# COMMITTEE REPORT

### BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 8<sup>th</sup> September 2021

Ward: Abbey App No.: 211010 Address: Land to the west of Abattoirs Road Proposal: Part Retrospective application for the erection of 40 no. sleeping units and 3no. support units for rough sleepers, to be used temporarily for a period of 5 years. Applicant: Reading Borough Council Deadline: 14/9/2021 Planning Guarantee 26 week target: 18/1/2022

#### **RECOMMENDATION:**

**GRANT** Planning Permission subject to conditions and informatives

# CONDITIONS TO INCLUDE:

- 1) TL1 3 yrs
- 2) Temporary permission five years
- 3) Use approved is as temporary homeless shelter accommodation only
- 4) AP1 Approved Plans
- 5) M1 Materials as submitted
- 6) Landscaping scheme to include large plants in planters to be submitted, approved and implemented prior to occupation
- 7) L3 Boundary Treatment as shown and retained
- 8) Details of lights to be submitted and approved prior to occupation
- 9) DC1 Vehicle Parking as specified prior to occupation
- 10) DC3 Vehicle Access as specified prior to occupation
- 11) DC7 Cycle Parking as specified prior to occupation
- 12) Refuse and Recycling as specified prior to occupation
- 13)Secure access system and CCTV to be provided prior to occupation and retained with 24-hour on-site monitoring

### **INFORMATIVES TO INCLUDE:**

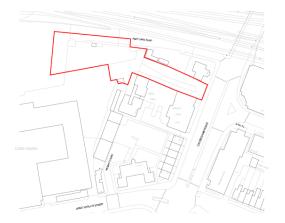
- 1) IF5 Terms and Conditions
- 2) IF6 Building Regulations
- 3) 111 CIL
- 4) IF3 Highways
- 5) IF8 Encroachment
- 6) IF1 Positive & Proactive.
- 7) Network Rail advice

# 1. INTRODUCTION & BACKGROUND

- 1.1 The site is a brownfield site partially bounded to the north by the railway line and partially by 59a Caversham Road (believed to be short term residential use), to the east by the A329 Caversham Road, to the south by a mixture of industrial and residential buildings and to the west by a large area of hardstanding associated with the Cattle Market buildings and appears to be being used informally for vehicle storage and parking. The application site is owned by the Council.
- 1.2 It has an abandoned character with scrubby vegetation recolonising the area through cracks in the hardstanding. Boundaries to neighbouring sites comprise a mix of palisade fencing, brick walls and corrugated metal structures.
- 1.3 There are a mix of scale of buildings with the buildings to the west associated with the Cattle Market being predominantly low rise in nature of one and two storeys and those to the east comprising several multi-storey buildings. The railway tracks are at an elevated position above the ground level of the application site.
- 1.4 The site is identified as potentially contaminated land, within an Air Quality Management Area and is part of the Cattle Market area allocated under Policy CR12a within the Reading Borough Local Plan (RBLP) 'West Side Major Opportunity Area'. It is within Flood Risk Zone 2.
- 1.5 In March 2020, as part of the Government's response to the Covid-19 pandemic, it was announced that local authorities should house all rough sleepers and those at risk of rough sleeping so that they could socially distance effectively and self-isolate if they needed to do so. As a result of the national 'Everyone in' response, over 260 people in Reading Borough, who were rough sleeping or at risk of rough sleeping, were accommodated in B&B/hotel accommodation in Reading during the course of the pandemic. This created a significant pressure on the Council's resources and solutions were required to move people on to alternative accommodation.
- 1.6 A range of 'move on' options were utilised and in order to meet the needs of a large number of the client group, with more complex needs, The Council's Housing Department proposed a temporary development of 40 units of modular accommodation with intensive support on site at this site. The authority, to spend Housing Revenue account monies to progress the development, was provided by Policy Committee on 3<sup>rd</sup> August 2020.
- 1.7 The original timeline for delivery was August to October 2020. Crown Commercial Service, the public procurement arm of Government, offered assistance in procuring the modular housing solution both in terms of drawing up a specification and drawing from their

established frameworks for supply and construction to help reduce costs. Tenders were sent out in August 2020, but a contractor was not appointed until November 2020 and the contract was not agreed until January 2021.

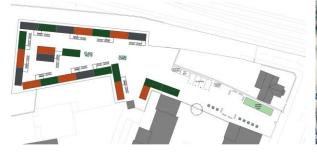
- 1.8 Legal issues and the arrival of travellers on site significantly hindered the availability of the site. The manufacturer suffered delays in the production of the units, which are all manufactured offsite, so although a significant number of the units are already on site the development is not likely to be completed until early September 2021.
- 1.9 The application is referred to committee as it is a Council own development (Regulation 3), as well as being a 'major' development.



# Location Plan

# 2. PROPOSAL

- 2.1 The proposal is for:
  - A total of 40 accommodation pods (2 in height), each comprising single person studio accommodation and a bathroom
  - 2 site welfare office pods 45.8sqm GIA
  - Laundry & Switch Room (electric distribution point) 22sqm GIA
  - New pedestrian gate onto Caversham Road
  - 4 no. staff car parking spaces
  - Bin storage, cycle storage and landscaping
  - 6 staff





- 2.2 Submitted plans and documentation received 18<sup>th</sup> June 2021 unless otherwise stated (including amended details) are as follows:
  - Site Location Plan Drawing no: 201123-101.01
  - Site Block Plan Drawing no: 201123-102.03
  - Site Layout Drawing no: 201123-114.03
  - Site Elevations A, B & C Drawing no: 201123-015.01
  - Site Elevations D, E, F, G & H Drawing no: 201123-016.01
  - Site Elevations J, K, L & M- Drawing no: 201123-017.02
  - Layouts and Elevations: Unit Types A&B Drawing no: 201123-110.01
  - Layouts and Elevations: Unit Types C&D Drawing no: 201123-111.01
  - Layouts and Elevations: Laundry Drawing no: 201123-113.02
  - Layouts and Elevations: Offices Drawing no: 201123-112.01
  - Exterior Lighting Drawing no: ASD-DN-MR-0920-003 Sheet 1 of 1 Rev R01, received 20<sup>th</sup> July 2021
  - Exploratory Hole Plan Drawing no: 20260-PW-AG-00-XX-DR-G-1001 Rev P01, received 20<sup>th</sup> July 2021
  - Foundation Plan and Details Two Storey Sleeper Pods Drawing no: 20260 - PWA-00-XX-DR-S-1001 Rev P01, received 20<sup>th</sup> July 2021

Other Documents:

- Design and Access Statement, dated 18<sup>th</sup> March 2021, prepared by Williams Architects, Document ref: 211123-130.01
- 2.3 Community Infrastructure Levy (CIL): the applicant has duly completed a CIL liability form with the submission. As the proposal is for temporary buildings there is an exemption from CIL liability.

### 3 PLANNING HISTORY

**171315/FUL:** Demolition of existing out buildings on site and the provision of a new public car park with access acquired from Abattoirs Road, with egress onto Great Knollys Street Land off Abattoirs Road, Reading - 'Disposed Of' 2/8/2018

**191384/REG3** - Demolition of existing outbuildings and the provision of a new public car park with access required from Abattoirs Road with egress on to Great Knollys Street, Reading - Pending

# 4 CONSULTATIONS

# Statutory

# <u>Network Rail</u>

- 4.1 No objection. Lighting Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. Following occupation of the development, if within three months Network Rail or a Train Operating Company has identified that lighting from the development is interfering with driver's vision, signal sighting, alteration/mitigation will be required to remove the conflict at the applicant's expense.
- 4.2 Drainage Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels if altered, to be such that water flows away from the railway. Drainage is not to show up on Buried service checks.

### Non-statutory

# Environmental Health

4.3 Officers are awaiting comments at the time of writing. This will be reported in an update report.

# Natural Environment (tree officer)

- 4.4 The site is within a low canopy cover ward (Abbey with reference to the adopted Tree Strategy) and within the AQMA as such, sufficient greening of any development is more important. Whilst I appreciate the temporary nature of the use, greening can still be incorporated to both meet policy requirements, aims of our Tree Strategy and to make the site more pleasant for users. The use of planters would enable any trees or shrubs within these to be re-used by the Council after use of the land ceases too.
- 4.5 Landscape principles should be established prior to a decision. The site would benefit from planting / green screening on the Caversham Rd /IDR frontage to help filter pollution. The type of tree planting in planters could include dwarf fruit tree varieties which would provide, wildlife value, softening of the site and fruit for the users. Planters

will have to be of a sufficient size - details of which could be secured via condition.

4.6 Given that the site is already being set up, it would seem reasonable to see if the full details could be resolved prior to a decision to avoid a pre-occupation condition.

# Thames Valley Police - Crime Prevention Design Adviser (Berks)

4.7 Awaiting comments at time of writing. Any response received will be reported in an update report.

# RBC Transport Strategy

4.8 The site in question has no existing planning use and therefore there are no vehicle trips associated with the application site, the principle of this was agreed as part of previous applications on the site. The proposal will increase vehicle movements to and from the site and therefore it must be established that the access illustrated is sufficient. This application is for the same site where the extended RBC car park is proposed to be located and I note this application is still undetermined. Therefore, details of how the two sites could coexist need to be provided and the new vehicle access to the site assessed and visibility splays provided. I am happy that speeds would be low and as such visibility should be provided at 2m x 25m in either direction.

It is also noted that no cycle parking has been provided, irrespective of the demographic cycle parking should still be provided at a ratio of 0.5 spaces per unit. The agent has confirmed that A small shed will be provided adjacent to the management suite for secure bicycle storage. Details of this need to be provided.

It will also need to be clarified how refuse will be collected, it is noted that the refuse store is located half way into the site which would assume that a refuse vehicle would travel along Abattoirs Road. If this is the case then a dedicated on site turning facility will be required. It should also be noted that a refuse vehicle will need to get to within 10m of where refuse is to be collected from.

In addition, and to be consistent with other applications for this site the applicant should implement a no right turn ban at the junction of Abattoirs Road and Caversham Road as the proposal increases vehicle movements to and from the site. Other applications have been required to undertake this prior to commencement of the use on the site however as this proposal is already partially in operation I would suggest that they implement this within 2 months of permission being granted given the statutory processes have already commenced in relation to the car park. I recommend a condition is used.

# Public consultation

- 4.9 The following addresses were consulted by letter: Arches Club, Abattoirs Road; Flats 1 & 2 59A Caversham Road; Flats 1-32 Malcolm Place, Caversham Rd; Flats 1-30 Jeffrey Place, Caversham Road; 1-29 Regent Court, Caversham Road; Reading Cattle Market, Great Knollys Street; Reading Auction Market, Great Knollys Street; Cattle Market Café, Great Knollys Street; and 18 Great Knollys Street.
- 4.10 3 objections were received. Full neighbour consultation comments are available to view on the Council's website. The following is a summary of the key issues raised:
  - Built without prior planning permission; not informed of the intent to use the land for this purpose prior to the units being erected.
  - Major concerns about the security of property and the increased likelihood of anti-social behaviour
  - Already a significant issue with bicycle theft and attempted theft as well as unwanted intruders into the neighbouring residential block (previous rough sleepers in the hallways). This wall gives direct access to the internal areas of the block of flats and totally undermines the locked front door!
  - What safety and security measures are being put in place to protect neighbours and property?
  - There are already existing container sleeping units built on the same sites building additional 40 units will create an over concentration of homeless unit in the area. This is done without further supporting amenities in the area, and the council is making a decision without a detailed plan for hosting a high density homeless pods site.

**Planning Officer comment:** It appears that the objector has misunderstood the proposal which is not for a further 40 units but is seeking permission for just 40 pods - including those already on site.

- Since the temporary container sleeping units were built I have observed increasing amounts of trespassing to our property area and people going through our rubbish in the middle of nights and left rubbish on the ground in our residential area. this has created health & safety issue for the local residents of Regent Court.
- As Regent Court is a listed building, accumulation of rubbish in the area and building of sleeper pods nearby may impact the appearance and character of a listed building.

- The area is next to the railway line and surrounded by a commercial area. The dirty and noisy living conditions would not be suitable and respectable.
- Concentrating all homeless in one area will hamper the effort for integrating them into the wider community.

# 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) (2021) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development". The relevant sections of the NPPF are:
- 5.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving the listed building or its setting or any features of special interest which it possesses.

# National Policy

Section 2 - Achieving Sustainable Development Section 9 - Promoting Sustainable Transport Section 11 - Making Effective Use of Land Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

5.3 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

### Reading Borough Local Plan (2019)

Policy CC1: Presumption in Favour of Sustainable Development

Policy CC2: Sustainable Design and Construction

Policy CC3: Adaptation to Climate Change

Policy CC5: Waste Minimisation and Storage

Policy CC6: Accessibility and the Intensity of Development

Policy CC7: Design and the Public Realm

Policy CC8: Safeguarding Amenity

Policy CC9: Securing Infrastructure

Policy EN1: Protection and Enhancement of the Historic Environment

Policy EN14: Trees, Hedges and Woodland

Policy EN15: Air Quality

Policy EN16: Pollution and Water Resources

Policy EN18: Flooding and Drainage

Policy H6: Accommodation for Vulnerable People

Policy TR3: Access, Traffic and Highway-Related Matters

Policy TR4: Cycle Routes and Facilities

Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

Policy CR2: Design in Central Reading Policy CR12: West Side Major Opportunity Area

- 5.4 Relevant Supplementary Planning Documents (SPDs) are:
  - Employment, Skills and Training (April 2013)
  - Sustainable Design and Construction (December 2019)
  - Revised Parking Standards and Design (October 2011)
  - Planning Obligations Under Section 106 (April 2015)
- 5.5 Other Documents:
  - Sequential and Exception Test of Sites in the Submission Draft Local Plan (March 2018, RBC)
  - Reading's Preventing Homelessness Strategy 2020 2025
  - Rough Sleeping Strategy 2019 2024, RBC
  - Housing Strategy for Reading 2020- 2025, RBC
  - Reading Borough Council Policy Committee Report 3<sup>rd</sup> August 2020

# 6 APPRAISAL

The main matters to be considered are:

- Principle of Development
- Design
- Residential Amenity
- Transport
- Landscaping
- Sustainability
- Environmental Matters
- Equalities impact
- Other Matters
- 6.1 Residents have raised issues that work has commenced on site prior to planning permission being sought and granted. The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2020 introduced part 12A which states that emergency development by a local authority or health service body is permitted development if that is:

<u>A. Development by or on behalf of a local authority(3) or health</u> <u>service body on land owned, leased, occupied or maintained by it for</u> <u>the purposes of—</u> (a)preventing an emergency; (b)reducing, controlling or mitigating the effects of an emergency;

or

(c)taking other action in connection with an emergency.

6.2 This, therefore, allowed for works to commence to provide emergency move on accommodation for those rough sleepers housed

in B&Bs during the pandemic, without first applying for planning permission. This was as long as permission was sought and secured by 31<sup>st</sup> December 2021. As at 11<sup>th</sup> August 21 pods had been installed. The remaining pods are due to be delivered by the end of the first week in September.

# Principle of Development

- 6.3 The NPPF states (para. 10) that "at the heart of the Framework is a presumption in favour of sustainable development" and at para. 11 that for decision-taking this means: "approving development proposals that accord with an up -to-date development plan without delay; ....". The overarching objectives are economic, social and environmental. The proposal would contribute towards supporting "strong, vibrant and healthy communities..." and through the provision of move-on accommodation and on-site support, would support health and social well-being.
- 6.4 The proposal meets the Council's Corporate Plan priority of safeguarding and protecting those that are most vulnerable. In addition, it contributes to the Council's strategic aims of promoting equality, social inclusion and a safe and heathy environment. The proposal also accords with the aims and priorities set out within the Council's Housing Strategy, Preventing Homelessness Strategy and Rough Sleeping Strategy.
- 6.5 Policy H6 of the Reading Borough Local Plan (RBLP) relates to accommodation for vulnerable people and states that "i).....Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible....ii) Development for specialist accommodation for vulnerable people will fulfil the following criteria: Developments will, where possible, locate accommodation close to.... relevant community facilities......; Development will incorporate areas of green space, which are particularly important for many groups of vulnerable people that meets the needs of the most up to date Housing Strategy may count towards affordable housing provision in line with policy H3."
- 6.6 The temporary proposal would provide accommodation for vulnerable people with a specialist service, commissioned to provide relevant on-site support, akin to a C2 use class, which includes residential institutions where a level of care is provided. The site is part of the allocation under Policy CR12a as follows:

CR12a, CATTLE MARKET: This site will be developed for a mix of edge-of-centre retail uses, and residential development, along with public car parking. The retail may include bulky goods, but should not include a significant element of non-bulky comparison goods retail. It must be designed to reflect the urban grid layout and built form of the centre and a single storey retail warehouse will not be permitted. Development should take account of mitigation required as a result of a Flood Risk Assessment. Site size: 2.46 ha Indicative potential: 330-490 dwellings, 10,000-15,000 sq m net gain of retail.

- 6.7 Whilst the proposal would not provide the permanent housing sought by the allocation, it would contribute to addressing more complex and immediate needs by providing safe accommodation for rough sleepers and on-site welfare support on a temporary basis, which would accord with Policy H6. This is a relatively unique opportunity to deliver a valuable scheme as a meanwhile/ temporary use on an underused piece of land in central Reading. It is also relevant that there has been no alternative proposal, which meets the allocation requirements, which has come forward for this site in over 20 years.
- 6.8 In conclusion, the principle of the use of the site as proposed on a temporary basis is considered acceptable. It would provide a form of affordable accommodation for vulnerable people in accordance with Policies H6 and H3, which weighs in favour over fulfilling the aims of the site allocation in this case. It would also provide employment benefits in the short term for the support staff for the site. The report goes on to consider the proposal against other relevant policies.

#### <u>Design</u>

- 6.9 The NPPF (Para 126) sets out that good design is a key aspect of sustainable development.
- 6.10 Policy CC7: Design and the Public Realm, requires all development to be of a "high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located."
- 6.11 The proposal includes pods at two storeys, mostly arranged around the perimeter of the site. They will have a utilitarian and basic appearance, although they will be colourful. They will sit comfortably within the surrounding context and their scale at 5.7m in height is acceptable. The layout maximises the use of this irregular shaped site, and the appearance will be softened by some planting in above ground pots and amenity space. The site will also include bin storage and parking.
- 6.12 Officers accept that the scheme will not meet the requirements of Policy CC7 in terms of high-quality design, but this has been weighed against the nature of this temporary development, which will meet a specific and specialist accommodation need, which is considered to make this scheme acceptable in this instance.
- 6.13 The site benefits from being in a highly accessible location with the necessary local infrastructure already in place. The existing vehicular access point on the northern side, from Abattoirs Road, will

be retained and a new pedestrian access point will be installed on the Caversham Road frontage.



- 6.14 In terms of achieving a design which is safe and accessible the proposal includes secure palisade fencing of 2m high around the site and access-controlled entrances and 24hr on site supervision.
- 6.15 The development of the site for the temporary pods, with some landscaping and on-site amenity, will provide improvements to the appearance of the site, and although not wholly in accordance with policy CC7, this is considered on balance to be suitable given the positive social benefits of the proposal.

### **Residential Amenity**

- 6.16 Policy CC8 requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety. The nearest residential properties to the proposal are adjacent to the boundary with the site at Jeffery Place and Malcolm Place.
- 6.17 Policy EN16 states that "proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution".
- 6.18 The pods themselves will be orientated such that there will be no overlooking, no overbearing effects, or loss of daylight/ sunlight of adjacent properties.
- 6.19 Issues have been raised through consultation with respect to crime and safety. The site will be bounded by 2m high palisade fencing and the entrances will be controlled through a door entry system, with CCTV, to prevent access to anyone other than those who will live or work there or who are required for providing services, e.g doctors. The site will be subject to 24/7 on-site support from the homeless charity, St. Mungo's, who will provide staff for individual support for

the residents of the site, which will take place within the offices, and staff for building services and incident response.

- 6.20 Each of the units will be externally lit for safe access to the units and there will be additional lighting to the site entrances and around communal areas. A condition is attached requiring the submission of the final lighting details and implementation prior to occupation.
- 6.21 For the occupants of the site, each of the pods will have a window to provide sufficient levels of daylight/ sunlight.
- 6.22 The windows and doors of the pods will be double glazed and will be located facing inwards and away from the railway to mitigate the impact of noise from that source.
- 6.23 In terms of amenity space there will be communal courtyard areas in front and around the pods as well as seating and a grassed area.
- 6.24 With the conditions proposed, the scheme is considered not to cause undue harm through noise disturbance or security concerns to the future occupants and nearby residents and is considered to provide an acceptable standard of temporary accommodation to the users. The proposal will not fully accord with relevant amenity policies, but it is considered it will provide sufficient measures when balanced against the benefits of the provision of a temporary scheme of this nature.

### **Transport**

- 6.25 The Application Site is in a very sustainable location within walking distance of the centre of Reading. There is a pedestrian point across Caversham Road very close to the site and access to public transport.
- 6.26 The proposal will retain access points for vehicles and pedestrians from Abattoirs Road and Caversham Road respectively and will include 4 no. car parking spaces for staff and covered cycle storage. The only vehicles visiting the site will be staff and support services and subject to clarification on traffic circulation, trip generation and suitable safety measures, it is likely that these could only turn left from the site onto Caversham Road. Bin storage is proposed as an open fronted, covered canopy structure and will be sited to enable easy proximity/ access for refuse vehicles. Transport comments have been provided (see consultation section of this report) and some questions remain. These will be addressed in an update report.
- 6.27 However, there was no in principle objection on transport grounds and therefore subject to the details sought being provided the requirements of the relevant policy TR5 will be met.

### Landscaping

6.28 Policy H6 states that development will incorporate areas of green space, which are particularly important for many groups of

vulnerable people. Policy CC7 requires developments to include appropriate landscaping and EN14 requires new development to make provision for tree planting within the application site, particularly on the street frontage and in areas such as this which have low tree coverage and are within Air Quality Management Areas EN15.

- 6.29 This proposal is for an emergency welfare accommodation project and bearing in mind the temporary (five year) nature of the accommodation, a landscaping solution which is appropriate needs to be considered.
- 6.30 The site is a relatively constrained urban site with no existing meaningful landscaping. The proposal will focus the siting of the pods adjacent to the site boundaries. The proposal will include some planting within above ground planters within the site, between the pods, and to boundaries. A condition is included for the submission and approval of a satisfactory detailed landscaping plan for implementation prior to occupation.
- 6.31 It will also involve the removal of scrub, particularly at the Caversham Road frontage. This will contribute to improving the appearance of the site.

#### **Sustainability**

- 6.32 Adopted Local Plan Policy CC2 requires new development to reduce the consumption of resources and materials and states that "All minor non-residential developments is required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum;...... Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective."
- 6.33 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change. Policy CC5 requires minimisation of waste during construction and the life of the development.
- 6.34 As a temporary scheme of this unique type of development it will not be possible to meet BREEAM standards. However, the proposals do offer a range of measures as follows contributing towards policy requirements:
  - The pods have been manufactured off-site using modern methods of construction to minimise waste and maximise efficiencies of the build process.
  - The units are well insulated using high performance rigid insulation boards lining the walls, roof and floor and windows are double glazed both for thermal and acoustic reasons.
  - They will be heated via electric panel heaters and hot water will be provided through an instantaneous electric water

heater ensuring no heat loss on the hot water system through stored water.

- LED lighting will be used both internally and externally. Other appliances installed in the pods will be low energy.
- 6.35 Although temporary in nature they are robustly manufactured, and they could be re-used.

# **Environmental matters**

- 6.36 *Air Quality*: Policy EN15 requires developments to "have regard to the need to improve air quality and reduce the effects of poor air quality". The pods are sited well back from Caversham Road and set away from the railway line and the direct impacts of poor air quality will therefore be minimised. The units are temporary and as an allocated site for housing it has been assessed as suitable for accommodation.
- Contaminated land: Policy EN16: Pollution and Water Resources 6.37 states that "Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site." Some sampling of the ground conditions was undertaken in February 2021 and this showed no contaminated material. Excavations have been kept to a minimum and generally to nominal depths of 300mm to 450mm and limited to installing foundation pads to each corner of the pods and for connections to required existing services. These excavations have not revealed any contaminated material or evidence of contaminated ground. No excavated material has been removed from the site during the works. Any comments received from Environmental Protection will be reported in an update.
- 6.38 *Flood Risk:* The site is in Flood Risk 2. It is part of an allocated site for residential and commercial uses and has therefore passed the sequential test. The proposed use is defined under the 'more vulnerable' classification of use for which flood risk standing advice is to be followed. Under the NPPG<sup>1</sup> it states that all vulnerable developments should follow the advice for: surface water management, access and evacuation and floor levels. There will be a permeable top surface across the whole site and the pods utilise eaves drop for rainwater fall to the blank elevation sides to manage surface water on site. There will be an emergency evacuation plan in place for staff and residents. It is considered that there will be no worsening of surface water run off as the pods will be located on areas which are existing hard surfacing, and existing drainage will be

<sup>&</sup>lt;sup>1</sup> Preparing A Flood Risk Assessment: Standing Advice, February 2021 (NPPG)

utilised. The ground floor pods will have an internal floor level above estimated flood levels.

### Equalities Impact

- 6.39 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.
- 6.40 In developing of the scheme it was agreed that ambulant disabled and disabled persons requiring such accommodation will continue to be housed within more accessible hotel accommodation as is currently the case.

# Other Matters

- 6.41 **S106**: There are no obligations which are required for the site to accord with Policy CC9.
- 6.42 *Impact on Listed Building:* An objector has raised concern over the impact of litter and the pods themselves on the appearance and character of the listed Regent Court.
- 6.43 Regent Court is sited ca 30m from the closest point to the site and its current setting is overwhelmingly dominated by the existing flats of Jeffery Court and Malcolm Court. As the pods are sited alongside and behind Jeffrey Court are only 2 storeys in height it is not considered that would be any detrimental effect with respect to the setting and the character and appearance of the listed buildings.
- 6.44 With respect to litter, there are currently no occupants of the site, and as a construction site should be left secure at the end of each day. During the operation of the site there will be sufficient bin storage and refuse will be collected regularly on-site by a refuse vehicle. The process of developing the site for a temporary use, which will have 24/7 on-site supervision, should minimise any likelihood of litter from the site being dumped in other locations.

# CONCLUSION

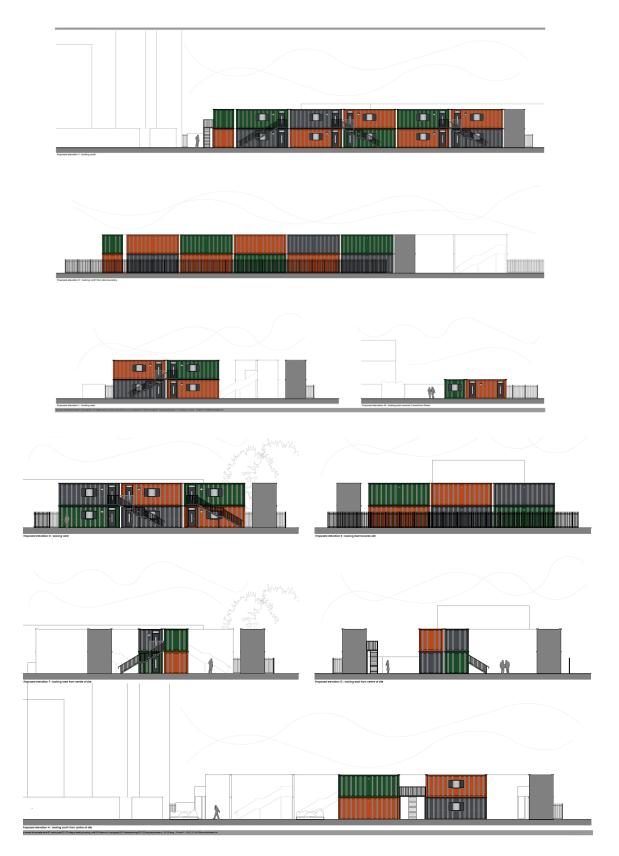
7.1 The proposal is for much needed temporary move-on accommodation for vulnerable homeless people with on-site welfare support. Although the scheme does not wholly meet some of the adopted planning policy requirements it is considered that delivering a proposal which meets an exceptional issue and for which there is an overriding public need, outweighs meeting normal policy requirements in this instance. Indeed, it responds very positively to a number of Council priorities with respect to addressing homelessness and rough sleeping.

7.2 Officers have worked positively and proactively with the applicant on this scheme and overall officers consider this to be a supportable scheme, which accords with relevant national and local policy. The planning application is therefore recommended for approval subject to conditions.

Case Officer: Alison Amoah

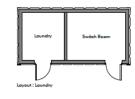
# **APPENDIX 1: Plans**

Floor Plans & Elevations



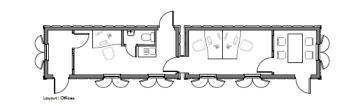








Elevations : Laundry

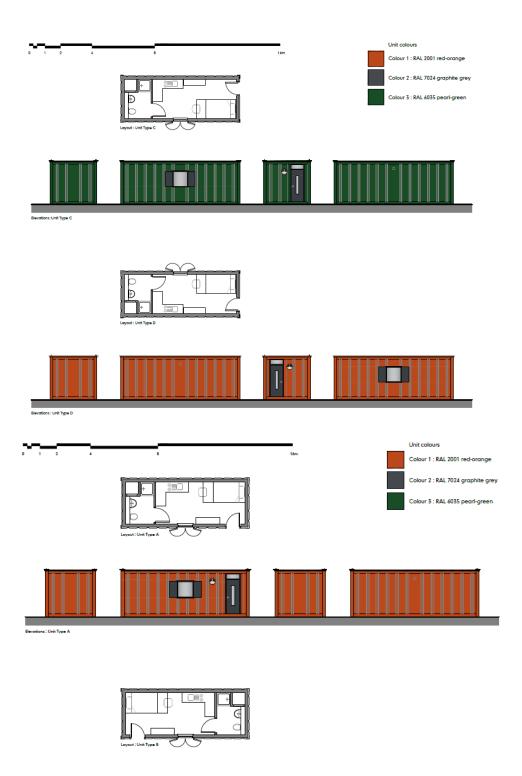




Front & Side Elevations : Offices



Rear & Side Elevations : Offices





Elevations : Unit Type B



Site Plan

