

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

U) Ecology Consultant for RBC (GS Ecology)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> "When determining planning applications, local planning authorities should apply the following principles:
>
> a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;"

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

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

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

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

V) Landscape Services Manager

4.21.1 Initial comments in October 2020 responding to proposed mitigation strategy for the River Thames submitted by the applicant on 13th October 2020 (shade tolerant planting by Christchurch Bridge & marginal planting on the northern bank adjacent to Reading Boat Club): The Council does not own any land on that stretch of the south bank of the Thames. There is a PROW across the land, but it is not ours. The Council owns the stretch between Caversham Bridge and Thames Avenue, but then nothing until Reading Bridge. That is as may be; as managers of the PROW, we would have concerns about future overhang, as the path is not wide along that stretch. Even so, I agree that the problem is the overall density and positioning, which isn't addressed by this proposal.

4.21.2 Further comments summarised in conversation with the Planning Officer and fed into the applicant on 22nd October 2020: The off-site location proposed on the northbank of the Thames by Reading University Boat Club would not have been suitable in any event, given the need to maintain the launching station for the boat club to the river at this point. It is also noted, for information, that based on the single initial plan submitted, it is unclear whether the proposed planting would have been in the river itself (floating option), or whether the intention would have been to provide planting on the land (riverbank) element, or indeed alter the alignment of the riverbank at this point.

4.21.3 Further response in November 2020 responding to the response from the applicant dated 12th November 2020 (included a River Thames Mark Up plan specifying EA and RBC owned land, according to the applicant): River Thames mark-up plan: as far as Officers are aware, RBC does not own the stretch of towpath directly to the north of the development site.

4.21.4 Towpath proposal: we see the ecological value of the seeded coir roll along the canalised bank of the river, but are opposed to any effective narrowing of the towpath by the proposed planting along it. There is already some vegetation along that route, so either the ecological value of the surface planting will be minimal, or there will be encroachment. This is a very busy off-road route, and needs to accommodate bicycles, as well as pedestrians, buggies and wheelchairs.

4.21.5 Suggestion by the applicant for mitigation on the south bank of Christchurch Meadows: Given the density of trees and undergrowth on most of the areas marked in red on the 'River Thames Mark-up', Officers do not see much scope for enhancement at almost all of the red-lined locations. The Council values marginal vegetation for its wildlife importance, but needs to balance its management of river banks with the requirement to keep views of the river open for people using the parks for recreational walking. The Council therefore have a mix of open views and reeds/coppice

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

W) Environmental Protection (EP)

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

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

1. The noise assessment has assumed a noise limit for noise from the SSE transformers and cooling fans of 5 dB above the L90 background for the external private amenity areas (and presumably façade of the development). The RBC policy is as follows:
   The predicted specific sound level (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise-sensitive facade shall be at least 10dB below the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The predicted rating level, LAr,Tr (specific sound level plus any adjustment for the characteristic features of the sound) as measured at a point 1 metre external to the nearest noise-sensitive façade (habitable window of a dwelling) shall not exceed the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation.

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

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

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

4.22.4 Noise – delivery hours / waste collections/ opening hours – Concerns are raised about the potential for noise disturbance due to deliveries and/or waste collections and/or commercial operations of the café on occupants of nearby residential properties, particularly late at night and early morning, so restrictions on permitted hours for deliveries and more generally opening hours are recommended (via planning condition).

4.22.5 Noise generating development - Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology. The café is likely to require mechanical plant and there may be an externally ventilated plant room associated with the ventilation for the residential development. Accordingly, a condition requiring a noise assessment is recommended prior to any mechanical plant being installed.

4.22.6 Kitchen Extraction – odour - In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005). This will be secured via condition.

4.22.7 Air Quality - Increased exposure - The assessment concludes that for 2021 the NO2 levels at the façade of the development will be below the objective levels. Clarification is required in terms of the modelling, whether the location of the Vastern Road diffusion tube was modelled as a receptor and whether that accurately predicted those measured levels? How close of the Vastern Road façade of the development to the main road compared to the diffusion tube location? These queries should be addressed.

4.22.8 Air Quality - Increased emissions - The information submitted states that there will be less road movements associated with the development than for the previous use. It is queried whether the number of residents less than the number of employees that were based on the SSE site?

4.22.9 Contaminated Land - A phase 1 and 2 contaminated land investigation has been submitted with the application. Some contamination has been detected which will require a remediation plan. There is also further investigation to be carried out: a gas risk assessment which is underway, and some further sampling in currently inaccessible areas: Areas below the existing building footprint on the southern extent of the site; Areas below the course of oil filled cables. Therefore the multi-stage contaminated land and land gas conditions are recommended.

4.22.10 Construction and demolition phases - EP have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability. As such, the EP based Construction Method Statement condition is recommended, together with hours of works and no bonfires during demolition/construction.

4.22.11 Bin storage – rats There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. A condition is therefore recommended.

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

- It is disappointing that the site cannot be designed with the noise from the transformers controlled at source or the site layout adjusted so that the noise from the transformers does not meet the 10 dB below background criterion or even a more conservative 0 dB above background. The applicant should clarify whether any adjustment has been made for tonality in the assessment and if so how much? What is the rating level prior to adjustments? It is noted that the occupants most affected have been provided with acoustic glazing and ventilation, however, it would be much more preferable if they were also able to open their windows, and the noise is constant. Is there really no options for reducing the noise at source?
- Air quality – it is stated that the model is over predicting. This needs to be clarified, as to me it sounds as if it is under predicting as the modelled concentration is lower than the measured one. Does the model need further adjustment in that case? (The response states: Slight over-predictions of NO_2 concentration were recorded at the Vastern Road diffusion tube DT52 (34.6 $\mu g/m^3$ compared to the measured annual mean concentration of 36.8 $\mu g/m^{3)}$

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

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

X) Others

4.23.1 No responses have been received from the following:

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

Public consultation responses

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

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

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

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

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

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

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

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

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

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

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

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

1 from each of the following addresses:

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

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

4.24.7 <u>Overdevelopment / density</u>

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

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

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

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

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

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

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

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

4.24.10 Cycling access to the Thames Path

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

4.24.11 Traffic, parking and associated wider impacts

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

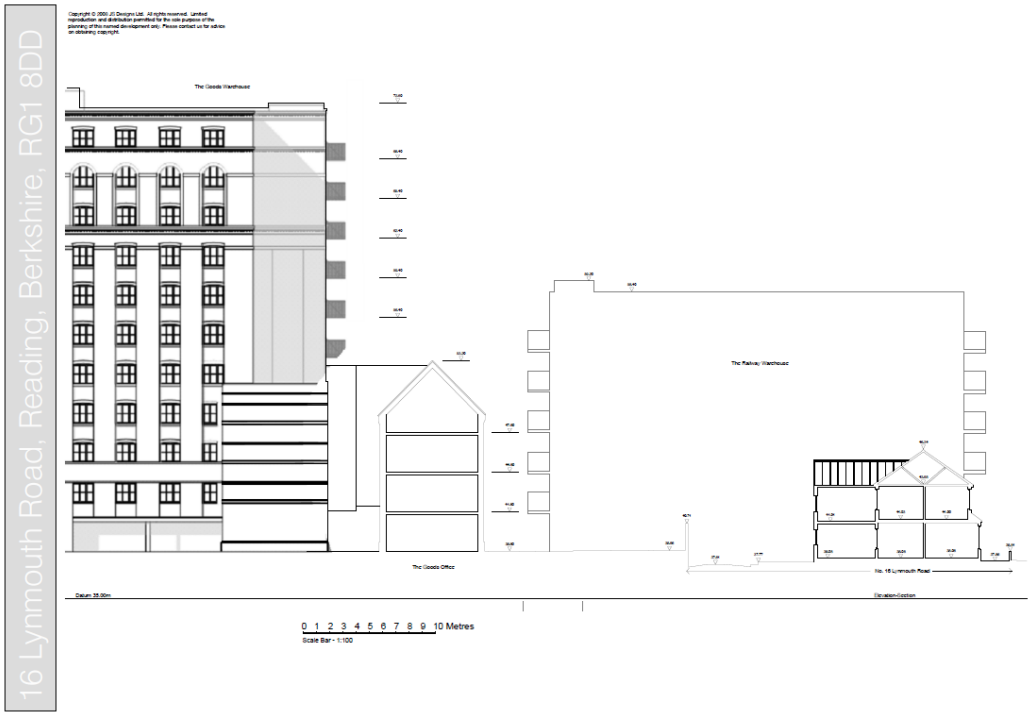
visitors will park on adjacent streets (even if they don't have a permit), thereby depriving residents and permit-holders of their ability to park.

4.24.12 Parking facilities for delivery drivers

- Question where delivery drivers would park (also moving in/out vehicles). If each flat has 2 deliveries a week (a low number) and each delivery taking 10 minutes to deliver (also on the low side), that is 150 x 2 x 10 = 3000 minutes. 50 hours a week of deliveries. Assuming the deliveries times are evenly spread, this would cause havoc on our street and the traffic will over-flow into Lynmouth Road.

4.24.13 Privacy and overlooking (and associated visual dominance and overbearing/sense of enclosure)

- Loss of privacy to Lynmouth Road properties from the proposed 4 storey properties (e.g. direct view into a conservatory and 75% of rear gardens)
- Thames Court flats will be overlooked by many other dwellings, with a direct line of sight into bedrooms and lounges. Residents will suffer a significant loss of privacy.
- Despite the proposed blocks exceeding a 'back-to-back distance of 20 metres cited in the policy text', the sheer scale of the proposed buildings will contravene Policy CC8 due to the loss of privacy and overlooking, the visual dominance and overbearing effects and the harm to the outlook of properties along Lynmouth Road (e.g. a specific section plan through No. 16 Lynmouth Road has been submitted to demonstrate the impact).



- Proposed building is not 'back-to-back'. It will be 'front-to-back' with principal living accommodation and external balconies directly overlooking properties on Lynmouth Road. This will disrupt a rightful claim to peaceful enjoyment of private amenity space and rooms at the back of Lynmouth Road properties, particularly during the evenings and weekends, and clearly lead to an unacceptable intrusion.
- Comment that trees planted to protect privacy would provide seasonal cover, but gaps between trees will not provide significant privacy. Question whether the trees would be maintained and by who.

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

4.24.14 Loss of daylight/sunlight and overshadowing

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

4.24.15 Crime and fear of crime

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

4.24.16 Visual amenity

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

4.24.17 Light pollution

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

4.24.18 Noise pollution

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

4.24.19 Public safety

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

4.24.20 Wellbeing of neighbours

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

4.24.21 Air quality

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

4.24.22 Affordable housing

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

4.24.23 Wildlife

- Negative impact on wildlife

4.24.24 Green / play space

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

4.24.25 Flood risk

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

4.24.26 Wider infrastructure

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

4.24.27 Precedence

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

4.25.1 Group Responses

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

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

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

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

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

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

4.25.5 **3. General**

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

4.25.6 **Reading Cycle Campaign** objects as follows:

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

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

5 RELEVANT PLANNING POLICY AND GUIDANCE

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

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

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

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

5.3 Relevant Supplementary Planning Documents (SPD) are:

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

Sites
Reading Station Area Framework (2010)

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

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

6 APPRAISAL

The main issues raised by this proposal are considered to be:
Principle of development
Residential density, mix and affordable housing
Layout/scale/design/ north-south route
Residential amenity
Transport
Locally Listed Building
Landscape/ecology
Energy
S106

Principle of development

6.1 The application site forms part of an allocated site in the Local Plan (CR11g, Riverside), currently knowns as the Southern & Scottish Electricity (SSE) site. The site size for CR11g is given as approximately 1.24 hectares with an indicative potential of between 250 – 370 dwellings, 1,000 – 2,000 sq.m of leisure and no significant net gain in office floor space.

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

6.3 The allocation was made on the expectation that SSE would eventually vacate all of this site and the expected residential development potential reflects that. The plan below shows the extent of the allocated site including the area still occupied by SSE on the east with the application site area on the west of the site outlined in red.

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

Residential density, mix and affordable housing

Density

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

6.6 Policy CC6 'Accessibility and the intensity of development' makes the important link between the scale and density of development and its inherent level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. This does not override other considerations but is an important element of meeting the borough's development needs in the most sustainable way. Policy H2 which specifically considers density and mix, requires that the appropriate density of residential development is informed by amongst other things, the character and mix of uses of the area in which it is located (including nearby heritage assets), its current and future level of accessibility by sustainable means, the need to achieve high quality design and the need to maximise the efficiency of land use. Within the Local Plan, indicative densities for different areas are set out and this indicates that for sites located within the Town Centre and in such close proximity to the station, would have an indicative density of above 100 dwellings per hectare. It is important to note there is no upper limit is provided for the Town Centre.

6.7 Policy H2 makes clear that the densities indicated will not be applied as hard-and-fast rules, and appropriate densities will be informed by a variety of factors, including the character and mix of uses of the area, accessibility and the need to: achieve high quality design, maximise the efficiency of land use; and minimise environmental impacts. In this instance there is a strong case for achieving the best use of this allocated residential site when coupled with the significant need for housing in Reading and the need to maximise the efficient use of land, particularly brownfield land in such a

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

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

Mix

6.9 Policy CR6 (Living in Central Reading) seeks that residential developments within the town centre area should incorporate a maximum of 40% of 1-bedroom units and a minimum of 5% of 3-bedroom units. The proposed mix of units of 61 x 1-bed (29%), 136 x 2-bed (65%) & 12 x 3-bed (6%%) is therefore acceptable in terms of Policy CR6 requirements.

Affordable Housing

6.10 In terms of affordable housing, the applicant made clear from the outset of the application that the proposal would not be viable if a policy compliant affordable housing offer was made. However, further to negotiations during the application process an offer was made to provide 43 (20%) of units on site in the form of 24 shared ownership apartments and 19 affordable rent apartments. The shared ownership units are shown in Block B with a mix of 15 one bedroom and 9 two bedroom apartments. The affordable rent units are shown in Block C with a mix of 9 one bedroom and 10 two bedroom apartments with rents set at Target (social) Rent.

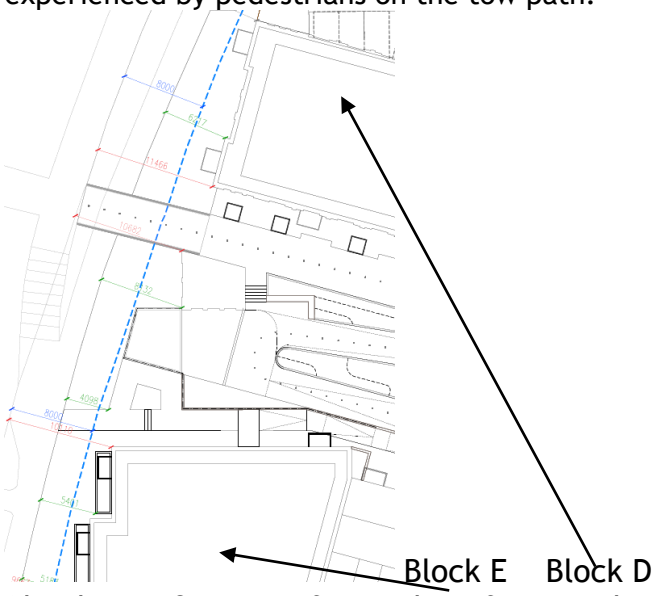
6.11 By reference to the comments provided by the viability offers and housing officers, while the proposed offer falls below the Policy H2 target the applicant has provided sufficient justification in their viability statement for the offer made and officers advise that, notwithstanding the negative concerns raised on other aspects of the proposed development, they do not recommend that the failure to provide policy compliant affordable housing should form a reason for refusing planning permission.

Layout / scale / design / north – south route

Layout

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

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



Blue line is 8 metres from edge of tow path.

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

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

Pinch point

6.16 There is also a concern that designing Blocks D & C to back on to the rest of the SSE site could make it difficult for the remainder of the allocated site to be developed in an acceptable way.

6.17 The height of Blocks A & B facing Vastern Road, while higher than anything else close by needs to be seen in the context of the width of Vastern Road itself and the height of buildings within view and anticipated by other sites allocated in the Local Plan. To the east lies Clearwater Court and Caversham Bridge Building and the nearly completed Thames Quarter building. To the south lies the rest of the Station/River major opportunity area as identified in the Local Plan where tall buildings are anticipated to achieve the redevelopment potential of these sustainably located sites. Officers are satisfied that in terms of appearance the proposed scale and design of Blocks A and B are acceptable.

Design

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

North-south route

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

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

Impact on residential amenity

6.21 The preceding section leads on to consideration of residential amenity for existing and future residents. The residents most likely to be impacted by the proposed development live to the west of the site plus those living in the cottage on Fry's Island in the Thames. The applicant's Daylight and Wind Reports have been considered by the Council's consultants and the conclusion reached accepts that while there will be some change and impact for existing residents this is starting from an unusual situation for a town centre site with the existing site cleared of any substantial structures. The applicant, by dropping the heights of the blocks directly backing on to the houses in Lynmouth Road have made a reasonable attempt to reduce the impact. It also needs to be considered that the residential use is likely to be more acceptable in residential amenity terms than the previous general industrial use.

6.22 For future residents while the dwellings inside would provide acceptable living spaces there is very little outdoor amenity space provided. Many of the flat units are provided with balconies but other residents or those wanting to do more than sit will be able to make use of the Christchurch Gardens on the north of the Thames. The applicant has confirmed that £100k would be part of a S106 package to be spent on play and leisure improvements here. This is welcomed but there remains a concern that a development on this scale with family size dwellings too should provide more on-site amenity space.

6.23 There are also strong concerns raised by Environmental Protection officers, as set out in the earlier Consultation Section. The applicant has failed to satisfy them that the new residents can be adequately protected from the noise and tonal disturbance caused by the equipment on the SSE site. They advise that their concerns are substantial and as it is not possible to address them through planning conditions, as the applicant advises that it is beyond their control to remedy the nuisance at source, the development should be refused planning permission for this reason. Officer agree and therefore the development should be refused for failing to demonstrate that it meets policies CC8, EN16 and CR6 by adequately mitigating the pollution from the adjacent site.

Transport

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

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

Locally Listed Building

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

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

6.27 With the rows of terraces to the west along Vastern Road and the streets to the North, the locally listed building provides a link to the past and the building itself is the last remaining building from the original power station works. The entrance building with a defined archway and traditional, intricate styling makes an important contribution to the streetscene of Vastern Road and its architectural style is both good-quality and characteristic of Reading. In short, the presumption should be for this building to be preserved and if possible, included within any redevelopment proposal, perhaps as a feature building. This was the advice of officers during pre-application discussions with the (now) applicant. The proposal is to demolish the building in its entirety. It is therefore necessary to consider the development proposal – including the loss of the locally listed building - against the relevant national and local policy criteria. This primarily consists of Section 16 of the NPPF 'Conserving and enhancing the historic Environment', Policy EN1 'Protection and Enhancement of the Historic Environment' and Policy EN4 'Locally Important Heritage Assets' contained within the Local Plan.

National Policy

6.28 Paragraph 197 of the NPPF concerns the effect of an application on the significance of a Non-Designated Heritage Asset (NDHA). It states that such effects, *"should be taken into account in determining the application"*. It

goes onto qualify that *"In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.

Local Plan Policy

6.29 Policy EN1 Protection and Enhancement of the Historic Environment' of the Local Plan specifically seeks to ensure that assets on the Local List are protected and where possible enhanced. As a starting point, the policy requires proposals to avoid harm in the first instance. The policy does recognise that should any loss of a heritage asset occur, this must be accompanied by *clear and convincing justification, usually in the form of public benefits*. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified in a Heritage Statement.

6.30 Policy EN4: 'Locally Important Heritage Assets' is most relevant, as it is the most specific local policy which affects locally important heritage assets. Policy EN4 seeks to ensure that development which specifically affects locally important heritage assets conserve the architectural, archaeological or historical significance of the asset. It is important to note, that like EN1, this policy also recognises that *"Planning permission may be granted in cases where a proposal could result in the loss of a locally important heritage asset"* subject to certain criteria being met.

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

Significance and benefits

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

6.33 The Council's local list description for this building states:

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

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

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

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

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

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

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

6.34 To be included on the local list nominated buildings are considered against three main categories, historic interest, architectural interest and townscape value. In terms of historic interest, the building is connected to the electrification of the tramways in the early 1900s, which was clearly an important modern change to a thriving industrial town like Reading.

6.35 In terms of architectural importance, the style of the building is not 'standard' as might befit an industrial premises. It appears to have been a bespoke design, drawing from fashionable architectural styles and a well-known local architectural firm was brought in, Brown & Albury, who at that time produced a number of buildings in the town including the Heelas department store (John Lewis façade), Reading West Library (Grade II), Caversham Free Public Library (Grade II), Rising Sun pub (locally listed, ref. LL7), The Corn Stores (Forbury Road, Grade II), the former National Westminster Bank on Market Place (Grade II listed). Albury and his firm appear to have been involved with many other buildings and restorative/refurbishments around the same time, some of which still survive. In fact, the applicant's Heritage Statement indicates that Frederick William Albury himself was one of the founders of the Reading Electric Supply Company.

6.36 In terms of townscape value, the building has a more limited contribution. Located on the northern side of the Vastern Road (the A329, part of the IDR), one needs to almost know that it is there to spot it. Once seen however the detailing certainly marks it out as a building of interest in sound condition but requiring of enhancements to its townscape setting. The building was locally listed in 2017 on the basis of meeting the above criteria and therefore its significance established.

6.37 The applicant has sought to justify the loss of the building by the potential benefits of the proposed development as explained in the applicant's Heritage statement. The applicant's Heritage Statement is comprehensive both in terms of describing the evolution of the electric works site, but also the condition and importance of the locally listed building at 55 Vastern Road. It states:

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

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

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

6.39 The applicant's planning statement sets out seven public benefits of the application scheme and are described by them as 'significant'. An officer commentary is offered to each below:

Facilitation of strategic link from Central Reading to Christchurch Bridge and across the River Thames
This is a benefit, but not only is it required by adopted policies and the RSAF; elsewhere in this report, the quality and attractiveness of that link is questioned and it is not clear that the retention of the Locally Listed building, in whole or part, would not be possible in any other layout.

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

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

High quality and sustainable design to reflect the strategic objectives of the station/river major opportunity area and the vision with the Local Plan that this will be a 'flagship scheme'.
One key aspect of considering the proposed development against paragraph 179 of the NPPF and the Local Plan Heritage criteria would be understanding the general design merit of any redevelopment on site. Section 12 of the NPPF 'Achieving well-designed places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high-quality places. Paragraph 127 of the NPPF includes the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The Government's National Design Guide 2019 (NDG) is clear that well-designed places contribute to local distinctiveness. This may include introducing built form and appearance that adds new character and difference to places or reinforcing existing features to create a positive and coherent identity that residents and local communities can identify with. Policy CC7 'Design and the Public Realm' sets out the local requirements with regard to design of new development and requires that all developments must be of high design quality that maintains and enhances the character and appearance of the area in which it is located. The aspects of design include: layout: urban structure and urban grain; landscape; density and mix; scale: height and massing; and architectural detail and materials.

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

Significant biodiversity improvements when compared to the current use of the Site to accord and assist with the wider objectives of the Local Plan in relation to wildlife corridors and habitats
The density of the development leads to pressures for increasing biodiversity on the site and mitigating the urbanising effect of the development on site, hence the reason that the applicant has had to explore options for off-site biodiversity enhancements. It is not clear that there are such benefits which are of any significance to the overall planning balance.

Economic benefits as a result of the development, through job creation, job opportunities, supply chain and an increase in the residential population of Central Reading, for weekend trading
This is not a particular benefit of this scheme, it could be said of any residential scheme.

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

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

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

Conclusion on loss of locally listed building

6.41 Were the application otherwise acceptable in design terms it may have been possible for the planning balance to have argued that the loss of the locally listed building could have been outweighed by the quality of design and layout being proposed. There are some planning (public) benefits and these are discussed above. However, these have not met the test of being substantial enough, sufficient to outweigh the loss of significance – which in this case is extremely harmful, the total loss of the building – so as to provide a convincing planning balance. The applicant considers that the Locally Listed building cannot be meaningfully retained, but this is couched in the context of the development which is being proposed.

6.42 It is useful in concluding, to be reminded of the key message in Policy EN4: "Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance". In this case, it is not just harm, it is complete loss. The significance of the Heritage Asset is set out above. The efforts to include it in the redevelopment are not clear and the overall planning benefits of the scheme not sufficiently justified. In conclusion, the loss of the loss of the heritage building is not considered acceptable in the context of the benefits of this application scheme and this forms a reason for refusal above for a failure to comply with policies CC7, EN1, EN4 and the NPPF.

Landscape/ecology

Landscape

6.43 The Natural Environment officer's comments are provided in the consultation section (Part T) above. Reference is made to the policy considerations and in particular Policy EN11 which seeks to protect *Reading's waterspaces "so they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor'.*

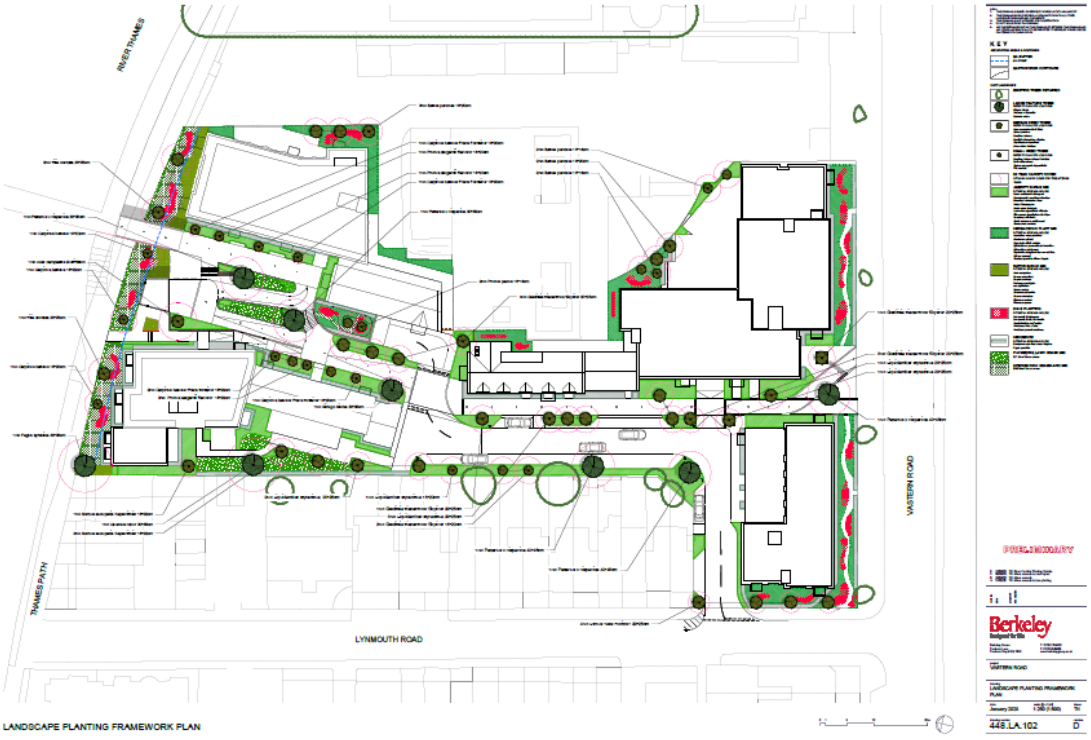
6.44 The River Thames is designated in the Local Plan as a Major Landscape Feature under policy EN13 and policy states that: *'Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature'.*

6.45 Officers concerns for the impact on the Thames caused by the development are consistent with those raised by the Environment Agency and the Council's consultant Ecologist and public comments received. The Environment Agency helpfully offered two options to mitigate their

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

6.46 The landscape officer also refers to Policy EN14: Trees, hedges and woodlands and while new planting is proposed there is a concern that the shading will prevent the trees from achieving their desired condition.

6.47 The landscaping plan below illustrates what has been proposed. As noted before given the scale of the development proposed in terms of the size and scale of the proposed buildings and number of residents one would normally have hoped for significant areas of landscape setting for the buildings and communal space on site. It is acknowledged that the site currently is devoid of landscaping and that any proposal for new landscaping is positive but with fewer dwellings and less land take by buildings so much better could have been provided to create a more pleasant area.



Ecology

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

6.48 The comments provided are again consistent with the concerns and objections raised by the Environment Agency about the shading of marginal vegetation along the river and thereby the potential for this to decline to the detriment of wildlife on the river.

6.49 These concerns have been discussed with the applicant as they could be mitigated by setting blocks D & E further back from the river and lowering their height. An alternative option of providing additional marginal planting elsewhere along the Thames was suggested by the EA and this is option the applicant preferred. However, it is not clear if the alternative location between Christchurch Bridge and Caversham Bridge is viable for the new marginal beds and whether other river users (boat owners and kayakers) might have objections.

6.50 The proposal has been considered in accordance with paragraph 175 of the NPPF, which refers to a mitigation hierarchy, and states "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;"

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

6.52 Given the earlier concerns caused by the height and massing of the proposed development on the character of the Thames as a recreational facility and significant visual asset to the town, which could be addressed by relocation and reduction of Blocks d and E officers consider it reasonable to conclude that the harm to wildlife should also be avoided in this way. The proposals therefore do not comply with the mitigation hierarchy and are in conflict with policies EN11, EN12 and should be refused planning permission for this reason.

Sustainable Development

6.53 Local Plan Policy H5 'Standards for New Housing' seeks that all new-build housing is built to high design standards. In particular, new housing should adhere to national prescribed space standards, water efficiency standards in excess of the Building Regulations, zero carbon homes standards (for major schemes), and provide at least 5% of dwellings as wheelchair user units. Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.

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

6.55 The first review found that the proposed energy strategy was not compliant with RBC energy and carbon policy, as well as not meeting wider council aspirations because the proposed thermal energy systems were not decentralised and did not use ground source heat pump (GSHP) or air source heat pump (ASHP) as a primary heating source. There was also no decentralised hydraulic heating system proposed, therefore the development was not "connection-ready" for any future DH networks that may be deployed in the area around the development.

6.56 A further revised energy strategy was completed by the applicant's consultant in December 2020, which did propose a hydraulic heating system and heat pumps as the primary low-carbon heat source and natural gas boilers for top-up heat. In so far as the relevant policy applies the proposed energy strategy meets the policy requirements although lacks the ambition sought by RBC energy and carbon policy guidance, as well as not being future-proofed for incoming national policy, for the following reasons:

- Insufficient evidence to discount open-loop GSHP, which is identified in the RBC Sustainable Design & Construction Supplementary Planning Document (SPD) as the preferred heat pump technology over ASHP;
- Reliance on natural gas boilers for heat top-up in winter periods is not future-proofed for the expected national Future Buildings Standard policy, which are currently at the consultation stage.

6.57 Officers are satisfied however, that the proposals demonstrate a good standard of sustainability and in particular the requirement adhering to zero carbon homes standards and therefore the development is policy compliant in this regard.

6.58 The proposal has also been confirmed that it would meet the requirements of sustainable drainage policies (see section I in the Consultation responses above).

S106

6.59 Were Members minded to disagree with the officer recommendation and decide to grant planning permission for the proposed development there are a number of obligations that the applicant would be required to commit to through the completion of a S106 legal agreement. The heads of terms would include:

- Affordable housing (43 apartments on site with the mix and tenure 45% affordable rent and 55% shared ownership as agreed) provided before private sale properties are occupied.
- Employment & Skills Plan (construction phase) before works start
- £200,000 financial contribution towards new crossing on Vastern Road before first occupation
- £100,000 financial contribution towards play and open space facilities on Christchurch Meadows before first occupation
- Provision of pedestrian/cycle route through the site connecting to Christchurch Bridge and Vastern Road before first occupation and associated infrastructure/signage

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

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

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

Equalities Impact

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

7 CONCLUSION

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

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

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

7.3 However, officers have spent a long time working with the applicant to try to overcome the main objection, which is the poor north-south route, as expressed by the Policy Team Leader. Officers believe that a different layout with fewer blocks would allow the north-south route to be provided directly and to the quality that the local plan policy allocation aspires to. Officers therefore consider that approving the development as proposed would lose the chance to achieve this key policy objective. The benefits as identified would be sought from any developer looking to develop this site for housing in excess of 100 dwellings so while not unwelcome are not specific to this proposed scheme.

7.4 As such, officers have concluded that the conflicts with the development plan are not outweighed by the benefits of the proposal in this instance. Officers have applied a suitable planning balance when reaching this conclusion. Planning Permission is therefore recommended to be refused for the reasons as stated at the start of this report.

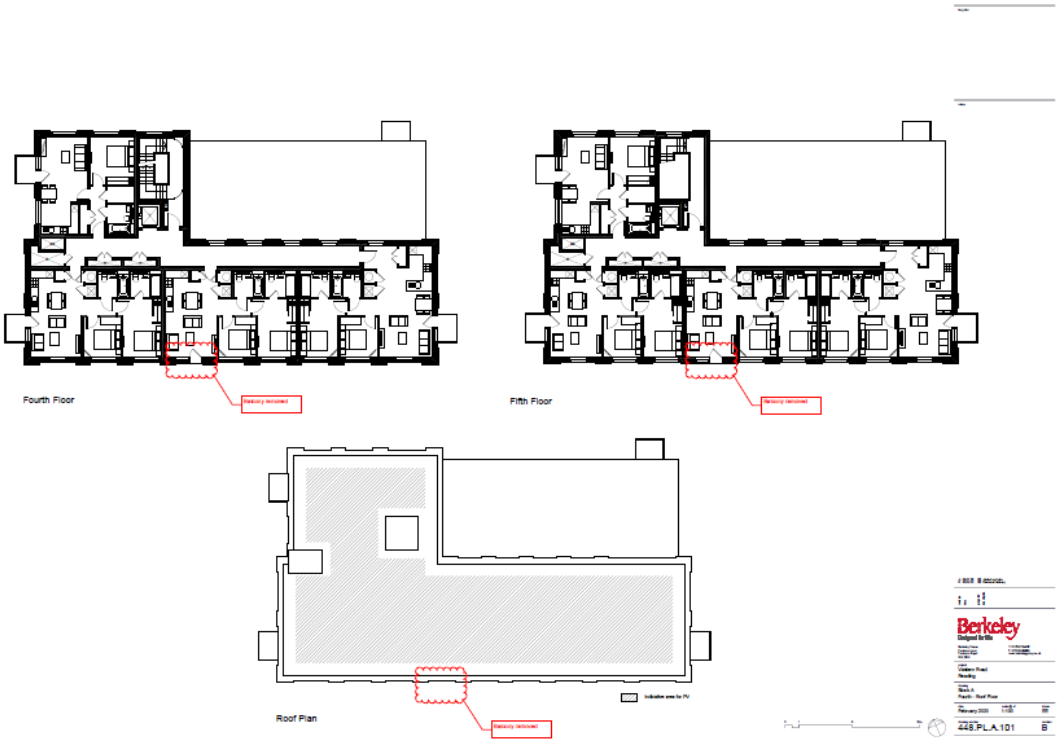
Case Officer: Mr Jonathan Markwell

Main plans considered.

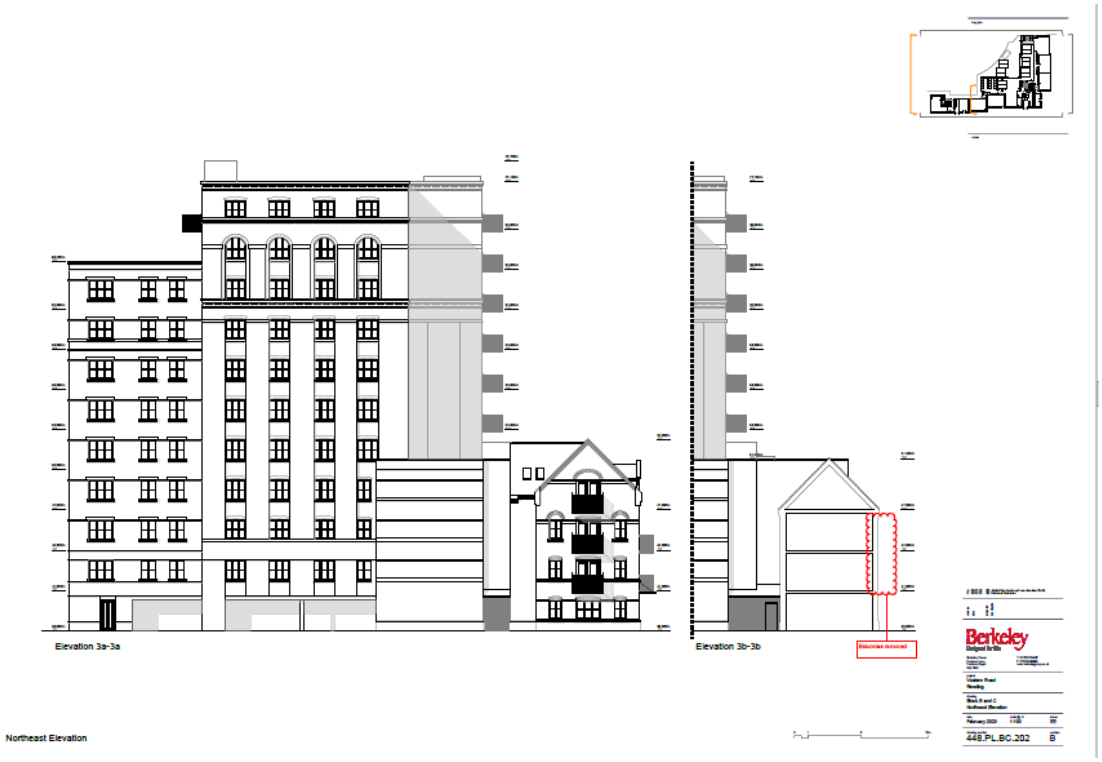
Master Plan

Block A Elevations

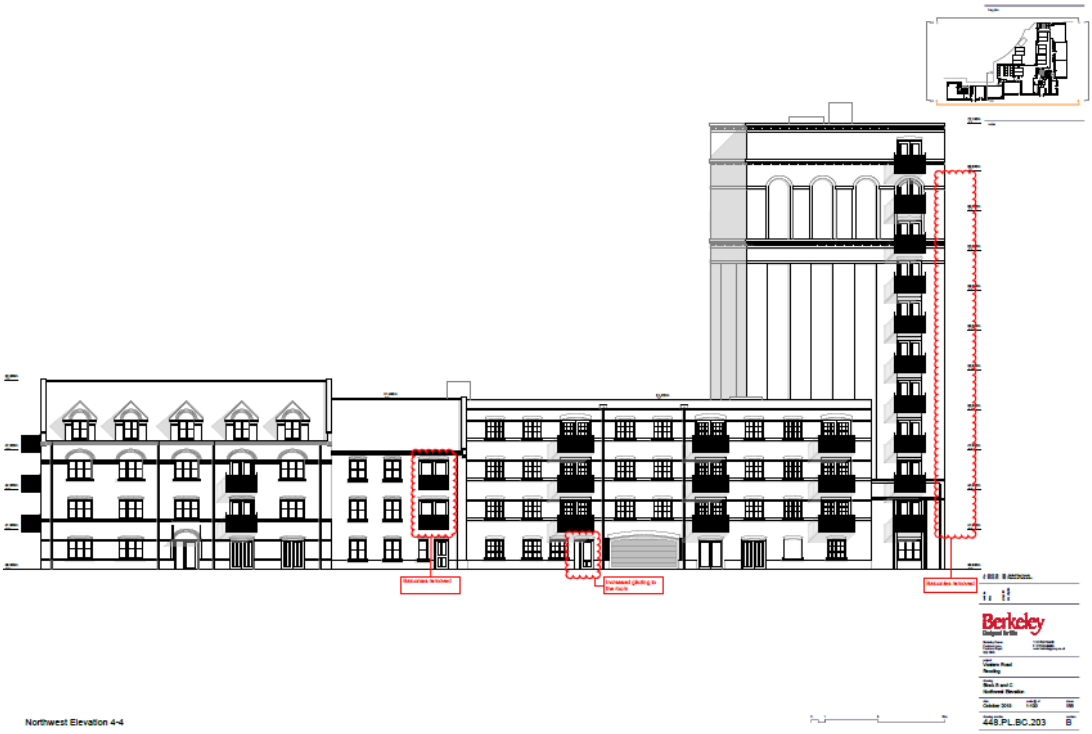
Block A floor plans



Block B – elevations from north

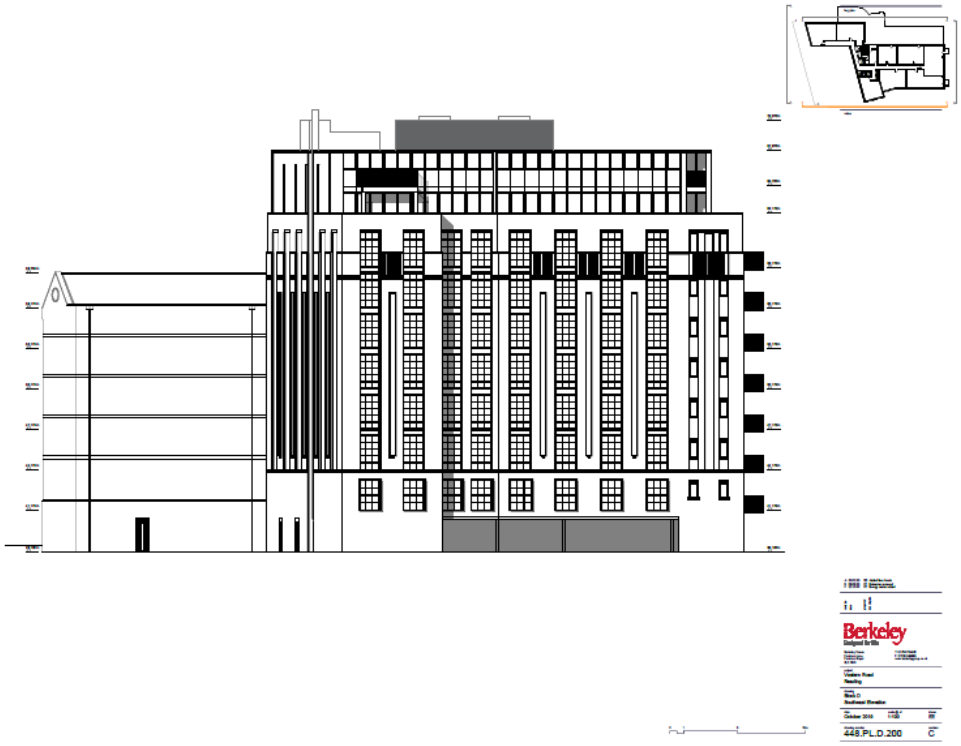


Block B Vastern Road Elevations



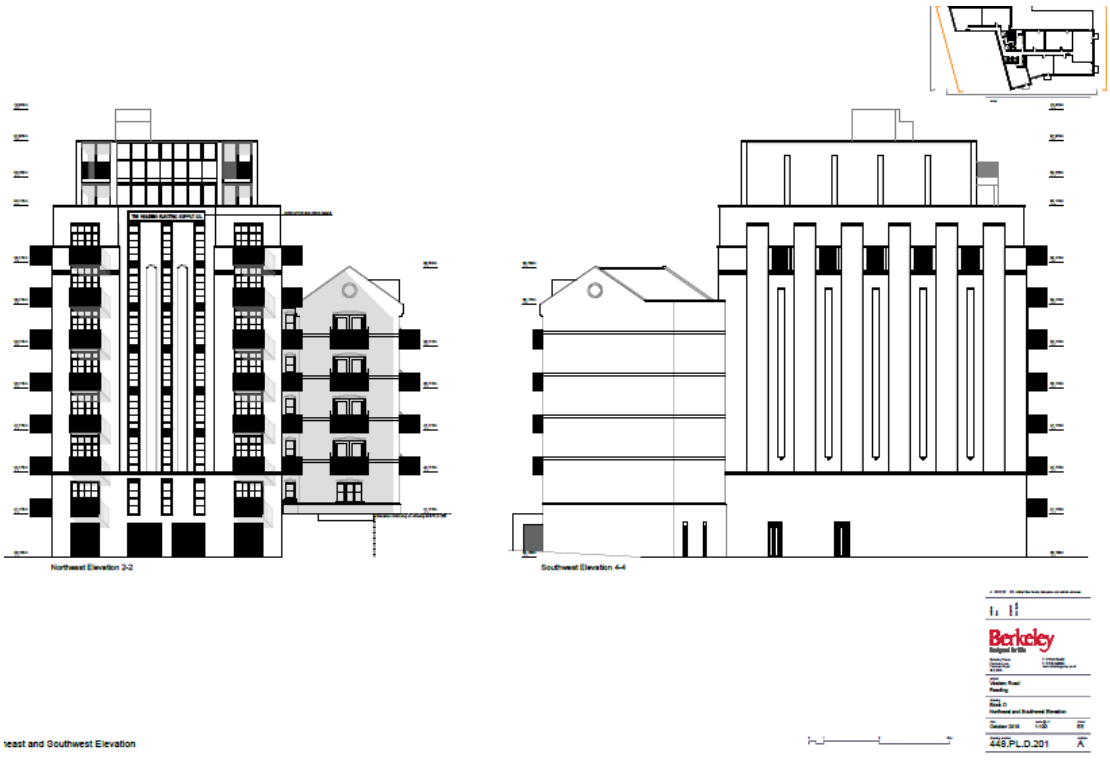
East elevation of Blocks B & C

Plans for Block D



Southeast Elevation 1-1

View from east



Northwest Elevation 3-3

Southwest Elevation 4-4

View from north and south

Plans for Block E

Elevation facing east and south

Block E

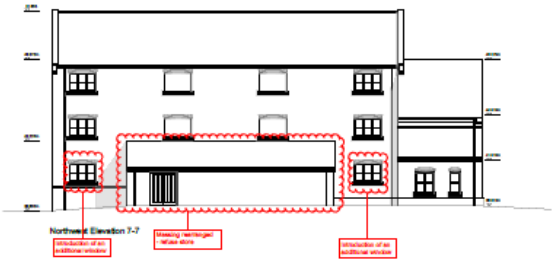
Elevations from west and north

Block E

Elevations for Block F & G

Southwest Elevation 5-5

Southeast Elevation 6-6



Block FG

Berkeley

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