

24 April 2024



**Reading**  
Borough Council  
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<b>Title</b>	<b>PLANNING APPLICATION REPORT</b>
<b>Ward</b>	Katesgrove
<b>Planning Application Reference:</b>	201766/FUL
<b>Site Address:</b>	40-68 Silver Street, Reading
<b>Proposed Development</b>	Erection of 4 storey building to provide 23 private rental homes with associated communal facilities, surface parking, access and landscaping works. (amended)
<b>Applicant</b>	Silver Street Developments Ltd
<b>Report author</b>	Alison Amoah - Principal Planning Officer
<b>Deadline:</b>	Original deadline 20 <sup>th</sup> March 2021, but an extension of time has been agreed with the applicant until 24 <sup>th</sup> May 2024
<b>Recommendation</b>	Delegate to the Assistant Director for Planning, Transport and Public Protection Services (AD PTPPS) to (i) GRANT full planning permission subject to the satisfactory completion of a Section 106 legal agreement or (ii) to REFUSE permission should the Section 106 legal agreement not be completed by the 24 <sup>th</sup> May 2024 (unless officers on behalf of the AD PTPPS agree to a later date for completion of the legal agreement).
<b>S106 Terms</b>	<p><b>Affordable Housing</b></p> <p><u>Affordable Private Rent Units</u></p> <p>To secure affordable housing on site consisting of six units (26% provision) comprising 4no. 2-bedroom 3 person units and 2no. 3-bedroom 4 person units at Affordable Private Rent. The rent shall be no more than 80% of market rent and capped at Local Housing Allowance inclusive of service charge, and the nominations to these units will be via a Nominations Agreement via Reading Borough Council's Housing Team.</p> <p>Affordable Private Rent Housing must be provided in perpetuity.</p>

#### Deferred Payment Mechanism for Affordable Private Rent Units

Deferred Affordable Housing Contribution to secure payment towards provision of affordable housing elsewhere in the Borough equivalent to remaining 4% should profitability of the scheme improve. Mechanism calculation: NOT to take place until 6 months following the first occupation of 75% of all units (equating to 6 months after first occupation of the 17<sup>th</sup> unit in this case), but before the date 12 months after first occupation of the 17<sup>th</sup> unit in this case) with the following inputs fixed:

- Gross Development Value (GDV) determined as part of the assessment of viability at the time of planning permission to be granted: £6,267,329
- Total Build Costs determined as part of the assessment of viability at the time of planning permission to be granted: £5,052,521
- Benchmark Land Value (BLV) determined as part of the assessment of viability at the time of planning permission to be granted: £433,200
- Developer profit as a % of GDV determined at the time of planning permission to be granted: 17.5%
- Deficit determined at the time of planning permission to be granted: No deficit

In accordance with the formula within Appendix 4 of the Affordable Housing SPD.

#### 'Clawback' Mechanism for the Sale of Affordable Private Rented Units

Following the Build to Rent covenant period of 20 years or in the event that a covenant is ceased within the 20-year period, all affected units to become Social Rent or Affordable Rent tenure with rents set no higher than LHA (or last published LHA increased by Consumer Price Index where LHA no longer exists). The affected Affordable Housing units to be offered for sale to a Registered (affordable housing) Provider. In the event that a Registered (affordable Housing) Provider is not secured for the provision of Affordable Housing on site, the units are to be offered to the Council to be provided by the Council as Affordable Housing. In the event that neither a Registered Provider nor the Council can come forward to provide Affordable Housing on-site, the developer to pay to the Council an equivalent financial contribution to be agreed by the Council and not less than 50% of the Gross Development Value of the Affordable Housing unit/s for the provision of Affordable Housing

elsewhere in the Borough. To be calculated (the mean average) from two independent RICS valuations to be submitted to and agreed by the Council prior to first occupation of any build to rent housing unit. In this event, the sum is to be paid prior to first occupation of any build to rent housing unit and index-linked from the date of valuation.

Should the application site subsequently be extended/ altered to create further residential units then a contribution towards affordable housing would apply on a cumulative basis also taking into account this application.

#### 'Clawback' Mechanism for the Sale of Market Rent Units

In the event that the owner of a build to rent development sells or otherwise transfers some or all of the units so that they no longer qualify as build to rent under some agreed variation to the terms of this agreement, the developer shall provide a valuation of the Build to Rent accommodation immediately prior to the sale/transfer and a valuation of the value following the change to non-Build to Rent. A financial contribution equal to 15% of the uplift in GDV shall be paid to the Council within 3 months of sale/transfer.

#### General Build-to-Rent Provisions

To meet the requirements as set out in Policy H4 of the Reading Borough Local Plan:

- *“Secured in single ownership providing solely for the rental market for a minimum 20-year term [from occupation] with provision for clawback of affordable housing contributions should the covenant not be met;*
- *Provide tenancies for private renters for a minimum of three years with a six-month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance;*
- *Provide a high standard of professional on-site management and control of the accommodation;*
- *Provide a commitment to high-quality rental arrangements, through meeting Reading Borough Council's voluntary Rent with Confidence Standards or equivalent measures.*

Further detailed as follows:

- Single management company. Council to be notified of details.
- To provide and maintain the Communal Facilities as identified on the plan to be annexed to the S106 legal agreement. Rights of access to Communal Facilities, including charges and terms of use, to be the same for all residents regardless of tenure.
- Service charges – All rents to be inclusive of service charge but exclusive of utility bills and council tax. Service charges to be set as such a level as to cover the costs of services to which the charge relates and no more.
- At the end of the Build to Rent Covenant Period the Communal Facilities to continue to be provided and managed.

### **Employment, Skills and Training**

Secure a construction phase Employment Skills and Training Plan or equivalent financial contribution of £4,080 towards local skills and labour training as calculated in accordance with the Council's Employment, Skills and Training SPD (2013). Contribution to be paid prior to commencement of the development.

### **Zero Carbon Offset – All Dwellings**

Zero Carbon Offset as per SPD 2019 to provide a minimum improvement for each individual dwelling in regulated emissions over the Target Emissions Rate (TER) in the 2013 Building Regulations, plus a S106 contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60 per tonne over a 30 year period).

As-built SAP calculation for each individual dwelling to be submitted for approval within 6 months following practical completion.

Contribution based on SPD formula below towards carbon offsetting projects calculated for each individual dwelling based on approved SAP calculation to be paid to the Council prior to the occupation of the first dwelling:

TER CO<sub>2</sub> m<sup>2</sup>/yr less 35% Co<sub>2</sub> m<sup>2</sup>/yr = 65% of TER

	<p>65% of TER x total square metres= total excess CO2 emissions annually x £1,800 = S106 contribution</p> <p><b>Transport</b></p> <p>Applicant to enter into a S278 agreement in relation to amendments to car parking bays and loading bay, and the provision of 3 no. trees to be located within the public highway as shown on approved Drawing no: PL_101 Rev P, dated 13/3/24 - Ground Floor Plan, received 14<sup>th</sup> March 2024, to be provided prior to occupation.</p> <p>The developer to provide and fund the provision of a car club bay, to include the procurement of a car club vehicle, for the bay on Silver Street, for a duration of 5 years. To be provided prior to occupation.</p> <p>Contribution of £7,500 towards Traffic Regulation Orders necessary to provide a car club bay and to alter the existing waiting restrictions. To be paid prior to occupation.</p> <p><b>Trees</b></p> <p>A contribution of £1614 for the maintenance of the 3 no. street trees for a period of 5 years.</p> <p><b>General</b></p> <p>Contribution towards monitoring costs plus a separate commitment to pay the Council's reasonable legal costs in connection with the proposed S106 Agreement will be payable whether or not the Agreement is completed.</p> <p>All financial contributions Index-Linked from the date of permission.</p>
<p><b>Conditions</b></p>	<p>To include:</p> <ol style="list-style-type: none"> <li>1. Time Limit 3 years.</li> <li>2. Approved Plans.</li> <li>3. Pre-commencement submission and approval of materials.</li> <li>4. Pre-occupation provision of access control measures and CCTV as approved.</li> </ol>

	<ol style="list-style-type: none"><li>5. Pre-occupation provision of all energy measures set out in the Energy and Sustainability Statement hereby approved.</li><li>6. Pre-commencement 'Design Stage' SAP.</li><li>7. Pre-occupation 'As Built' SAP.</li><li>8. Pre-commencement submission and approval of a Sustainable Drainage Strategy.</li><li>9. Pre-occupation provision of Sustainable Drainage Strategy.</li><li>10. Pre-occupation provision of approved vehicle parking.</li><li>11. Pre-occupation provision of approved vehicle access.</li><li>12. Pre-occupation provision of approved cycle parking.</li><li>13. Pre-occupation EVCP (electric vehicle charging points) layout and detailed specification to be submitted and approved.</li><li>14. Pre-occupation stopping up of the existing access and abandoned immediately after the new access has been brought into use. The footway(s) and verge shall be reinstated to the satisfaction of the Local Planning Authority.</li><li>15. Parking permits.</li><li>16. Parking permits.</li><li>17. Pre-occupation submission and approval of bin stores.</li><li>18. Waste Management Plan to be submitted and approved prior to occupation.</li><li>19. Pre-commencement construction method statement (including Transport and EP based requirements) to be submitted and approved.</li><li>20. Compliance condition relating to hours of demolition/construction works (0800-1800hrs Mondays to Fridays and 0800-1300hrs Saturdays, and not at any time on Sundays and Bank or Statutory Holidays)</li><li>21. Compliance condition relating to no burning of materials or green waste on site.</li><li>22. Pre-commencement submission of a noise assessment and mitigation measures and pre-occupation implementation.</li><li>23. Pre-occupation implementation of remediation measures and submission and approval of a remediation validation report.</li><li>24. Compliance condition relating to discovery of any unidentified contaminated land.</li><li>25. No mechanical plant to be installed unless a noise assessment and mitigation scheme has been submitted and approved.</li></ol>
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	<p>26. Provision of approved landscaping scheme no later than during the first planting season following the date when the development is ready for occupation.</p> <p>27. Pre-occupation submission and approval of a Landscaping Management Plan.</p> <p>28. Pre-occupation submission and approval of Green roof details including maintenance arrangements and installation prior to occupation.</p> <p>29. Prior to commencement details of a minimum of eight swift bricks and four bat boxes/brick/tiles to be built into the walls of the new building(s) to be submitted and approved, installed prior to first occupation and retained thereafter.</p> <p>30. No external lighting to be installed other than that shown on the approved plans, unless details, have been submitted and approved.</p> <p>31. Pre-installation submission and approval of PV details and installation prior to first occupation.</p> <p>32. No use of roof except for maintenance.</p> <p>33. Provision of obscure glazing/fixed shut windows prior to first occupation.</p> <p>34. Provision of all communal areas shown on approved plans for use by all tenants prior to 1<sup>st</sup> occupation and retention at all times thereafter.</p> <p>All pre-commencement conditions have been agreed with the Applicant.</p>
<p><b>Informatives</b></p>	<p>To include:</p> <ol style="list-style-type: none"> <li>1. Terms and conditions</li> <li>2. Building Regulations approval required</li> <li>3. Encroachment</li> <li>4. Damage to the highway and works affecting the highway</li> <li>5. Access construction</li> <li>6. Pre-commencement conditions</li> <li>7. S106</li> <li>8. Complaints about construction</li> <li>9. Community Infrastructure Levy</li> <li>10. Noise insulation between residential properties</li> <li>11. Positive and Proactive Statement</li> </ol>

## **1. EXECUTIVE SUMMARY**

- 1.1 The proposal is recommended for approval subject to the conditions set out above.
- 1.2 The proposal relates to a currently vacant brownfield site to be redeveloped for a single residential block comprising 23 flats, parking, and landscaping. The proposal would have no unacceptable impacts on neighbouring properties and would have no adverse transport impacts. It would secure affordable housing and the effective use of this vacant and derelict plot. There are no significant detrimental effects of the proposal, and it is considered that it accords with adopted policies and is recommended for approval.

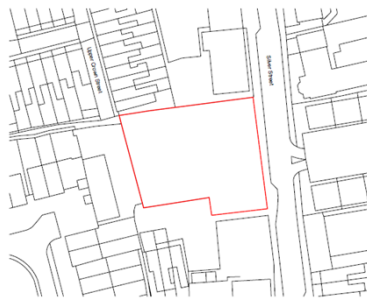
## **2. INTRODUCTION**

- 2.1 The application site is on the western side of Silver Street previously occupied by a tall single storey commercial building (40 Silver Street) and a two-storey I-shaped commercial building (62-68 Silver Street), both demolished a number of years ago.
- 2.2 To the west of the site is Rimaud House, which is a 3no. storey residential block at an elevated position approximately 2m higher than the application site. At the north-west, the site immediately adjoins no 69 Upper Crown Street, a two-storey end of terrace house. Immediately to the north is a block of flats called Platinum Apartments which is 2.5 storeys with a third floor of accommodation in the roof, which has private amenity space and parking to the rear (west). To the south of the site is a further residential block of flats and the gardens serving Hawk Cottages.
- 2.3 Silver Street is a one-way street, with vehicles passing in a north to south direction and there is a layby in front of the site. Formerly, the vehicular access to the site was via two dropped kerbs at either end of the site's frontage, along with pedestrian access.
- 2.4 The area is predominantly residential with a mix of traditional terraces and semis, but there are some commercial premises in the area. There is no one single prevailing architectural style which characterises the area, but the majority of the buildings are traditional brick and tile construction. There are a range of different building styles, heights, ages of property and materials, with large scale modern flat blocks located north of the site towards the town centre, and around the site



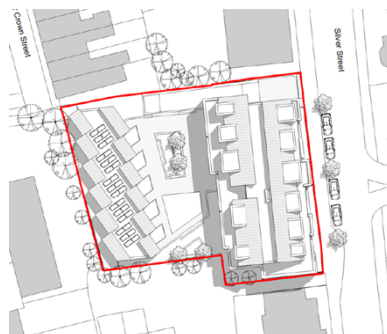
3-4 storey flats, 2-3 storey courtyard offices (Windsor Square) and to the south 2-3 storey Victorian terraces.

- 2.5 Opposite the site is a 61-unit student scheme, also owned by the applicant, more recently developed and which is a part 4 and part 3 storey building of modern appearance.
- 2.6 The site lies within an area that has less than 10% tree canopy cover as identified within the Council's adopted Tree Strategy and within an Air Quality Management Area (AQMA) (Policy EN15) and Area of Archaeological Potential (Policy EN2).



*Site Location Plan*

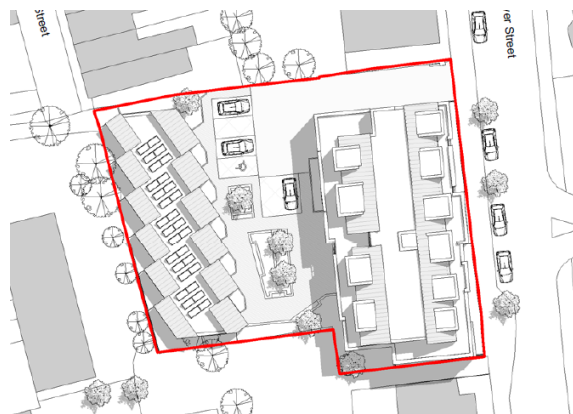
- 2.7 Permission was granted in 2015 (now lapsed) for a single building comprising 15 flats (40 Silver Street) and since that time both properties at 40 Silver Street and 62-68 Silver Street have been demolished and there have been a number of refused student housing schemes, and related dismissed appeals (see history section below).
- 2.8 This application has been under consideration for an extended period as there were a number of concerns with the original submitted proposal which was for the erection of 4 storey and 2 storey buildings to provide 39 private rental homes with associated communal facilities, basement parking, access and landscaping works. This comprised a main block of 33 flats (9x studios; 14x 1 beds and 10x2 beds) to the Silver Street frontage and a smaller building of six 2 bed terraced houses to the rear of the plot.



*Originally submitted proposed site plan Dec 2020*

2.9 An email from the agent on 24/5/21 advised that further to updated costings for the basement that this element of the scheme would create a significant effect on the viability of the scheme. A number of amendments were, therefore, made to the original two building submission (received 7/6/21), comprising:

- The removal of the basement parking with the resulting impact on the courtyard landscaping/ amenity from relocated parking spaces, albeit at a much-reduced number;
- A reduction to the front building to increase the space to Platinum Apartments;
- A reduction in the number of apartments and increase in the size of the units;
- A revised mix to include some 3 bed units; and
- Adjustments to the internal layout of the front building so that the proposed common room would not share a lobby with one of the proposed apartments.



*Amended Site Plan 4/8/21*

2.10 Discussions were ongoing between the Planning Officer, and the applicant/agent and some further changes were made 5/7/21, 7/7/21, 4/8/21 and 6/8/21 including an increase in the space between the front flatted block and the rear terraced block, a reduction in the number of terraces, and a small adjustment to the private amenity space serving the terraces. However, officers considered that the amendments were not sufficient to achieve a supportable scheme at that time and fundamentally that the proposed scheme would be overdevelopment of the site and required a reduction in the scale of buildings and siting within the plot. Key areas of concern were:

- The relationship of the rear block to the rear boundary and the resulting extremely limited, and, in our view, not pleasant private amenity space for the proposed houses as well as poor outlook, especially at ground floor level to the rear.

- The distance/ relationship between Block A and the houses (Block B) to the rear, and the shared parking/ amenity space, which provides limited setting and amenity space and that there would be an overbearing effect from Block A on Block B.
- Lack of space to be able to provide meaningful landscaping and tree planting within and to the front of the site (within the red line), which is considered to not meet relevant policies.
- Relationship between the blocks to the existing residential units at 69 Upper Crown Street and Platinum apartments and effects on daylight and sunlight

2.11 It was agreed that an amended scheme, which removed the rear building and reintroduced landscaping/ amenity space and parking to the rear of the building, could be considered as an amendment under this application.

2.12 Prior to a resubmission of information for a one building scheme, draft plans were submitted on 24/11/21 for a 28-dwelling scheme with 11 car parking spaces (1 accessible space), set back for trees to the front, and landscaping/amenity space. The proposed mix was for 20x1 beds/studios, 7x2 beds; and 1x3 bed. Officers provided advice and comments on 4/4/22 regarding:

- The need to improve the mix of unit sizes;
- Revised daylight/sunlight assessment to demonstrate that the proximity to Platinum Apartments and the revised set back of the building would not have differing and more detrimental effects than previous schemes with regards to Platinum Apartments and 69 Upper Crown Street;
- Assignment of parking spaces to specific units;
- Access to roof areas at third floor would not be supported, because of likely loss of privacy and overlooking to surrounding dwellings;
- Requirement for defensible space to the ground floor windows and the overall communal space should provide meaningful and pleasant spaces, which would be enclosed and sufficiently separate from the parking spaces and vehicular access;
- Net biodiversity gain where possible;
- Safe pedestrian access to cycle and bin stores;
- S106 obligations to include Affordable housing, construction skills and zero carbon to meet Policy H5.

2.13 Following this an amended scheme comprising 1 building of 28 flats was submitted (11/8/22) with the building set further back from Silver Street to allow tree planting within the site; rear parking and communal amenity

space; a revised mix of units; and amendments to reduce the bulk of the upper levels at the rear corner nearest Platinum Apartments. During further negotiation, and as a result of consultee comments and neighbour consultation, the final amended scheme for 23 flats is presented for committee consideration as set out under Section 3 'Proposal' below.

2.14 The application is a 'major' development (a residential scheme of 10 units and over) and, therefore, referred to the Planning Applications Committee.

### 3 PROPOSAL

3.1 The final amended scheme is summarised as follows:

- A Private Rented Scheme (PRS also known as Built to Rent)<sup>1</sup> for 23 flats comprising 4 no. 3 beds, 11 no. 2 beds, and 8 no. 1 beds with the following GIA floor areas:

Apartment Type Schedule		
Flat Number	Name	Area

#### Level 0

00_01	1B2P Flat	50 m <sup>2</sup>
00_02	2B3P Flat	61 m <sup>2</sup>
00_03	3B4P Flat	78 m <sup>2</sup>
00_05	2B3P Flat (Acc.)	62 m <sup>2</sup>

#### Level 1

01_01	2B3P Flat	61 m <sup>2</sup>
01_02	2B3P Flat	61 m <sup>2</sup>
01_03	2B3P Flat	62 m <sup>2</sup>
01_04	1B1P Flat	39 m <sup>2</sup>
01_05	1B1P Flat	39 m <sup>2</sup>
03_09	2B3P Flat	61 m <sup>2</sup>
03_14	3B4P Flat	74 m <sup>2</sup>

#### Level 2

02_03	2B3P Flat	62 m <sup>2</sup>
03_15	2B3P Flat	61 m <sup>2</sup>
03_16	2B3P Flat	61 m <sup>2</sup>
03_17	2B3P Flat	61 m <sup>2</sup>
03_20	3B4P Flat	74 m <sup>2</sup>
03_21	1B1P Flat	39 m <sup>2</sup>
03_22	1B1P Flat	39 m <sup>2</sup>

#### Level 3

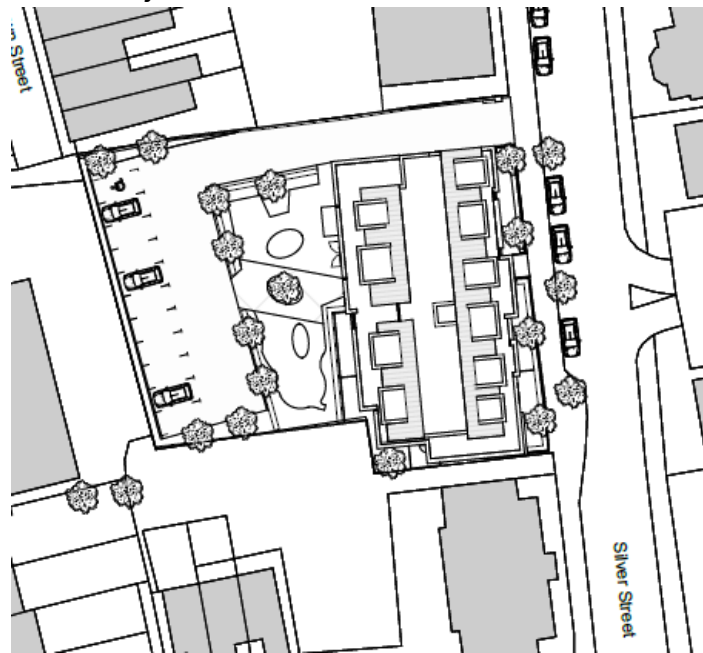
03_01	1B1P Flat	37 m <sup>2</sup>
03_02	3B4P Flat	77 m <sup>2</sup>
03_03	1B1P Flat	37 m <sup>2</sup>
03_04	2B3P Flat	62 m <sup>2</sup>
03_05	1B2P Flat	50 m <sup>2</sup>

Grand total: 23

<sup>1</sup> PRS development is often now funded on an institutional basis as long term property assets owned and managed.

- Communal lounge and a reception area.
- 11 car parking spaces (including one accessible space) and EVCP.
- Rear communal amenity space, landscaping and tree planting, tree planting to the front within the site and 3 no. street trees
- 40 no. cycle spaces.
- Car club space

3.2 The scheme would create one block of 12.2m in height over 4 floors, set from the northern boundary with Platinum Apartments by 4.4m and wall to wall distance of just over 7m.



*Amended Proposed Site Plan*

3.3 The proposed external surfaces would be fair faced brick, standing seam metal roof and dark grey/ brown aluminium window frames.



3.4 Submitted Plans and Documentation:

*(Final existing and proposed plans only included below)*

- Drawing no: PL\_003 dated 10/11/17 - Existing Location Plan, received 10<sup>th</sup> December 2020

- Drawing no: PL-002, dated 18/11/20 - Existing Site Plan - [shows previous buildings at no.40 and no. 62-62], received 10<sup>th</sup> December 2020
- Drawing no: PL\_000 Rev E, dated 13/3/24 - Location Plan [Proposed Block Plan], received 14<sup>th</sup> March 2024
- Drawing no: PL\_001 Rev F, dated 13/3/24, received 14<sup>th</sup> March 2024 - Site Plan [Proposed]
- Drawing no: PL\_101 Rev P, dated 13/3/24 - Ground Floor Plan, received 14<sup>th</sup> March 2024
- Drawing no: PL\_102 Rev J, dated 13/3/24 - First Floor Plan, received 14<sup>th</sup> March 2024
- Drawing no: PL\_103 Rev K, dated 13/3/24 – Second Floor Plan, received 14<sup>th</sup> March 2024
- Drawing no: PL\_104 Rev L, dated 13/3/24– 3<sup>rd</sup> Floor Plan, received 14<sup>th</sup> March 2024
- Drawing no: PL\_105 Rev I, dated 13/3/24 – Roof Plan, received 14<sup>th</sup> March 2024
- Drawing no: PL\_110 Rev F, dated 1/8/22 – Elevation – Block A\_ Silver Street, received 11<sup>th</sup> August 2022
- Drawing no: PL\_111 Rev F, dated 7/8/22 – Elevation – Block A\_ Courtyard, received 11<sup>th</sup> August 2022
- Drawing no: PL\_113 Rev E, dated 13/3/24 – Elevations – North and South, received 14<sup>th</sup> March 2024
- Drawing no: PL\_115 Rev B, dated 1/8/22 - Section A & B, received 11<sup>th</sup> August 2022
- Drawing no: PL\_200 Rev A, dated 24/7/22 – Façade Detail Elevation, received 24<sup>th</sup> March 2023
- Drawing No: PL\_501 Rev C, dated 13/3/24 – Area Schedules, received 14<sup>th</sup> March 2024
- Drawing no: 102 Rev I, dated 24/1/24 - Landscaping Layout with Services Overlaid, received 26<sup>th</sup> January 2024
- Drawing no: 202 Rev E dated 7/7/23 - Planting Plan, received 26<sup>th</sup> February 2024
- Drawing no: 301 Rev E, dated 24/1/24 – Trees in Hard Landscaping Details, received 26<sup>th</sup> February 2024
- Drawing no: PL\_301 Rev B, dated 13/3/24 – Level 0\_Access Control – Security, received 14<sup>th</sup> March 2024
- Drawing no: PL\_302 Rev B, dated 13/3/24 - Level 1\_Access Control – Security, received 14<sup>th</sup> March 2024
- Drawing no: PL\_303 Rev B, dated 13/3/24 - Level 2\_Access Control – Security, received 14<sup>th</sup> March 2024
- Drawing no: PL\_304 Rev B, dated 13/3/24 - Level 3\_Access Control – Security, received 14<sup>th</sup> March 2024

*Other Documents received:*

- Affordable Housing Viability Report, dated 7/2/23, prepared by S106 Affordable Housing, received 24<sup>th</sup> March 2023
- Air Quality Assessment, Document ref: AQ0684, dated October 2019, prepared by Gem Air Quality Ltd, received 7<sup>th</sup> January 2021
- Combined Phase 1& Phase 2 Ground Investigation Report, document ref: 1227-003-002, dated 26/9/2019, prepared by Westlakes Environmental, received 10<sup>th</sup> December 2020
- Daylight and Sunlight Report V1.2 dated 3/3/23, prepared by Delva Patman Redler, received 24<sup>th</sup> March 2023
- Design and Access Statement, dated 22/3/23, prepared by Studio NQ, received 24<sup>th</sup> March 2023
- Drainage Strategy, Ref: 1227-002-007 dated 16/10/23, prepared by Westlakes Engineering, received 18<sup>th</sup> October 2023
- Energy and Sustainability Statement Rev A dated April 2022, prepared by QED, received 11<sup>th</sup> August 2022
- Letter from Haslams dated 31/5/22 received 11<sup>th</sup> August 2022
- Planning and Heritage Statement, dated March 2023, prepared by GW Planning, received 24<sup>th</sup> March 2023
- Transport Statement dated 7/2/23, Document ref: R-20-0086-01E, prepared by Evoke, received 24<sup>th</sup> March 2023

3.5 Community Infrastructure levy (CIL):

In relation to the community infrastructure levy, the applicant has duly completed a CIL liability form. The development would be CIL liable and estimated as £292,601 (based on 1,632 GIA at 2024 rate of £179.29).

## 4 PLANNING HISTORY

40 Silver Street

**150885/FUL** - The proposed redevelopment of 40 Silver Street, demolition of existing light industrial building and erection of 14 flats 8x2bed & 6x1 bed, including 14 parking spaces and landscaping – Approved 21/3/16

**162232/PREAPP** - Student accommodation comprising 67 studio rooms with ancillary areas. Total floor space 2432m<sup>2</sup> – Observations sent 20/3/17

**172218/FUL** - Demolition of existing building and erection of a part 3 and part 4 storey (plus basement level) building to provide 62 studio rooms (sui generis use class) with associated ancillary space and landscaping works – Refused 9/2/18. Reasons:

*“1. The proposed development due to the height and bulk of Block A, the cramped layout between the blocks and the dominating design would result in the site appearing over developed and a harmful addition to the streetscene, of detriment to the character and appearance of the area. As such the proposal is contrary to Policy CS7 of the Reading Borough LDF Core Strategy and para. 17 of the NPPF.*

*2. The proposed development due to the height, position and bulk (of Block A in particular) will result in the loss of amenity for neighbouring residents through overlooking, loss of privacy, loss of light and noise and disturbance arising from the use of this small site to accommodate 62 students. As such the proposal is contrary to Policy DM4 of the Reading Borough Sites and Detailed Policies Document.*

*3. The proposed development would lead to a concentration of student accommodation in this area that would detrimentally impact on the lives of adjoining occupiers and would fail to provide a mixed and balanced community contrary to the aims of Policy CS15, NPPF para.50 and emerging Policy H12.*

*4. In the absence of a completed legal agreement to secure:*

*i) an acceptable mitigation plan or equivalent contribution towards the provision of Employment, Skills and Training for the construction phase of the development,*

*ii) a contribution of £5,000 towards the changes to the parking restrictions to facilitate access into the development,*

*iii) a travel plan and highway alterations,*

*iv) a restriction on occupancy to students only, and*

*v) implementation of the student accommodation management plan;*

*the proposal fails to provide adequate controls over the use of the development, including its highways and other travel impacts, contrary to Policies DM4, DM12, CS20, CS22, CS23 and CS24 and the Revised Parking Standards and Design SPD 2011. The proposal also fails to contribute adequately to the employment, skills or training needs of local people with associated socioeconomic harm, contrary to Policies CS3, CS9, DM3 and the Employment Skills and Training SPD (2013).”*

This was appealed – Ref: APP/E0345/W/3199747 – Dismissed 29/10/18, relating to overdevelopment of the site; harmful to the character and appearance of the area; harmful to the living conditions of the adjoining occupiers; no substantive evidence to demonstrate a specific need for student housing in this location nor that it would provide an appropriate density and mix of residential development.



**180725/DEM** - Application for prior notification of proposed demolition – Given 25/2/19

**182150/PREAPP** - Erection of a three storey (plus basement level) building to provide student studio rooms. Approx 1700m<sup>2</sup> GEA. Comments from Design Review Panel provided 1/2/19 and other consultee comments 8/3/19.

40-68 Silver Street

**190449/FUL** - Erection of part 1, part 2 and part 4 storey (plus basement level) buildings to provide 79 student studio rooms (sui generis use class) with associated ancillary space and landscaping works – Refused 11/9/2019 for the following reasons:

- 1. The proposed development, due to the combination of the bulk and height of Block A, the spacing between Block A and B, and the dominating design with development on three sides of the plot, would result in the site appearing over developed and a harmful addition to the streetscene, of detriment to the character and appearance of the area. As such the proposal is contrary to Policy CS7 of the Reading Borough LDF Core Strategy and Section 12 of the NPPF.*
- 2. The proposed development, due to the height, position and bulk (of Block A in particular), will result in the loss of amenity for neighbouring residents through overlooking, loss of privacy, loss of light and noise and disturbance arising from the use of this small site to accommodate 79 students. As such the proposal is contrary to Policy DM4 of the Reading Borough Sites and Detailed Policies Document.*
- 3. The proposed development, due to the relationship between the Blocks and the overall layout and movement through the site, will result in detriment to the amenity of proposed residents in terms of how they would experience the external courtyard space and internal space through overlooking, loss of privacy and noise and disturbance. As such the proposal is contrary to Policy DM4 of the Reading Borough Sites and Detailed Policies Document.*
- 4. The proposed development would lead to a concentration of student accommodation in this area that would detrimentally impact on the lives of adjoining occupiers and would fail to provide a mixed and balanced community contrary to the aims of Policy CS15, NPPF para.91 and emerging Policy H12.*

5. *It has not been clearly demonstrated how this proposal for Purpose Built Student Accommodation (PBSA) meets an identified need that cannot be met on those sites identified within the Emerging Local Plan for student accommodation or on sequentially preferable sites. The loss of this site to student accommodation would further reduce the Council's ability to meet its housing need within its own boundaries. The proposal therefore does not comply with Policy H12 of the Emerging Local Plan and conflicts with the aims of the NPPF para.68.*
6. *Insufficient information has been submitted to demonstrate that the scheme would be appropriate in the Air Quality Management Area and is therefore contrary to Policy CS34 of the Reading Borough Core Strategy and Policy DM19 of the Reading Borough Sites and Detailed Policies Document.*
7. *The layout does not comply with the Local Planning Authority's standards in respect of vehicle parking which could result in on-street parking on Silver Street during the arrivals and departure period at the beginning and end of term. This would adversely affect road safety and the flow of traffic in conflict with Core Strategy Policy CS24 and Sites and Detailed Policies Document Policy DM12.*
8. *In the absence of a completed legal agreement to secure:
  - i) an acceptable mitigation plan or equivalent contribution towards the provision of Employment, Skills and Training for the construction phase of the development,
  - ii) a travel plan and highway alterations,
  - iii) a restriction on occupancy to students only,
  - iv) implementation of the student accommodation management plan,the proposal fails to provide adequate controls over the use of the development, including its highways and other travel impacts, contrary to Policies DM4, DM12, CS20, CS22, CS23 and CS24 and the Revised Parking Standards and Design SPD 2011. The proposal also fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm, contrary to Policies CS3, CS9, DM3 and the Employment Skills and Training SPD (2013).*

Appeal into 190449 ref: APP/E0345/W/20/3248604 – Dismissed 15<sup>th</sup> January 2021 upholding the following refusal reasons:

No. 2 – with respect to the harmful effect on the outlook and loss of light to the windows in the side of Platinum House; No. 3 – In terms of the ground floor student warden unit, which would suffer from excessive

noise and disturbance, to the detriment of the living conditions of the occupant; No.5 and No.7

**200098/PREAPP** – Pre-application advice for proposed new Build-To-Rent development – File note of meeting provided 7/1/21



**200919/FUL** - Erection of part 2 and part 4 storey (plus basement level) buildings to provide 71 student studio rooms (sui generis use class) with associated ancillary space, access and landscaping works. (Resubmission of application 190449). – Refused 14/1/2022 for the following reasons:

1. *It has not been clearly demonstrated how this proposal for Purpose Built Student Accommodation (PBSA) meets an identified need that cannot be met on those sites identified within the Adopted Reading Borough Local Plan for student accommodation or on sequentially preferable sites. The loss of this site to student accommodation would further reduce the Council's ability to meet its housing need within its own boundaries. The proposal therefore does not comply with Policy H12 of the Reading Borough Local Plan and conflicts with the aims of the NPPF para.68.*
2. *In the absence of a completed legal agreement to secure:*
  - i) *an acceptable mitigation plan or equivalent contribution towards the provision of Employment, Skills and Training for the construction phase of the development;*
  - ii) *a travel plan and highway alterations including the required traffic Regulation Order (TRO) to amend the waiting restrictions within the layby on Silver Street to allow the modification of the vehicular access;*
  - iii) *a restriction on occupancy to students only; and*
  - iv) *implementation of the student accommodation management plan, the proposal fails to provide adequate controls over the use of the development, including its highways and other travel impacts, contrary to Policies CC8, CC9, TR1 and TR3. The proposal also fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm, contrary to Policy CC9 and the Employment Skills and Training SPD (2013).*

3. *There has been a failure to demonstrate the acceptability of the scheme in terms of sustainable drainage and attenuation of localised flooding for all rainfall events, contrary to Reading Borough Local Plan Policy EN18.*

62-68 Silver Street

**04/01465/FUL (041374)** - Renovation and extension of existing building to provide 4 flats and a ground floor B1(a) office – Refused 2/2/2005

**06/00708/FUL (061413)** - Renovation and extension of existing building to provide 4 flats and B1(a) office on ground and first floor – Approved, subject to S106 legal agreement, 10/8/2006

**11/01016/PREAPP (111690)** - Pre-application advice for conversion to student accommodation – Observations sent 7/9/2011

**11/01917/FUL (110915)** - Renovation and extension of existing building to provide student accommodation (16 no. self-contained rooms) – Approved, subject to S106 legal agreement, 28/09/2012

**171165/FUL** - Conversion of existing building to residential use plus additional two floor of accommodation to provide 6no. two bedroom flats plus parking, cycle storage and bin storage – Withdrawn 20/3/19 (on submission of current application 190449)

**190242/DEM** - Application for prior notification of proposed demolition – Given 17/3/19

79 Silver Street – student site on opposite side of Silver Street

**170785/FUL** - Demolition of existing building and erection of a part 3 and part 4 storey (plus basement level) building to provide 56 student studio rooms (sui generis use class) with associated ancillary services and landscaping works – Approved, subject to S106 legal agreement, 10/1/2018

**180075/VAR** - Demolition of existing building and erection of a part 3 and part 4 storey (plus basement level) building to provide 56 student studio rooms (sui generis use class) with associated ancillary services and landscaping works without complying with condition 2 (approved plans) of planning permission 170685 to introduce a larger basement area to allow an increase to 61 student studio rooms – Approved, subject to S106 legal agreement, 21/6/2018

**181150/NMA** - Non-Material Amendment to planning consent 180075 for changes to approved plans at -1 level to allow for the merging of 2

studios in to 1 flat and new studio flat in place of sub-station. No additional rooms provided – Agreed 6/8/2018

**181819/NMA** - Non-Material Amendment to planning consent 180075 VAR for changes to approved plans to allow the building to be clad in part brick/part render. – Agreed 14/11/2018

**191023/NMA** - Non-material amendment to planning application 180075 for changes to positioning of approved roof windows – Agreed 15/8/2019.

## 5 CONSULTATIONS

- 5.1 RBC Archaeology – All necessary archaeological mitigation works have already been conducted at the site and nothing further is required in light of the amended plans.
- 5.2 **Planning Officer Note:** When the buildings were demolished this was in accordance with demolition (prior notification) approvals, and these were subject to the implementation of archaeological investigation in accordance with schemes that were agreed with Berkshire Archaeology.
- 5.3 Ecology Adviser – This application is for the erection of private rental homes with associated ancillary space, parking, access, and landscaping.
- 5.4 The proposed development is in a predominantly urban location and is unlikely to affect protected species. However, in accordance with paragraph 180 of the NPPF, which states that “opportunities to incorporate biodiversity in and around developments should be encouraged” a condition should be set to ensure that enhancements for wildlife are provided within the development.
- 5.5 The Planning statement states:  
*“[.]that attention should focus on the development of eco enhancement measures as part of the new proposals. As detailed in the landscaping strategy and details this can include tree planting, planting within proposed courtyard and boundary landscaped areas, and also the provision of Hirundine boxes to encourage swifts and house martins.”*
- 5.6 This part of Reading supports a population of swifts whose numbers have declined in recent years in part to a lack of nesting sites which are found in buildings and the proposed development represents an

opportunity for habitat enhancement to benefit swifts as well as other birds, bats and insects.

- 5.7 The landscaping plan/strategy appears to be outline only and the standard landscaping condition should be set to ensure that full details are agreed with the council. Subject to the landscaping condition and a condition regarding swift bricks, bat boxes/ bricks/ tiles there are no objections to this application on ecological grounds.
- 5.8 RBC Transport – *Comments on the original 1 building scheme for 28 flats received 11/8/22* - The revised proposals include the construction of a three-storey apartment block to the east of the site facing Silver Street with a rear courtyard car park on the western side of the site. The development comprises:
- 4 x studio / one person apartments;
  - 15 x one-bedroom / one person apartments;
  - 1 x one-bedroom / two person apartment;
  - 4 x two-bedroom / three person apartments;
  - 3 x two-bedroom / four person apartments;
  - 1 x three-bedroom / four person apartment;
  - Reception and Management Suite with communal mailboxes and storage room;
  - 44sqm Common Room;
  - 11 Surface Level Car Parking Spaces;
  - Car Club and 2 additional parallel parking bays on -street; and
  - 40 cycle parking spaces.
- 5.9 The application site is located on the western side of the A327 Silver Street, a one-way section distributor road, which carries southbound traffic out of Reading to J11 of the M4 and other parts of South Reading including Reading University. Inbound traffic to the town centre would travel via Southampton Street, the A327 northbound route.
- 5.10 The majority of roads in the vicinity of the site either have single or double yellow line parking restrictions in place or are restricted to resident permit holders only between 08:00-20:00. Silver Street has “No Waiting” parking restrictions (DYL) preventing on-street parking and peak hour loading bans between 8.15-9.15am and 4.00-6.15pm. A layby currently runs across the site frontage and there are currently two access points which are protected by “No Waiting” parking restrictions (DYL). The layby is currently unregulated.
- 5.11 The application site is outside the town centre area but is located within 700m of the Central Core Zone. Bus stops are located on Silver Street and London Street within 200m of the site providing frequent premier

bus services to and from the town centre, and other areas in South Reading. An on-street southbound cycle lane is provided on Silver Street on the western side of the carriageway and a northbound cycle lane is provided on Southampton Street. The site is therefore accessible to good public transport links, town centre services and employment areas.

#### Access

- 5.12 Silver Street is part of the “A” road network carrying between 9,000 and 10,000 vehicles a day and is one of the main routes out of central Reading to the south. Therefore, any proposals need to comply with the Council’s adopted Design Guidance for Residential Accesses on to Classified Roads.
- 5.13 Vehicular access to the central parking courtyard will be provided via the existing dropped kerb to the north of the proposed building. A minimum width of 4.3m will be provided which exceeds the minimum width required for two cars to pass. No gates are illustrated on the proposed site plans.
- 5.14 The other existing access into the site will need to be stopped up and the footway reinstated to line and level to be covered by condition.
- 5.15 Pedestrian access will be provided along the site frontage onto Silver Street either via the main reception foyer.

#### Servicing

- 5.16 For most developments located on a classified road, servicing should take place within the site. The Transport Statement asserts that *“On-street parking bays are provided along Silver Street and the proposals include the provision of two additional on-street bays which can be utilised for any visitor parking requirements as well as delivery and servicing vehicles.”* However, if the on-street bays are occupied by parked cars then refuse collection would be required to take place from the traffic lane which could have a detrimental impact on the functioning of the transport network. Therefore, this point should be addressed to ensure there is no impact on the public highway through on- street servicing.
- 5.17 A refuse store is provided internally at the north end of the apartment block with capacity for eight 1100 litre Eurobins. It is envisaged that the refuse vehicle will wait on Silver Street, and management staff at the site will bring the bins to the front of the development and return the empty ones to the store on collection days. However, the Council’s Waste department should be consulted on this application to determine

whether the arrangements comply with their requirements before determining this application.

#### Parking Provision

- 5.18 The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per 1-2 bedroom unit. A lower parking provision can be considered when the development poses no detriment to highway safety.
- 5.19 A total of 11 surface level parking spaces (including one disabled bay) will be provided at the rear of the site at a ratio of 0.39 spaces per unit. The parking provision for the development is acceptable in this instance considering the location of the site (to Reading Town Centre) and the parking controls in the area. However, there should be an assumption that any future occupants of the flats would not be issued with resident parking permits which should be secured through the conditions and informative placed on the consent.
- 5.20 Policy TR5 of the Local Plan also states any developments of at least 10 spaces must provide an active charging point (1 space for every 10 spaces). Therefore, in accordance with RBC standards, one parking space will be equipped with an 'active' electric vehicle charging point.
- 5.21 To support a lower car parking provision, the site also proposes one on-street car club space on Silver Street. The Highway Authority are of the view that providing the car club on the Public Highway would be of benefit given that it would not only serve the application site but the wider area. The reason for this is that it becomes more accessible to the general public therefore increasing usage and giving the car club(s) more of an opportunity to be successful. To facilitate this the applicant would be required to contribute £7,500 towards a Traffic Regulation Order (TRO) so that the car club space/bay can be provided on the Highway. In line with the Council's Parking Standards and SPD, the car club should be provided and funded by the developer for a duration of 5 years.
- 5.22 The proposed development will provide a total of 40 cycle parking spaces, the equivalent of 1.42 cycle spaces per dwelling. The higher provision of cycle storage will also encourage residents to use cycling as their main mode of transport to and from the site and will further reduce the need for car journeys associated with the site.



- 5.23 Secure and covered cycle parking will be provided within the site, located on the southern side of the vehicular access to the north of the site. The cycle storage area will be equipped with 20 two-tier stackers (providing space for 40 bicycles) located at ground floor level.

#### Construction Method Statement

- 5.24 The applicant should be aware that there would be significant transport implications constructing the proposed building in this location. If this application is approved, a Construction Method Statement is required and should be approved before any works commence on-site.

- 5.25 The recommended conditions are as follows: CMS to be submitted and approved; vehicle parking to be provided as specified; vehicular access to be provided as specified; cycle parking to be provided as specified; refuse and recycling to submitted and approved; access closure with reinstatement; no automatic entitlement to parking permits; and details of EVCP. The S106 obligations would be: S278 agreement in relation to the provision of 3 no. trees to be located within the public highway along with an associated obligation to maintain the trees for a period of 5 years; Provision and funding of a car club bay on Silver Street for a duration of 5 years; Contribution of £7,500 towards Traffic Regulation Orders necessary to provide a car club bay and to alter the existing waiting restrictions.

- 5.26 **Planning Officer Note:** Amended information was received 24/3/23. Transport provided the following further comments on 16/6/23:

- 5.27 I have reviewed the amended plans and reviewed the revised Transport Statement dated 7/2/23, by Evoke Transport, received 24/3/23.

- 5.28 The Transport Statement (para 3.5.4) states that *“A 12m loading bay is proposed directly outside the site which will be used for delivery and servicing movements associated with the site and neighbouring developments, as requested by RBC in recent comments.”*

- 5.29 However, I have reviewed the swept path analysis in Appendix C and it does not appear an RBC Refuse vehicle could easily enter and exit the loading bay. Swept path analysis demonstrate whether vehicles have adequate space to undertake movements without putting pedestrians in danger, damaging highway infrastructure, or coming into conflict with other vehicles. The swept path analysis indicates that the refuse vehicle cannot complete its manoeuvres without the front of the vehicle overrunning the tree pit. In addition, the rear of the vehicle will overspill onto the carriageway as it cannot fully access the bay in forward gear (see image below). Feedback is required from waste services as they requested the loading bay.

- 5.30 The car club bay is marked as 7554mm in length, therefore, there is scope to reduce the length of the car club bay and make the loading bay longer to enable refuse vehicles to be able to pull into the loading bay more easily.
- 5.31 **Planning Officer Note:** Amended drawings were provided on 13/7/23 to show an increased length of the service/ loading bay. Transport requested that updated tracking diagrams be submitted to demonstrate that a refuse vehicle could enter and exit the loading bay to meet Transport and Waste management requirements.
- 5.32 The Transport Officer confirmed that *“A 12m loading bay is proposed directly outside the site which will be used for delivery and servicing movements associated with the site and neighbouring developments. A revised tracking diagram has been submitted to demonstrate that an RBC Refuse vehicle could easily enter and exit the loading bay without the front of the vehicle overrunning the tree pits or carriageway. It is stated the management staff at the site will bring the bins to the front of the development and return the empty ones to the store on collection days. The Council’s Waste department should provide final comments on the size of the bin store.”*
- 5.33 RBC Environmental Protection – Confirmation that the comments provided under the previous application 200919 would still apply and that there would be no objection subject to conditions for the submission and approval of a noise assessment to protect the dwellings from environmental noise including a mitigation scheme; mechanical plant noise assessment if applicable; submission and approval of a construction method statement; limitation of construction hours; no burning of waste on site; implementation of approved remediation strategy and validation report; reporting of unexpected contamination and sound insulation informative.
- 5.34 200919 comments were: “Noise impact on development - A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.
- 5.35 The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.
- 5.36 Where appropriate, the noise assessment data should also include noise events (LAMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

**Internal noise criteria (taken from BS8233:2014)**

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB LAeq,8hour	
Living rooms (07:00 – 23:00)	<35dB LAeq,16hour	
Gardens & Balconies	<50dB LAeq,T	<55dB LAeq,T

- 5.37 As a noise assessment has not been submitted, and the proposed development is by a busy road, I recommend a condition is attached to any consent requiring a noise assessment to be submitted prior to commencement of development and any approved mitigation measures implemented prior to occupation to show that recommended noise levels in the table above can be met.
- 5.38 The noise assessment will need to identify the external noise levels impacting on the proposed site.
- 5.39 Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.
- 5.40 I recommend the following conditions: Sound Insulation from External Noise
- 5.41 Noise between residential properties – sound insulation of any building - an informative is suggested.
- 5.42 Air Quality - Increased exposure - The air quality assessment submitted with the application demonstrates that the air quality at the development will be within the EU limit values therefore no mitigation is required.
- 5.43 Contaminated Land - The phase 1 and 2 contaminated land investigation has noted some sources of contamination in made ground which will require removal and residual made ground not to be used in areas of landscaping. The remediation strategy is included within the report. Recommended conditions below, which are required to ensure that future occupants are not put at undue risk from contamination: Implementation of Approved Remediation Scheme; Reporting of Unexpected Contamination.
- 5.44 Construction and demolition phases - We have concerns about potential noise, dust and bonfires associated with the construction (and

demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

- 5.45 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.
- 5.46 The following conditions are recommended: Construction Method Statement; construction hours of working; No burning of waste
- 5.47 Bin storage – rats - There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. I recommend a condition regarding the submission and approval vermin proof bin storage.”
- 5.48 RBC Natural Environment (Trees) – The Officer originally provided comments on 8/2/21 and this related to the original scheme of 2 buildings, basement car park and a courtyard amenity space. The specific issues they raised at that time related to the following:
- Need for space to be accommodated on the frontage for tree planting. The site is within the AQMA, a low canopy ward and a ‘treed corridor (ref Tree Strategies)
  - The scheme proposes new street trees, outside the site and within the Highway in build-outs – previous advice was not positive, and including trees within the red line should be the default position, but if it can be demonstrated that it would not be feasible then a contribution on Council land could be appropriate. Assuming an appropriate argument is presented to agree the principle of off-site planting, we would obviously need to check whether planting on the Council pavement is practically possible, i.e. are services (above or below) in the way. No decision on the application should be made before it is confirmed whether planting is feasible. The applicant should liaise with Highways / Parks and investigations made. If planting is possible on RBC land and it’s been accepted that agreeing a contribution for off-site planting is reasonable in this case, then it will be acceptable. Input over the costs to be secured within a S106 will have to be determined and should incorporate a high specification

hard landscape tree pit for each tree. Further advice can be given at a later stage.

- Without demonstrating justification, feasibility and acceptability of the details, the application is not acceptable in landscape terms. It is disappointing that the Landscape statement lacks any details about this planting other than indicative locations.

5.49 **Planning Officer Note:** Significantly amended plans were received on 7/6/21, which included:

- Removal of the basement;
- Removal of communal landscaped area to the courtyard; and
- Provision of ground level parking.

5.50 The Natural Environment (Trees) Officer advised that the revisions were not acceptable, and in summary commented as follows:

- The underground parking is now omitted, with the parking now within the internal courtyard space meaning that the previous landscaped amenity space / courtyard is now completely omitted. This is a wholly negative change resulting in negligible planting within the site.
- The elevation appears to indicate tree planting within the curtilage to the frontage, but this is not on the Ground Floor Plan and all plans should be consistent.
- As the site is within low canopy cover ward, within the AQMA and on a 'treed corridor' development must include extensive planting, including tree planting, and where this is not feasible alternative greening, e.g. green walls and roofs, must be incorporated. In terms of landscaping / greening, the latest revisions fail to meet the requirements of policy or adopted strategies (also ref BAP and Climate Emergency Strategy), hence are not supported.
- In relation to the off-site trees, the principle of SUDs with trees build-outs have been agreed and detailed tree pits specifications need to be submitted for consideration. Without these, the off-site tree planting will not be considered and tree planting within the site on the frontage will be required, which is likely to require a greater set back. Lack of trees on the frontage (inside or outside the site) will be unacceptable.

5.51 **Planning Officer Note:** Further amended plans were received 11/8/22 and Natural Environment Officer confirmed (6/12/22) that in principle the development would be acceptable from a tree and landscaping perspective, but that further information was required summarised as follows:

- The proposals re-introduce the rear courtyard and tree planting on the frontage (within the site) so are positive from that respect.
- The flat roof element does not include a green roof; a lost opportunity.
- Plans are not consistent – 6 trees are shown on the frontage on the Landscape Layout, but 4 are shown on all other plans.
- No species palette has been provided for consideration and to demonstrate what would be feasible in the narrow planting strip shown to the frontage. Tree pits here will need to be designed to allow sufficient soil volume.
- There is insufficient tree pit detail for the proposed highway trees. The tree pits here will require specialist design to provide a good soil volume, e.g. by the use of root cells and could (as per agreed in principle by highways) look to be SuDs tree pits. Companies such as GreenBlue Urban can assist with such tree pits design.
- Tree pit details and soil volume will be required for the proposed trees in planters within the courtyard.
- Species should meet the native or wildlife friendly criteria, as well as providing a mix of family, genus and species for diversity.
- The location of services runs should be considered now to demonstrate no conflict with the indicated landscaping.

5.52 **Planning Officer Note:** Further comments were provided by Natural Environment Officer (15/6/23) further to amended plans received 24/3/23 summarised as follows:

- The Site Plan shows 4 trees on the site frontage (within the site) and 3 within the street (Highways land), along with planting elsewhere on site incorporating another 10 trees. This is not consistent with the Landscape plan which shows 6 (very small) trees on the site frontage.
- Incorporation of the street trees is a positive aspect and agreeable in principle. To secure monies for this planting scheme, we need to agree more details prior to a decision. To move this matter on, I suggest that GreenBlue Urban are invited to a site meeting with relevant officers to discuss the design for the street trees so that they can then provide a quote to be used for S106 purposes. RBC would then assess the cost of the trees (if not provided by GB Urban) and maintenance.
- No planting palette has been provided, as previously requested.
- The Roof plan does not include green roofs. As per comments from Transport DM, the SuDs design should aim, as a default, to be landscape led. This could incorporate a blue-green roof to address the request for a green roof and landscape led SuDs together.

- Tree pit details and soil volume information has not been provided.
- Clear existing and proposed – all services and all routes are required.

- 5.53 **Planning Officer Note** - Further amended plans were received on 13/7/23 to show: revised street tree positions on Silver Street allowing increased length of service/ loading bay; introduction of a green/ brown (sedum) treatment of the central flat area of roof; and a full planting schedule. The Natural Environment Officer provided further comment (8/8/23). This comprised detailed comments on the specific species and proposed form of trees, soil volume, request for details of root barriers, tree pit design and proposed green roof; latest drainage and other service layouts.
- 5.54 There was ongoing dialogue between the Natural Environment Officer and the applicant's landscape consultant, and further amendments and clarifications were provided.
- 5.55 Further amended revised plans were received on 26/1/24 and the Natural Environment Officer comments of 5/2/24 confirmed that the plans were acceptable save for a minor amendment to tree pit details. Further amended details were received on 26/2/24, which the Natural Environment Officer confirmed are acceptable. Recommended conditions are for hard and soft landscaping to be implemented in accordance with the approved plans, the submission and approval of a landscape management plan, as well as a relevant obligation in the S106 to secure the off-site tree planting by the applicant and for the applicant to pay a financial contribution for the ongoing maintenance of the trees for a period of 5 years.
- 5.56 **RBC SUDS Manager (Local Lead Flood Authority – LLFA)** – Comments on the March 2023 amendments - The proposed sustainable drainage scheme results in a reduction in run off when compared to the existing run off from the site and as such is acceptable in principle. However, it is noted that the proposed design is still based on the original development layout [i.e. 2 buildings and basement car parking] that has been revised quite considerably and as such a revised drainage design would be required to suit the current scheme. This is, however, something that could be dealt with by way of a condition given the submitted information confirms that a reduction in run off from the site would be facilitated by the proposals.
- 5.57 The proposed drainage scheme, although dealing with the SuDs hierarchy in part as detailed in the NPPG and listed below, does not fully

address the infiltration element of the hierarchy and does not address Policy EN14 or EN18 of the Reading Borough Local Plan.

- *into the ground (infiltration);*
- *to a surface water body;*
- *to a surface water sewer, highway drain, or another drainage system;*
- *to a combined sewer.*

5.58 The applicant is therefore required to review how the SuDs proposals can meet the following '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'.

5.59 With the above in mind I am happy to agree to the principle of the SuDs proposals, but further details must be provided to address the above and as such I am happy to accept the proposal subject to the following conditions: sustainable drainage to be approved and implementation of the approved scheme.

5.60 **Planning Officer Note:** An amended Drainage Strategy was submitted and the LLFA Officer provided the following further comments (2/11/23):

5.61 The proposed sustainable drainage scheme results in a reduction in run off when compared to the existing run off from the site and as such is acceptable in principle however as detailed within the drainage report a detailed design is still required.

5.62 With the above in mind I am happy to agree to the principle of the SuDs proposals but further details must be provided to address the above and as such I am happy to accept the proposal subject to conditions.

5.63 **Planning Officer Note:** Further to the submission of plans to show the drainage strategy for the site area and the overall drainage network the SUDS Officer confirmed acceptability of the proposed scheme subject to conditions requiring the approval of a Sustainable Drainage Strategy and the pre-occupation implementation of the approved strategy.

5.64 Thames Valley Police – Crime Prevention Design Advisor – *Original comments 1/2/21* - I consider some aspects of the design and layout to be problematic in crime prevention design terms and therefore, with specific reference to the location of the post boxes and concerns regarding Physical security and access control offer the following recommendation.

5.65 Given the location of the development I believe the attachment of an access control strategy condition will ensure the sustainable safety and security of the development, safeguarding future residents.



- 5.66 Recommendations: *Postal boxes*: My only comments at this juncture would be to relocate the post boxes from the private residential core to the communal lobby, where mail can be delivered whilst maintaining the safety and security of the building.
- 5.67 *Physical security Condition*: Physical security and access control into and throughout the development will be critical in creating and sustaining a ‘*Safe and accessible environments where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion*’. I request that a condition be included.
- 5.68 **Planning Officer Note**: the TVP provided some advice as to the measures which would need to be included:
- compartmentalisation of each floor within the development via physical security measures. This enables residents to identify visitors and prevent unauthorised access into the private parts of the buildings whilst maintaining a safe and secure distance.
  - External Communal entrance and communal lobbies should include specific types of door sets with access controlled via the use of electronic remote release locking systems with audio/visual link to each apartment.
  - Bin and cycle store doors and external sliding doors and roller shutters must be robust.
  - Detailed plans and locations of Formal surveillance (CCTV) cameras
- 5.69 Plans were originally received on 9/2/21 to show proposed access control and CCTV and a relocation of letter boxes. At that time TVP confirmed that these were acceptable. Amended plans showing the access controls and CCTV within the context of the amended scheme were provided. A condition is recommended requiring the implementation of such measures in accordance with approved plans.
- 5.70 RBC Waste – “Capacity - for 28 flats on the standard fortnightly collection, we would provide:
- 4 x 1100L bins for general waste
  - 5-6 x 1100L bins for recycling
  - 2-3 x 240L bins for food waste
- 5.71 The document states that they have space for 8 x 1100L bins in total which would be too small for this number of bins. They would either need a bigger bin store or have a weekly collection through trade waste.
- 5.72 I do have concerns regarding the refuse vehicle having to wait on Silver Street, whilst the bins are emptied. The vehicle should be able to pull in/over. With Silver Street being a single carriage way the build-up of traffic whilst the bins are being loaded is an issue.

5.73 The document advises that the management staff will bring the bins out and return after collection; due to the walking distance this would need to be upheld.”

5.74 **Planning Officer Note:** The amended scheme for 23 flats was further reviewed and the Waste Officer confirmed that for a standard collection (i.e. fortnightly for general waste and recycling and weekly for food waste) that the overall proposed bin storage capacity would be insufficient. However, for weekly commercial collections the space shown would be sufficient for the required capacity of 3 x 1100L for general waste, 5 x 1100L for recycling and 2 x 240L for food waste. They also advised that there would need to be rotation of bins once full, as the internal arrangement would only allow for the front two to be accessible. The agent confirmed that the applicant was intending to arrange a weekly trade waste collection, either from the Council (if this service is available) or via a private contractor and the bin store and related on site management arrangements have been designed for weekly refuse collection. An enlargement of the loading bay on Silver Street and tracking plans adequately demonstrated that a refuse vehicle could pull off the main carriageway for collection. The agent also confirmed that a management team would rotate the bins and present them for collection. A condition is recommended for the submission and approval of a Waste Management Plan to address the specific requirements.

#### *Public*

5.75 The following properties were notified of the application by letter:

- 63-69 Upper Crown Street (odd)
- Stirling House – Flats 1-18
- Windsor Square Nos. 1-8
- Platinum Apartments Flats 1-20
- Hawk Cottages nos. 1-5
- Rimaud House, Iliffe Close Nos 1-5

5.76 Further letters were sent when amended plans were received in August 2022 and March 2023.

5.77 The summary of objections received is as follows:

#### *Design*

- A 4 storey dwelling is also out of keeping for this area as the flats opposite are 3 storey as are those next to it; other flats in the area mostly two / max three storey so no there is no precedence for a 4 storey building.

#### *Amenity*

- Loss of privacy [to Platinum Apartments and Stirling House flats].

- Overbearing especially to the lower sections of Platinum Apartments; Large, obtrusive building.
- Impact on daylight and sunlight to surrounding buildings including those opposite - The sun currently travels across the south facing wall of the building, which is where our lounge/kitchen is located. On this wall are the windows for this room, so a building of 3 or more stories would block this light and make our main living area very dark [Platinum Apartments]; Overshadowing to Platinum Apartments; the ground floor living room of Platinum Apartments does not have a larger Juliette balcony window to help mitigate light loss.

#### *Proposed Residential Use*

- The development has the same provisions as the refused student scheme and there is no requirement for further student flats at this location; It would appear the plans were amended to make these flats more residential, however the common area within the building would suggest otherwise.
- It should be for self-contained flats.
- Transient neighbours whether they are students or not tend to have a lack of consideration and respect for neighbours at the base level but students in particular seem to have a total disregard, lack of awareness and a contempt for people around them.
- There would be constant noise and disruption from students.

#### *Transport and Parking*

- The road is rather dangerous with most cars speeding past the building with no regard for the cycle lane or pedestrians, not to mention the excessive noise they cause. Accidents will increase when these flats are built. Both roads next to it have cameras or speed bumps this road needs one of these measures as people tend to race up Silver Street already?
- Insufficient parking already and more flats will lead to additional congestion and problems parking; lack of proposed parking which will add to the already frustrating parking situation.
- Silver Street is already a very busy road with constant traffic. The road is in disrepair and as a result the building suffers from traffic vibrations constantly (it's not just big lorries, every bus and large van makes the building shake).
- What are the plans to solve the lack of free parking for residents in area?

#### *Suggested Alternative Uses*

- Already too many flats on this road and insufficient commercial sites and green space. Should be a commercial site again to allow micro

mobility e cargo trike businesses, to reduce the footprint of cars, and make our city greener.

- What are you doing to create employment in the area?
- There are no children's play parks in the centre of Reading you have to go towards the river, university or Palmer Park. This would be a great use of this space to put a children play park here; a green space for the community would be a better option for the site than yet another building.

#### *Infrastructure*

- Serious lack of adequate facilities nearby.

## **6. RELEVANT PLANNING POLICY AND GUIDANCE**

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".
- 6.2 For this Local Planning Authority the development plan is the Reading Borough Local Plan (November 2019). The relevant national / local policies / guidance are:

#### National Planning Policy Framework (2023).

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

- 2. Achieving Sustainable Development
- 4. Decision-making
- 5. Delivering a Sufficient Supply of Homes
- 8. Promoting Healthy and Safe Communities
- 9. Promoting Sustainable Transport
- 11. Making Effective Use of Land
- 12. Achieving Well-Designed and Beautiful Places
- 14. Meeting the Challenge of Climate Change, Flooding and Coastal Change

National Planning Policy Guidance (2014 onwards)

#### Reading Borough Local Plan (November 2019).

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  
EN2: Areas of Archaeological Significance  
EN12: Biodiversity and the Green Network  
EN14: Trees, Hedges and Woodland  
EN15: Air Quality  
EN16: Pollution and Water Resources  
EN17: Noise Generating Equipment  
EN18: Flooding and Drainage  
EM3: Loss of Employment Land  
H1: Provision of Housing  
H2: Density and Mix  
H3: Affordable Housing  
H4: Build to Rent Schemes  
H5: Standards for New Housing  
H10: Private and Communal Outdoor Space  
TR1: Achieving the Transport Strategy  
TR3: Access, Traffic and Highway-Related Matters  
TR4: Cycle Routes and Facilities  
TR5: Car and Cycle Parking and Electric Vehicle Charging

Relevant Supplementary Planning Documents (SPD) are:

- Employment Skills and Training SPD (2013)
- Revised Parking Standards and Design SPD (2011)
- Sustainable Design and Construction SPD (2019)
- Affordable Housing SPD (2021)
- Planning Obligations Under S106 SPD (2015)

Other relevant documents:

- Reading Borough Council Tree strategy (2021)

## **7. APPRAISAL**

The main matters to be considered are:

- Land use principles

- Design Considerations and Effect on Character
- Density and Mix
- Impact on Amenities of Adjoining Occupiers and Future tenants
- Natural Environment
- Transport/ Parking
- Environmental Matters
- Flood Risk & Drainage
- Sustainability
- S106
- Other
- Equalities impact

### **Land use principles**

- 7.1 Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development that reflects the presumption in favour of sustainable development, which lies at the heart of national policy (NPPF).
- 7.2 The three overarching objectives defined in the NPPF, to achieving sustainable development are economic, social and environmental. With regard to the economic role, the proposal would contribute to economic activity through the construction period. The provision of additional housing would meet the social objective and landscaping and measures to enhance biodiversity would support the environmental objective.
- 7.3 The location of the site is dominated by residential uses with some offices and other commercial uses. It is an accessible location on the edge of the town centre and the redevelopment of this brownfield site for a residential use would be acceptable in principle, representing a sustainable development and an effective reuse of the site. This would accord with the NPPF's principle of making effective use of land (Para. 123) and Reading Borough Local Plan (RBLP) housing policies (Policy H1) by contributing towards housing provision to 2036 and build to rent housing (private rental - Policy H4). It would create some local employment opportunities (during the construction phase).
- 7.4 The previous use of the site was for employment, however the principle of the loss of the commercial use for residential use was accepted with the granting of the now lapsed planning permission for residential (15 flats) at 40 Silver Street (150885/FUL) and student housing (16 units) at 62-68 Silver Street (11/01917/FUL).

- 7.5 Although the principle of the use and location are considered acceptable this would be subject to satisfactorily meeting other policy requirements as addressed further below.
- 7.6 The amended scheme has been assessed in the context of the previous refusals and appeal decisions and the lapsed residential scheme (150885 – part of the site at 40 Silver Street)

### **Design Considerations and Effect on Character**

- 7.7 Policy CC7 requires that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 7.8 The proposed amended scheme comprises a single 4 storey building to the Silver Street frontage. It would have three storeys with a fourth set back with dormer windows. With respect to the height and appearance in the streetscene it is proposed with a mono-pitched roof, with inset flat roofed dormers. The overall design is groups of projecting sections with corresponding dormers above, with a variation in building line to break up the mass of the frontage. The proposal is for a contemporary appearance using fair faced brick, feature recessed panels, brick cills, standing seam zinc roof and aluminium windows and ventilation louvres.
- 7.9 The proposal would bring the built form to the front of the site and align with adjacent plots and the prevailing building line on the street, whilst still ensuring landscaping and tree planting of the frontage within the site as well as street tree planting to further enhance the public realm.
- 7.10 The overall height would be 12.2m above ground level, which is consistent with the maximum height of previous, albeit refused, schemes (190449, 200919) and officers considered the overall height to be acceptable, and this did not form a specific reason for refusal at that time.
- 7.11 The proposed scheme sits lower than the highest point of Platinum Apartments to the north and is of a similar height to Hieatt Close to the south (11.0m). It is, therefore, considered to be an acceptable height within the context of the neighbouring buildings and the wider area.
- 7.12 In terms of character and appearance the Inspector into the 190449 appeal considered that the height and massing of the front block would be comparable in scale to the neighbouring buildings and would complement the street scene along Silver Street.
- 7.13 The building's set back reduces any degree of dominance.

7.14 The contemporary appearance of the proposal, which includes projecting bays and staggered front building line with dormers above, is similar to that presented under the previous schemes 190449 and 200919 (extracts below), albeit the bays and dormers are slightly wider and with a slightly different arrangement.



7.15 Although more contemporary than most other buildings within the area there is a recently built, very similar scheme, at no. 79 Silver Street (owned by the applicant) which is student housing, and indeed the adjacent buildings at Hiatt Close and Platinum Apartments include similar elements to the proposal with respect to staggered building lines and projecting elements with flat roof dormer features.

7.16 The type of design as shown in the proposed scheme was considered acceptable under the previous applications on this site.



*Hiatt Close to the south*



*Platinum Apartments to the north*

7.17 The layout of the site with the main block to the front with amenity and parking to the rear, and the depth of the building, is very similar to the last approved residential scheme for part of the application site (40 Silver Street - 150885 – see approved site plan below).





**Approved ground floor plan 150885**



**Proposed ground floor plan**

- 7.18 The recognition of the need to set the building away from Platinum Apartments was set out in the appeal decision for the refused and appealed scheme of 190449. The proposed scheme would achieve good set off to Platinum Apartments which is ca 7m between side walls compared to 4m under 190449, and is similar to the previous 200919 scheme, where the set off was considered acceptable. Further information with respect to amenity impacts is set out under that section below.
- 7.19 There would be good back- to- back distance to Rimaud House to the west, whilst the siting of the building would accord with the adjacent building block pattern.
- 7.20 The landscaping, amenity space, and boundary planting would improve the overall appearance of the site compared to its previous commercial appearance and as a current unused site.
- 7.21 In terms of the proposed materials' palette this would include traditional materials with some contemporary detailing included a grey multi-brick with recessed windows, aluminium dark grey/brown finish to window frames and a metal standing seam roof including cladding to dormer roofs.

Zinc clad dormer and roof (indicative image)



- 7.22 It is considered that the proposals would be acceptable in their scale, mass, appearance and overall design and would, therefore, be in accordance with Policy CC7 and the principles of high-quality design set out in the NPPF.

### **Density and mix**

- 7.23 Policy H2 requires density to be informed by the character of the area accessibility, high quality design, efficient use of land and amenity for existing and proposed residents.
- 7.24 Policy H2 also states that *“Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.”*
- 7.25 Policy H4 requires build to rent schemes to provide for a mix of unit sizes in accordance with Policy H2.
- 7.26 The total site area is 0.136ha and the density proposed would equate to ca 169.7 dwellings per hectare. This is comparable with the adjacent Platinum apartments which equates to ca 140 dwellings per hectare (20 units on a 0.143ha site) and is much lower than 1-9 Hieatt Close of 290 dwellings per hectare (9 units on 0.031ha). The indicative density ranges for urban sites, as set out in Fig 4.5 of the RBLP, is 60-120 dwellings per hectare, but the policy allows for different factors to influence an appropriate density including the character in terms of density of an area. It is therefore, considered that this would be an appropriate density level and very similar to the previous approval for 40 Silver Street (150885).
- 7.27 In terms of housing mix the amended scheme now includes 4 no. 3 beds and 11 no. 2 beds, equating to 17.4% and 47.8% respectively. Although the number of 3 beds does not meet policy, the supporting text to Policy H2 (para 4.4.9) accepts that *“homes with two or more bedrooms, capable of accommodating families, represent the majority of the need”* and the proposal would offer over 65% as 2 or 3 bedrooms. Policy H2 does state such compliance should have *“regard to all other material considerations”*. As the proposal would not provide 50% 3 bed units there would be a degree of harm in respect of meeting this specific housing need, albeit it would contribute towards overall housing provision and provide some larger units. This harm will need to be weighed against the wider benefits of the scheme.
- 7.28 The sizes of the units would meet the national space standards, as set out in the supporting text to Policy H5.

### **Impact on Amenities of Adjoining Occupiers and Future tenants**

- 7.29 Policy CC8 states that *“Development will 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;....” And “The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate...”.*

- 7.30 Policy H10 requires that dwellings be provided with “*functional private or communal open space....., flats may be provided with communal outdoor space, balconies and/or roof gardens. The design of outdoor areas will respect the size and character of other similar spaces in the vicinity.... ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.*”

### **Privacy and Overlooking**

- 7.31 The majority of the proposed windows would be east or west facing, i.e. towards the rear or towards Silver Street and would be at sufficient distance, and with respect to Rimaud House, which is to the west of the site, would be on lower ground than it, to not cause concerns regarding the loss of privacy and unacceptable overlooking to those properties to the rear and opposite the site
- 7.32 There would be a few side facing windows to the north towards Platinum Apartments at a distance of ca 7m, but these would be narrow openings and would include translucent film to avoid direct overlooking, albeit the upper part of the window could be opened. The opening part would be side hung to offer a view towards Silver Street and would be restricted to open no wider than 30 degrees to preclude direct views towards Platinum Apartments.
- 7.33 There would be the potential for overlooking of the rear windows of the proposed building and private communal amenity space from Rimaud House, which is at an elevated level compared to the site. However, there are existing trees along the shared boundary and there would be a distance of 29.7m between the buildings and 19.7m to the edge of the amenity space, which is considered to meet standard back-to-back distances and would not cause a detrimental relationship and one which is not considered to be unusual for an urban site.
- 7.34 The depth of the building is relatively comparable with adjoining plots and balconies etc have been removed and considered that sufficient separation to not create unusual or detrimental effects with respect to overlooking. It is usual to have some overlooking, direct and oblique views between sites especially in an urban context, and there are already existing situations of such relationships, e.g. Platinum Apartments to the rear of and the amenity spaces of Upper Crown Street.

### **Access to Sunlight and Daylight**

- 7.35 Many of the neighbour objections relate to concern over loss of daylight and sunlight, but in particular to the side windows at ground, first and second floors of Platinum Apartments to the north.
- 7.36 The NPPF (para. 129) states that *“when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*
- 7.37 An amended Daylight and Sunlight Assessment was submitted and models the effect of the proposal on the windows of neighbouring buildings. The assessment includes review of the daylight to the proposed dwellings using the illuminance method<sup>2</sup>, and the effect on the daylight and sunlight of neighbouring dwellings using the Vertical Sky Component (VSL - total amount of skylight available), no skyline (NSL - which measures the area within a room that can receive direct sunlight and the distribution around the room), and Annual Probable Sunlight Hours (APSH – amount of sunlight reaching a room calculated as a percentage of annual probable sunlight hours at the centre of its windows).
- 7.38 This is based on the guidance within the BRE ‘*Site Layout Planning for Daylight and Sunlight: A guide to good practice*’ (third edition, 2022).
- 7.39 The Assessment sets out that *“the BRE guide states that its default numerical guidelines are not mandatory, and must be interpreted flexibly, because natural daylight is only one of many factors in site layout design. In certain circumstances, such as city centres or areas with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.”*
- 7.40 Paragraph 5.1 of the Assessment identifies that Appendix f of the BRE Guide states *“In assessing the loss of light to existing windows nearby a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building and for the developer to set 0.8 times the values for the permitted scheme as benchmarks”*.

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<sup>2</sup> BRE Guide The minimum recommended target illuminance level (lux) for room types in UK dwellings is 100 lux for bedrooms, 150 lux for living rooms and 200 lux for kitchens. As the living/kitchen/dining areas have the kitchens to the rear of the room a target of 150 lux has been used in the assessment.

- 7.41 The Assessment includes assessing the scheme against the now lapsed approved residential scheme (150885) and using this for 'alternative target values'.
- 7.42 The proposed building has been set away from Platinum Apartments at a very similar distance to the previous permission (150885 wall-to wall distance of 7.09m compared to 7.2m) for the reason of reducing the effects of loss of daylight/ sunlight on the Platinum Apartments. The conclusion of the Assessment is that based on an assessment of the proposed scheme against the existing baseline that there would be some adverse effects on the existing side facing windows at Platinum Apartments. However, when using the approved scheme as the baseline the effects would be almost the same as the previous approval.
- 7.43 When assessed against the previous approved scheme the results demonstrate that all six neighbouring properties would continue to meet BRE target values or VSL, NSL and /or APSH reduction of no more than a 2% absolute change when compared against the extant consent target values. This is not considered to be material in nature. There would be a small number of rooms which would experience a slight gain in daylight due to the different configuration of the roof compared to the previous permitted scheme.
- 7.44 The rooms in Platinum Apartments, that the affected windows serve, are open plan kitchen/living dining areas which also have windows to the front facing Silver Street. As an urban site is it inevitable that the proposal will be positioned close to existing buildings, which in turn will change the context in respect of shading, daylight and views. The Assessment illustrates that the proposal would not have significant adverse impacts on the residential amenities of the neighbouring properties and the close-by habitable spaces. On balance, therefore, when also considering the needs of ensuring an efficient use of the site and a design which is appropriate in its overall scale for the specific site, the proposal is considered acceptable.
- 7.45 In terms of the Assessment of the proposed scheme against the existing position, 5 no. of the side windows at Platinum Apartments, which serve 3 no. living/kitchen/ dining spaces, which, as stated above, are rooms which also have windows to Silver Street, would experience loss of daylight as measured using the Vertical Sky Component (VSC), with 2 of the windows having a 'significant effect'. However, the VSC method assesses each window individually and for planning purposes (and as within the BRE guidance) spaces with more than one window should be considered in overall daylight terms. When assessed by the NSL and APSH methodologies the rooms at Platinum Apartments would continue

to meet BRE guidance in terms of overall daylight for the rooms, and all rooms would also continue to meet BRE guidelines in relation to sunlight.

- 7.46 The assessment confirms that there will be no significant loss of daylight or sunlight to Rimaud House, 69 Upper Crown Street and Heatt Close.
- 7.47 The conclusion is that the proposed development will not cause undue harm on the neighbouring residential dwellings and in the context of an urban setting, can be considered acceptable in planning terms.
- 7.48 In terms of daylight to the proposed flats the Assessment shows that 57 of the 65 rooms assessed would satisfy the BRE guidelines for daylight illuminance. Of the eight rooms which fall below guidance the median illuminance would be at least 85 lux. Seven of these are lounge/kitchen diner spaces with kitchens to the rear of the space, and in all cases the main living area would see the minimum lux level for the space. This level of compliance in this urban site is considered acceptable.
- 7.49 For sunlight to the new dwellings the analysis shows that 61 of the 65 rooms assessed will satisfy the guidelines and those falling below are bedrooms. The BRE guide recommends that for dwellings at least on habitable room and preferably a living room should receive at least 1.5hrs of sunlight on 21<sup>st</sup> March. All 23 units would contain living rooms which would meet this criteria.

#### ***Visual Dominance and Overbearing Effects***

- 7.50 The building is considered to be an appropriate scale for this location and the set-back upper floor, and articulated frontage, contribute towards reducing any overbearing effects. There is good separation to the boundaries and the building footprint is similar to the surrounding pattern of development. It would not dominate the wider area visually.

#### ***Harm to Outlook***

- 7.51 The surrounding residents will have an altered outlook and in particular from the side facing windows at Platinum Apartments. It should be noted that these rooms also have windows facing towards Silver Street. With the siting of the building sufficiently away from Platinum Apartments, but whilst ensuring an acceptable density of development for this site, it is considered that this outlook would not be unduly harmed and would not create an acceptable relationship at this urban site.
- 7.52 The remaining surrounding buildings are at a much greater distance from the proposed scheme or do not have windows directly facing the site.

### ***Noise and Disturbance***

- 7.53 The proposed scheme would introduce new units to the site and this would inevitably be accompanied by some noise and disturbance, but this is within the context of a busy urban environment including a busy road. It is not considered that the use of the site for 23 flats would create an unusual level of noise and disturbance compared to similar developments nearby.
- 7.54 It is worth noting that the Appeal Inspector, referring to the previous refused scheme 190449, did not consider that there would be harm to the living conditions of neighbouring occupants by reasons of noise disturbance, overlooking and loss of privacy and that was a scheme for 79 student rooms across 2 main buildings and a link building.
- 7.55 Unlike previous student schemes bins and cycle storage is not adjacent to the boundary with Platinum Apartments and would be fully integrated into the building. This would remove any previous officer concerns regarding noise and disturbance and odour, albeit this concern was not shared by the Inspector at that time.

### ***Lighting***

- 7.56 This would be limited to low level bollard and access lighting, however, a condition is included requiring submission of details should further external lighting be sought.

### ***Crime and Safety***

- 7.57 Following comments from TVP Crime Prevention Design Advisor the amended proposal includes access controls and CCTV. The proposed building would have active management from a small management suite by the main entrance, and would have access controls (pass key) into the building as well as a CCTV system covering the car parking and courtyard. A condition is recommended requiring the implementation of such measures in accordance with approved plans. This would accord with Policy CC8 and NPPF paras. 91b and 127b.

### ***Amenity Space***

- 7.58 With regard to private and communal outdoor space Policy H10 states that flats may be provided with communal outdoor space, balconies and/or roof gardens.
- 7.59 The proposal includes a rear communal amenity space of ca 290sqm, which when balanced against the requirements for parking spaces and landscaping to the boundaries and to the frontage, is considered to be an acceptable provision within this urban site and comparable to that

present at Platinum Apartments. This would combine with the internal communal room, which would open directly onto this space.

- 7.60 It is considered that the proposals would be acceptable in respect of the amenity of future occupiers and also the effects of the development on the amenity of surrounding uses, in accordance with Policies CC8 and H10.

### **Transport/Parking**

- 7.61 Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway related matters), and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development.
- 7.62 The amended proposal includes 11 no. car parking spaces including EVCP and disabled space, and 40 no. cycle spaces. Access would be from one of the existing accesses on Silver Street and there would be the provision of a car club space and 2 on-street parking bays to the frontage on Silver Street.
- 7.63 The Transport Officer has confirmed that subject to conditions relating to the pre-occupation provision of vehicle access, car parking, cycle parking and EV spaces, pre-commencement submission and approval of bin storage, submission and approval of a Construction Method Statement, stopping up of existing accesses and S106 obligations regarding car club, traffic regulation order and trees with the highway, the scheme would be acceptable and would accord with Policy TR1, TR3, TR4 and TR5 of the Reading Borough Local Plan.

### **Environmental Matters**

- 7.64 Noise – Policy CC8 and EN16 require development to not cause a significant detrimental impact to the living environment of existing or new residential properties.
- 7.65 The development itself is not expected to generate any significant external noise impacts. With respect to environmental noise from Silver Street the main issue raised by the EPO is whether new residents will have an acceptable noise environment. A condition is recommended requiring the submission and approval and implementation of a noise assessment and mitigation measures.



- 7.66 Air Quality – Policy EN15 states that *“Development should have regard to the need to improve air quality and reduce the effects of poor air quality.”*
- 7.67 An Air Quality Assessment has been submitted and the Environmental Protection and Nuisance Officer (EPO) has confirmed that the air quality at the development would be within EU limit values and, therefore, complies with Policy EN15.
- 7.68 Contaminated land – Policy EN16 states that *“development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.”*
- 7.69 A full ground conditions survey was carried out following demolition works. The EPO has confirmed that the scheme would be acceptable with the inclusion of conditions for implementation and verification of the remediation scheme and a compliance condition relating to discovery of any unidentified contaminated land.

### **Flood Risk & Drainage**

- 7.70 Local Plan Policy EN18 (Flooding and Sustainable Drainage Systems) states, *“.....All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards.....Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.”*
- 7.71 The submitted Drainage Strategy states that the ground conditions at the site vary and that there is relatively low permeability and given the space restrictions it is recommended that the use of a soakaway as permanent solution for surface water drainage is not recommended, therefore alternative SuDS comprising a green roof and bio retention areas is proposed. The surface water will be directed to a cellular attenuation tank located proposed within the parking area and from there it would discharge to the existing surface water sewer within Silver Street. The surface water would be attenuated and discharged at the reduced brownfield rate of 5.0l/s.
- 7.72 The Strategy also states that *“The site surface water drainage would be designed to provide adequate capacity not to flood for a 1 in 30-year storm plus climate change (+35%) event and such that flood water generated from a 1 in 100 year plus climate change storm event (+40%)*

*shall be constrained within the site boundary so not to cause off-site flooding. The risk of flooding elsewhere should therefore not be increased as a result of the development proposals.”*

- 7.73 Reducing surface water run off further, by using permeable paving, would be investigated further during the detailed design stage.
- 7.74 The foul water would be collected in a private network and discharged to an existing combined sewer.
- 7.75 The SUDs Officer has confirmed that subject to conditions for the pre-commencement submission of approval of a Sustainable Drainage Strategy and the pre-occupation implementation of the approved strategy that the scheme is acceptable and accords with Policy EN18.

### **Natural Environment**

- 7.76 Policy EN12 seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable. Policy EN14 states that Reading's vegetation cover will be extended. Policy CC7 sets out that good design should incorporate appropriate landscaping.
- 7.77 The submitted landscaping scheme includes 17 no. new trees within the site and 3 no. street trees along with new hedge and shrub planting including to the boundaries and planting within the courtyard amenity space.
- 7.78 During the course of the application there were a number of amendments made to the landscaping scheme and the issues raised are set out in the consultation section above. Fundamentally the improvements secured were the setting back of the building and enhanced tree establishment systems through tree pits and soil volumes, as well as improved tree species to maximise canopy spread.
- 7.79 The applicant would implement the street trees under a S278 agreement and would provide a financial contribution, secured through a S106 obligation, for RBC to undertake the ongoing maintenance, for a period of 5 years.
- 7.80 The Natural Environment (Tree) Officer confirmed that the overall amended scheme would be acceptable subject to recommended

conditions for pre-occupation provision of the approved landscaping scheme and pre-commencement submission and approval of a landscape management plan as well as the S106 obligation for the street trees. In addition, a materials condition is recommended, which would relate to hard landscape materials and external lighting.

- 7.81 The Ecologist advised that as the site has no real ecological benefits at present that a full ecology survey was not required, and the focus has been on achieving a landscaping strategy that would include native and wildlife friendly species and tree planting. In addition, a condition is recommended requiring the submission and approval of a detailed scheme for swift bricks and bird and bat boxes/ bricks/tiles around the building.
- 7.82 The proposed scheme also includes for a green roof, the details of which would be secured via condition and this would contribute towards adaptation to climate change and SuDS through landscaping (Policy EN18 and supporting text).



**Proposed Landscape Layout**

- 7.83 It is considered that the proposed landscaping scheme would enhance the visual appearance of the site and enhance the biodiversity value of the site. This would, therefore, subject to the above recommended conditions, accord with Policies EN12, EN14 and CC7.

## **Sustainability**

- 7.84 The overarching sustainability policy, Policy CC2 requires proposals for new development to reduce the consumption of resources and materials and states that *“Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 7.85 Policy CC3: Adaptation to Climate Change, requires that *“all developments demonstrate how they have been designed to incorporate measures to adapt to climate change.”*
- 7.86 Policy CC4: Decentralised Energy also requires development to demonstrate how consideration has been given to securing energy for the development from decentralised sources. Supporting text in para. 4.1.19 states that this policy would mainly apply in Central Reading.
- 7.87 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 7.88 Policy H5 sets a number of requirements for the design and construction of new homes, allowing some flexibility where compliance would make a scheme unviable: Achieve the higher water efficiency standard under Building Regulation 36(3); All major development to be designed to achieve zero carbon homes. Supporting text (para. 4.4.6) states that where homes are not designed to be carbon neutral *“this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Reading”*
- 7.89 An Energy and Sustainability Statement has been submitted which states that there would be a ca 36% reduction in carbon emissions and the commitment to contribute towards carbon offsetting in according with the policy and supporting SPD. This would be secured through a S106 legal agreement obligation.
- 7.90 The Statement identifies that due to the distance to the potential local district heating network current cluster areas being considered, located within the town centre, it would not be viable to connect to these due to the distance and the cost to extend the network to this site.
- 7.91 The proposal, therefore, is to utilise energy efficiently and generate some of the energy needed on site through the use of heat pump systems and PV.

7.92 The structure would achieve high thermal insulation standards and a number of low energy and passive strategies would be adopted to reduce the demands for heating and mechanical ventilation and air conditioning. These include:

- Avoiding undue solar gain/ cooling needs by solar control on windows.
- Minimising electrical demand by achieving good daylight levels.
- Enhanced glazing specification with good U-value (insulation) and G-value (solar absorption) performance.
- High standards of air tightness for heated areas.
- Mechanical & Electrical Systems.

7.93 In terms of energy efficiency measures the proposal would include:

- Use of centralised air source heat pumps.
- Low energy lighting and efficient lighting controls.
- providing low temperature hot water.
- Providing mechanical ventilation with heat recovery (MVHR).
- On-site generation from rooftop PV panels.
- A building management system to reduce energy wastage e.g. shutting off heating and lighting to unoccupied rooms.

7.94 There would be water saving sanitary ware and the use of a proportion of sustainable timber, recycled and other materials and waste management plans for construction and the use of the building.

7.95 A sustainable drainage strategy and the introduction of new trees and planting will improve attenuation of surface water run-off and improved eco habitat compared to the former wholly hard surfaced commercial site.

7.96 The proposed hard landscaping paving material would provide a permeable surface.

7.97 Overall it is considered that the proposal would meet the policy requirements of Policies CC2, CC3, CC5 and H5 and the SPD, subject to a condition requiring the implementation of the stated measures, an obligation within the S106 for carbon offsetting and a condition requiring the submission and approval PV details.

### **S106**

7.98 In accordance with Policies CC2, CC9, H3, H4, and H5 the following obligations would be sought:

- Affordable Housing

- Build-to Rent – to meet Policy H4 requirements and Affordable Housing SPD
- Employment Skills and Training Plan - construction
- Carbon Off-Setting financial contribution based on a formula
- Transport – S278 highway works and £7,500 for Traffic Regulation Order
- Street tree provision and ongoing maintenance
- Monitoring and legal costs

7.99 Policy H3 requires *“on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing; ..... provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate. In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.”*

7.100 Policy H4 for Built to Rent schemes specifically states that such schemes should *“provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.”*

7.101 The applicant submitted a viability assessment which initially included no provision for affordable housing. Further to review and negotiation by the Council’s appointed consultant and RBC’s Assets Team, a final scheme was agreed to secure 26% on-site affordable housing provision for a build to rent scheme comprising 4no. 2-bedroom 3 person units and 2no. 3-bedroom 4 person units at discounted market rent. The rent shall be no more than 80% of market rent and capped at Local Housing Allowance, along with deferred payment contributions or 30% fully policy compliant scheme for market housing scheme and for both the cascade mechanism in the event that a Registered (affordable Housing) Provider were not secured. The recommended obligation also includes for a contribution to affordable housing in the event a site were altered to create further residential units.

7.102 Policy H4 sets out a number of criteria, as follows, which developments of self-contained, private rented homes need to provide, and these would be secured through obligations within the S106 legal agreement:

- *“Secured in single ownership providing solely for the rental market for a minimum 20-year term with provision for clawback of affordable housing contributions should the covenant not be met;*

- *Provide tenancies for private renters for a minimum of three years with a six-month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance;*
- *Provide a high standard of professional on-site management and control of the accommodation;*
- *Provide a commitment to high-quality rental arrangements, through meeting Reading Borough Council's voluntary Rent with Confidence Standards or equivalent measures; ...*
- *Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document."*

7.103 Policy CC9 includes a high priority for obligations which meet economic development services and infrastructure, including employment, skills and training development initiatives. As a major category residential development, and in line with the adopted Employment Skills and Training SPD (2013), the development is expected to provide a construction phase employment and skills plan, working in conjunction with REDA, to demonstrate how it would benefit the local employment market, or an equivalent financial contribution towards local skills and training, which would equate to a total of £4,080 calculated as £2500 x GIA sqm (1632Sq m in this case) /1000 (3% would be used to support the role of the Skills for Business Coordinator).

7.104 Policy H5 requires carbon offsetting financial contributions where schemes would not achieve carbon neutral homes. This would be in accordance with the formula within the Sustainable Design and Construction SPD.

7.105 There would be a S278 for highway alterations to provide for three trees within the public highway. The provision of off-site trees would accord with Policy CC9 which states that *"Other measures, should also be considered where a specific need is identified and justified including environmental improvements outside the Central Area, including off-site street tree planting."*

7.106 There would also be the requirement for the provision and funding of a car club bay on Silver Street for five years and £7,500 towards Traffic Regulation Orders necessary to provide a car club bay and to alter the existing waiting restrictions. This would provide an alternative to owning a private car and an alternative method for sustainable transport in accordance with Policy TR1.

7.107 The applicant has confirmed their commitment to these obligations, which would be part of a S106 legal agreement.

7.108 The above obligations would accord with Policies CC9, H3, H4, H5, TR1, TR3 and the Employment, Skills and Training SPD (2013).

### **Other**

7.109 Policy H5 requires developments over 20 units to provide 5% of units to be wheelchair user units in line with Part M Building Regulations 4(3). One of the ground floor 2 bedroom units would be a wheelchair accessible unit and the accessible parking space would be in a central position to ensure suitable access to the building.

7.110 In terms of waste collection arrangements, the development would not have space for on-site servicing and therefore waste collection would be from the kerbside. RBC Waste Officers have advised that the location of the communal bin is too distant from the kerbside to utilise RBC waste collection services as it would rely on the bins being brought to the kerbside. RBC Transport Officers have confirmed that the loading/servicing bay to the front of the site would be sufficient for a refuse vehicle to pull off the carriageway.

7.111 The Waste Team has confirmed that the scheme would be acceptable subject to a weekly commercial collection arrangement, as proposed by the applicant, and the requirement for a Waste Management Plan condition to ensure that details are secured, including that bins would need to be presented to the roadside and be rotated within the bin store by a management company, due to the internal bin store layout.

### **Equalities Impact**

7.112 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.



- 8.1 In accordance with the NPPF the proposal would result in sustainable development, utilising previously developed land in a sustainable location. The principle of development for housing would be acceptable and it would contribute towards meeting housing requirements (Policy H1, H4 and NPPF).
- 8.2 The landscaping scheme, which includes tree planting to the frontage both within the site and within the street, would enhance the appearance of the site and the wider area.
- 8.3 The trees, planting and the proposed green roof would improve the sustainable drainage. The inclusion of PV on the roof along with other energy saving measures and on-site air source heat pumps would generate some of the energy requirements of the site and the measures proposed including high thermal insulation standards and low energy and passive strategies would achieve around 36% savings in annual carbon dioxide emissions.
- 8.4 The proposal would have some limited harm with respect to: some loss of daylight and sunlight to some of the units within Platinum Apartments, albeit this is comparable to the effects of the previous approved residential scheme; slightly below full policy compliant affordable housing provision (26% compared to 30% requirement); and below the required residential mix in terms of the number of 3-bed units (Policy H2). The proposal does represent a compromise and the benefits of achieving an effective and efficient use of the site, with a viable option to bring this vacant site back into use, the provision of additional housing in an accessible location, SuDs, enhancement of the appearance of the site, and ecological benefits, has been balanced positively against the harms identified.
- 8.5 It is considered that the scheme would address all material matters and the benefits of the scheme would outweigh the harms. The application is, therefore, recommended for approval, subject to the recommended conditions and the satisfactory completion of S106 legal agreement.

Case Officer: Alison Amoah

**Proposed Plans shown below:**

## Proposed Site Plan



## Proposed Ground Floor Plan



# Proposed First Floor Plan



# Proposed Second Floor Plan



## Proposed Third Floor Plan



## Proposed Roof Plan



# Proposed Elevations and Section



① Street Elevation - Silver Street long elevation  
1:200



② Street Elevation - Silver Street  
1:100



⑥ Elevation 6 - North  
1:100



⑤ Elevation 5 - South  
1:100



③ West Elevation - Block A  
1:100



① Section A - A  
1:100



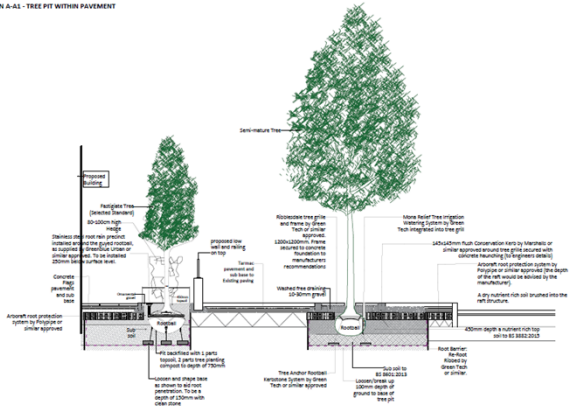
② Section B - B  
1:100



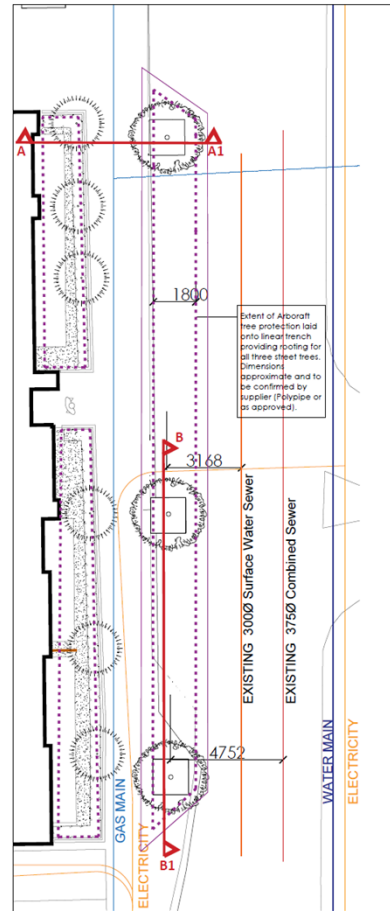
***Landscape Layout (as above)***

# Tree Pits

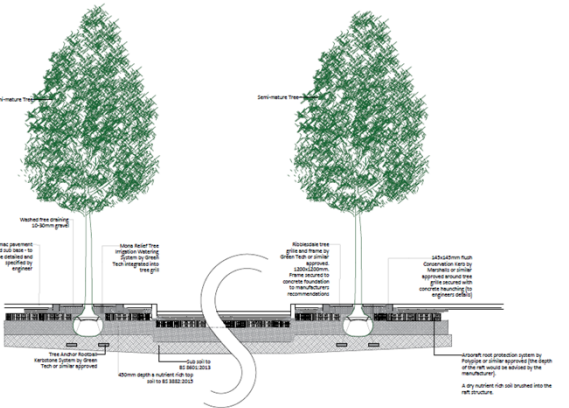
SECTION A-A1 - TREE PIT WITHIN PAVEMENT  
1:50



PLAN TO SHOW EXTENT OF UNDERGROUND ROOT PROTECTION  
1:100



SECTION B-B1 - TREE PIT WITHIN PAVEMENT  
1:50



**TREE NOTES** (in accordance with BS 8545:2014)

Handling and Storage

- The lifting of bare root and rootballed trees should take place only in the dormant season
- Ground conditions at the time of lifting should be favourable; the ground should not be waterlogged, excessively dry or frozen. Particular attention should be paid to the protection of root systems in drying winds and from direct sunlight
- Container-grown and containerised trees can be dispatched at any time of the year, irrespective of the time of year when such trees are dispatched, the fibrous roots in the container should hold the compost ball together once the container is removed; if the compost ball falls apart, the tree should be rejected as there has been inadequate root development.
- The length of time that trees are held in temporary storage should be kept to a minimum. There are occasions when rootballed trees are lifted during the dormant season and stored for supply at a later date. Such trees should be stored in an upright position and irrigated until dispatched.

# CGIs





② Street Elevation - Silver Street  
1:100







View from South West

View from North West



View from South East

View from East